

Land at Cronton Road, Cronton Planning Statement

Bellway Homes Limited (North West Division)

23 December 2025

LICHFIELDS

**Lichfields is the
pre-eminent planning
and development
consultancy in the UK**

We've been helping create great places
for over 60 years.

lichfields.uk

Contents

1.0	Introduction	1
	Application Submission	1
	Procedural Matters	2
	Structure of the Report	2
2.0	Application Site and Context	4
	The Site and Surroundings	4
	Connectivity and Sustainability	4
	Planning History	6
3.0	Pre-Application Engagement	7
4.0	Development Proposals	9
	Parameters Plans	9
	Use and Amount	9
	Layout	10
	Appearance	11
	Vehicular and Pedestrian Access	11
	Landscaping and Open Space	12
	Potential Off-Site Improvements	13
5.0	Planning Policy Context	14
	Development Plan	14
	Material Considerations	16
	Emerging National Policy	21
6.0	Planning Assessment	23
	Principle of Development	23
	Affordable Housing and Housing Mix	34
	Design and Layout	35
	Open Space	36
	Highways and Access	37

	Environmental Considerations	39
	Infrastructure	47
	Heritage and Archaeology	49
	Conclusion	49
7.0	Benefits of Development	50
	Economic	50
	Social	51
	Environmental	53
8.0	Planning Balance	54
	The Presumption in Favour of Sustainable Development	54
	Very Special Circumstances [VSC]	57
9.0	Conclusion	62

Appendices

Appendix 1 Draft S106 Heads of Terms

Appendix 2 Council's Pre-Application Response

Appendix 3 Lichfields Five Year Housing Land Supply Assessment

1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of the Applicant, Bellway Homes Limited (North West Division) [Bellway], to assist Knowsley Metropolitan Borough Council [the Council] in its consideration of an application for outline planning permission for the development of land at Cronton Road, Cronton.

1.2 The proposed description of development is:

“The erection of up to 120 dwellings and other associated works (all matters reserved except for access)”

1.3 The extent of the application site [the Site] is shown by the red edge on the location plan that accompanies the application. Bellway considers that the Site comprises Grey Belt land and a full assessment on this matter is provided in Section 6.0 of this Planning Statement.

Application Submission

1.4 The purpose of this report is to bring together the necessary information to appraise the development proposals against prevailing planning policy and other material considerations. It forms part of a suite of plans and documents to accompany the outline planning application. This includes the following:

- 1 Planning application forms, submitted via the Planning Portal;
- 2 Application covering letter;
- 3 Application plans and drawings (see Drawing Schedule at Annex 1 of the application covering letter);
- 4 This Planning Statement, including Affordable Housing Statement, S106 Draft Heads of Terms and Lichfields Five Year Housing Land Supply Assessment;
- 5 Statement of Community Involvement, prepared by Bellway;
- 6 Health Impact Assessment; prepared by Bellway;
- 7 Social Value Statement, prepared by Lichfields;
- 8 Economic Benefits Statement, prepared by Lichfields;
- 9 Design and Access Statement, prepared by APD;
- 10 Transport Assessment, including Framework Travel Plan, Access Drawing and Illustrative Off-site Improvement Drawings, prepared by Prime Transport Planning;
- 11 Landscape and Visual Statement, prepared by FPCR;
- 12 Illustrative Landscape Masterplan, prepared by FPCR;
- 13 Ecological Impact Assessment, including Bat Report, GCN Report and Breeding Bird Report, prepared by FPCR;
- 14 Biodiversity Net Gain Assessment Report (included in EcIA – Appendix D), prepared by FPCR;

- 15 Completed Statutory Biodiversity Net Gain Metric, prepared by FPCR;
- 16 Arboricultural Impact Assessment, prepared by FPCR;
- 17 Flood Risk Assessment including Outline Drainage Strategy, prepared by Pell Frischmann;
- 18 Drainage Proforma 1, prepared by Pell Frischman;
- 19 Heritage and Archaeological Desk Based Assessment, prepared by GHC Archaeology and Heritage;
- 20 Air Quality Assessment, prepared by SLR;
- 21 Noise Impact Assessment, prepared by SLR; and,
- 22 Phase I Geo-Environmental Assessment, prepared by Brownfield Solutions.

Procedural Matters

Plans for Determination

- 1.5 The planning application is submitted in outline with all matters reserved except for access. The following plans are therefore submitted for formal approval and listing on the decision notice:
- 1 Site Location Plan (Dwg. No. LP-01);
 - 2 Parameters Plan (Dwg. No. APD/BHNW189/PA01 Rev B); and,
 - 3 Proposed Access Strategy (Dwg. No. P25012-001 Rev B).

Draft Heads of Terms

- 1.6 Draft S106 Heads of Terms [HoTs] are included at **Appendix 1** of this report. The draft HoTs address any potential infrastructure requirements and other potential contributions which may be included as part of a planning permission on the Site, and which meet the requirements of the Regulation 122 Community Infrastructure Levy [CIL] Regulations and the National Planning Policy Framework [NPPF]. The potential contributions will be based on the Draft HoTs and will be agreed between the applicant and the Council during course of the determination of the application.

Statement of Community Involvement

- 1.7 A Statement of Community Involvement [SCI] has been prepared to accompany the application and is provided separately. The SCI provides a summary of the community consultation and wider public and stakeholder engagement undertaken prior to submission of this application.

Structure of the Report

- 1.8 The following sections of this Planning Statement are structured as follows:
- Section 2.0 describes the application site and its surroundings;

- Section 3.0 provides a summary of the pre-application engagement undertaken with the Council;
- Section 4.0 describes the proposed development;
- Section 5.0 outlines the relevant planning policy framework for the determination of the application;
- Section 6.0 considers the compliance of the proposed development with the relevant planning policies;
- Section 7.0 sets out that the compliance of the proposed development with the principles of sustainable development;
- Section 8.0 sets out the planning balance; and,
- Section 9.0 concludes this Planning Statement.

2.0 **Application Site and Context**

The Site and Surroundings

- 2.1 The site extends to approximately 4.26 hectares [ha] and comprises relatively flat, undeveloped land. The Site is located on the western edge of Cronton and directly abuts the settlement edge and existing residential development along Wheatfield Road and Cronton Road. The Site contains scattered shrubs, trees, and hedgerows along its boundaries.
- 2.2 The site is bounded:
- To the north by undeveloped agricultural fields.
 - To the east by residential development forming the western edge of Cronton.
 - To the south by the rear gardens of family houses located off Cronton Road (A5080), which forms the remainder of the southern boundary. Cronton Road provides access to Cronton from the M62 and M57 motorways and connects the site to the northern edge of Widnes to the east and Huyton to the north-west.
 - To the west by undeveloped agricultural fields, beyond which are scattered residential properties located off the A5080 Cronton Road.
- 2.3 The site is located within Flood Zone 1 and is therefore at low risk of fluvial flooding. Dog Clog Brook runs along the northern boundary, and parts of the site adjacent to the watercourse are identified as being at risk of reservoir flooding. Very small pockets within the site, as well as an area adjacent to the brook, are identified as being at risk of surface water flooding; however, overall, the site is considered to be at very low risk of surface water flooding.
- 2.4 The site contains no known designated or non-designated heritage assets and lies outside a Conservation Area. The nearest designated heritage assets include the Grade II Listed Stocks, situated approximately 400 metres to the east, and Town End Farmhouse and Cronton Cross (both Grade II Listed), located around 325 metres north-east of the site's northern boundary. All three assets are well screened by existing housing and landscape features on land that separates them from the site. The Town End Conservation Area is located approximately 300m to the north-east of the Site.
- 2.5 The site is not located within or adjacent to an Area of Outstanding Natural Beauty [AONB], a National or Local Nature Reserve, or a Site of Special Scientific Interest [SSSI]. A Local Wildlife Site (ref. George's Wood and adjacent land) lies approximately 110 metres from the site's north-western corner.
- 2.6 An existing Public Right of Way [PRoW] (ref. CR/5/1) runs alongside part of the western boundary and continues north to south through the southern section of the site before connecting with the A5080 Cronton Road.

Connectivity and Sustainability

- 2.7 The site is situated between Huyton (approximately 3.7 miles to the north-west and located within the Brough of Knowsley), which is identified as a suburban town, and the town of Widnes (within the Bough of Halton), approximately 2.25 miles to the south-east. Cronton

is well-connected, with excellent local, regional, and national transport links. Cronton lies close to several key routes, including the A5080, A557, and the M62, providing efficient access to Liverpool (30-minute drive time), Warrington (20-minute drive time), Manchester (40-minute drive time), St Helens (15-minute drive time) and the wider North West. The A557 also connects directly to the Mersey Gateway Bridge, offering fast links to Runcorn (15-minute drive time) and Cheshire.

2.8 The site is in a sustainable location adjacent to the urban area of Cronton, which offers a range of local shops and services, including pubs, retail outlets, a community centre, and two primary schools within close proximity. The roads within Cronton contain a network of footways, street lighting and local crossing points, creating an environment conducive to walking. The distances and walking times (based upon the methodology set out in the Transport Assessment [TA]) to key services in Cronton are listed below (walking times expressed as mm:ss):

- The Unicorn Inn Public House (491m from Site; 06:10 walking time);
- Dandelion Tavern (600m from Site; 07:32 walking time);
- Hairdresser (627m from Site; 07:52 walking time);
- Hampton Drive Shops (628m from Site; 07:53 walking time);
- Cronton CofE Primary School (758m from Site; 09:28 walking time);
- Cronton Wesleyan Chapel (771m from Site; 09:39 walking time);
- Cronton Community Centre (821m from Site; 10:17 walking time);
- Playground (848m from Site; 10:37 walking time);
- Cronton Crown Green Bowls Club (873m from Site; 10:55 walking time);
- Holy Family Church (1,046m from Site; 13:06 walking time);
- Holy Family Catholic Primary School and Nursery (1,059m from Site; 13:19 walking time);
- Pasture Park and Gardens (1,123m from Site; 14:04 walking time);
- Cronton Garden Centre (1468m from Site; 18:21 walking time);
- Parkland Sports Club and Cafe Parklands (1590m from Site; 19:53 walking time);
- Pex Hill Country Park (1,622m from Site; 20:19 walking time);
- Cronton Sixth Form College (1651m from Site; 20:38 walking time);
- Hough Green Medical Centre and Pharmacy (1,920m from Site; 24:01 walking time);
- Hough Green Neighbourhood Centre (1,991m from Site; 24:53 walking time); and,
- St Basil's Catholic Primary School (2,003m from Site; 25:02 walking time).

2.9 In terms of accessibility by cycle, a substantial number of destinations can be reached within a 10-20 minute cycle ride such as multiple railways stations including:

- Hough Green (10-11 minutes),
- Widnes (13-14 minutes); and,

- and Rainhill (16-17 minutes).

- 2.10 Additional educational facilities are also available including Ashley High School and Ormiston Chadwick Academy (both 11-12 minutes). Major employment opportunities are accessible within a 25-minute cycle ride, including Symmetry Park to the south-east of Tarbock Island, the Interchange Motorway Estate (17 minutes), and the Lea Green Industrial Estate (21 minutes). Furthermore, Widnes, Whiston (including Whiston Hospital), Huyton, Prescot, Halewood and parts of Runcorn can all be reached under 30 minutes, offering further employment opportunities.
- 2.11 Three local bus stops located on Cronton Road are within a 5–8 minute walk of the site (located on near / adjacent Alder Lane, adjacent Chapel Lane and adjacent Smithy Lane) providing access to services towards Widnes, Hough Green, Rainhill and Liverpool. An additional bus stop is also available in the village centre on Smithy Lane, adjacent Hampton Drive, where some of the same services can be accessed. In addition to these stops, a southbound bus stop (Cronton, adj. Hampton Drive) is located on Smithy Lane, approximately 300m from the Site. This stop consists of a flag-and-pole and dedicated bus layby. Fewer services can be accessed from this bus stop compared to the bus stops on Cronton Road, however it provides an alternative boarding point for three of the local services operating in the area.
- 2.12 The services provide convenient connections to a range of local and wider destinations including Widnes town centre, Hough Green, Upton Rocks, Halton View, Rainhill, Prescot, Huyton, Warrington and Liverpool. There are a number of services available across the day offering hourly services (from 6am to 11pm – a full schedule is provided in the TA), ensures that a variety of journey purposes can be accommodated by public transport). These include commuting, education, retail and leisure activities. A summary is provided below:
- 2.13 Rail connections are available at several nearby stations. Hough Green Station, approximately 1.5 miles from the site, offers frequent services operated by Northern Trains, providing direct links to Liverpool Lime Street (2 per hour), Liverpool South Parkway (2 per hour), Warrington Central (2 per hour), Manchester Oxford Road and Piccadilly (2 per hour), and additional regional destinations. Widnes station, approximately 2 miles from the site, offers further rail connections operated by East Midlands Railway to Manchester Piccadilly, Sheffield, Nottingham and Norwich. Rainhill Station is also nearby, offering services on the historic Liverpool–Manchester railway.
- 2.14 Liverpool John Lennon Airport is situated approximately 8 miles west of the site, providing extensive domestic and international flight options. Manchester Airport, one of the UK's busiest aviation hubs with over 190 direct destinations, is also accessible via the M56.
- 2.15 With regular bus services, multiple nearby rail stations, and excellent access to major motorway networks, the site offers convenient and comprehensive connectivity for both local travel and longer-distance journeys.

Planning History

- 2.16 There is no recent planning history of relevance to the site or its immediate surroundings.

3.0 Pre-Application Engagement

- 3.1 A pre-application request was submitted to the Council on 14th April 2025. The submitted pre-application layout included 101 dwellings.
- 3.2 The pre-application meeting (ref. 25/00023/PREAPP) was held on 12th June 2025. The meeting was attended by the Local Planning Authority [LPA], the Local Highway Authority [LHA] and the Lead Local Flood Authority [LLFA].
- 3.3 During the meeting, the LPA outlined that the Council could demonstrate five years' supply of deliverable housing sites. No verbal feedback was provided during the pre-app meeting on whether the Site could meet the NPPF's definition of Grey Belt. However, concerns were raised regarding the sustainability, accessibility and connectivity of the Site and whether the scheme would accord with Paragraph 155(c) should a Grey Belt case be made.
- 3.4 Written pre-application advice was received on 16th October 2025 from a number of consultees from within the Council, including planning policy, urban design, highways, housing, education, open space, archaeology and heritage, noise and air quality, ecology and drainage (see **Appendix 2**). The main comments from the pre-application response are summarised below:
- **Grey Belt** – The Site could be classed as Grey Belt land. This is because the responses set out:
“It is considered that the site does not significantly contribute toward checking unrestricted sprawl of large built-up areas due to the intervening land in this location between Cronton and neighbouring development [Purpose A]. As Cronton is not considered to be a ‘town’, the site does not contribute towards preventing neighbouring towns from merging into one another, thereby not compromising this purpose of including land within the Green Belt [Purpose B]. It is also considered that the site does not preserve the setting and special character of a historic town [Purpose D].”
 - **Principle of Development** – The Council confirmed that the Site could be Grey Belt and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan [Paragraph 155(a) of the NPPF]. The Council considered that NPPF Paragraph 155(b) could not be met. This was on the basis the Council can demonstrate a 5YHLS. The Council also considered that the Site is not sustainably located for the tests set out paragraph 155(c) of the NPPF to be met. This was specifically in relation to existing issues around pedestrian accessibility caused by constrained footpath widths on Cronton Road and Smithy Lane.
 - **Layout** – The net density of the scheme was considered at the lowest end of the acceptable range. The Council raised concerns around the lack of integration of the scheme within the existing adjoining residential development. Concerns were raised over the lack of natural surveillance of the proposed areas of greenspace. Properties adjacent to Cronton Road should be framed by soft landscaping.
 - **Trees and Landscaping** – Street trees and hedgerows should be incorporated into the layout to soften the streetscene and create a rural environment.

- **Sustainability and Accessibility** – Concerns were raised around the accessibility of the Site for pedestrians and public transport users, due to the existing narrow footway along Cronton Road preventing accessibility to Cronton village. The LHA requested that consideration be given to whether the current width of the footpath facilitates safe access into the Site. The footpath connection through to the Dog Walking Field to the north-east of the Site was noted, but concerns were raised regarding the substandard width of footways via Smithy Close beyond the Dog Walking Field.
- **Highways** – The LHA considered the vehicular access arrangements from Cronton Road acceptable. Parking standards should be complied with. Internal roads should accord with adoptable standards.
- **Drainage and Flood Risk** – Whilst the LLFA recognised that a small area of the Site is affected or lies adjacent to land affected by surface water flooding, the scheme does not include buildings, access/escape routes, land raising or other vulnerable elements within the area affected by surface water flooding. On this basis, it is not considered that a sequential test needs to be undertaken. A Flood Risk Assessment, drainage strategy and submission of the drainage pro-forma should be submitted with any planning application.
- **Affordable housing** – The Council considered that, given the Site's location, it may not be appropriate to provide 40% of the new homes as affordable. The Council could consider a mixture of onsite provision and a commuted sum for off-site provision.

3.5 The pre-application advice issued by the Council has been taken into account in the preparation of the application.

4.0 Development Proposals

- 4.1 This section sets out a description of the proposed development. It should be read in conjunction with the accompanying planning application drawings and the Design and Access Statement [DAS] prepared by APD.
- 4.2 The application is submitted in outline with all matters reserved other than means of primary access. Design, layout, landscaping, and internal access arrangements details are reserved for subsequent approval through a future reserved matters application.

Parameters Plans

- 4.3 As set out previously, a Parameters Plan (Dwg No. APD/BHWN189/PA01 Rev B) is submitted as part of this application. The plans are submitted to establish the key parameters and principles for land use and design of the development at outline stage.
- 4.4 The Parameter Plan identifies the areas within the Site that will comprise residential development, and areas that will be designated as open space, green infrastructure and surface water drainage infrastructure. Compliance with the Parameter Plan will be secured by conditions attached to the outline planning permission and all reserved matters will be required to be in general accordance with this approved plan.
- 4.5 Alongside the Parameters Plans, a DAS has been prepared to provide further illustrative details in relation to an indicative design and layout. The DAS includes an Illustrative Masterplan (Dwg No. APD/BHWN189/IMPO1 Rev A) which has been prepared for illustrative purposes only to show how a residential development of up to 120 units could be accommodated on-site within the established parameters. Detailed approval is not sought for this illustrative layout plan.
- 4.6 The Parameter Plan should be viewed alongside the DAS and other accompanying design related information.

Use and Amount

- 4.7 The development will provide up to 120 new dwellings, anticipated to range from one to five bedrooms, with the exact mix being confirmed at the reserved matters stage. The Parameter Plan and DAS establishes that the development will be characterised by a mix of family homes, with a maximum building height of 2 storeys.
- 4.8 The net developable area comprises 3.13ha of the Site, equivalent to 73.5% of the total site area, achieving a net density of 38 dwellings per hectare [dph] based on 120 dwellings.
- 4.9 It is proposed that 40% of the total dwellings that will be delivered on-site will be affordable, in line with national planning policy requirements. The precise quantum, tenure split, and mix of the affordable dwellings will be established at the reserved matters stage and through discussions with the LPA.

Layout

- 4.10 The Parameter Plans establish the broad layout principles of the scheme, including the development parcels and areas of green infrastructure. A subsequent reserved matters application will seek approval for the detailed design of the scheme, including the layout.
- 4.11 The Illustrative Masterplan (Dwg No. APD/BHWN189/IMPO1 Rev A) forms part of the supporting information for the planning application. This is provided for illustrative purposes and provides an indicative representation of the potential scheme layout, although this is not for formal approval as part of this outline application. The Illustrative Masterplan shows how the proposed development will be landscape-led and will provide a hierarchy of roads including primary streets, lanes and shared drives. Areas of green infrastructure are shown throughout the Site. These connect through the centre of the Site and utilising the existing PRow which will be retained and enhanced, with an area of open space to the north of the Site and potential pedestrian connections to surrounding areas including an existing dog walking field to the north-east.
- 4.12 The accompanying DAS sets out design principles in relation to the potential layout of the scheme. These include:
- Key buildings positioned to terminate views and in key locations to frame and define junctions and key spaces.
 - Active frontages always provided to public areas to ensure natural surveillance.
 - Retention of existing landscaping where possible to create green infrastructure links for existing wildlife habitats and retain the buffers to the open countryside.
 - The relationship between the proposal and the existing settlement edge to be considered and lower density to allow for a softer transition.
 - Focal spaces created to aid legibility and way finding.
 - Key frontages that are positioned on primary movement routes will be key to the architectural appearance of the development and therefore positively set the character of the development.
- 4.13 In accordance with Manual for Streets [MfS], the design speed of the access road will be 20mph. While the internal layout will be subject to a separate reserved matters application, the layout will be based on MfS design guidance meaning that the layout will focus on the needs of pedestrians, cyclists, and public transport users, creating a sense of place and community, permeable streets offering good quality connections and will recognise the needs of people of all ages and abilities.
- 4.14 The Illustrative Masterplan also shows a potential additional pedestrian link at the north-eastern corner of the site leading onto the existing dog walking field. A cul-de-sac arm will be provided to the smaller south-western section of the site, providing driveway access and shared access driveways, while an internal loop road has been illustrated to cover the largest part of the site in the north-eastern section. An area of informal public open space [POS] is proposed towards the northern boundary of the site, accessible from the dog walking field at the north-eastern corner.

- 4.15 The existing PRoW which runs through the site will be realigned, surfaced appropriately, and integrated into the site masterplan.

Appearance

- 4.16 Appearance is a reserved matter for future consideration. However, dwellings that will be constructed at the Site will generally be reflective of the Site's surroundings and context, and existing residential development to the east of the Site. The accompanying DAS (Chapter 2.0 – Setting the Scene) provides a comprehensive assessment and summary of the site context, which outlines a character study of Cronton, the settlement pattern, historical growth of the village and a review of the landscape character and topography. This assessment will form the basis of the future detailed design of the scheme, and the proposals will draw on the character of the surrounding area, both through materials and design cues, and an overall continuity will be maintained throughout the Site.
- 4.17 The accompanying DAS sets out design principles in relation to design and appearance. The intended appearance of the proposed development will be included as part of a reserved matters application which will detail the architectural style of individual buildings and street scenes. The aim will be to create a built form that provides a scale, massing and appearance that will complement the context, creating a distinct and legible townscape, and to create an external built form of high-quality design that will complement and respond to the setting whilst creating a sense of place. The choice of materials and associated detailing of texture, colour and decoration will seek to maintain an overall coherence and link to Cronton's key design features.

Vehicular and Pedestrian Access

- 4.18 Vehicular and pedestrian access is proposed from Cronton Road, along the southern boundary of the Site. Whilst details of access are reserved, approval is sought for the main vehicular access from Cronton Road.
- 4.19 The proposed access from Cronton Road is illustrated on the Proposed Access Strategy Plan (Dwg. No. P25012-001 Rev B). The site will be served by a simple priority-controlled junction on the northern side of Cronton Road, positioned towards the eastern end of the site frontage. The proposed access will comprise a 5.5m wide carriageway, 2.0m wide footways and 10.0m radii. It has been demonstrated that visibility splays of 2.4m x 120m can be achieved from the proposed site access, in accordance with the Design Manual for Roads and Bridges [DMRB] for roads subject to a 40mph speed limit.
- 4.20 Whilst a safe level of visibility can be achieved based on recorded 85th percentile speeds, the applicant is willing to fund a Traffic Regulation Order [TRO] to extend the existing 30mph speed limit to the west of the site. Appropriate speed limit terminal signage and gateway features could also be provided. Pedestrians and cyclists will be able to utilise the main vehicular access from Cronton Road. The existing footway along the site frontage will be widened to 2.0m for the full extent, with the exception of a short section towards the south-western boundary to ensure the existing trees in that location can be retained. All other trees and hedgerow along the existing site frontage will need to be removed to ensure the delivery of the proposed access and associated visibility splays. Any loss will be mitigated through new planting within the site.

4.21 As noted on the Parameter Plan (Dwg No. APD/BHWN189/PA01 Rev B) there is also potential to provide pedestrian access to the existing dog walking field north of Houghton Croft utilising a 2.0m wide shared pedestrian footway up to the north-eastern boundary of the site. There is also potential for onward provision of a more formal route beyond the boundary, which could be a shared surface to promote both pedestrian and cycling accessibility. The Applicant would be willing to further explore and discuss this option with the LPA, and potentially facilitate this connection and additional onward provision in future at reserved matters stage.

4.22 In terms of parking provision, as the final housing mix is not known and subject to future detailed reserved matters submissions, calculations relating to detailed parking provision have not been undertaken. A future reserved matters application(s) will specify sufficient parking provision, both in terms of numbers and dimensions, to comply with the relevant standards at the time of submission.

Landscaping and Open Space

4.23 Final details of landscaping will be sought at the reserved matters stage. Notwithstanding this, the Illustrative Landscape Strategy (Dwg. No. 13294-FPCR-XX-XX-DR-L-0001) submitted as part of this application shows how existing landscape features across the Site will be retained and incorporated into the layout. Existing vegetation and trees will be retained where possible, with the majority on onsite open space focused to the north of the Site.

4.24 Design principles for the proposed green infrastructure and landscape proposals are summarised below:

- 1 The trees and hedgerow along the Cronton Road frontage will need to be removed to deliver the required visibility for the proposed access to the site. A new native hedgerow with hedgerow trees is proposed beyond a wide grass verge. Elsewhere, boundary vegetation will be retained and incorporated into the proposals.
- 2 The illustrative proposals show an area of open space stretching north from Cronton Road, accommodating the foul sewer easement and the public footpath. This will deliver a centralised green for recreation, onto which proposed dwellings will face.
- 3 A second area of public open space is shown in the north of the site. This will act as an extension to the existing dog walking field (immediately east) and will accommodate new native planting and drainage attenuation.
- 4 The public footpath leading through the site will be incorporated into the open space, with dwellings facing onto this.
- 5 Street trees will be delivered within private front gardens to help soften the built development.

4.25 The Parameter Plan indicates 0.97 ha of the site will be designated for open space, green infrastructure, and drainage infrastructure, equivalent to c. 22% of the Site.

Potential Off-Site Improvements

4.26

In recognition of the condition of existing footways to the east of the site on Cronton Road and Smithy Close, several indicative offsite footway improvements are proposed to enhance pedestrian connectivity to the site. These improvements are illustrative only at this stage and subject to further discussions with the Council. Potential improvements are summarised below and set out in further detail within the TA.

- **Footway widening of the north-eastern footway:** the northern footway to the east of the site, between the proposed site and Wheatfield Road, can be widened to 2.0m wide where possible, with a minimum width of 1.5m where pinch points are present such as boundary walls. This is shown on Drawing 'Potential Footway Improvements - Cronton Road' (Dwg. No. P25012-004-02A) in Appendix F of the TA.
- **Footway widening to the east of the Wheatfield junction:** adjacent to a hedge bordering No.397 Cronton Road, the footway narrows to less than 1.0m in width. Initially, cutting back the existing hedge should be explored to whether this would allow the footway to be widened. If this is not feasible, or does not result in a meaningful improvement, the Applicant is willing to widen the footway. Drawing 'Potential Footway Improvements - Cronton Road East of Wheatfield Road' (Dwg. No. P25012-007A) in Appendix F of the TA illustrates how this could be achieved by realigning the northern kerb line to provide a 1.5m wide footway clear of the hedge, while maintaining a 6.8m wide carriageway.
- **Footway widening at Smithy Close:** Drawing 'Potential Footway Improvements - Smithy Close' (Dwg. No. P25012-005) in Appendix F of the TA shows a wider footway on the eastern side of the road only, with a potential priority-controlled arrangement giving priority to northbound vehicles.
- **Bus Stop Improvements:** To further improve accessibility and sustainability, the Applicant is also willing to offer upgrades to the closest bus stops located west of the site on Cronton Road. Potential improvements could include a raised kerb waiting area, bus stop road markings, and a dropped kerb pedestrian crossing. However, there appears insufficient highway land for the delivery of bus shelters.
- **Lodge Lane Bridleway:** Lodge Lane Bridleway is located opposite the proposed footway on Cronton Road. Dropped kerbs and tactile paving could be provided in its vicinity from the proposed footway if deemed necessary by the Council. To improve the Bridleway for cyclists, the applicant is also willing to provide funding towards PRow enhancements. Funding could therefore contribute towards resurfacing this section, thereby improving its suitability and attractiveness for cyclists.

4.27

As mentioned previously, all the suggested off-site improvement schemes are illustrative only at this stage but represent the Applicant's commitment to improving the sustainability to and from the site. Any of the suggested off-site improvements will be subject to further discussions with the Local Highways Authority and detailed design.

5.0 **Planning Policy Context**

- 5.1 Section 70(2) of the 1990 Act and Section 38(6) of the 2004 Act requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. Accordingly, this section sets out the development plan and key material considerations.

Development Plan

- 5.2 The Council's development plan relevant to this site comprises the:

- Knowsley Local Plan Core Strategy [Core Strategy] (adopted January 2016);
- Saved policies from the Knowsley Replacement Unitary Development Plan [UDP] (adopted June 2006); and,
- Joint Merseyside Waste Local Plan (adopted in 2013 by Halton, Knowsley, Liverpool, Sefton, St Helens and Wirral Councils).

Knowsley Local Plan Core Strategy

- 5.3 The Core Strategy (adopted January 2016) sets out the vision, objectives, and policies guiding development in Knowsley to 2028. The following Core Strategy policies are relevant to the proposed development:

- Policy SD1 (Sustainable Development): Planning applications that accord with Local Plan policies will be approved without delay unless material considerations indicate otherwise.
- Policy CS1 (Spatial Strategy for Knowsley): Spatial development to 2028 will focus on existing urban areas, prioritising locations accessible from areas in need of regeneration. The provision of a wide choice of housing, including affordable housing, is a key priority. Seeks to maintain the existing settlement hierarchy, including the role of Huyton/Stockbridge Village, Kirkby, Prescott/Whiston and Halewood as larger suburban centres, and of Cronton, Tarbock and Knowsley Village as rural villages.
- Policy CS2 (Development Principles): New developments should support core principles, including meeting housing needs. New development should understand and respect the character and distinctiveness of places and landscapes.
- Policy CS3 (Housing Supply, Delivery and Distribution): Provision will be made for 8,100 new dwellings between 2010 and 2028. The policy supports efficient land use and requires a minimum density of 30 dwellings per hectare [dph].
- Policy CS5 (Green Belt): Inappropriate development will not be permitted in the Green Belt except in very special circumstances.
- Policy CS7 (Transport Networks): Development should prioritise accessibility and sustainable transport modes.
- Policy CS8 (Green Infrastructure): New development must be served by Green Infrastructure to meet the needs of residents and the local environment, seek to protect, maintain and where possible enhance biodiversity within and around new developments, and provide adequate mitigation and/or, as a last resort, compensation

for Green Infrastructure or biodiversity loss, in circumstances where harm resulting from the development is otherwise unavoidable. Planning powers will ensure adequate quantity and improved quality of locally important open spaces, including outdoor sports provision.

- Policy CS15 (Delivering Affordable Housing): For housing developments within the current urban area, 10% of dwellings should be affordable. Within all proposed market sector housing developments which have a capacity of 15 dwellings or more, a minimum provision of affordable housing will be sought as follows: 10% on sites within the current urban area; and 25% on sites identified as Sustainable Urban Extensions.
- Policy CS17 (Housing Sizes and Design Standards): Housing developments must deliver an appropriate mix of dwelling sizes, including 1–4 bedroom homes and bungalows, as set out in Table 8.1.
- Policy CS19 (Design Quality and Accessibility): New development must meet high design and accessibility standards and complement and enhance (where possible), existing landscape.
- Policy CS20 (Managing the Borough's Historic Environment): Development should preserve or enhance historic assets and encourage the re-use of vacant or underused heritage buildings.
- Policy CS21 (Greenspaces and Trees): Development resulting in the loss of urban greenspace will not be permitted unless exemption criteria are met and benefits clearly outweigh harm. Also states that adequate replacement provision where tree loss is unavoidable, comprising two additional trees for every tree lost and taking account of species and size. The quantitative and accessibility standards for the provision of public open spaces within Substantial Residential Areas are set out in Table 9.1 for greenspace typologies Parks and Gardens; Amenity Greenspace; Provision for Children and Young People; and Allotments.
- Policy CS22 (Sustainable and Low Carbon Development): New development will be required to meet high standards of sustainable design and construction and minimise carbon emissions.
- Policy CS24 (Managing Flood Risk): Development that poses an unacceptable flood risk will not be permitted and should preferably be located in areas of low flood probability.
- CS26 (Waste management): The Council will promote sustainable forms of waste management and promote use of site waste management plans.
- CS27 (Planning for and paying for new Infrastructure): sets out requirements for infrastructure provision for new developments and potential developer contributions for new development.

Knowsley Unitary Development Plan

5.4

The Knowsley Replacement UDP was adopted in June 2006. Relevant policies include:

- Policy DQ2 (Security in the Built Environment): new development should be designed so as to provide good levels of personal and property security.

- Policy DQ4 (Trees and Development): 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.
- Policy ENV2 (Noise and Vibration): 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.
- Policy ENV5 (Contaminated land): 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.
- Policy T5 (Location of Major Traffic Generating New Development): major developments (as defined in table 8.1) should be or be capable of being located within safe and convenient walking distance of public transport facilities (defined as being no more than 400 metres from a bus stop and/or 800 metres from a rail station or Mersey tram stop).
- Policy T7 (New development and walking and cycling routes): new development should preserve and where possible enhance the walking and cycling network, as it can help enhance and provide access to green corridors & the countryside as well as promoting and encouraging exercise and healthy living for all.
- Policy T8 (Transport Assessment): planning applications for major traffic generating development will be required to be accompanied by a TA.
- Policy T9 (Travel Plans): planning applications for major traffic generating development will be required to be accompanied by a Travel Plan.

Material Considerations

National Planning Policy Framework

- 5.5 The most recent iteration of the NPPF was published in December 2024 and amended in February 2025. The NPPF is an important material consideration in the determination of the planning application.
- 5.6 The overarching aim of the NPPF is to proactively deliver sustainable development to support the Government's economic growth objectives. The NPPF [paragraphs 8 & 9] identifies three overarching dimensions to achieving sustainable development: economic, social and environmental. These dimensions are interdependent and need to be pursued in mutually supportive ways.
- 5.7 The NPPF [paragraph 11] establishes a presumption in favour of sustainable development. It states that for decision taking, this means approving development proposals that accord with an up-to-date development plan without delay. Where policies are out of date, the NPPF states that planning permission should be granted unless any adverse impacts of granting permission must significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.

- 5.8 The other pertinent policies for the Council's assessment of these development proposals are:
- 1 Delivering a sufficient supply of homes (Chapter 5.0):
 - a Paragraph 61 - 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.
 - 2 Promoting healthy and safe communities (Chapter 8.0):
 - a Paragraph 96 - Planning policies and decisions should aim to achieve healthy, inclusive and safe places.
 - 3 Promoting sustainable transport (Chapter 9.0):
 - a Paragraph 108 - Transport issues should be considered from the earliest stages of development proposals, so that the potential impacts of development on transport networks can be addressed, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places.
 - b Paragraph 110 - 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. 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.
 - c Paragraph 115 - In assessing applications for development, it should be ensured that sustainable transport modes are prioritised; safe and suitable access to the site can be achieved for all users; the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance; and any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree through a vision-led approach.
 - 4 Making effective use of land (Chapter 11.0):
 - a Paragraph 124 - Planning policies and 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.
 - 5 Achieving well-designed places (Chapter 12.0):
 - a Paragraph 131 - 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.
 - 6 Protecting Green Belt Land (Chapter 13.0):
 - a Paragraph 142 - The Government attaches great importance to Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

- b Paragraph 143 - Green Belt serves five purposes:
 - i to check the unrestricted sprawl of large built-up areas;
 - ii to prevent neighbouring towns merging into one another;
 - iii to assist in safeguarding the countryside from encroachment;
 - iv to preserve the setting and special character of historic towns; and,
 - v to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- c Paragraph 153 - When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness¹. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- d Paragraph 155 - The development of homes in the Green Belt should also not be regarded as inappropriate where all the following apply:
 - i The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - ii There is a demonstrable unmet need for the type of development proposed;
 - iii The development would be in a sustainable location, with particular reference to Paragraphs 110 and 115; and,
 - iv Where applicable the development proposed meets the 'Golden Rules' requirements set out in Paragraphs 156-157.
- e Paragraph 156 - Where major development involving the provision of housing is proposed on sites in the Green Belt, the following contributions ('Golden Rules') should be made:
 - i affordable housing which reflects either: development plan policies produced in accordance with Paragraphs 67-68 of the NPPF; or until such policies are in place, the policy set out in Paragraph 157.
 - ii necessary improvements to local or national infrastructure.
 - iii the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces [Paragraph 156].
- f Paragraph 157 - Affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing

¹ Footnote 55 - Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.

requirement which would otherwise apply to the development, subject to a cap of 50%.

- g Paragraph 158 - A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.

Planning Practice Guidance

- 5.9 The Planning Practice Guidance [PPG] is a further material consideration in the determination of this application.
- 5.10 Guidance on the role of the Green Belt in the planning system was updated on 27th February 2025. The guidance specifically sets out advice for considering proposals on potential grey belt land.
- 5.11 Paragraph 005 provides the considerations informing the assessment of contribution made by a site to Green Belt purposes (a), (b), and (d). Notably, this paragraph confirms that the purposes relate to towns / large built-up areas, and villages do not fall within the remits of this.
- 5.12 Additionally, paragraph 006 of the PPG considers how the application of footnote 7 should be considered when identifying land as grey belt. It states:

“As defined in the NPPF, grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development. In reaching this judgement, authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7. Where this is the case, it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals.”
- 5.13 Paragraph 007 goes on to state that:

“Any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land, subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.”
- 5.14 Paragraph 009 also states that where grey belt sites are not identified in existing plans or Green Belt assessments, in addition to the consideration of the site’s contribution to Green Belt purposes a, b or d, and whether the application of policies to areas and assets of particular importance identified in footnote 7 to the NPPF (other than Green Belt) provide a strong reason to restrict development, consideration should be given to whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy and this guidance.
- 5.15 Paragraph 010 confirms that:

“Where a site is judged to be grey belt, and to not fundamentally undermine the purposes of the remaining Green Belt across the plan area if released or developed, wider considerations will still be relevant to the consideration of development proposals on the site. These would include determining whether the development would not be inappropriate development in the Green Belt, as set out in paragraph 155 of the NPPF. That question would include consideration of whether a development is sustainably located, whether it would meet the ‘Golden Rules’ contributions (where applicable), and whether there is a demonstrable unmet need for the type of development proposed.”

Supplementary Planning Documents

- 5.16 There are several Supplementary Planning Documents [SPDs] that will be a material consideration in the determination of this application.

Design Quality in New Development SPD

- 5.17 The Design Quality in New Development SPD was adopted in January 2016 and sets out the Council’s aspirations and expectations for design standards in new development. This SPD has been prepared to provide the overarching context for design in the borough, and highlights borough wide issues which should be taken into account in designing new development.

Ensuring a Choice of Travel SPD

- 5.18 The Ensuring a Choice of Travel SPD was adopted in September 2010 and was published to assist developers in ensuring that their proposals are accessible, promote sustainable travel patterns and minimise the congestion and pollution caused by vehicles. The main objective of the SPD is to ensure a good choice of travel modes to all new development.

Trees and Development SPD

- 5.19 The Trees and Development SPD was adopted in June 2016 and aims to assist in fully considering and justifying development proposals with regard to trees 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.

Amended New Residential Development SPD

- 5.20 The New Residential Development SPD was adopted in September 2018 and is an update of the 2016 SPD. The SPD is intended to complement the Design Quality in New Development SPD and is designed to help developers understand how Knowsley Council interprets policy for individual development proposals by outlining best practice of high quality and inclusive design.

Adding Social Value to Development, Employment and Skills SPD

- 5.21 The Adding Social Value to Development, Employment and Skills SPD was adopted in September 2018 and provides guidance on how the Council will implement the requirements of the Knowsley Local Plan, and Policy CS4 in particular, by requesting that developers in the Borough prepare and implement a Social Value Strategy [SVS] in a case where their scheme meets or exceeds a certain threshold.

Developer Contributions SPD

- 5.22 The Developer Contributions SPD was adopted in June 2016 and sets out the way in which the Council will implement its approach to developer contributions, sought as part of new development. The SPD supplements the Core Strategy policies by providing detailed guidance on how developer contributions will operate in Knowsley. The guidance is designed to be of particular use to developers, planning officers, stakeholders and local residents, and seeks to provide greater certainty at the earliest stages of the planning process, before a planning application is submitted, so that the cost implications of developer contributions can be fully taken into account.

Knowsley and Sefton Green Belt Study

- 5.23 The Council's most recent Green Belt Assessment comprises the Knowsley and Sefton Green Belt Study published in November 2012 (CD10). The Site was assessed as part of a wider land parcel (ref. KO60 – Land bounded by M62, Fox's Bank Lane, Cronton Road and Hall Lane, Cronton) covering 157.26 ha. The Site is located in the south-eastern corner of the wider parcel. The findings of the study are set out below:
- Purpose One (referred to as 'Containment' within the study) – The parcel is partially contained. The south eastern corner of the parcel is contained by the urban area – Cronton Village. The parcel is well contained to north by the M62 and south by A road. The west of the parcel is contained by the boundary with Parcel 58/59, which features a minor road.
 - Purpose Two (referred to as 'Separation of Settlement' within the study) – The parcel is located in a wide gap.
 - Purpose Four (referred to as 'Historic Setting' within the study) – South of the parcel is adjacent to Cronton Village Conservation Area. Development in this area may affect views of the semi-rural Conservation Area.
- 5.24 The study concludes that “the parcel is within a wide gap; development within this parcel would not have a significant impact on separation.”

Emerging National Policy

- 5.25 The most recent draft iteration of the NPPF was published by the Government on 16th December 2025, with a consultation on the proposed changes set to run until 10th March 2026. The consultation version comprises a substantial restructure of existing policies and includes new National Decision-Making Policies [NDMPs]. At this stage, the consultation version can only be afforded limited weight in the determination of this planning application. The weight to be afforded to this document may change depending on when the document is formally published. However, it is important to consider the broad thrust

of the proposed changes to understand the direction of travel regarding policy changes and the implications that the revised document may have during determination of this planning application.

- 5.26 The consultation version encompasses a number of proposed changes which provide further support for significantly boosting the supply of homes across the country. In particular, there is a broadened application of the presumption in favour of sustainable development, and a clear and increased emphasis on supporting new development adjacent to existing settlements. The proposed wording suggests that this is particularly the case for new development which meets an “*evidenced unmet need*” and schemes which are well related to an existing settlement, of a scale which can be accommodated based on existing context and the proposed availability of infrastructure. It is considered that these proposed changes provide clear support for the form of development proposed as part of this application, and should be considered accordingly.

6.0 **Planning Assessment**

- 6.1 This section of the report considers the compliance of the proposed development with the relevant policies of the statutory development plan and material considerations, including the NPPF and PPG.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act requires that planning applications be determined in accordance with the development plan, unless material considerations indicate otherwise. Accordingly, the starting point for the assessment of the overall principle of development is the status of the application site in the development plan, alongside the NPPF as a material consideration.

Principle of Development

- 6.3 The Site is designated as Green Belt land by Core Strategy Policy CS5. Policy CS5 notes that inappropriate development will not be permitted in the Green Belt except in very special circumstances.
- 6.4 It should be noted however that Policy CS5 is not consistent with national planning policy on Green Belt. In particular, NPPF paragraph 155 sets out that residential development in the Green Belt should not be regarded as inappropriate where:
- a The development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - b There is a demonstrable unmet need for the type of development proposed;
 - c The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the NPPF; and,
 - d Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.
- 6.5 Therefore, to establish the principle of development, criteria (a)-(d) of NPPF paragraph 155 must be met. These are considered in turn below.

NPPF Paragraph 155 – criterion a

- 6.6 This criterion has two elements: (i) whether the development would utilise Grey Belt land; and (ii) whether the development fundamentally undermines the purposes (taken together) of the remaining Green Belt across the area of the plan.

Grey Belt Assessment

- 6.7 The definition of ‘Grey Belt’ was introduced at Annex 2 of the December 2024 iteration of the NPPF:

“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

6.8 NPPF paragraph 143 sets out the Green Belt purposes. The three referenced in the above definition are:

- “(a) To check the unrestricted sprawl of large built up areas;*
- (b) To prevent neighbouring towns merging into one another; and,*
- (d) To preserve the setting and special character of historic towns.”*

6.9 Additional guidance is provided in the PPG on Green Belt, as noted in **Section 5.0** of this Statement, which includes guidance on how to assess the contribution land makes to purposes (a), (b), and (d).

6.10 To determine whether the Site falls within the definition of Grey Belt, the Site has been assessed against its contribution to Green Belt purposes (a), (b) and (d).

Purpose (a): To check the unrestricted sprawl of large built up areas

6.11 This purpose relates to the sprawl of large built-up areas, and the PPG² is clear that villages should not be considered large built-up areas. Cronton is defined as a village and is therefore not considered to be a large built-up area.

6.12 In any case, the development of the Site will extend the built-up area of Cronton further to the west. Given the relatively limited size of the Site, any housing to come forward would be of a scale that relates well to the size of the existing settlement. Existing defensible boundaries, particularly Dog Clog Brook along the Site’s northern boundary, existing hedgerows and a field boundary to the west and Cronton Road to the south provide robust barriers to prevent unrestricted sprawl.

We consider that the Site makes a **weak contribution** to purpose (a). Therefore, the Site does not strongly contribute to this purpose. The Council’s formal pre-application response confirms that officers agreed the Site does not strongly perform against purpose (a).

Purpose (b): To prevent neighbouring towns merging into one another

6.13 We consider that the Site performs weakly against purpose (b). The development of the Site will not result in the merging of towns. This is because Cronton is considered a village not a town. Regardless of this, due to the extent of the remaining Green Belt land surrounding the Site that separates it from the nearest urban areas of Huyton to the north-east and Upton to the south the site on its own provides no significant contribution to this purpose.

6.14 The Knowsley and Sefton Green Belt Study (2012) (CD10) concurs that a wider parcel to include the Site (ref. KO60 – land bounded by M62, Fox’s Bank Lane, Cronton Road and

² Paragraph: 005 Reference ID: 64-005-20250225

Hall Lane, Cronton) covering 157.26ha comprises “a parcel [is] within a wide gap; development within this parcel would not have a significant impact on separation.” Given the relatively limited extent of the Site within this parcel, the findings continue to be applicable. Additionally, the Council confirmed in their pre-application response that the Site does not contribute to this purpose on the basis that Cronton is not a town.

- 6.15 To conclude, the Site is considered to have a **weak contribution** to this purpose.

Purpose (d): To preserve the setting and special character of historic towns

- 6.16 Cronton is a defined village not a town and is therefore not a nationally recognised historic town. Regardless of this, Cronton is not a nationally recognised historic settlement, so even if it were to be described as a town, this criteria would not be met. Therefore, the development of the Site will not have any impact on the setting or special character of a historic town. The Site does not therefore contribute to purpose (d).

- 6.17 The Council’s pre-application response agrees with this conclusion and states:

“As Cronton is not considered to be a ‘town’, the site does not contribute towards preventing neighbouring towns from merging into one another, thereby not compromising this purpose of including land within the Green Belt.”

- 6.18 The development of the Site will not have any impact on the setting or special character of a historic town, and the Site is considered to have **no contribution** to this purpose.

Footnote 7 Constraints

- 6.19 To meet the NPPF’s Grey Belt definition the Site must not strongly contribute to Green Belt purposes (a), (b) or (d) and must not include any footnote 7 assets that would provide a strong reason for refusing or restricting development.

- 6.20 The only footnote 7 constraint of relevance on the Site is the risk of reservoir flooding along the Site’s northern boundary adjacent to the brook, as well as some very small pockets at risk of surface water flooding within the Site, including an area adjacent to the brook. However, the incorporation of SuDS within the layout will suitably mitigate any flood risk constraints on-site. Consequently, flood risk constraints do not provide a strong reason for refusing development on the Site.

Conclusion on Grey Belt definition

- 6.21 It has been demonstrated that the Site does not strongly contribute to purposes (a), (b), or (d) and is not subject to any NPPF footnote 7 constraints that would provide a strong reason for refusing or restricting development.

- 6.22 Additionally, the Council confirmed in their written pre-application response (**Appendix 2**) that the Site does not contribute strongly to any relevant Green Belt purposes, and by their own assessment the Site is therefore considered to meet the Grey Belt definition.

Appropriate Development within the Grey Belt

- 6.23 NPPF paragraph 155 establishes that the development of Grey Belt land to provide housing should not be inappropriate where:

- a The development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b There is a demonstrable unmet need for the type of development proposed (evidenced by a lack of a five year supply of deliverable housing sites, including the relevant buffer, or where the Housing Delivery Test [HDT] was below 75% over the previous three years);
- c The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the NPPF; and,
- d Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.

Criterion (a)

- 6.24 Given the assessment above and the confirmation received from the Council in the written pre-application response, it is considered that the development would utilise Grey Belt land, therefore the first part of criterion (a) is met.
- 6.25 The second element of NPPF paragraph 155 criterion (a) is considering whether the development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.
- 6.26 The PPG sets out that to assess this, the extent to which the development of Green Belt land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five purposes in a meaningful way must be considered.
- 6.27 As established in our assessment against purposes (a), (b), or (d), the Site is considered to have no contribution to any of these purposes. Green Belt Purpose (e) (to assist in urban regeneration) would not be considered to compromise criterion (a), as it has been demonstrated through the Council’s inability to demonstrate a 5YHLS that there is insufficient land within the urban area to meet housing needs in the Borough.
- 6.28 Furthermore, the proposed development parcel represents a very small area of the overall Green Belt area in Knowsley. 54% of the plan area is designated as Green Belt. Development of the 4.26ha site would not fundamentally undermine the purpose of the remaining Green Belt. At a strategic level, due to the Site’s limited size and the considerable extent of the remaining Green Belt in this location, the removal of the Site from the Green Belt will not undermine the five purposes (when taken together).
- 6.29 It is recognised that the Site does not represent land of a particular landscape importance and does not contribute to the open nature of the countryside. The Site is also well contained and enclosed on all sides by established boundaries and would not represent a significant encroachment into the open countryside.
- 6.30 The Council’s pre-application response also confirms that the development could be viewed as utilising Grey Belt land that would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan and concludes that part (a) of paragraph 155 is therefore considered to be met.

Criterion (b)

- 6.31 Criterion (b) requires there to be a demonstrable unmet need for the type of development proposed. NPPF footnote 56 states that for housing applications, a demonstrable unmet need is a lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the HDT was below 75% of the housing requirement over the previous three years.

Housing Delivery Test

- 6.32 The Council's latest HDT figure for 2023 (published in December 2024) is 316%. Given the Council's latest HDT figure exceeds 75%, the criterion (b) HDT trigger is not met.

Five Year Housing Land Supply Position

- 6.33 The Council's most up to date Five Year Housing Land Supply [5YHLS] Position is set out in the Knowsley Strategic Housing Land Availability Assessment [SHLAA] (2024 Update) published in December 2024, based on the period 2024/25-2028/29. The Council's latest claimed 5YHLS position is **7.2-years**.
- 6.34 The Council's 5YHLS position was calculated based on their Core Strategy housing requirement figure of 450dpa for the first four years and then 255dpa for the fifth year. This was based on Standard Methodology 2 [SM2] and did not apply a 5% buffer as this was removed in the December 2023 publication of the NPPF. It should also be noted that the LPA's assessment is also based on the December 2023 NPPF, which is materially different to the December 2024 NPPF.
- 6.35 The Council adopted the Core Strategy in January 2016, more than five years ago, and the Council has not undertaken a review of strategic policies since its adoption. Consequently, the provisions of the December 2024 NPPF (para. 78) require the Council to calculate their 5YHLS position against SM3.
- 6.36 Whilst the Council's HDT figure is above 85%, the Council is not required to apply a 20% buffer to the 5YHLS calculation. However, under NPPF para. 78(a), the Council should apply a 5% buffer to ensure choice and competition in the market for land. From 1st July 2026, for the purposes of decision making, a 20% buffer will apply to the calculation [§78(c)]. This is because the Council's adopted housing requirement is more than five years old and is less than 80% of their LHN figure using SM3.
- 6.37 Lichfields has undertaken a detailed review of the Council's claimed 5YHLS position (base date 1st April 2024) and re-based the assessment to 1st April 2025 to cover the period 2025/26 to 2029/30. This detailed assessment is provided at **Appendix 3**. As part of this review, Lichfields have assessed the different components of the Council's supply, specifically Housing Commitments Forecast, Local Plan Housing Allocations Forecast and SHLAA Sites Forecast. This has been supplemented by the supply from residential planning permissions granted between 1st April 2024 and 31st March 2025.
- 6.38 When accounting for the Council's LHN of 608dpa (SM3) and applying a 5% buffer, the Council has a total five year housing requirement of 3,192 dwellings. These amendments from the LPAs calculations are the minimum amendments required to reflect up to date national policy. Therefore, any updated position issued by the Council would be required to

reflect these amendments and, on this basis, would therefore be bound to conclude that the deliverable housing land supply is below 5 years.

- 6.39 The findings of Lichfields review of the deliverable supply conclude that the Council can only evidence a five year supply of 2,055 dwellings, due to a lack of clear evidence provided in relation to Category B sites. This represents a reduction of 1,137 dwellings from a stated supply of 3,192 dwellings. On this basis, the Council can only evidence **3.22-years' supply** of deliverable housing land. Therefore, it is considered the 5YHLS test in NPPF para. 155(b) is considered to be met.

Criterion (c)

- 6.40 Regarding criterion (c), which notes that development of 'Grey Belt' land is only regarded as not inappropriate where development would be in a sustainable location, with particular regard to be had to paragraphs 110 and 115 of the NPPF.
- 6.41 Paragraph 110 states that 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.
- 6.42 Paragraph 115 notes that in assessing applications, it should be ensured that:
- a sustainable transport modes are prioritised;
 - 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; and,
 - d significant impacts from the development on the transport network or on highway safety can be effectively mitigated.
- 6.43 This section should be read alongside the TA and accompanying Framework Travel Plan.

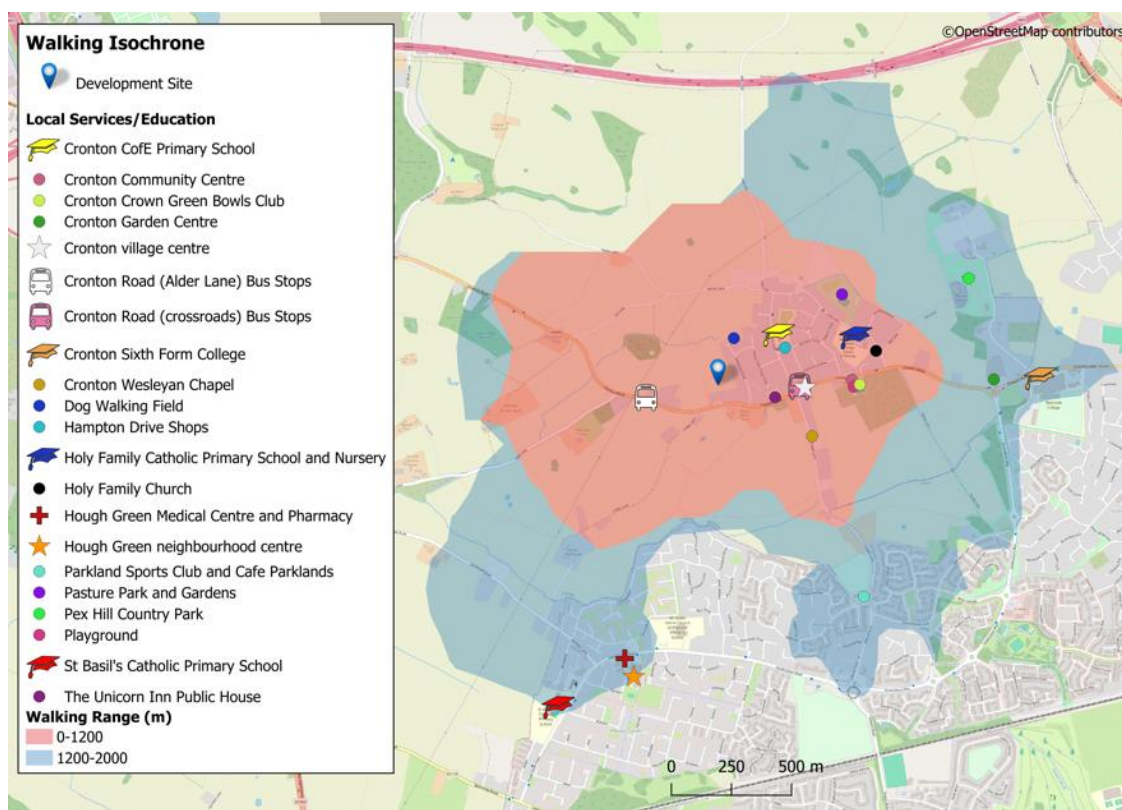
NPPF Paragraph 110

- 6.44 With regard to paragraph 110 of the NPPF, the Site is in close proximity to local facilities and amenities as set out at Section 2.0 and Section 4.0 of this report and Sections 4 and 5 of the accompanying TA. This is summarised again below.

Access on Foot

- 6.45 The site is located on the western edge of Cronton, where the roads within Cronton contain a network of footways, street lighting and local crossing points, creating an environment conducive to walking.
- 6.46 The CIHT document entitled Providing for Journeys on Foot (2000) suggests walking distances which are relevant to this application. In order to highlight the site's accessibility by foot, an indicative walking isochrone has been produced (Figure 6.1). To provide an accurate representation of the future highway network, the Site's proposed vehicular access and potential pedestrian / cyclist access points have been manually added to the network used for the isochrone. The accessibility distance is based on an origin / destination point in the approximate centre of the developed portion of the site.

Figure 6.1 Walking Isochrone



Source: Prime Transport Planning

- 6.47 TA Appendix G (Figure 5.1) represents the Site's walking catchment within the CIHT's preferred maximum distances of 1,200m for local service trips and 2,000m for commuting trips. The Figure demonstrates that the CIHT's preferred maximum walking distances encompass much of Cronton, including the village centre, schools, community facilities and recreational amenities.
- 6.48 TA Table 5.2 summarises the distance and the typical time it would take to walk from the centre of the site to some of the local amenities and centres of employment and education. The table demonstrates that a range of local services, including public houses, takeaway food outlets, community facilities, recreation areas and places of worship, are located within the 1,200m preferred walking range, with the village centre (Hampton Drive shops) walkable in approximately 8 minutes. In addition, multiple primary schools and Cronton Sixth Form College lie within the CIHT's 2,000m preferred maximum walking distance for educational trips, with Cronton CofE Primary school walkable in less than 10 minutes, Holy Family Catholic Primary School and Nursery in circa 13 minutes and Cronton Sixth Form College in just over 20 minutes.
- 6.49 Three local bus stops located on Cronton Road are within a 6–8 minute walk of the site, providing access to services towards Widnes, Hough Green, Rainhill and Liverpool. An additional bus stop is also available in the village centre on Smithy Lane, adjacent Hampton Drive, where some of the same services can be accessed.

6.50 Several potential off-site improvement schemes are also proposed to encourage accessibility via walking and public transport, as set out in Section 4.0 of this Statement and Section 5 of the TA. Potential improvements include:

- 1 Widening of the northern footway along Cronton Road between the proposed site access and Wheatfield Road, including realignment of Cronton Road carriageway and associated works to southern footway, dropped kerb crossings and drainage;
- 2 Widening of the Cronton Road northern footway adjacent no. 397 Cronton Road;
- 3 Widening of the Smithy Close footway on the eastern side of the road, with a priority controlled arrangement giving priority to northbound vehicles;
- 4 Upgrades to the closet bus stops located west of the site on Cronton Road. Potential improvements could include a raised kerb waiting area, bus stop road markings, and a dropped kerb pedestrian crossing; and,
- 5 Improvements to Lodge Lane Bridleway including dropped kerbs and tactile paving, and potential funding towards PRow enhancements to contribute towards resurfacing and improving suitability and attractiveness for cyclists.

Access by Cycle

6.51 A cycling isochrone showing the Site's catchment has been produced and is shown in TA Appendix F (Figure 5.2). The figure illustrates 2,000m, 5,000m and 8,000m catchment ranges which equate to 10-minute, 25-minute and 40-minute journey times respectively which are based on the somewhat conservative or leisurely cycle speed of 12kph. Anecdotally, commuting cyclists are generally thought to travel at speeds between 15-20kph and are often willing to cycle more than 8,000m so a greater catchment may be more realistic.

6.52 TA Appendix F (Figure 5.2) demonstrates that the entirety of Cronton and the majority of northern Widnes lie within the 5,000m cycling range. In addition, Rainhill, Hough Green, parts of Halewood, and Lea Green Industrial Park fall within the 8,000m range, supporting the potential for cycling to be used for both education and employment trips. The cycling distances and times to a selection of key local centres of education, employment and amenities, as well as neighbouring settlements, are shown in TA Table 5.3.

6.53 The table demonstrates that as well as the village services and amenities already mentioned, a substantial number of destinations can be reached within a 10-20 minute cycle ride such as multiple railways stations including Hough Green (10-11 minutes), Widnes (13-14 minutes), and Rainhill (16-17 minutes). Additional educational facilities are also available including, Ashley High School and Ormiston Chadwick Academy (both 11-12 minutes).

6.54 Major employment opportunities are accessible within a 25-minute cycle ride, including Symmetry Park to the south-east of Tarbock Island, the Interchange Motorway Estate (17 minutes), and the Lea Green Industrial Estate (21 minutes). Furthermore, Widnes, Whiston (including Whiston Hospital), Huyton, Prescot, Halewood and parts of Runcorn can all be reached under 30 minutes, offering further employment opportunities.

6.55 Existing cycle routes have been identified in the east of Cronton, including the off-road cycle track along Sandy Lane down to Old Upton Lane on the northern boundary of Widnes. The Applicant is willing to extend the existing 30mph speed limit west of the site,

which along with the extended residential environment with the development in place, will help make Cronton Road more conducive for cycling towards these existing facilities. Furthermore, the Applicant is willing to provide a dropped kerb crossing and funding towards Bridgeway enhancements if deemed necessary by the Council.

- 6.56 Given the evidence presented in TA Figure 5.2 and Table 5.3, it can be concluded that cycling can be a default choice for journeys to local services, education and employment zones.

Access by Public Bus

- 6.57 A number of bus stops are located on Cronton Road adjacent to Alder Lane, Chapel Lane and Smithy Lane, all within a short walk of the site. The eastbound stop near Chapel Lane benefits from a raised kerb which supports level boarding for mobility-impaired users, while the remaining stops comprise flag-and-pole installations with clear roadside markings.
- 6.58 In addition to these stops, a southbound bus stop known as ‘Cronton, adj. Hampton Drive’ is located on Smithy Lane, approximately 300m north of Cronton Road. This stop consists of a flag-and-pole and dedicated bus layby. Fewer services can be accessed from this bus stop compared to the bus stops on Cronton Road, however it provides an alternative boarding point for three of the local services operating in the area.
- 6.59 The local bus stops offer convenient access for residents travelling to destinations including Widnes, Huyton, Warrington and Liverpool. TA Table 5.4 summarises the bus services that can be caught from the bus stops described above.
- 6.60 The services outlined above provide convenient connections to a range of local and wider destinations including Widnes town centre, Hough Green, Upton Rocks, Halton View, Rainhill, Prescot, Huyton, Warrington and Liverpool. The No. 7 route offers the most comprehensive service, with early morning, daytime and evening journeys in both directions and direct connections to Warrington and Liverpool. These destinations provide access to a variety of retail, employment, leisure and healthcare facilities and represent important public transport opportunities for future residents of the site.
- 6.61 Widnes town centre, Green Oaks and a number of intermediate neighbourhoods can be reached using the No. 26 and 26A routes, which operate hourly during the daytime from stops at ‘Cronton, adj. Smithy Lane’. The No. 10 route provides additional connectivity on schooldays, with morning and afternoon journeys linking Cronton to Farnworth, Upton and central Widnes. The Nos. C42 and C46 routes provide further links to Huyton, Knowsley and Liverpool.
- 6.62 The number of services available across the day, particularly those provided by the Nos. 7 and 26 routes, ensures that a variety of journey purposes can be accommodated by public transport. These include commuting, education, retail and leisure activities.
- 6.63 Given the proximity of the bus stops to the site and the range of destinations accessible by regular public transport services, bus travel is considered to be a viable and convenient alternative to the private car for future residents. The network provides access to a wide selection of employment, education and retail destinations within reasonable travel times

and therefore represents a suitable sustainable travel option in accordance with paragraph 110 of the NPPF.

Access by Rail

- 6.64 The nearest railway stations to the site are Hough Green (2.7km / 10-11 minutes by bicycle), Widnes (3.6km / 13-14 minutes) and Rainhill (4.4km / 16-17 minutes). These stations are accessible by cycle or via connecting bus services. A short car journey for longer distance rail based trips would also constitute a sustainable journey. Widnes station benefits from 50 car parking spaces and has a formal drop-off/pick-up point. Hough Green has 41 car parking spaces.
- 6.65 Hough Green Station provides direct services to Liverpool Lime Street, Warrington Central, and Manchester Oxford Road. Widnes Station serves the same destinations, as well as provides connections to Nottingham, Sheffield and Norwich. Rainhill forms part of the historic Liverpool–Manchester line, offering frequent east–west services to Liverpool Lime Street, Manchester Victoria, and Manchester Airport.
- 6.66 Given the proximity of these stations and the ability to reach them by sustainable modes, rail represents a viable option for longer-distance commuter journeys.
- 6.67 Overall, it should be considered that the Site is in a highly sustainable location adjacent to the existing built-up area, and benefits from access to a range of local facilities and a genuine choice of non-car transport modes in line with the requirements of the NPPF.

Framework Travel Plan

- 6.68 In line with best practice, a Framework Travel Plan has been produced and submitted as part of this planning application. The document further addresses NPPF para. 110, and forms the start of an ongoing process to encourage and monitor the use of sustainable modes of travel. The document should be read in conjunction with the TA, and a summary of the key points is as follows:
- Outlines the key local and national objectives of the TP process;
 - Sets targets for the reduction of car/van driver trips by between 5 and 10%;
 - Indicates potential measures that can be implemented to achieve these targets; and,
 - Provides details of how the TP will be managed, monitored and reviewed.

NPPF Paragraph 115

- 6.69 As set out above, the proposed development has a clear focus and prioritisation of sustainable transport modes which can benefit from a number of off-site improvements to enhance pedestrian and cycle accessibility and offer a genuine choice of non-car transport modes.
- 6.70 The TA also demonstrates that a safe and suitable access to the Site can be achieved for all users. The development will be accessed from Cronton Road via a simple priority-controlled junction. The access will be positioned towards the eastern end of the site frontage and will comprise a 5.5m wide carriageway, 2.0m wide footways and 10.0m radii. It has been demonstrated that the most onerous visibility splays required for a 40mph

speed limit can be delivered from the access. The Applicant is, however, also willing to fund the extension of the existing 30mph speed limit west of the site frontage if the Council consider that this would be necessary and appropriate.

- 6.71 Furthermore, the existing footway located along the site frontage will be widened to 2.0m where the extent of adopted highway allows, and dropped kerbs with tactile paving will be provided on both sides of the access road along the Cronton Road desire line. This will further improve safety and accessibility for pedestrians accessing the Site.
- 6.72 The TA also sets out there are no significant impacts on the local transport network or on highways safety, concluding that the proposed development would not result in an 'unacceptable impact on highway safety' nor have a 'severe' impact on the operation of the highway network in terms of safety and capacity. The impact is best described as negligible.
- 6.73 Considering the requirements of paragraph 115 of the NPPF, the accompanying TA demonstrates that safe and suitable access can be formed, there is the opportunity to provide a development that is reflective of national requirements, and there are no significant impacts on the local transport network or on highways safety. During the pre-application process, the LHA confirmed acceptance of the proposed access point in principle.

Criterion (d)

- 6.74 In relation to criterion (d), development of 'Grey Belt' land is only regarded as not inappropriate subject to meeting the 'Golden Rules', where applicable. Paragraph 156 notes that for applications for major housing development on land designated as Green Belt, the following 'Golden Rules' apply:
- a Affordable housing provision 15% greater than the adopted requirement, subject to a cap of 50%, should be provided (Paragraph 157);
 - b Contributions should be made for necessary improvements to local or national infrastructure; and,
 - c Proposals should include provision for new, or improvements to existing, green spaces that are accessible to the public.
- 6.75 In terms of rule (a), Core Strategy Policy CS15 (Delivering Affordable Housing) states that within all proposed market sector housing developments which have a capacity of 15 dwellings or more, a minimum provision of affordable housing will be sought as follows:
- 10% on sites within the current urban area; and;
 - 25% on sites identified as Sustainable Urban Extensions within Policies SUE1 to SUE2c.
- 6.76 The Core Strategy does not set out a specific affordable housing requirement on existing sites within the Green Belt. Instead, the policy sets a maximum 25% affordable housing target. The Council confirmed through pre-application engagement that a 15% uplift on the maximum requirement of 25% affordable housing provision would be required in accordance with paragraph 157 of the NPPF. To address rule (a), 40% of the total dwelling yield will therefore be provided as affordable housing and proposed provision is discussed further in the Affordable Housing Statement.

- 6.77 With regard to contributions to necessary infrastructure improvements, those required to make the development acceptable in planning terms can be secured through a S106 Agreement. Heads of Terms and contributions will be agreed with the Local Planning Authority during the course of determination the LPA during determination, dependent on the necessary requirements identified by statutory consultees and compliance with the CIL Regulations and NPPF tests (para. 58). A number of potential off-site improvement schemes are also proposed to encourage accessibility via walking and public transport, as previously set out in this Planning Statement.
- 6.78 The proposals will include new high-quality open spaces which will be accessible to the public. The Site currently comprises agricultural fields in private ownership with limited public access except for the existing PRoW, however the proposal would open new POS to the public. As discussed in **Section 4.0** of this report, the Parameter Plan demonstrates the ability to accommodate at least 0.97ha of onsite open space. The proposals also include a potential pedestrian connection to the existing dog walking field to the north-east of the Site, and a further pedestrian connection to the north of the Site as part of the enhanced PRoW through the Site.
- 6.79 Based on the above, it is concluded that the 'Golden Rules' set out in paragraph 157 of the NPPF have been satisfactorily addressed as part of this application.

Principle of Development Summary

- 6.80 Whilst the proposals do not comply with Core Strategy Policy CS5 (Green Belt), this policy does not entirely accord with the provisions of the NPPF in relation to development in the Green Belt. Whilst the development does propose major residential development in the Green Belt, the Council's spatial strategy and adopted policy has been insufficient in delivering the new homes needed, therefore additional greenfield sites outside settlement boundaries are required, which given the characteristics of the Borough, will be on Green Belt sites.
- 6.81 The Site is not considered inappropriate development in the Green Belt as it meets the definition of Grey Belt in the NPPF, and it has been demonstrated that all four criteria set out at NPPF paragraph 155 have been met including the 'Golden Rules'. The Proposed development also complies with Core Strategy Policies SD1 (Sustainable Development), CS1 (Spatial Strategy for Knowsley), CS2 (Development Principles) and CS3 (Housing Supply, Delivery and Distribution). Therefore, the principle of development is established.

Affordable Housing and Housing Mix

Affordable Housing Statement

- 6.82 The Core Strategy does not set out a specific affordable housing requirement on existing sites within the Green Belt. Instead, Policy CS15 sets a maximum 25% affordable housing target. The Council confirmed through pre-application engagement that a 15% uplift on the maximum requirement of 25% affordable housing provision would be required in accordance with paragraph 157 of the NPPF. Bellway is committed to delivering a policy compliant affordable housing provision as part of the proposed development, which also address rule a of the 'Golden Rules' at paragraph 157 of the NPPF. Therefore 40% of the total dwelling yield will be provided as affordable housing.

- 6.83 Core Strategy Policy CS15 requires an affordable tenure split of 75% social rent and 25% intermediate tenure. Currently, a specific affordable tenure split has not been provided at outline stage, and this will be informed by consultation with the Council at the point of the submission of a reserved matters application.
- 6.84 Bellway understands that the Council will seek to secure 40% affordable housing via a legal agreement pursuant to S106 of the Town and Country Planning Act 1990 [the 1990 Act]. Draft Heads of Terms are submitted as part of this planning application, and it is considered that due consultation will be held through the course of determination.
- 6.85 It is therefore considered that the proposed development is compliant with the requirements of Policy CS15 regarding the provision of affordable housing and will assist in delivering much needed affordable housing across a size and tenure to meet local need.

Housing Mix

- 6.86 Policy CS17 (Housing Sizes and Design Standards) sets out that housing developments must deliver an appropriate mix of dwelling sizes, including 1–4 bedroom homes and bungalows, as set out in Table 8.1.
- 6.87 Detail of the types and sizes of the housing that will be delivered is reserved for approval at reserved matters stage. The detailed proposals at that stage will have regard to housing types and sizes to ensure that a mixed and balanced community is achieved and will include a range of high-quality homes serving the needs of the local population.
- 6.88 Consultation with the Council will be undertaken at reserved matters stage to agree a suitable mix as informed by the relevant local evidence at the time of submission.
- 6.89 As such, based on the level of detail included in this outline application, the proposals comply with Policy CS17 regarding housing mix.

Design and Layout

- 6.90 Policy CS3 (Housing Supply, Delivery and Distribution) supports efficient land use and requires a minimum density of 30dph for residential development. Policy CS19 (Design Quality and Accessibility) sets out that new development must meet high design and accessibility standards. Policy DQ2 (Security in the Built Environment) noted that new development should be designed so as to provide good levels of personal and property security.
- 6.91 The Design Quality in New Development SPD (January 2016) provides further detail on the Council's aspirations and expectations for design standards in new development. The New Residential Development SPD (September 2018) is intended to complement the Design Quality in New Development SPD and assist developers to understand how the Council interprets policy for individual development proposals by outlining best practice of high quality and inclusive design.
- 6.92 The application is submitted in outline and detailed considerations such as layout and design will be provided as part of future reserved matters applications. However, the application is accompanied by a DAS and an Illustrative Masterplan (prepared by APD), which demonstrates how the development will integrate with the existing built form in

proximity of the Site, and outlines the design principles that will be considered and followed in the detailed design of the scheme.

6.93 The layout and design of proposed development will respond directly to the character of the landscape and local context. In particular, the future detailed scheme will propose the following design principles in relation to layout and appearance:

- 1 Key buildings positioned to terminate views and in key locations to frame and define junctions and key spaces.
- 2 Active frontages always provided to public areas to ensure natural surveillance.
- 3 Retention of existing landscaping to create green infrastructure links for existing wildlife habitats and retain the buffers to the open countryside.
- 4 The relationship between the proposal and the existing settlement edge to be considered and lower density to allow for a softer transition.
- 5 Focal spaces created to aid legibility and way finding.
- 6 Additional potential pedestrian link at the north-eastern corner of the site leading onto the existing dog walking field.
- 7 Key frontages that are positioned on primary movement routes will be key to the architectural appearance of the development and therefore positively set the character of the development.
- 8 Retention, realignment and enhancement of the existing PRoW which will be surfaced appropriately, and integrated into the site masterplan.
- 9 Built form that provides a scale, massing and appearance that will complement the context, creating a distinct and legible townscape, and to create an external built form of high-quality design that will complement and respond to the setting whilst creating a sense of place.
- 10 Materials and associated detailing of texture, colour and decoration will seek to maintain an overall coherence and link to Cronton's key design features.

6.94 The final density of the development will be confirmed at reserved matters stage. However, the submitted Parameters Plan and supporting Illustrative Masterplan indicates an indicative net density of approximately 40 dph (based on a 120 dwelling development), in line with the minimum 30dph requirement under Policy CS3.

6.95 Overall, it is considered that the proposed development complies with Core Strategy Policies CS3 and CS19, UDP Policy DQ2, Design Quality in New Development SPD and New Residential Development SPD.

Open Space

6.96 Policy CS21 (Greenspaces and Trees) sets out the Council's Public Open Space [POS] requirements and states that when considering proposals for new residential development, the Council will seek enhancements to greenspaces via on-site provision, new off-site provision or enhancement of existing off-site provision through developer contributions secured by legal agreement in accordance with Policy CS27.

6.97 Core Strategy Table 9.1 provides a breakdown of the required POS provision (see below).

Figure 6.2 Substantial Residential Area Standards for Greenspace Quantity and Accessibility

Typology	Description	Quantity Standard (hectares per 1,000 residents)	Accessibility Standard (maximum recommended distance)
Park and Garden	Formal and urban parks and gardens	0.8	1.2km (15 minute walk)
Amenity Greenspace	Areas of informal greenspaces in and around housing areas	0.5	800m (10 minute walk)
Provision for Children and Young People	Play spaces and provision for young people, e.g. skate parks and play areas.	0.1	800m (10 minute walk)
Allotments	Areas for growing fruit and vegetables	0.05	1.6km (20 minute walk)

Source: Knowsley Core Strategy

6.98 The proposed development is an outline planning application and therefore, a detailed mix will follow at reserved matters stage which will enable a specific open space requirement to be calculated.

6.99 For a 120 dwelling development, it is considered that approximately 0.39 ha of POS would be required based on an indicative occupancy level, with 0.22 ha for Parks and Gardens, 0.14 ha for Amenity Greenspace and 0.03 ha for Provision for Children and Young People. The Parameter Plan submitted with this application indicates a potential capacity of 0.97 ha of POS, well in excess of the maximum required under Policy CS21. A quantity for each open space typology will be agreed with the LPA during determination of the application, though it is expected that allotment provision will be provided off-site through a financial contribution.

6.100 As such, it is considered that the proposals demonstrate compliance with the requirements of Policy CS21, significantly exceeding the adopted policy requirement. The final POS scheme will be agreed with the Council at reserved matters stage.

Highways and Access

6.101 Core Strategy Policy CS7 states 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. Policy CS19 states that new development in Knowsley will be expected to integrate effectively with existing development and link to existing shopping and service provision.

6.102 UDP Policy T5 (Location of Major Traffic Generating New Development) states that major developments (as defined in table 8.1) should be or be capable of being located within safe and convenient walking distance of public transport facilities. UDP Policy T7 (New development and walking and cycling routes): new development should preserve and where possible enhance the walking and cycling network, as it can help enhance and provide

access to green corridors & the countryside as well as promoting and encouraging exercise and healthy living for all. Policy T8 (Transport Assessment) requires planning applications for major traffic generating development to be accompanied by a TA, and Policy T9 requires planning applications for major traffic generating development to be accompanied by a Travel Plan.

6.103 To assess the highways impacts and accessibility of the proposed development, a TA has been prepared by Prime Transport Planning. The TA considers the highways and transportation implications associated with an outline application for a proposed residential development comprising up to 120 dwellings. The assessment has been undertaken in accordance with relevant national and local guidance, including the NPPF, PPG, Manual for Streets [MfS / MfS2], Core Strategy and the Ensuring a Choice of Travel SPD.

6.104 A summary of the TA is provided below:

- 1 The proposed vehicular access will be taken from Cronton Road via a new simple priority junction comprising a 5.5m wide carriageway, and 2 x 2.0m footways which will connect to the existing footway provision on the northern side of Cronton Road. The existing footway along the site frontage will be widened to 2.0m and dropped kerbs and tactile paving will also be provided over the access.
- 2 Swept path analysis demonstrates that the access is suitable for all anticipated vehicle types, including refuse collection vehicles. 2.4m x 120m visibility splays can be achieved from the proposed site access, illustrating that a considerable level of visibility is achievable beyond what is required. Whilst a safe level of visibility can be achieved based on recorded 85th percentile speeds, the applicant is willing to fund a Traffic Regulation Order [TRO] to extend the existing 30mph speed limit to the west of the site.
- 3 The main access could be supplemented by a potential pedestrian connection to the dog walking field at the north-eastern corner of the site. The existing PRoW which runs through the site will be maintained on its current alignment, surfaced appropriately, and integrated into the site masterplan.
- 4 The impact of the development has been assessed using observed 2025 baseline traffic data factored to a 2032 forecast year, taking account of local growth and relevant committed developments. An absolute and percentage impact exercise has been undertaken to demonstrate that an assessment of off-site junctions is not required. Furthermore, a distribution sensitivity test has been undertaken so strengthen the methodology within the TA.
- 5 It has been demonstrated that the proposed site access will operate with a considerable level spare capacity. The development impact on the local highway network is therefore best described as negligible.
- 6 A review of the most recent five-year road safety records identified no discernible pattern of collisions or existing deficiencies in the local highway network that would be exacerbated by the proposed development.
- 7 A detailed and comprehensive assessment of the sustainability of the Site is provided in Chapter 5 of the TA, which demonstrates that the Site is located in an accessible and

sustainable location, particularly with the proposed improvements to pedestrian infrastructure.

- 6.105 The TA concludes that the proposed development would not result in an ‘unacceptable impact on highway safety’ nor have a ‘severe’ impact on the operation of the highway network in terms of safety and capacity. The impact is best described as negligible.
- 6.106 The sustainable transport opportunities and proposed improvements show that the development will enable future residents to travel conveniently by walking, cycling and public transport. A Framework Travel Plan has also been produced and submitted as part of this planning application. The document further addresses paragraph 110 of the NPPF, and forms the start of an ongoing process to encourage and monitor the use of sustainable modes of travel. The proposals therefore conform to both national and local policy requirements to maximise sustainable travel choices, minimise the need to travel by private car, and ensure that new development is located in a safe and accessible location.
- 6.107 As such, the proposal complies with local and national planning policy including Core Strategy Policies CS7 and CS19, UDP Policies T5, T7, T8 and T9 and the relevant provisions of the NPPF including paras. 110 and 115. The proposals comply with all relevant guidance with respect to sustainable accessibility, safety and impact on the highway network, and there are no highways or transportation related reasons why planning permission should not be granted.

Parking

- 6.108 Ensuring a Choice of Travel SPD Appendix A includes the latest vehicle and cycle parking standards for developments in the Borough. For ‘other areas’, which applies to the Site, the relevant standards are as follows:
- 1 bed dwellings - 1 parking space;
 - 2-3 bed dwellings - 2 parking spaces; and,
 - 4+ bed dwellings - 3 parking spaces.
- 6.109 The proposals will provide an appropriate level of parking with regard to the Council’s standards, and each dwelling with allocated parking will include electric vehicle charging facilities. Storage for cycles will also be provided, with full details included in a subsequent reserved matters application.
- 6.110 As such, the proposals are considered to comply with the Ensuring a Choice of Travel SPD in terms of parking.

Environmental Considerations

Landscape and Visual Impact

- 6.111 Core Strategy Policy CS2 (Development Principles) sets out that new development should understand and respect the character and distinctiveness of places and landscapes. Core Strategy Policy CS19 states that to enhance the local distinctiveness, identity and accessibility of places, new development within Knowsley will be expected to complement

and enhance (where possible), existing landscape, topography, green infrastructure and features of local importance and historic interest.

6.112 To assess the landscape and visual impacts arising from the proposals, a Landscape and Visual Statement [LVS] has been prepared by FPCR and is submitted as part of this application.

6.113 The LVS provides assessment of the likely landscape and visual effects of the proposed development, which are summarised below:

- 1 The proposed development will result in a loss of openness, loss of hedge and trees along Cronton Road frontage, a change in character from semi-rural to urban, and an extension of the existing settlement in a westerly direction.
- 2 The impact on landscape character will be most notable on the site itself due to the direct impact on landscape character, reducing with distance from the site as indirect impacts are limited by the reduced opportunities for views of the proposed development.
- 3 There will be some limited adverse impact at a district level, with development resulting in the loss of trees and arable farmland – both of which are listed as key characteristics of the wider ‘Cronton and Pex Hill’ Landscape Character Area. Impacts on the large-scale National Character Areas ‘Lancashire Coal Measures’ and ‘Mersey Valley’ will be negligible, as the proposed development comprises a modest extension to an existing settlement, which such settlements being characteristic of the wider NCAs.
- 4 The most notable adverse effects on visual amenity will be experienced by residents of dwellings immediately east, south and west of the site and by footpath users passing through the site. These receptors will experience full or partial changes to views, with proposed dwellings forming prominent elements. East of the immediate line of dwellings, it is not anticipated that there will be any effects to visual amenity.
- 5 There will be no impact to visual amenity of residents in Cronton Conservation Area. Effects on visual amenity diminish with distance from the site, with intervening vegetation and buildings limiting effects experienced from receptors west and south of the site. Where more open views of the Site can be experienced from the north, the impact of the proposed development will be more apparent, but due to the largely agricultural landscape, the number of receptors is limited.
- 6 By Year 15, the proposed planting will deliver some benefits, helping the development to assimilate with the wider setting. This planting will result in some reduction on adverse visual effects, mostly benefitting receptors to the north of the site.
- 7 The proposed development will not result in any unacceptable effect on landscape character or visual amenity. The illustrative proposals demonstrate that these effects can be appropriately mitigated through retention of existing boundary vegetation where feasible, limiting height of buildings, proposing development that is in keeping with the established character, and incorporating green infrastructure to help the built development assimilate with the setting.

6.114 In landscape terms, the proposed development is therefore considered to be in accordance with national and local policy, as well as guidance set out in published landscape character

assessments. Furthermore, the Site is considered to have the capacity to accommodate the nature of the proposed development without undue or unacceptable effects on landscape character and visual amenity, and with the potential for improvements to the landscape structure of the Site itself, which will in the long term provide a beneficial effect.

- 6.115 The proposed development will not result in any unacceptable effect on landscape character or visual amenity and the proposals are considered to complement and enhance the existing and wider landscape in line with Policies CS2 and CS19.

Landscaping

- 6.116 Core Strategy Policy CS2 (Development Principles) sets out that new development should recognise environmental limits, protect and enhance environmental assets, enhance local character and promote quality of place by understanding and respecting the character and distinctiveness of places and landscapes. Core Strategy Policy CS19 (Design Quality and Accessibility in New Development) states that to enhance the local distinctiveness, identity and accessibility of places, new development within Knowsley will be expected to complement and enhance (where possible), existing landscape, topography, Green Infrastructure and features of local importance and historic interest.

- 6.117 An Illustrative Landscape Strategy (Dwg. No. 13294-FPCR-XX-XX-DR-L-0001) is submitted as part of this application and shows how existing landscape features across the Site will be retained and incorporated into the layout. Existing vegetation and trees will be retained where possible. Design principles for the proposed green infrastructure and landscape proposals are summarised below:

- 1 The trees and hedgerow along the Cronton Road frontage will need to be removed to deliver the required visibility for the proposed access to the site. A new native hedgerow with hedgerow trees is proposed beyond a wide grass verge. Elsewhere, boundary vegetation will be retained and incorporated into the proposals.
- 2 The illustrative proposals show an area of open space stretching north from Cronton Road, accommodating the foul sewer easement and the public footpath. This will deliver a centralised green for recreation, onto which proposed dwellings will face.
- 3 A second area of public open space is shown in the north of the site. This will act as an extension to the existing dog walking field (immediately east) and will accommodate new native planting and drainage attenuation.
- 4 The public footpath leading through the site will be incorporated into the open space, with dwellings facing onto this.
- 5 Street trees will be delivered within private front gardens to help soften the built development. is submitted as part of this planning application to demonstrate how high-quality landscaping scheme could be delivered at detailed design stage based on the submitted parameter plans. It is noted that this landscape strategy has been fundamentally informed by the recommendations of the LVS.

- 6.118 It is considered that the proposed development will accord with Core Strategy Policies CS2 and CS19 to ensure the delivery of a high-quality, sensitive landscaping scheme that will be agreed at detailed design stage.

Ecology

- 6.119 Policy CS8 (Green Infrastructure) sets out that new development must be served by Green Infrastructure to meet the needs of residents and the local environment and seek to protect, maintain and where possible enhance biodiversity within and around new developments according to their designation and significance to provide space for nature.
- 6.120 An Ecological Impact Assessment [EcIA] has been prepared by FPCR to support this application and identify the ecological features of the Site and its surroundings and assess the potential impacts of the development on the ecological interest. The assessment draws from a desk study, UKHab Survey and Preliminary Protected Species Survey of the Site and surrounding area which was carried out in January and April 2025. A series of additional detailed surveys were completed in 2025. The surveys comprised species surveys for bats, breeding birds and Great Crested Newts (see EcIA appendices). A Biodiversity Net Gain Strategy has also been undertaken and should be read in conjunction with the EcIA. A series of wintering bird surveys are also ongoing. To date, two wintering bird surveys have been undertaken per month in February, March and November 2025 and will continue until January 2026.
- 6.121 A summary of the EcIA is provided below:
- 1 The assessment has concluded that there is the risk for impacts to four Local Wildlife Sites, located within 1km of the Site boundary. However, given the distance of these LWS from the Site boundary and the relative size of the development the residual effect of these impacts are not predicted to be significant.
 - 2 A preliminary assessment has concluded that the residual effects on the Mersey Estuary will be neutral. However, the winter bird surveys to inform the assessment are ongoing and as such, the detailed impact assessment for this feature has been deferred until the wintering bird surveys have been completed. The wintering bird report will be issued during the determination period on completion of the surveys and will include an impact assessment to this important ecological feature.
 - 3 Proposals will result in permanent losses of habitats under the footprint of the development. The habitats lost are predominantly of low ecological importance, with the exception of 115m of species poor native hedgerow and four mature trees required to facilitate safe access to the site. An additional mature tree will also be lost, as well as localised impacts to the watercourse on the northern boundary.
 - 4 All impacts to onsite habitats are not predicted to be significant. The loss of all habitats within the Site will be appropriately compensated for through the measures detailed within the associated BNG report.
 - 5 Following compensation, a minor positive effect is predicted on local breeding bird and bat populations.
 - 6 Construction phase impacts will be minimised through careful control of construction activities through an industry best practice Construction Environmental Management Plan [CEMP]. As a result, all other predicted effects on important ecological features are predicted to be neutral.

- 6.122 Subject to the implementations of the recommendations and mitigation within the EcIA, it is considered that the proposals will comply with the relevant legislation. It is therefore considered that the proposals comply with Core Strategy Policy CS8.

Biodiversity Net Gain

- 6.123 Biodiversity Net Gain [BNG] is mandatory under Schedule 7A of the 1990 Act (as inserted by Schedule 14 of the Environment Act 2021) in England. A 10% BNG requirement is mandatory for major development proposals.
- 6.124 Policy CS2 (Development Principles – Principle 4) sets out that new development in Knowsley will be expected to maintain or enhance the quantity and quality of biodiversity and habitats, including potential impacts on nationally and internationally important sites for biodiversity. Policy CS8 (Green Infrastructure) states that new development must provide adequate mitigation and/or, as a last resort, compensation for green infrastructure or biodiversity loss, in circumstances where harm resulting from the development is otherwise unavoidable.
- 6.125 A BNG Assessment Report has been prepared by TEP and is submitted to support this planning application. Given that this planning application is submitted in outline (all matters reserved except access), the BNG assessment has been prepared to establish the habitat baseline of the Site, provide methods and assumptions to assess the post development habitat scoring of the Site, and assess the feasibility of the current indicative development design to deliver a net gain in biodiversity.
- 6.126 The BNG strategy has determined that the Site has a baseline biodiversity value of 12.76 habitat units, 3.2 hedgerow units and 1.26 watercourse units. A BNG calculation was then completed for the Site, with the onsite post development habitats based on the Illustrative Landscape Masterplan (Dwg. No. 13294-FPCR-XX-XXDR- L-0001) and guided by ecological professional judgement.
- 6.127 The report goes on to outline a realistic and deliverable series of habitat creation and enhancement measures for the Site to be undertaken to contribute to delivering a 10% gain in Biodiversity Value. At present, based on the above, on-site post intervention consists of 0.74 habitat units, 6.86 hedgerow units and 1.55 watercourse units, which is the equivalent to a 23% loss in habitat units, a 114.53% gain in hedgerow units and a 22.84% gain in watercourse units.
- 6.128 To achieve a net gain of 10%, subsequent approval(s) will require an additional 4.29 units of any habitat type. In order to achieve a net gain of 10% for the scheme offsite compensation will be required via one or a combination of the following methods:
- Habitat creation or enhancements on additional land under landowner control;
 - The purchase of biodiversity units from a registered offsite provider; or,
 - Statutory credits (as a last option).
- 6.129 A design stage BNG assessment will be submitted at reserved matters stage to determine a conclusive BNG outcome. However, given the above, it is concluded that proposals can deliver a 10% BNG for the scheme, which would be secured by the BNG condition attached to any planning permission for the proposed development.

- 6.130 The proposed development therefore meets the mandatory 10% BNG requirement and accords with Core Strategy Policies CS2 and CS8.

Trees

- 6.131 Core Strategy Policy CS21 (Greenspaces and Trees) states that development resulting in the loss of urban greenspace will not be permitted unless exemption criteria are met and benefits clearly outweigh harm. The Policy also states that adequate replacement provision where tree loss is unavoidable, comprising two additional trees for every tree lost and taking account of species and size. UDP Policy DQ4 (Trees and Development) sets out 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.
- 6.132 The Trees and Development SPD (June 2016) has also been fully considered, which sets out guidance relating for best practice for proposals incorporating trees and landscaping within new developments, requirements for detailed survey of all existing trees and requirements for provision of replacement trees.
- 6.133 To assess the implications of the proposed development an Arboricultural Assessment, prepared by FPCR, is submitted as part of this application. The purpose of the report is firstly to present the results of the assessment of the existing trees' arboricultural value, based on their current condition and quality and to secondly, provide an assessment of impact arising from the proposed development of the site.
- 6.134 The Arboricultural Assessment concludes the following:
- 1 A total of 31 individual trees, ten groups of trees, and six hedgerows were surveyed as part of the Arboricultural Assessment. Trees were surveyed as individual trees, groups and hedgerows as per the survey methodology. Appendix A of the assessment presents details of all individual trees, groups and hedgerows recorded during the assessment.
 - 2 A total of five individual trees were assessed as being of high quality (Category A). These five trees, all mature English oak (*Quercus Robur*) were distributed across the site with three on the western boundary, one within the verge alongside Cronton Road and one within the rear garden of a property on Wheatfield Road beyond the site's eastern boundary.
 - 3 Most individual trees recorded were of moderate quality, with English oak being the dominant species recorded.
 - 4 Two individual trees T20, a mature sycamore on the site's western boundary and T27, a mature sycamore situated close to the rear garden of a property on Cronton Road, were both assessed as being unsuitable for retention (Category U).
 - 5 To achieve access to the site from Cronton Road will require the removal of sections of hedgerow, individual trees and tree groups. The proposed access will directly impact T26 (Category C) and T25 a mature English oak considered of high quality and Retention Category A. The loss of T25 is unavoidable to facilitate development of the site, but replacement provisions of appropriate size and species will be necessary and can be achieved to ensure the development is in accordance with Policy CS21. It is therefore proposed that four heavy standard English oak would be planted on the site

in positions that could support their mature size to adequately mitigate for the loss if this mature high-quality tree meeting the policy requirements.

- 6 The visibility splay requirement of the new junction will require the removal of T21, T22, T23, T24, G9 and the entirety of hedgerow H1 (approximately 100m). Their removal would be mitigated in accordance with Policy CS21 through the planting of six heavy standard English oak within the development in positions that could support their mature size.
- 7 The removal of approximately 100m of hedgerow H1 would be partially mitigated for through the planting of a new hedgerow behind the visibility splay for the new junction to directly mitigate for this hedgerow loss. Further hedgerow planting would also be provided across the development to ensure the proposed scheme delivers a net gain in terms of linear hedgerows.
- 8 Any further arboricultural impacts across the development are likely to be limited but are likely to include the removal of two trees recorded as Category U (T20 and T27).

6.135 To conclude, while tree loss is necessary to facilitate access to the site, this proposed tree and hedgerow removal could be mitigated for through new tree and hedgerow planting, to ensure the development is in accordance with Core Strategy Policy CS21 and the Trees and Development SPD (June 2016). The Illustrative Masterplan has identified that through considered design it would be feasible to integrate a high proportion of the existing tree cover within the development, and that a sustainable long-term relationship between dwellings and retained trees could be achieved.

Noise

6.136 Policy 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.

6.137 To assess the implications of the proposed development a Noise Impact Assessment has been prepared by SLR and is submitted as part of this application. The assessment has considered the potential impact of the existing noise environment on the Proposed Development. At this stage, the assessment is based on the illustrative proposals that have been submitted as part of the outline planning application. Should outline planning permission be granted, a further assessment will be undertaken at the reserved matters stage in relation to the detailed proposals.

6.138 The Noise Impact Assessment sets out the following:

- A baseline noise level survey has been undertaken to determine existing sound levels across the Proposed Development. The dominant noise source affecting the Site is road traffic noise from Cronton Road, with shooting noise from Sandhall Air Rifle Club also audible.
- The results of the assessment of shooting noise from the air rifle club has concluded that shooting noise levels are below the threshold for annoyance and considered to fall within the No Observed Effect Level [NOEL] category when considering planning policy.

- For transportation noise, the ProPG Stage 1 initial site noise risk assessment concludes that during the daytime and night-time, ambient noise levels across the majority of the Proposed Development falls within the 'Negligible' risk category, with areas adjacent to Cronton Road within the 'Medium' to 'Low' risk category.
- For night-time maximum noise events, the north of the Proposed Development falls within the 'Negligible' risk of adverse noise impact. Areas fronting Cronton Road will experience elevated noise levels within the 'High' risk category, with dwellings behind these reduced to within the 'Medium' and 'Low' categories. The site is likely to be acceptable for residential development from a noise perspective provided that good acoustic design is applied.
- The ProPG Stage 2 assessment concludes that openable windows will be suitable to achieve internal sound levels for dwelling to the north of the development. Where openable windows are not suitable, largely to the south of the development, a varying scheme of glazing and ventilation has been recommended such that the internal sound levels within BS 8233 can be achieved.
- Sound levels within external amenity areas are predicted to be equal to or below 55dB LAeq,16hr for the majority of the site and are therefore within the requirements of BS 8233. For areas along southern boundary, adjacent to the Cronton Road, noise levels in external amenity areas are expected to exceed BS 8233's upper guideline level of 55dB LAeq,16hour. Therefore, it is advised that external amenity areas should be located to the rear of dwellings fronting the Cronton Road, so that the buildings would screen the external amenity areas. Garden fences are also likely to reduce noise levels in these areas further.
- An overheating assessment has been undertaken in accordance with AD-O. This concludes that the majority of the development can achieve overheating guideline levels with openable windows. However, façades to the south facing the Cronton Road would need alternative means of ventilation to meet criteria.
- When assessed against the requirements of the NPPF and Noise Policy Statement for England (NPSE), a No Observed Adverse Effect Level [NOAEL] is predicted across the development on the basis that the façade mitigation strategies are implemented.

6.139 The proposed development will ensure that appropriate noise levels are achievable within the Site, in compliance with Policy ENV2. The proposed development will accommodate any required noise mitigation measures at detailed design stage as part of a future Reserved Matters application.

Air Quality

6.140 CS Policy CS2 (Development Principles) seeks to minimise negative impact upon air quality. UDP Policy ENV1 (Control of Pollution in New Development) states that development will not be permitted which is likely to cause significant harm to amenity as a result of impact on air quality.

6.141 An Air Quality Screening Assessment has been prepared by SLR Consulting Limited in support of the application. The assessment considers the potential impacts associated with dust and particulate matter during the construction phase, and the potential air quality impacts associated with the operational phase of development.

- 6.142 The assessment has concluded that, with site-specific mitigation measures in place in the form of construction best practices, the significance of dust and particulate matter effects associated with earthworks, the construction of dwellings and trackout is deemed to be not significant.
- 6.143 During the operational phase, the assessment has taken into account the number of vehicles estimated to be generated from the development. This equates to 514 AADT vehicles heading westbound along Cronton Road and 153 AADT vehicles heading eastbound on Cronton Road. Once vehicle distribution is taken into account, the number of vehicle movements only slightly exceeds the 500 AADT screening criteria for vehicles travelling westbound. This route passes through mostly agricultural land with very few sensitive receptors. The number of vehicles travelling eastbound through the village of Cronton falls below the screening criteria. Due to the low background concentrations in the vicinity of the Site and the relatively small number of proposed dwellings, it is considered unlikely that the pollution concentrations associated with the development (specifically the increase in traffic movements) would exceed the annual mean air quality objectives within the Site.
- 6.144 The findings of the assessment have concluded that the proposed development will not generate an unacceptable risk to air pollution for existing and future sensitive receptors in accordance with CS Policy CS2 and UDP Policy ENV1. The assessment includes a series of recommended measures to mitigate any associated air quality impacts resulting from the development, including the incorporation of Electric Vehicle [EV] charging points and implementing a Travel Plan, the detail of which will be submitted at reserved matters stage.

Infrastructure

Flood Risk and Drainage

- 6.145 Policy CS24 (Managing Flood Risk) states that development that poses an unacceptable flood risk will not be permitted and should preferably be located in areas of low flood probability.
- 6.146 A Flood Risk Assessment [FRA] has been prepared by Pell Frischmann in support of the application. The FRA also includes an Outline Drainage Strategy (FRA Appendix C). The FRA provides the following conclusions and recommendations:
- 1 The entirety of the development site is located in Flood Zone 1.
 - 2 Although small areas of the site boundary and the land adjacent to the site are at medium or high risk of surface water flooding, the majority of the site is considered at low risk of surface water flooding.
 - 3 The development site is considered to have a low risk of groundwater flooding and a low risk of sewer flooding, as no groundwater emergence or flooding related to surcharging sewers at the site was identified.
 - 4 The site benefits from informal local flood defences of high ground.
 - 5 The site is not shown to be at risk of flooding from reservoirs.
 - 6 In line with NPPF paragraph 175, a sequential test is not required.

- 7 Outline drainage plans include an attenuation pond which ties in SuDS features such as lined permeable paving within some driveways and an offline swale. Discharge will be to the existing drainage ditch located adjacent to the western site boundary, which is a tributary of Dog Clog Brook to the north of the site.
- 8 Infiltration tests should be carried out in line with BRE 365 Guidelines to determine whether infiltration will be viable.

6.147 The FRA demonstrates that the proposed development does not pose an unacceptable flood risk and is therefore in accordance with Policy CS24.

Ground Conditions

6.148 Core Strategy Policy CS2 (Development Principles) seeks to mitigate negative impact upon soil quality. UDP Policy ENV1 (Control of Pollution in New Development) sets out that development will not be permitted that is likely to cause significant harm to amenity as a result of impact on the quality of land and soil (due to contamination). Additionally, UDP Policy ENV5 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.

6.149 A Phase I Geo-Environmental Assessment Report, prepared by Brownfield Solutions Ltd, accompanies the planning application. A summary is provided below:

- 1 A review of available historical Ordnance Survey Maps and satellite imagery has been undertaken, which concludes that the Site has remained as open fields up until the present day. Historically, surrounding land uses have predominantly been agricultural and residential.
- 2 Historical mapping has shown potential for localised Made Ground on-site due to ponds that are thought to have been infilled. The Site is considered to be underlain by Till, Devensian and the deeper solid geology is indicated to be part of the Kinnerton Sandstone Formation.
- 3 There are no current landfill sites recorded within 500m. One recorded historic landfill is located within 500m. Inert and industrial wastes were last recorded in 1985.
- 4 It has been deemed that the overall risk from land contamination at the Site is considered to be low. The only notable source of ground gas is the off-site historic landfill, which is considered to present a moderate to low risk. The overall risk to controlled waters at the Site is considered to be low to very low. Radon is also not considered to pose a risk.
- 5 It is acknowledged that the Site lies within a Mining Remediation Authority Reporting Area. However, mining related instability is not deemed to pose a risk to the development of the Site.

6.150 Overall, it is considered that the risk from on and off-site sources of contamination is low to cause significant harm or risk to the amenity of future residents in accordance with the development plan. However, the report concludes that intrusive investigations will be required to confirm the associated level of risk from the contaminants identified and inform any remediation works required to ensure that no significant harm to resident amenity will

result due to land contamination. This will ensure full compliance with CS Policy CS2 and UDP Policies ENV1 and ENV5.

Heritage and Archaeology

- 6.151 Core Strategy Policy CS20 (Managing the Borough's Historic Environment) states that development should preserve or enhance historic assets, including Listed Buildings, Conservation Areas and archaeological remains. Development proposals on sites which include, or are considered to have the potential to include, heritage assets or comprising archaeological interest, should be accompanied by a heritage impact statement.
- 6.152 In accordance with the policy, a Heritage Impact Statement has been prepared by GHC Archaeology & Heritage Ltd. The statement considers the available archaeological, historical, topographic and land use information to assess the significance and archaeological potential of the Site. A summary of the findings are set out below:
- 1 That there are no designated heritage assets are located within the Site. There are eight designated heritage assets within the 1km search area, comprising specifically seven Grade II Listed structures and one Conservation Area, Town End Conservation Area. However, due to the distance between the Site and these assets, and the intervening topography, vegetation and landscaping, and built development, the assets are well screened from the development and does not contribute to the significance of these assets. These assets are also not deemed sensitive to the future development of the Site given their distance from the Site's boundaries.
 - 2 There are no non-designated heritage assets within 1km of the Site. The Merseyside Historic Environment Record [HER] contains 104 records within 1km of the search area. There is no recorded evidence of Prehistoric or Roman; Medieval; Post-Medieval; or Industrial to Modern activity within the Site. The Site has therefore been assessed as having low potential for archaeological remains of all periods.
 - 3 No designated or non-designated built heritage assets with potential sensitivity to the development of the Site have been identified. Additionally, no evidence of archaeological remains has been identified to preclude the development of the Site for housing.
- 6.153 Overall, it is considered that the development will have no impact on the nearest historic assets identified and instead will preserve their significance in accordance with Core Strategy Policy CS20.

Conclusion

- 6.154 It has been demonstrated throughout **Section 6.o** that the proposed development is broadly in line with the Development Plan and is not considered to be inappropriate development within the Green Belt. In accordance with section 70(2) of the 1990 Act and Section 38(6) of the 2004 Act the proposed development should therefore be granted planning permission, as concluded in Section 8.o (Planning Balance).

7.0 **Benefits of Development**

- 7.1 The NPPF sets out that sustainable development has three overarching objectives; economic, social, and environmental. These are interdependent and should be pursued in mutually supportive ways. This section establishes how proposed development contributes to the achieving sustainable development as set out in paragraph 8 of the NPPF. It demonstrates that the proposals perform a positive economic, social and environmental role and this should be given significant weight in the planning balance.

Economic

- 7.2 In accordance with the economic objective for achieving sustainable development, set out at NPPF (para. 8), the proposed development will contribute to building a strong, responsive and competitive economy. In particular, the proposals will bring a number of economic and fiscal benefits in terms of job creation and increased expenditure in the local economy. This will benefit Knowsley, which ranks 17th out of 296 local authorities on the Indices of Multiple Deprivation [IMD2025].

Economic Benefits During Construction

- 7.3 The proposed development will generate significant economic benefits during the construction phase. Construction employment has been estimated based on a total construction cost of approximately £23.4m, calculated using standard residential building costs from the BCIS Comprehensive Building Price Book. By dividing this figure by the average total purchases of goods, materials, and services per construction employee in the North West, it is estimated that the development will create around 99 temporary construction jobs over the 3.5 year build period.
- 7.4 National construction firms typically employ a mix of permanent staff and local contractors. Based on experience elsewhere, it is reasonable to expect that a proportion of these jobs will be filled by the local workforce, particularly as measures will be implemented to encourage local recruitment.
- 7.5 In addition, local businesses—and the wider North West economy—are likely to benefit from trade linkages established during construction. This will support further indirect employment through suppliers of construction materials and equipment. Local businesses may also experience temporary increases in expenditure as a result of direct and indirect employment effects (e.g., construction workers visiting local shops and facilities).
- 7.6 Additional employment opportunities will arise through indirect and induced jobs, driven by increased demand for goods and services from businesses involved in the development.
- 7.7 The annual Gross Value Added [GVA] generated during construction, as a result of direct, indirect, and induced jobs, is estimated at approximately £18.7m.

Economic Benefits After Completion

- 7.8 Once the dwellings are occupied, residents will require services such as decorators, plumbers, and gardeners. In addition, residents relocating from outside the local area will

generate increased demand for facilities including shops, restaurants, and other amenities, delivering further economic benefits to the locality.

- 7.9 It is estimated that the development could generate approximately £660,000 in first occupation expenditure, and £757,400 in net additional annual expenditure from new residents. A significant proportion of this spending is expected to be retained within surrounding town centres, providing a valuable source of trade for local businesses and supporting retail-related employment. This additional expenditure could sustain up to 8 new jobs in the local area.

Labour Market Flexibility

- 7.10 Housing supply can play a key role in the flexibility of the local labour market, which itself is an important component in local economic competitiveness. This is because a shortage of housing, or a lack of affordability, can act as a barrier to accessing employment opportunities. It can also result in long-distance commuting and unsustainable travel patterns.
- 7.11 The proposed development would contribute to the market and affordable housing needs of the local community and the wider borough, helping to support sustainable access to local employment opportunities.

Local Authority Revenue Benefits

Council Tax

- 7.12 Having regard to levels of Council Tax levied by the local authority in the 2025/26 financial year for Cronton, it is estimated that the development could generate around £220,400 per annum in additional council tax payments in perpetuity.

New Homes Bonus

- 7.13 Under the UK Government's New Homes Bonus [NHB] scheme, the Council has the potential to benefit from additional funding provided by the Government if the dwellings included within the proposed development are delivered. Using standard methods of calculation, as contained within the Government's NHB calculator, it is estimated that delivering up to 120 dwellings could generate around £206,550 of NHB payments in each year they are paid.

Social

- 7.14 Paragraph 8 of the NPPF sets out that the social objective of achieving sustainable development is to support strong, vibrant, and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.

Supply of Housing

- 7.15 The proposed development would assist the Council in meeting its local housing need of 608 dwellings per annum, whilst securing sustainable patterns of growth and development.

- 7.16 The proposed development would contribute to the Council's immediate housing supply in the short term, with Bellway seeking to commence development as soon as practical following the grant of planning permission.

Meeting Market Housing Needs

- 7.17 The application proposals will help meet the housing needs of present and future generations. The development will include a mix of dwelling types and sizes that reflect local requirements.
- 7.18 The proposals will offer a range of housing options for existing residents, providing a significant contribution to meeting the Council's 5YHLS requirement, and enabling people to remain within their community where social ties are established. Smaller dwellings will support first-time buyers and those wishing to downsize, while new family homes will cater to households requiring larger accommodation.
- 7.19 Accessible housing will ensure older residents can maintain independence for longer, and new homes will be designed to adapt to changing needs over time. Providing suitable local options for upsizing and downsizing will encourage market movement and support a balanced housing offer.

Meeting Affordable Housing Needs

- 7.20 Affordable homes would ensure that those priced out in the open market can still remain in the local area. It is proposed that 40% of the dwellings on the whole of the Site will be affordable housing in accordance with national planning policy.
- 7.21 The Council's most recent Housing Needs Assessment [HNA] (2021) identifies a total of overall gross affordable housing need of 1,443 dwellings. The proposed 40% affordable housing would make a significant contribution to meeting affordable housing needs in the Borough.

Location and Form of Development

- 7.22 The NPPF states that planning decisions should aim to create healthy, inclusive, and safe places that promote social interaction, are accessible, and support healthy lifestyles.
- 7.23 The proposed development will deliver a high-quality built environment designed to meet local needs and complement the character of its surroundings. It will provide a diverse range of dwellings in various types, sizes, and tenures to meet the needs of the local population and foster a mixed, sustainable community, including 40% of all homes as affordable. The detailed housing mix will be agreed at reserved matters stage.
- 7.24 The development will offer significant health benefits by creating opportunities for social interaction among new residents and encouraging active, healthy lifestyles. Proposed open spaces will extend the existing network in the area and will be publicly accessible, enhancing recreational and natural features.
- 7.25 The design will promote active travel, with an emphasis on walking and cycling, supported by a comprehensive pedestrian and cycle network throughout the site. An additional potential pedestrian link at the north-eastern corner of the Site could also be proposed, which leads into the existing dog walking field. Further off-site improvement schemes are

also proposed to encourage accessibility via walking and public transport, as set out in Section 4.0 of this Statement and Section 5 of the TA.

- 7.26 Extensive areas of public open space will provide opportunities for informal recreation and play, further supporting healthy lifestyles for both new and existing residents.

Environmental

- 7.27 The NPPF states that the planning system should protect and enhance the natural, built, and historic environment, including making effective use of land, improving biodiversity, and mitigating and adapting to climate change.

- 7.28 The supporting documents submitted with this application demonstrate that the proposed development will safeguard the natural, built, and historic environment, enhance biodiversity, use natural resources responsibly, and address climate change through the design of the proposed dwellings. In particular:

- 1 The proposed development scheme will have an overall positive ecological impact and deliver 10% BNG;
- 2 The proposed development will deliver improved open space and recreational routes throughout the Site and to the surrounding area, including 0.97 ha of POS provision, well in excess of the policy requirements and potentially providing greater public access to the existing dog walking field to the north-east of the Site;
- 3 The Site is sustainably located in terms of access and connectivity to local amenities and facilities by both walking and cycling, with the potential provision of improved off-site pedestrian connections, whilst nearby bus stops and a train station allow for the opportunity to utilise sustainable methods of transport;
- 4 Bellway will ensure the incorporation of water efficiency measures, including eco-sanitary ware and restricted flow rates, to ensure an appropriate level of water efficiency is achieved in the development;
- 5 Bellway will adopt best practice measures in relation to the reuse and recycling in construction through the management of residual waste, with robust procedures are in place to share materials such as soil and aggregate between sites and to sort waste on and off site to divert waste from landfill;
- 6 Bellway will ensure that the environmental impact of construction materials is minimised and that materials are sourced responsibly; and,
- 7 The dwellings will be constructed in line with the Future Homes Standard, or any future standard applicable at the time of construction.

- 7.29 On this basis, the proposed development will not have an unacceptable impact on environmental resources and will deliver certain benefits.

8.0 **Planning Balance**

The Presumption in Favour of Sustainable Development

8.1 The Council is unable to demonstrate a five-year supply of deliverable housing sites, as required by NPPF para. 74. This means that there is a presumption in favour of sustainable development. In accordance with the NPPF [para. 11d], this means that planning permission for residential development should be granted unless:

- i The application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development proposed. These protected assets are listed at footnote 7 of the NPPF.
- ii Any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

NPPF Paragraph 11d(i)

8.2 We consider first whether any of the protected assets and areas listed at footnote 7 of the NPPF provide a strong reason for refusing development.

8.3 The Site is designated as Green Belt, one of the protected assets listed at NPPF footnote 7. However, NPPF para. 115 establishes four criteria which must be met for development in the Green Belt to not be regarded as inappropriate. This Planning Statement has demonstrated compliance with these four criteria, as follows:

- 1 The Site meets the NPPF definition of ‘Grey Belt’ and development of the Site is not considered to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- 2 The Council cannot demonstrate a five-year supply of deliverable housing sites, therefore there is demonstrable unmet need for new homes in the Borough;
- 3 The Site sits within a sustainable location and benefits from access to a range of local facilities and offers a genuine range of transport modes in line with the requirements of the NPPF; and,
- 4 The development proposals meet the ‘Golden Rules’ requirements, as set out in NPPF paras. 156-157.

8.4 The proposed development wholly complies with the requirements of NPPF para. 155 and is therefore appropriate development in the Green Belt. On this basis, the Site’s Green Belt designation does not provide a strong reason for refusing development.

8.5 The Site is not subject to any other areas or assets of particular importance listed under NPPF footnote 7. Therefore, the application of policies in the NPPF that protect assets or areas of particular importance do not provide a strong reason for refusing the development proposed.

NPPF Paragraph 11d (ii)

- 8.6 We consider below whether any adverse impact of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. To assess this, the benefits and adverse impacts of granting planning permission for the proposed development are summarised below.

Benefits of Development

- 8.7 The primary benefit of the development is the delivery of new homes.
- 1 **Open Market Housing:** the proposals provide for up to 120 new dwellings, 60% of which will be for open market sale. Given the shortfall in the Council's housing land supply, there is a clear need for additional housing land in the Borough in the short term. It is considered that the Council's five-year housing land supply position is just 3.22-years which highlights the immediate need for deliverable sites to come forward to provide market homes. The proposed development would contribute to the Council's housing supply in the short term, with Bellway in a position to submit a reserved matters application shortly after the grant of outline permission on the Site. The provision of market housing should therefore be attributed **substantial weight** in favour of the development.
 - 2 **Affordable Housing:** the proposals additionally include 40% affordable housing, in accordance with adopted local policy (25%) and a requirement to provide 15% above local policy as part of the NPPF 'Golden Rules' requirements. The affordable homes on the Site would assist with meeting a significant annual need for affordable housing in the Borough. Noting the affordable housing need in the Borough, the provision of affordable housing should be attributed **substantial weight** in favour of the development.
 - 3 **Golden Rules:** the proposals comply with the 'Golden Rules' requirements, providing affordable housing at a level of 40%, the provision of new publicly accessible space, and improvements to local infrastructure. In line with NPPF para. 158, compliance with the 'Golden Rules' should be given **significant weight** in favour of the proposals.
- 8.8 Noting the environmental, social, and economic benefits of the proposed development as set out in **Section 7.0** of this report, it is evident that the proposals comply with the sustainable development principles set out in the NPPF. The proposals are considered against each component subsequently:
- 1 **Economic Benefits:** the proposed development provides a number of economic benefits relating to both the construction and occupation phases of this development. As noted previously, the proposals will provide employment opportunities within the local community directly linked to development at the Site, and through induced and indirect jobs. The proposed development will also result in increased revenue for the Local Authority through additional Council Tax receipts associated with the development. The economic benefits arising from the development are therefore attributed **moderate weight** in favour of the development.
 - 2 **Environmental Benefits:** the proposals provide for a net gain in biodiversity of 10%, in line with the statutory requirement. The retention of existing ecological features on the Site alongside the additional planting will further support existing and new habitats

on site, the long term management of which are secured without additional cost to the Council. The energy efficient nature of the proposed housing, and the environmental practices employed by Bellway should also be considered in this regard. The environmental benefits of the proposed development are therefore attributed **moderate weight** in favour of the development.

- 3 **Social Benefits:** whilst substantial weight has already been attributed to the delivery of market and affordable housing, contributing to the creation of a diverse community and the health and well-being benefits of the development must also be considered. The proposed development facilitates opportunities for social interaction between new residents, and encouraging healthy, active lifestyles through onsite POS and improved links to local facilities and amenities. The proposals provide the opportunity to include a substantial quantum of POS of 0.96 ha, well in excess of maximum policy requirements, with associated recreational benefits for future residents at the Site, as well as providing attractive open space for nearby existing residents. The social benefits arising from the development should therefore be attributed **moderate weight** in favour of the development.

Adverse Impacts of Development

8.9 The adverse impacts arising from the development proposals also must also be considered against the proposals. These are summarised below:

- 1 **Green Belt Policies:** conflict with Local Plan must be considered, notably regarding Policy CS5 which restricts major residential development in the Green Belt. These policies were adopted prior to the first iteration of the NPPF and are not consistent with National Policy, making no references to 'grey belt'. The harm arising from this conflict is limited noting the immediate need for additional housing land in the Borough, as evidenced by the Council's 3.22-years' supply, and therefore **very limited weight** is given to this conflict.
- 2 **Landscape and Visual Impact:** the LVS has comprehensively assessed landscape impacts and the Site is considered acceptable to accommodate the nature of the proposed development without undue or unacceptable effects on landscape character and visual amenity, and with the potential for considerable improvements to the landscape structure of the Site, providing beneficial effects on the landscape character of the Site in the long term. Limited adverse impacts are afforded **limited weight** against the development.
- 3 **Arboricultural Impact:** the loss of trees to facilitate the site access arrangements must be considered. Whilst a full planting scheme will be provided at reserved matters stage, compensatory planting will be provided sufficient to compensate for the trees lost. However, the proposals will result in the loss of existing trees within the site, therefore this loss is afforded **moderate weight** against the development.

Conclusion on NPPF Paragraph 11d(ii)

8.10 In applying the overall planning balance, the potential adverse impacts of allowing the proposals have been identified above and these are considered to be **moderate** at most, whereas the material issues weighing in favour of the proposals range from very limited to substantial and taken together these benefits carry **substantial weight**.

- 8.11 Upon balancing the above considerations, it is concluded that the adverse impacts of granting planning permission would fall short of significantly and demonstrably outweighing the benefits of the proposals, which include the delivery of much needed market and affordable housing, along with wider social, economic and environmental benefits.
- 8.12 On this basis, the presumption in favour of sustainable development is engaged and planning permission should be granted subject to appropriate planning conditions and obligations.

Very Special Circumstances [VSC]

- 8.13 As set out above, the site comprises grey belt land for the purposes of this application. It is, therefore, not inappropriate development in the Green Belt that requires a demonstration of VSC in order for planning permission to be granted.
- 8.14 Notwithstanding this, we have considered whether VSC exists in any event in the context of paragraph 153 of the NPPF, if the requirements of paragraph 155 of the NPPF are not considered to be met by the Council.
- 8.15 For development deemed inappropriate to be permitted and in accordance with paragraph 153 of the NPPF, the potential harm to the Green Belt, by reason of inappropriateness and any other harm resulting from the proposal, must be clearly outweighed by other considerations. Under this policy test, substantial weight must be given to any harm to the openness of the Green Belt. However, the extent of harm to the Green Belt and any other adverse impacts arising from the development must be weighed against any other benefits.

Harm to the Green Belt

- 8.16 When considering whether VSC exists, it is, therefore, firstly necessary to consider the extent of the harm to the Green Belt that results from the development (in addition to harm by definition). This assessment has regard to two main issues, wider strategic purposes and local more site-specific purposes. The former is as important as the latter as Green Belt is a strategic policy that deals with issues at a high level.
- 8.17 Paragraph 142 of the NPPF states that there are two essential characteristics of the Green Belt, namely ‘permanence’ and ‘openness’. Paragraph 143 of the NPPF sets out the five purposes of including land within the Green Belt. An appraisal of the characteristics of the proposed development against the impact on ‘permanence’, ‘openness’ and the five Green Belt purposes is set out below.

Harm to Openness

- 8.18 Although, there is no formal definition of openness in the context of Green Belt, it is generally considered as the absence of development. PPG paragraph 013 states that *“openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume.”*³

³ PPG Reference ID 64-013-20250225

- 8.19 It is acknowledged that the proposed development may cause some harm to the openness of the Green Belt. The proposed development will therefore, by definition, harm openness. However, the degree to which this is affected is largely ascertainable by objective means but also necessitates an assessment of more subjective issues such as the visual and spatial effect of the proposed development. In this context there are two issues to consider, namely: (a) the openness of the wider Green Belt; and (b) the openness of the Site.
- 8.20 It is important to have consideration for the effects the proposed development will have on the visual openness of the Green Belt including impacts on long distance views, visual links to the wider Green Belt and inter-visibility between settlements. The Site is on the edge of the existing settlement of Cronton and has a semi-rural, settlement edge character influenced by adjacent built development and other urbanising elements such as electricity pylons.
- 8.21 The design of the proposed illustrative planting also aims to minimise the visual effects on openness by setting the built form within a strong landscape framework appropriate to the location. The landscape proposals are primarily concentrated on the perimeter of the development. The landscape treatment to Site boundaries will be robust and will provide a suitable screen to the wider Green Belt, which will improve in stature over the years.
- 8.22 It is acknowledged that the development proposals will introduce new dwellings on the Site and thereby reduce openness. However, the proposed development will seek to minimise any adverse impacts of development. As set out in the accompanying LVS, the proposed development will result in a loss of openness, loss of hedge and trees along Cronton Road frontage, a change in character from semi-rural to urban, and an extension of the existing settlement in a westerly direction.
- 8.23 The landscape treatment to the boundaries will be robust and will provide a soft edge to the interface between the development and the Green Belt. The proposed planting will create a strong screen, which will improve in stature over the years, providing a long-term boundary to the urban area. By Year 15, the proposed planting will deliver some benefits, helping the development to assimilate with the wider setting. This planting will result in some reduction on adverse visual effects, mostly benefitting receptors to the north of the site. With the implementation and establishment of the landscape proposals, the Site would become more visually contained and will supplement the existing boundaries, reinforce landscape pattern and help to enclose and screen the proposed development. Over time, this will restrict the influence of the proposed development on the openness of the Green Belt. Overall, it is considered that there would be a very minor change to visual openness as a result of the proposed development.
- 8.24 In terms of the impact the proposed development will have on the spatial openness of the Green Belt, it is acknowledged that the proposed development will introduce built development onto the Site, thereby reducing openness. The LVIA concludes that the proposed development will have some limited adverse effects, but these will be reduced by the implementation of landscape planting and other mitigation. It is therefore concluded that the proposed development would have an impact on spatial openness, albeit limited.
- 8.25 The proposed development will not result in any unacceptable effect on landscape character or visual amenity. The illustrative proposals demonstrate that these effects can be appropriately mitigated through retention of existing boundary vegetation where feasible,

limiting height of buildings, proposing development that is in keeping with the established character, and incorporating green infrastructure to help the built development assimilate with the setting.

8.26 In conclusion, when assessing impacts of development to the openness of the Green Belt, both visual and spatial, whilst it is acknowledged that the proposed development will impact the spatial openness of the site locally, the overall harm is limited and localised when considering the visual containment of the site and that the nature of the proposed development will not change the perceived character of the wider Green Belt, as open countryside.

8.27 Consequently, both spatially and visually, the proposed development would result in **limited and localised harm** to the openness of the Green Belt.

Harm to Permanence

8.28 When having regard for the harm to the permanence of the Green Belt, it is clear that developing a site within the Green Belt would affect its ability to remain permanently open. Rather, the issue of 'permanence' is relevant to whether there would be harm to the purposes of the Green Belt and to whether there might be consequential effects on the remaining Green Belt in the area.

8.29 54% of the plan area is designated as Green Belt. The proposed development parcel represents a very small area of the overall Green Belt area in Knowsley. Development of the 4.26ha site would not fundamentally undermine the purpose of the remaining Green Belt. At a strategic level, due to the Site's limited size and the considerable extent of the remaining Green Belt in this location, the removal of the Site from the Green Belt will not undermine the five purposes (when taken together). The Council's pre-application response also confirms that the development could be viewed as utilising land that would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

8.30 In these circumstances, the proposals will provide a firm, clear and a defensible long-term Green Belt boundary in this location, will not adversely impact Green Belt purposes, will have limited strategic impact on the remaining Green Belt and therefore have a limited impact in relation to 'permanence'.

Harm to Green Belt Purposes

8.31 The impact of the development upon Green Belt purposes (a), (b) and (d) was considered as part of the Green Belt assessment set out at paragraphs 6.11-6.18. This assessment concluded that the Site performs a **weak contribution** to purposes (a) and (b), and **no contribution** to purpose (d).

8.32 The Applicant's assessment against Green Belt purposes (c) and (e) is set out below.

Purpose (c) - to assist in safeguarding the countryside from encroachment

8.33 It is acknowledged that the proposed development will introduce an urban feature into the rural landscape and thus result in localised change in physical characteristics of the countryside. However, the Site can be characterised as relatively featureless with fields

currently being used on an ad hoc basis for agriculture. The Site only supports fauna or flora of low interest or importance and the development of the site will not lead to the loss of high-quality agricultural soils. It is recognised that the Site does not represent land of a particular landscape importance and does not contribute to the open nature of the countryside.

- 8.34 The Site also has strong physical boundaries and is well screened by existing vegetation and trees on all boundaries, which assists in reducing any change to the countryside to a more localised effect. There are also a number of urbanising influences to the east and south of the Site by virtue of existing residential development and other urbanising elements such as electricity pylons. The proposed scheme is designed to retain and enhance the current field boundaries, and this approach would further limit visibility from outside the Site. As such we consider this to demonstrate that the sense of encroachment is limited.
- 8.35 The proposals, whilst involving development in the countryside, will open an area of previously private land to public access, as well as providing ecological enhancement to significantly enhance public enjoyment of the area. As such, the development proposals will have a community benefit.
- 8.36 The Site is well contained and enclosed on all sides by established boundaries and would not represent a significant encroachment into the open countryside. The site therefore makes a **weak contribution** to this purpose.

Purpose € - to assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 8.37 It has been demonstrated through the Council's inability to demonstrate a 5YHLS that there is insufficient land within the urban area to meet housing needs in the Borough. Therefore, a Green Belt location is necessary to deliver the proposed development and there are no alternative suitable sites in urban areas. The site therefore makes **no contribution** to this purpose.

Other Harm

- 8.38 An assessment of other harmful impacts (i.e. effects not capable of mitigation) arising from the development are summarised earlier in this section (adverse impacts of development – paragraph 8.9) and apply here in the same manner.
- 8.39 The impact on the Green Belt must also be considered as an adverse impact arising from development. As established previously, the proposals will still result in some harm to the openness of the Green Belt. However, the Site is well contained by existing, strong boundary features and is visually enclosed. As such, the harm to the openness of the Green Belt is attributed **limited weight** against the proposals.

Other Considerations / Benefits

- 8.40 An assessment of the benefits of the proposed development are set out earlier in this section (paragraphs 8.7-8.8) and apply here in the same manner. It is considered that the benefits of the development collectively carry **substantial weight**.

Summary of Very Special Circumstances

- 8.41 Based on the above assessment, it is considered that there are also VSC to justify the proposed development in the Green Belt.
- 8.42 It is considered that harm to the Green Belt, by reason of inappropriateness, carries substantial weight against the proposed development. Other harm to the Green Belt's permanence, openness and Green Belt purposes are limited and localised which is given moderate weight. There are no other harmful impacts arising from the proposed development. Any identified impacts can be robustly mitigated.
- 8.43 In order for VSC to exist, the identified harm must be clearly outweighed by the benefits and material considerations supporting the proposed development. In this instance, the VSC case for the proposed development comprises a number of significant benefits which are considered to be substantial, and the weight afforded to these benefits are considered to clearly outweigh the limited additional harm identified.
- 8.44 In accordance with the NPPF, planning permission should still be granted as it is considered that the identified harm is clearly outweighed by the benefits and material considerations supporting the proposed development, and VSC therefore exists.

9.0 Conclusion

- 9.1 This Planning Statement has been prepared by Lichfields on behalf of Bellway to assist the Council in its consideration of an application for outline planning permission for the development of land at Land at Cronton Road, Cronton.
- 9.2 The Site is situated in a highly sustainable location adjacent to the settlement edge of Cronton. Cronton is well-connected, with excellent local, regional, and national transport links, and benefits from a wide range of frequent bus and train services. The site is in a sustainable location adjacent to existing residential development, with Cronton offering a range of local shops and services, including pubs, retail outlets, a community centre, and two primary schools within close proximity of the Site and within acceptable walking distance. The Site benefits from an ability to utilise all forms of sustainable transport modes to reach a wide variety of services and facilities within close proximity to the Site.
- 9.3 The proposals include the provision of up to 120 dwellings, alongside substantial areas of POS. The primary access to the Site from Cronton Road is applied for in detail, with all other matters reserved. A 10% net gain in biodiversity is provided on Site in accordance with statutory requirements.
- 9.4 It is considered that the Council does not have a five-year supply of deliverable housing sites. Therefore, the proposals benefit from a presumption in their favour and the 'tilted' planning balance is engaged.
- 9.5 The Site falls within the definition of 'Grey Belt' land, as agreed by the LPA. The proposed development also meets the requirements of paragraph 155 of the NPPF and the 'Golden Rules' and therefore is not considered inappropriate development in the Green Belt. In any case, if the Site is not considered to be Grey Belt, it is considered that Very Special Circumstances exist for the proposed development as the substantial benefits are considered to clearly outweigh the limited additional harm identified.
- 9.6 The application is supported by a full suite of technical reports that confirm there are no technical constraints to the Site's development, and the scheme will not result in any significant adverse impacts.
- 9.7 The proposed development is located in a highly sustainable location and will deliver much needed market and affordable housing, providing significant, economic, social and environmental benefits.
- 9.8 Upon applying the tilted planning balance, it is demonstrated that the proposed development would not result in any adverse impacts that would significantly and demonstrably outweigh the benefits of the scheme.
- 9.9 Taking into account the considerations set out in this report, and in line with paragraph 11(d) of the NPPF, planning permission should be granted without delay.

Appendix 1 Draft S106 Heads of Terms

Planning Obligations: Draft Heads of Terms for Section 106 Agreement

Our ref 67395/06/SPM/AMcL
Date 23 December 2025

Subject Land at Cronton Road, Cronton

1.0 Introduction

- 1.1 This Draft Heads of Terms has been prepared by Lichfields on behalf of Bellway Homes Limited (North West Division) [Bellway] to accompany an application for outline planning permission for the development of up to 120 dwellings on land at Cronton Road, Cronton [the Site].
- 1.2 It should be noted at the outset that the Heads of Terms set out in this document are predominantly dependent on the technical consultees assisting on preparation of the application, determining a relevant contribution / proposed commitment required to make the development acceptable.
- 1.3 Bellway wishes to reserve the right, if required, to submit a Viability Assessment during determination of the application should this scenario arise.
- 1.4 At present, Bellway is proposing the provision of 40% affordable housing. This is in accordance with the Knowsley Local Plan Core Strategy [Core Strategy] Policy CS15 which sets a maximum 25% affordable housing target, and a 15% uplift applied. The uplift is in accordance with National Planning Policy Framework [the Framework] para. 157 to address rule a of the 'Golden Rules' at para. 157, regarding development on grey belt land.
- 1.5 At this stage, the following contributions are expected as part of any planning permission on the site.

2.0 Land Ownership

- 2.1 The land that is the subject of the application falls within title MS545504 and the parties envisaged to be signatories to any legal agreement will be the beneficiary of that title and Bellway Homes Limited along with the Council.

3.0 Affordable Housing

- 3.1 To submit an Affordable Housing Scheme before the commencement of the development. The Affordable Housing Scheme shall provide 50% affordable housing on the site:
 - 1 The tenure of the Affordable Housing will be split ***% Shared Ownership (Intermediate) Housing and ***% Affordable Rented.

- 3.2 The definition of Shared Ownership (Intermediate) housing and Affordable Rented is that included in the Framework (Annex 2).
- 3.3 In the event that the Developer has either:
- 1 Offered the Affordable Housing (or any units forming part thereof) to an Affordable Housing Provider or Providers for a continuous period of 6 months with no Affordable Housing Provider expressing a wish to take such Affordable Housing; or
 - 2 Where the Developer itself proposes to provide the Affordable Housing (or any units forming part thereof) it has made the same available for a continuous period of 6 months without a qualifying person expressing a wish to occupy such Affordable Housing, then such units will no longer be considered as Affordable Housing and the Developer shall be entitled to sell such Affordable Housing (or relevant units forming part thereof) on the open market. The developer shall provide a contribution (to be agreed) from the sales of the units to the Local Planning Authority [LPA].

4.0 Active Travel

Travel Plan

- 4.1 To submit a Full Travel Plan before the commencement of the development. The Full Travel Plan will set out the methods that will be employed to encourage future occupiers to use non-car modes of travel.
- 4.2 Prior to the occupation of ***% of the dwellings, a Travel Plan monitoring sum of £2,500 (plus an additional refundable 10% surcharge if plans are submitted on time) will be made.
- 4.3 Any unexpended portion of the active travel contribution (and interest accruing) shall be returned to the Owner no later than 10 years after the payment.

Potential Off-Site Active Travel Improvements

- 4.4 Several potential off-site improvement schemes are also proposed to encourage accessibility via walking and public transport. The improvement schemes may comprise the following:
- 1 Widening of the northern footway along Cronton Road between the proposed site access and Wheatfield Road, including realignment of Cronton Road carriageway and associated works to southern footway, dropped kerb crossings and drainage;
 - 2 Widening of the Cronton Road northern footway adjacent no. 397 Cronton Road;
 - 3 Widening of the Smithy Close footway on the eastern side of the road, with a priority controlled arrangement giving priority to northbound vehicles;
 - 4 Upgrades to the closest bus stops located west of the site on Cronton Road. Potential improvements could include a raised kerb waiting area, bus stop road markings, and a dropped kerb pedestrian crossing; and,
 - 5 Improvements to Lodge Lane Bridleway including dropped kerbs and tactile paving, and potential funding towards PRow enhancements to contribute towards resurfacing and improving suitability and attractiveness for cyclists.

- 4.5 To make a contributions towards the above improvement schemes depending on which schemes are required. Contributions will be calculated separately for each individual off-site improvement once determined.

5.0 Education

- 5.1 To make a contribution of £*** towards off-site educational needs for Early Years and Primary Education, provided there is proven to be insufficient school places in existing schools for the potential pupils arising from the development.
- 5.2 The off-site Education Contribution (and interest accruing) shall be used to improve education facilities within the catchment area of the development site.
- 5.3 To ensure that the off-site Education Contribution (and interest accruing) is not used for any purpose other than the one set out above, and any schools shall be identified in the agreement.
- 5.4 Any unexpended portion of the off-site education contribution (and interest accruing) shall be returned to the Owner no later than 10 years after the payment.

6.0 Open Space Provision

- 6.1 Core Strategy Policy CS21 (Greenspaces and Trees) sets out the Council's Public Open Space [POS] requirements. The proposed development is an outline planning application and therefore, a detailed mix will follow at reserved matters stage which will enable a specific open space requirement to be calculated.
- 6.2 An appropriate amount of on-site POS for each typology will be agreed through the determination of the application, in accordance with the requirements of Policy CS21. However, it is considered that allotment provision will be provided off-site via a financial contribution.

7.0 Outdoor Sports Provision

- 7.1 Prior to the occupation of ***% of the dwellings, to make a contribution of £*** towards Outdoor Sports Provision.
- 7.2 Any unexpended portion of the Outdoor Sports Provision (and interest accruing) shall be returned to the Owner no later than 10 years after the payment.

8.0 Biodiversity Net Gain

- 8.1 Prior to the occupation of ***% of the dwellings, the necessary enhancements to achieve the statutory 10% Biodiversity Net Gain will be implemented in line with the approved Biodiversity Gain Plan.
- 8.2 Prior to the commencement of development, off-site mitigation will be provided in the form of *** habitat units to achieve the necessary 10% gain in all unit types and satisfy the trading rules.

9.0 Social Value

- 9.1 Prior to the occupation of ***% of the dwellings, a Social Value contribution of £100 per dwelling will be made.

10.0 Index Linkage

- 10.1 If any sum has not been paid by ***, it will be index linked to the Consumer Prices Index from that date.

11.0 Legal Costs

- 11.1 To pay the Council's reasonable legal costs for preparing and completing the agreement. The legal costs will not exceed [£***] and will be payable on the signing of the agreement.

12.0 Solicitors Details

- 12.1 It is envisaged that Bellway will use the following solicitor to prepare any legal agreement would be:

Gowlings WLG LLP

Two, Snowhill

Birmingham

B4 6WR

*** *Figures to be determined in due course.*

Appendix 2 Council's Pre-Application Response

PRE-APPLICATION RESPONSE

25/00023/PREAPP

Proposal: Erection of 101 dwellings comprising a mix of two, three and four bedroom dwellings and a phase two development option

Location: Land at Cronton Road, Cronton, Knowsley, WA8 5PZ

Thank you for your pre-application enquiry. The following response sets out the informal opinion of the Local Planning Authority (LPA) based on the information that has been provided to us. The response does not prejudice any formal decision which the LPA may make should a more formal application be submitted. This letter will address the principal issues in turn.

Summary

In summary, the proposal is currently not considered to comply with paragraph 155 of the NPPF, parts B and C because the Council has a 5 year housing land supply and the site is not located in a sustainable location having regard to paragraphs 110 and 115 of the NPPF and as such, the proposal is considered to represent inappropriate development in the Green Belt for which there are no very special circumstances to outweigh the harm to the Green Belt. There is also concern that the proposal may not be capable of meeting all the Golden Rule requirements referenced in paragraph 156 of the NPPF in relation to provision of necessary local infrastructure although I understand on-going dialogue with the Local Highways Authority is looking into footway improvements and other sustainable linkages. On this basis, the scheme cannot be supported by the Local Planning Authority as it is considered to be inappropriate development in the Green Belt, for which no very special circumstances exist to outweigh the harm to the Green Belt. You will be aware that the Council has decided to produce a local plan under the 'new system' and we have recently undertaken a 'call for sites' exercise. Should you wish to pursue the development of this site we suggest you may wish to do so through the local plan process rather than through a planning application which would not be supported.

We also have concerns about how sustainable the site is and the level of integration with the surrounding area. The design and layout considerations set out above should focus on connectivity with the surroundings and ensure the scheme includes a central focus around a village green with a clear street hierarchy and high levels of surveillance over the greenspace.

Relevant planning policies

National Planning Policy Framework

Knowsley Replacement Unitary Development Plan (available at the following link <https://localplanmaps.knowsley.gov.uk/documents/knowsley-local-plan-adopted-core-strategy.pdf>):

DQ2 Security in the Built Environment
DQ4 Trees and Development
ENV2 Noise and Vibration
ENV3 Light Pollution
ENV5 Contaminated land
T5 Location of Major Traffic Generating New Development
T7 New development and walking and cycling routes
T8 Transport Assessment
T9 Travel Plans

Policies within the Core Strategy

(<https://localplanmaps.knowsley.gov.uk/documents/knowsley-local-plan-adopted-core-strategy.pdf>)

SD1 Sustainable development
CS1 Spatial Strategy for Knowsley
CS2 Development principles
CS3 Housing Supply, Delivery and Distribution
CS5 Green Belt
CS7 Transport Networks
CS8 Green Infrastructure
CS15 Affordable housing
CS17 Housing sizes and design standards
CS19 Design quality and accessibility in new development
CS20 Managing the Boroughs Historic Environment
CS21 Greenspaces and trees
CS22 Sustainable and low carbon development
CS24 Managing flood risk
CS26 Waste management
CS27 Planning for and paying for new Infrastructure

Supplementary Planning Documents (all available at the following link:

<https://www.knowsley.gov.uk/residents/building-and-planning/local-plan/examination-library/supplementary-planning-documents>

Design quality in new development SPD
Ensuring a choice of travel SPD
Trees and development SPD
Amended new residential development SPD
Adding social value to development, employment and skills SPD
Developer Contributions SPD

Principle of Development

The application site is located in the Green Belt and Local Plan Core Strategy Policy CS5 applies. The NPPF states that substantial weight should be given to any harm to

the Green Belt, including harm to its openness and that inappropriate development is, by definition, harmful to the Green Belt. NPPF paragraph 155 sets out that development of homes should not be regarded as inappropriate where all of the following apply:

- A) 'The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- B) There is demonstrable unmet need for the type of development proposed;
- C) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework;
- D) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157'.

Grey Belt land is specifically defined in the NPPF as PDL or land that, in each case, does not strongly contribute to any of the purposes of including land within the Green Belt falling under (a) (b) or (d) of paragraph 143. It is considered that the site does not significantly contribute toward checking unrestricted sprawl of large built-up areas due to the intervening land in this location between Cronton and neighbouring development. As Cronton is not considered to be a 'town', the site does not contribute towards preventing neighbouring towns from merging into one another, thereby not compromising this purpose of including land within the Green Belt. It is also considered that the site does not preserve the setting and special character of a historic town. On this basis it is considered that the site could be classed as Grey Belt land.

On this basis the development could be viewed as utilising grey belt land that would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. Part A) of paragraph 155 is therefore considered to be met.

In terms of part B) of NPPF paragraph 155, the Local Planning Authority has a five-year supply of deliverable housing sites and therefore part B of paragraph 155 is not met. The proposed development would therefore be inappropriate development in the Green Belt and should not be granted planning permission unless there are other considerations which clearly outweigh the substantial harm caused (very special circumstances).

In terms of part C) of NPPF paragraph 155, it is considered that the site is not located in a sustainable location having regard to paragraphs 110 and 115 of the NPPF. This is due to the limited accessibility and connectivity of the site by walking, cycling and public transport. Access to shops, services, leisure and employment is considered to be limited other than by private car. On this basis, it is not considered that part C) of paragraph 155 is met. This is covered further under the 'Sustainability' section of the report.

It is also noted that for Green Belt sites which are the subject of a planning application, the Golden Rules should be met:

- A) Affordable housing that accords with paragraphs 67-68 of the NPPF or AH that is 15% above the highest existing affordable housing requirement up to a 50% cap;
- B) Necessary improvements to local or national infrastructure; and
- C) Provision of new or improvements to existing green spaces that are accessible to the public.

In relation to Golden Rule A), the site should demonstrate that the site can achieve an affordable housing requirement of 40%. Additionally, the scheme will need to be able to contribute towards local or national infrastructure improvements as required by Golden Rule B). This includes the s106 contributions towards local education provision and necessary highways improvements including footway widening and integrated links to the surrounding road network which are discussed in more detail below. Finally, to meet Golden Rule C) the scheme will need to provide relevant on-site greenspace and s106 contributions towards greenspace improvements.

The site fails to meet parts B and C of paragraph 155 of the NPPF. As such the development would be classed as inappropriate development which is harmful to the openness of the Green Belt. Paragraph 153 sets out that inappropriate development should not be approved except in very special circumstances and VSCs will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. It is not considered that VSCs exist to outweigh the harm resulting from housing on this site and as such the principle of the development is not acceptable.

You will be aware that the Council has decided to produce a local plan under the 'new system' and we have recently undertaken a 'call for sites' exercise. Should you wish to pursue the development of this site we suggest you may wish to do so through the local plan process rather than through a planning application which would not be supported.

Layout and Design

Core Strategy Policy CS3 states that densities of a minimum 30 dwellings per hectare will be required for residential development in Knowsley. Lower densities will only be acceptable in circumstances where:

- a) The nature of the location in question allows for this; and
- b) It can be demonstrated that an identified local housing need will be met.

It is noted that the net density of the scheme is at the lowest end of the acceptable range.

In relation to design and layout, Core Strategy Policies CS2 and CS19 are clear in their requirements that proposals must demonstrate a comprehensive approach to development and be of a high design quality. The Design Quality in New Development SPD and Amended New Residential Development SPD also set out design criteria that should be adhered to. Policies CS2 and CS19 of the Local Plan

Core Strategy set out general design criteria for new residential development and seek to ensure that new development maintains a good standard of amenity for all existing and future occupants and integrates well with existing development. Policy CS19 states that development proposals should 'avoid unacceptable impacts on existing residents.....and future occupiers'. Additionally, Policy DQ2 of the Replacement UDP seeks to minimize anti-social behaviour through good design.

The Council's SPD (New Residential Development) offers further guidance on separation distances and confirms that developments should incorporate minimum interface distances to preserve residential amenity and protect existing residents' and future occupiers' privacy. 12 metres is required between principal elevations and gables, habitable room window separation distances to existing properties should be 22 metres and interface distances between new principal to principal rear elevations should aim to achieve at least 20metres interface distance. Garden depths should be a minimum of 10m.

The layout does not show a high level of integration with adjoining development and the link to the northeast stops at the boundary with a field and it is not known how pedestrians would access adjacent footways within Cronton Village through this link. Further information is required to understand how this connection would work in practice as well as land ownership information. Generally, interface distances would appear to be in line with policy requirements but it is advised that each property interface and rear garden depth, in particular where proposed new housing adjoins existing housing, meets or exceeds the minimum requirements.

I have some concerns regarding how the scheme is capable of complying with policy DQ2 of the Knowsley UDP. There are areas of greenspace both to the north of the site and the greenspace at the site entrance that have limited overlooking and properties are arranged in rigid lines at a rather awkward angle to the greenspace that is not reflective of a rural street layout nor does it maximise levels of open surveillance opportunities given the juxtaposition of the properties. In addition to this, plot 52 is the only plot overlooking the small area of greenspace in the furthest northwest corner of the site. Even if plot 52 was dual fronted, this would not achieve adequate levels of overlooking here. I appreciate there is a sewer pipe that affects the layout here but some attempt to frame the greenspace directly would be welcomed. In terms of the layout of the greenspace, this appears to be dominated by a SUDS pond.

In terms of the general layout, inclusion of dual fronted properties on corner plots would enhance street scenes. Parking within greenspace areas should be avoided and frontage parking is not supported. The majority of parking should be to the side of dwellings. The area of hardstanding overlooked by plot 59 is overly large and creates a central viewpoint dominated by hardstanding. Additionally, the siting of plot 59 is at an awkward angle that does not relate well to the junction. There is an opportunity here to create a village green focused development and this would provide a more attractive layout. Incorporation of a clear street hierarchy would

enhance the village green focal point and ensure that the scheme incorporates a legible hierarchy of streets.

Finally, I understand that Highways are keen to avoid properties directly accessing onto Cronton Road which has resulted in a layout that sets property frontages behind the existing boundary treatment, an area of grass and an access road. This creates an opportunity for the properties to be framed by soft landscaping to enhance views from Cronton Road but again appears quite uniform in line and not reflective of its rural setting. Consideration should be given to a creating green corridor into the development that frames new housing within a setting of tree planting.

Landscape Character and Integration with Cronton Village

The Environmental Sustainability Service (ESS) has raised concerns about the proposal in relation to landscape character, layout and wider impacts on the character of Cronton. Cronton Village is a small settlement which is dominated by hedgerows and trees and small-scale housing estates with diverse one-off feature houses. The scheme includes quite a disconnected and uniform urban extension which is rather isolated from the village core. The level of connectivity and integration with Cronton is considered to be limited by ESS. This is also discussed in the sustainability section.

ESS has raised concern about the piecemeal approach to the location of the greenspace and the design of the entrance rectangular piece of greenspace which is described as 'non-descript'. The design of the greenspace with overlooking houses in a more informal design would add more interest to the street-scene. ESS have commented that the location of the central paved or hardstanding area within the centre of the development is considered to offer some focus but is not designed in such a way as to create a central village green feel to the layout. This needs to tie in better and include more emphasis on the creation of a true village green rather than placing greenspaces to the edges of the development.

ESS has asked for green wildlife corridors to be created as well as more connections with the surrounding area. The wildlife corridors should link with George's Wood which has the potential to be ancient woodland. Existing hedgerows and other green links should be incorporated into the development.

Trees and Layout

The Trees and Development Supplementary Planning Document sets out guidance in dealing with trees within development sites. There is a Tree Preservation Order at Pex Hill, Cronton (reference 69/00001/TPO) to the west of the site/bounding phase 2 of the site. There are also numerous trees adjacent to the site boundary. Any planning proposal should seek to retain the TPO and boundary trees.

An Arboricultural Survey and an Arboricultural Impact and Method Statement should be submitted with any planning application. These documents should identify the trees within and adjoining the site, confirming their amenity value, set out those trees which will be retained and any that are proposed to be removed, identify the RPA of all trees and set out any methodology for facilitating the development in relation to protecting the retained trees.

Whilst I have not seen a tree retention/removal plan, the proposal appears to indicate removal of trees to facilitate access into the site. Policy CS21 of the Local Plan Core Strategy sets out that proposals for new development should retain existing trees, woodland and other habitat features which offer a positive contribution to the local environment in terms of visual amenity. Only where tree loss is unavoidable should adequate replacement tree planting be provided on a two for one basis, having regard to species and size. Where on-site tree replacement cannot be achieved a financial contribution would be required to compensate for any tree loss on a 2:1 basis at £920 per tree.

However, in this type of development, I would expect to see street trees and hedgerow planting to be designed into the layout to soften the street-scene and create a rural environment. ESS have stated that these should be outside private gardens where possible. Climax species should be incorporated to provide a better longer term impact on the landscape. ESS have stated that trees need at least 17m² of soft /permeable ground to enable them to flourish. Where this cannot be achieved, trees should be planted in a tree pit system which has tree cells that provide at least 17m³ of tree soil for them under the hard surface.

A buffer of 15m is advised around the woodland buffer in the interests of mitigating against any adverse impacts on high value trees. This would ensure the proposal is capable of complying with policies CS2, CS19 and CS21 of the Local Plan Core Strategy and UDP policy DQ4.

Highways

Comments from National Highways

National Highways have commented to state that they would wish to see a detailed transport assessment considering the impact on SRN M62 Junction 6 and 7.

Sustainability

Policy CS7 in the Core Strategy states 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. Policy CS19 states that new development in Knowsley will be expected to integrate effectively with existing development and link to existing shopping and service provision.

As discussed in our meeting, I have concerns about the sustainability, accessibility and connectivity of this site.

The site is not easily accessible for the use of regular public transport. The train stations of Prescot and Whiston are not considered to be within easy walking distance nor are they on a route whereby walking to these stations would be safe. A comprehensive Sustainability Statement considering the accessibility of the site would be required to be submitted with any planning applications setting out how accessible the site is for public transport including how residents could access local services, GPs, schools and shops by bus and train and how regular these services are, together with walking distances of bus stops and train stations for accessing these shops/services. Consideration of the footway and whether the width facilitates safe access should also be taken into account.

The Government has now released a new accessibility tool which, at a high level, identifies how well connected a site is. The table below shows the scores for the application site and benchmarks them nationally.

Scores

Overall (except driving)		Cycling		Driving	
Overall	48	Overall	60	Overall	81
Education	49	Education	55	Education	69
Leisure	42	Leisure	56	Leisure	75
Health	30	Health	45	Health	71
Shopping	42	Shopping	54	Shopping	79
Residential	62	Residential	75	Residential	93
Workplaces	52	Workplaces	62	Workplaces	85

Public transport

Overall	53
Education	57
Leisure	48
Health	40
Shopping	48
Residential	62
Workplaces	56

Walking

Overall	38
Education	41
Leisure	32
Health	14
Shopping	33
Residential	59
Workplaces	34

By mode of transport

	Overall	Walking	Cycling	Public transport	Driving
10th percentile	38.9	33.7	48.4	40.7	74.6
20th percentile	52.1	48.0	58.1	53.5	79.8
30th percentile	58.6	55.5	63.1	59.7	82.6
40th percentile	63.1	60.7	66.7	64.2	84.5
Median	66.8	64.8	69.7	67.8	86.2
60th percentile	70.2	68.5	72.5	71.2	87.6
70th percentile	73.7	72.1	75.5	74.7	89.0
80th percentile	77.8	76.3	78.7	79.0	90.6
90th percentile	83.2	81.6	83.6	85.3	92.5

The site lies within the bottom 20th percentile for overall connectivity (except driving) and overall access to public transport and within the bottom 10th percentile for access by walking to leisure, health and shopping services. This reaffirms our concerns about accessibility of the site.

In terms of connectivity to the adjoining village of Cronton, the submitted plans show a single footpath link to the northeast of the site. However, this appears to connect to a field and does not link with the road/footway network of Cronton. The link should allow pedestrian access to the adjoining footway network which it currently does not do. Further investigation is recommended to secure meaningful connectivity. For example, who owns the field and can Bellway secure a connection to the footway within Cronton?

Additionally, the footway to the south of the site is narrow and connectivity to nearby services by walking/cycling is poor. The links via footway to nearby Cronton Village, bus stops and services are not fit for purpose and would not promote an accessible site. Consideration needs to be given to footway improvements and enhancing links by walking and cycling to services, schools, GPs, employment and shops.

Active Travel

Whilst a consultation went out to Active Travel England (ATE), it was confirmed that they do not offer detailed advice at pre-application stage. However, some of the key active travel criteria are listed in the ATE standing advice note that summarises the key criteria that ATE will assess when consulted on a formal planning application. This standing advice can be accessed here: [Active Travel England: sustainable development advice notes - GOV.UK](#)

Comments from the Local Highway Authority

The LHA has offered detailed comments on the phase 1 layout. I've copied these below:

Site Access and Visibility

- Suitability of access arrangements for all vehicle types
 - The provision of 10m radii for a 30mph(major road)/20mph(minor road) is questioned as it could lead to excessive speeds of vehicles entering the site, given the recorded speeds quoted in the Highway Scoping Note. See note below regarding future development phase.
 - Highways request a Road Safety Audit to accompany the Application.
- Compliance with visibility splay standards
 - Junction visibility is shown to meet the speed survey results of 40mph, using DMRB standards. The location of the speed survey should be identified to allow confirmation of this.
- Conflict with nearby junctions or existing accesses
 - Access would form staggered crossroads with Lodge Lane (unadopted) with an offset of approximately 50m which is considered to be acceptable.

Traffic Impact and Trip Generation

- Transport Statement/Assessment review
 - comments provided in Transport Consultant Scoping Note Response
- Impact on junction capacity and local network

- comments provided in Transport Consultant Scoping Note Response
- Requirement for mitigation or financial contributions
 - Not known at this stage

Internal Layout and Circulation

- Turning space, vehicle tracking, and refuse/emergency access
 - Swept path analysis has been provided which is considered acceptable. A separate emergency access would be preferred but not mandatory for phase 1, but could be necessary for any future phases.
- Layout compatibility with adoption standards (if applicable)
 - Generally considered acceptable.
 - Traffic calming measures will be required for straight sections in excess of 60m, this should be shown on the proposed site layout plan to aid consideration of types/positioning.

Parking and Servicing

- Compliance with local parking standards
- Avoidance of overspill parking on the public highway
 - Not considered likely
- Cycle parking and bin collection arrangements
 - All dwellings will need cycle parking provision in line with the SPD, which can be within a garage or a secure shed.
 - No concerns regarding refuse collection are anticipated.

Pedestrian and Cycle Connectivity

- Safe access to/from the site on foot and by bike
 - Considerable concern regarding the inadequate pedestrian provision along Cronton Road which will be a significant desire line to bus stops and local amenities. Footways on alternative route via Smithy Close are also severely substandard in width.
 - Crossing to serve pedestrians and cyclists should be provided between site and Lodge Lane which is a public bridleway, noting the limited highway land to the south side of Cronton Road.

- A Minimum Accessibility Standard Assessment (MASA) will need to be carried out.
- Direct pedestrian access for frontage plots to the estate road adjacent to junction with Cronton Road should be provided to cater for the desire line to the east.
- 2m footway will need to be provided along Cronton Road site frontage for to serve journeys to the west.
- Links to existing networks and crossing facilities
 - As above.

Public Transport Access

- Proximity to bus stops/rail stations
 - Nearest bus stops located over 400m from the site entrance. New stops should be provided, in close proximity to the site for services passing along Cronton Road. Applicant should engage with Merseytravel regarding this issue.
- Impacts on existing services or infrastructure
 - Not considered relevant

Road Safety Considerations

- Local collision data and site-specific safety risks
 - To be considered within Transport Assessment
- Proximity to vulnerable users (schools, crossings, etc.)
 - Not expected to be a significant impact
- Whether a Road Safety Audit is required
 - Yes, site access junction.

Construction Impacts

- Need for a Construction Management Plan (CMP)
 - Yes, will be a condition on any consent.
- Temporary disruption, delivery routing, and contractor parking
 - To be included within CMP

Legal/Procedural Requirements

- Anticipated need for S278, S38, S106 or TROs
 - To be considered as part of planning application, but scheme will require S38 and S278 works as a minimum.
- Impacts on existing highway land or public rights of way
 - Site is bisected by a public right of way. Application layout will need to incorporate this into the site design.

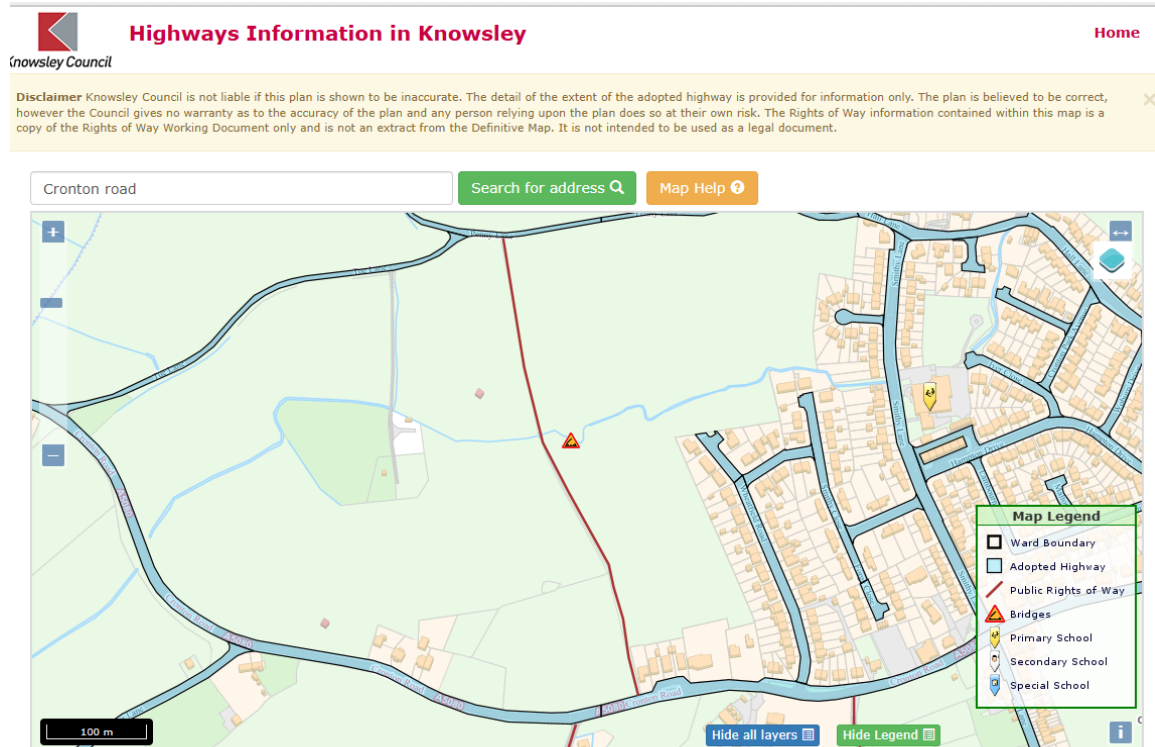
Phase 2

The phase 2 drawing appears to show that it would be larger than phase 1. Highways have significant concerns about introducing any more traffic to Penny Lane, on the basis of its current form, which is predominantly single track, as is much of Hall Lane to the north. Information contained in the transport scoping note would suggest that both roads would attract a significant proportion of phase 2 development traffic, based upon the supplied traffic distribution model and by route planning software, if an access were to be taken from Penny Lane. Penny Lane would require significant upgrading to allow it to be used as an access to the northern parcel of the development. I suggest that we discuss this further.

If phase 2 did come forward, it is important that the site links with the surrounding area and demonstrates connectivity and adequate integration via different modes of transport. I note your queries to Highways regarding how many vehicles the LHA would allow from a single access road. However, there is no definitive number and the focus here is on ensuring a development that integrates well north and south.

Public Right of Way

There is a public right of way that runs north to south across the site. This route should be retained and integrated into any development. The map below shows the location of the route.



Affordable Housing

The proposed site lies within the Green Belt and is designated by policy CS5 of the Local Plan Core Strategy. The site will be subject to meeting the 'Golden Rules' set out in the paragraphs 156-157 of the NPPF. Paragraphs 157 of the NPPF sets out that the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. Knowsley's CS15 Local Plan Core Strategy requirements are: 10% on sites within current urban areas and 25% on sites within a sustainable urban extension. As Policy CS15 sets a 25% maximum affordable housing target, the target AH requirement on grey belt sites is considered to be 40%. Paragraph 66 of the NPPF states that for major housing developments, the mix of affordable housing should meet local needs. Policy CS15 of the Local Plan Core Strategy requires an affordable tenure split of 75% social rent and 25% intermediate tenure.

The need for more social rent is evident through increasing numbers on the Council's housing register, the high numbers on of homeless households currently in temporary accommodation and the reduction of the overall number of affordable homes for rent in Knowsley alongside less homes becoming available to let. Part 5 of the NPPF and, in particular, paragraphs 66 and 71 give a firm indication that homes for Social Rent should be provided and preference for affordable homes for rent should be Social Rent given current private rent levels in Knowsley. The Council's housing register (31.3.25) had 2802 households applying for affordable homes for rent with the need made of the following:

Bedroom Need	Number of applications	%
1	1288	46%
2	952	34%
3	420	15%
4+	142	5%

Therefore, any development should provide a range of unit types for rent to support meeting local housing need. The Knowsley Housing Strategy 2022-2027 for the Prescot/Whiston/Cronton township where the site is located recommends that the housing offer should have a greater emphasis on 1-, 2- and 4-bedroom affordable homes.

Given the location of the site it may not be appropriate to provide 40% of the new homes as affordable, therefore the Council could consider a mixture of on site provision and a commuted sum for off-site provision.

Education

I have consulted the Education Department with regard to this pre-application enquiry. The following comments have been provided based on the phase 1 development of 101 dwellings:

Early Years

The Whiston and Cronton Area has 2 childcare providers and 5 childminders with a combined net capacity of **128 FTE** childcare places but with overall **5 FTE** vacancies. By September 2025 the Education Department are expecting a further demand of **35 FTE** places required due to the expanded childcare offer being rolled out by the DfE but to date there are no definite plans in place currently to be able to offer these. The estimated pupil yield, based on the bedroom mix provided and the average pupil yields per household for Knowsley (using data provided by Department for Education) is as follows:

No. of Bedrooms	No. of Houses	EY Yield	EY Pupils
1	0	0.04	0
2	10	0.09	0.9
3+	91	0.08	7.28
Total	101		8 (8.18)

With 8 additional children, this would equate to an additional 4 Full Time Equivalent (FTE) places required within the Whiston & Cronton ward.

Therefore, an education contribution would be sought in respect of 4 FTE childcare places i.e. the full yield of this development. The DfE recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school (ref page 16, paragraph 36 [Securing developer contributions for education](#)).

Based on a primary cost per place of £19,989, this gives a maximum contribution request of £79,956 towards Early Years places. This amount should be adjusted by indexation at the point of sealing the Section 106 agreement.

Primary Education

The Cronton Primary Planning Area has 2 schools, with a combined net capacity of 420 places. The January 2024 School Census recorded 399 pupils on roll at these schools. The pupil projections based on the January 2024 School Census project that by 2028/29, there will be **401** pupils on roll at these schools. Assuming that the existing schools have a capacity of **420**, a surplus of **19** places is projected by January 2029. The estimated pupil yield, based on the bedroom mix provided to me and the average pupil yields per household for Knowsley (using data provided by Department for Education) is as follows:

No. of Bedrooms	No. of Houses	Primary Yield	Primary Pupils
1		0.02	
2	10	0.11	1.1
3	59	0.21	12.39
4	32	0.31	9.92
5		0.36	
Total	101		23 (23.41)

With **23** additional pupils from this development, the number of pupils on roll at schools in this planning area would increase to **424**. This would result in a shortfall of **4** places.

Therefore, an education contribution would be sought in respect of **4** primary places.

Primary Education Contribution

The latest DfE Cost Per Primary School Place is £19,989 for permanent expansion. For 4 places towards a permanent expansion, the contribution request would total **£79,956**. This amount should be adjusted by indexation at the point of sealing the Section 106 agreement.

Secondary Education

The Central Secondary Planning Area has 3 schools, with a combined net capacity of **3,324** places. The January 2024 School Census recorded **2,701** pupils on roll at these schools. The pupil projections based on the January 2024 School Census project that by 2028/29, there will be **3,106** pupils on roll at these schools. Assuming

that the existing schools will still have a combined capacity of **3,324**, there are projected to be **218** unfilled places in January 2029. The impact of Halsnead Garden Village has been factored into the pupil forecasts. The estimated pupil yield, based on the bedroom mix provided to me and the average pupil yields per household for Knowsley (using data provided by Department for Education) is as follows:

No. of Bedrooms	No. of Houses	Secondary Yield	Secondary Pupils
1		0.01	
2	10	0.06	0.6
3	59	0.17	10.03
4	32	0.29	9.28
5		0.38	
Total	101		20 (19.91)

With **20** additional pupils from this development, the number of pupils on roll at schools in this planning area would increase to **3,126**. This would result in **198** unfilled places, so this means 5.9% of secondary places would be unfilled. Therefore, no education contribution is sought in respect of secondary places at this time.

Open Space Provision

Policy supported by Local Plan Core Strategy Policy CS21 and the Developer Contributions Supplementary Planning Document require open space provision contributions towards existing or new open space typologies within the Borough where on-site provision is not proposed. The development of 101 dwellings has been put into the Local Planning Authority's open space calculator, and the following (maximum) contributions will be required in connection with the proposed development:

Parks and Gardens: £99,543.42

Amenity Greenspace: As the development proposes on-site amenity greenspace, no contribution is required for this typology.

Allotments: £5,290.92

Provision for Children and Young People: £13,401.96

Outdoor Sports Provision: £78,401.04

Please note I've sent over a consultation to the Environmental Sustainability Service to ascertain if on-site play equipment is required within the development. It is noted that the NPPF paragraph 156 states new residents should be able to access good quality greenspaces within a short walk from their home so consideration of the

proximity of the above spaces will need to be undertaken to ascertain what typologies are within a short walking distance.

The Developer Contributions SPD sets out the maximum recommended distance accessibility standards for different POS typologies. This is a 15-minute walk from a park/garden, a 10-minute from amenity greenspace, an 800m walk from play areas (provision for children and young people) and a 20-minute walk away from allotments.

Once I've had a response from ESS, I'll comment further.

S106 requirements – based on 101 dwellings

The following contributions would be applicable to the development:

Travel Plan monitoring: For between 10-150 houses, the contribution is £2,500 plus an additional refundable 10% surcharge if plans are submitted on time. For schemes of 150-250 houses, the travel plan monitoring contribution is £5,000 plus the additional refundable 10% surcharge. More than 250 houses results in a £10,000 contribution (plus 10% refundable surcharge).

Social Value: £100 per dwelling

Early years education contribution: £79,956

Primary Education contribution: £79,956

An affordable Housing obligation will also be required to deliver 40% affordable housing across the scheme. Additionally, if off site tree planting is required, this will be at a rate of £920 per tree and off-site tree replacement planting is on a 2:1 basis.

Please note I've also consulted Cheshire and Merseyside NHS to ascertain whether a health contribution will be required. I will report separately on this when I've had a response.

Archaeology

Cronton is recorded in the Domesday Survey of 1086 with historic documentation tracking its development over the following centuries until the Modern Period. It remained a small settlement until the mid-nineteenth century when it doubled in size. Throughout this time the proposed development site has remained as agricultural land. Undeveloped and historically undisturbed areas of green space are considered to have an as yet undefined archaeological potential.

NPPF paragraph 207 is clear that "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.”

Consequently, in accordance with NPPF paragraph 207 it is advised that prior to development taking place, a programme of archaeological investigation is carried out to determine the presence, nature, extent and significance of any surviving archaeological remains.

The applicant should submit a Project Design for archaeological work for approval in writing by the Local Planning Authority. The archaeological works should be undertaken in accordance with the agreed Project Design.

Heritage Assets

There are three designated heritage assets that lie in close proximity to the site:

The Stocks – Grade II

Cronton Cross – Grade II

Town End Farmhouse – Grade II

Consultants providing the Council’s conservation advice have confirmed that, based on the submitted layout, the proposal would cause no discernible level of harm or loss of significance to the heritage assets identified above. This is due to the distance the proposed development is from the assets, no intervisibility between the application site and the identified heritage assets and limited/no historic association.

It is considered that a Heritage Impact Assessment would need to be carried out to assess the impact of any scheme to allow the consideration of the proposal against policies CS1 and CS15 of the Local Plan Core Strategy and the NPPF. This would also be needed to ensure that the proposal seeks to preserve the special character of heritage assets, including their setting in accordance with the principal statutory duty under the Planning (Listed Building and Conservation Areas) Act 1990.

Construction Management Plan and Impacts through construction

Environmental Health have advised that to protect the amenity of the nearby residents during demolition and construction, a construction management plan condition would be recommended. EH have also stated that if piling or heavy-duty machinery is proposed to be used in the construction process, a pre-construction survey of the condition of surrounding properties is recommended prior to works starting and vibration monitoring should be undertaken for the duration of the works.

Noise

Environmental Health has recommended that a Noise assessment is submitted to address any noise impacts from Cronton Road. The noise assessment will need to

demonstrate that the development would not be detrimental to the amenity of future occupiers. This assessment should identify any mitigation required to achieve relevant noise standards both within gardens and within habitable rooms. Any scheme for the protection of the dwellings from noise shall ensure that noise exposure within living rooms and bedrooms and gardens does not exceed the relevant standards. Where windows are required to be kept closed to meet the indoor noise levels then an alternative means of ventilation should be provided.

EH has advised that should the development require a substation or proposes air source heat pumps, then a fixed plant noise condition would be recommended to protect future residents' amenity from noise.

Contamination

Environmental Health has confirmed that there is evidence of a landfill to the west of the site (within 250m) which was licenced for excavation of waste and hardcore. Infilled ponds have also been identified within the site. As such a phased site investigation will need to be submitted to support the submission of a planning application.

The site also lies in an area identified as a development low risk area for coal mining activity.

Air Quality

An air quality assessment is considered to be required as the proposed development would exceed the stage 1 criteria (more than 10 residential units) and stage 2 criteria (realign roads / introduce a new junction) as stated in the document, Land-Use Planning & Development Control: Planning for Air Quality. [air-quality-planning-guidance.pdf](#).

Social Value

In accordance with the 'Adding Social Value to Development: Employment and Skills' Supplementary Planning Document, a social value contribution would be required. This is worked out on a per dwelling basis so for the first phase (101 dwellings) this has been calculated at £10,100 and equates with approximately 228 social value (or employment and skills) weeks. Any second phase would be calculated based on the number of proposed dwellings. Any planning application should also include a Social Value Strategy.

Ecology

Merseyside Environmental Advisory Service has been consulted as part of this pre-application enquiry. A Preliminary Ecological Appraisal (PEA) that meets BS 42020:2013 will be required prior to determination of any future planning application. The PEA should be undertaken in accordance with CIEEM (2017)¹ guidelines. Surveys should be carried out by suitably qualified and experienced persons and follow relevant good practice.

The following information should be included in any PEA report:

- A desk study, including data from the Local Environmental Records Centre, following CIEEM (2017) guidelines, and the County Bird Recorder (Steve White – stevewhite102@btinternet.com). The desk study should identify records for designated sites, protected and priority species, qualifying bird species and habitats on site and within a suitable buffer. However, a data search with a 1km radius is expected as a minimum;
- An Extended Phase 1 Habitat survey / UK Habitat Classification (UKHab) survey identifying the habitats on and adjoining the site. This should include a Phase 1 / UKHab Habitat map and target notes and should follow accepted Survey Guidelines: JNCC (2010) Handbook for Phase 1 Habitat Survey; UK Habitat Classification Working Group (2020) UK Habitat Classification System (UKHab) Methodology;
- An assessment of the potential for protected species to be present;
- The requirement for further specialist surveys, for example, breeding birds (including ground-nesting species), non-breeding (wintering) birds, bats and water vole;
- An assessment of the likely ecological effects of the proposals, because of construction works and site operation;
- Any avoidance or mitigation measures that will be implemented;
- The presence of any invasive and/or injurious weeds species (Wildlife and Countryside Act 1981 as amended, Weeds Act) on site or within 7m of the site boundary. The location and extent of any invasive or injurious weeds should be shown on a scaled plan; and
- Identify opportunities for biodiversity net gain in line with NPPF and Defra's 25 Year Plan for the Environment.

The southwestern corner of the phase 2 development option land is directly adjacent to George's Wood and adjacent land Local Wildlife Site (LWS), which contains potential ancient woodland habitat. Ancient woodland is an irreplaceable habitat and paragraph 193 of the NPPF advises Local Planning Authorities to refuse planning permission that would result in the loss or deterioration of ancient woodland, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

The applicant should consider how effects on the LWS will be avoided, minimised and mitigated. In addition to effects during the construction phase, the potential for

¹ CIEEM (2017) Guidelines for Preliminary Ecological Appraisal

increased operational phase effects on the LWS (i.e. as a result of increased recreational pressure) also needs to be considered.

Biodiversity Net Gain

In accordance with the Environment Act, there is a mandatory requirement for all development to deliver a mandatory 10% Biodiversity Net Gain². Any future application must be accompanied by minimum information set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However, in order to assist the consideration of biodiversity net gain as part of the determination of the planning application the applicant should submit sufficient information to allow the Local Planning Authority to consider more broadly whether the biodiversity gain condition is capable of being successfully discharged³.

The applicant may wish to submit this in the form of a draft Biodiversity Gain Plan (which should be completed using the Defra Biodiversity Gain Plan template⁴). Further advice on Biodiversity Net Gain requirements for the Liverpool City Region can be found in the MEAS BNG information note⁵.

MEAS has advised that to aid the delivery of 10% BNG, the development should retain and enhance the existing boundary hedgerows and vegetation along the watercourse corridor and consider creating ONG (other neutral grassland) habitat in the northern part of the site, should the soil conditions be suitable.

The Liverpool City Region Local Nature Recovery Strategy (LNRS)⁶ is currently in preparation. Any development should seek to support delivery of the LNRS priorities and measures especially where mapped opportunities for nature align with the development.

Please note the following information should be submitted to address BNG:

- UKHAB habitat survey of the current pre-development habitat;
- Completed Statutory Defra Metric showing both pre-development habitats and proposed post construction habitats. This should be submitted with macros disabled, and all sheets unhidden;
- Accompanying habitat condition assessments must be submitted for the existing pre-development habitats and proposed condition of newly created or enhanced habitats;
- GIS layers of pre-development baseline and post-development baseline;
- Evidence that the mitigation hierarchy and biodiversity gain hierarchy have been followed;
- Landscape masterplan showing on site habitat provision;

² <https://www.gov.uk/government/collections/biodiversity-net-gain>

³ Planning Practice Guidance on BNG paragraph 019

⁴ [Biodiversity gain plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614411/biodiversity_gain_plan_-_gov_uk.pdf)

⁵ <https://eas.merseysidebiobank.org.uk/biodiversity-net-gain/>

⁶ [Local Nature Recovery Strategy | Liverpool City Region Combined Authority](https://www.liverpoolcityregion.gov.uk/local-nature-recovery-strategy/)

- Details of any proposed offsite provision (e.g. use of habitat bank, provision of own offsite, use of national credits); and
- A draft habitat management and monitoring plan for any proposed habitats that are considered significant on-site gains (this should follow the Habitat management and monitoring plan template. Please refer to the following: [Habitat Management and Monitoring Plan Template - JP058](#)).

Habitat Regulations Assessment

National/international designated sites lie within close proximity to the application site. These are: Mersey Estuary SPA and Mersey Estuary RAMSAR, and as such, policy CS8 is relevant. The proposal will put increased recreational pressure on these designated sites and the increased visits may result in significant effects on habitats and species for which these sites have been designated. Recreational pressure from residential development has been identified as a Likely Significant Effect alone and in combination with the Liverpool City Region. Recreational pressure is recognised in the formal statutory Conservation Advice Packages⁷ and Site improvement Plans⁸ as medium risk to qualifying features of the national and international sites.

As such, any application must demonstrate how increased recreational pressure will be avoided or mitigated to enable the LPA to compile a HRA prior to determination.

Please also note that the site is within the Natural England Impact Risk Zone (IRZ) and the proposals meet the consultation triggers 'Rural residential – Any residential development of 50 or more houses outside the existing settlements/urban areas'. Consultation with Natural England will therefore be required prior to determination of any future planning application.

Please note examples of mitigation measures which could form part of a bespoke mitigation package are listed below. Following the Sweetman ruling, a clear distinction must be made between essential features of the development and additional mitigation measures needed to protect the national and international sites:

- Provision of public open space within the development boundary;
- Improving access to and promoting use of Suitable Alternative Natural Greenspaces (SANG) (including contributions to management);
- Provision of information in sales packs or on information boards, informing residents of the importance of the national and international sites, and responsible user code and the location of SANGs; and
- Financial contributions to the management of national and international sites and SAMM (Strategic Access Management & Monitoring).

⁷ [European Site Conservation Objectives for Mersey Estuary SPA - UK9005131](#)

⁸ [Site Improvement Plan: Mersey Estuary - SIP138](#)

Incorporation of these measures may enable the LPA to conclude that there are no adverse effects on the integrity of the SPAs, SACs and Ramsar sites.

Low Carbon Development

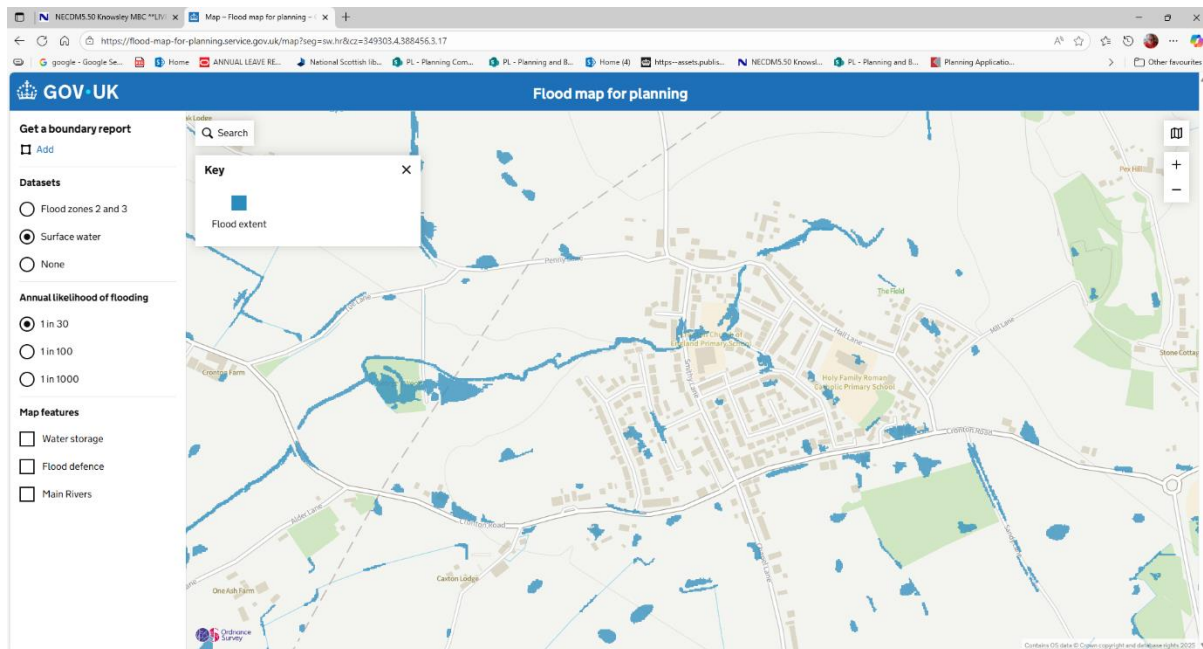
In January 2020 Knowsley Council declared a Climate Emergency to help tackle global warming at a local level. The Council has committed to embedding carbon reduction and climate action across the Council's plans, policies and services. As such the proposed development should consider the use of low carbon and/or renewable energy in line with Local Plan policy CS22 (Sustainable and Low Carbon Developments).

Drainage

The LLFA has been consulted as part of the pre-application enquiry. The LLFA has stated that the site is located in flood zone 1 and is generally associated with low risk of flooding from all sources although the site shows a small area at risk of surface water flooding. Whilst a small area of the site is affected/lies adjacent to land affected by surface water flooding, the scheme does not include buildings, access/escape routes, land raising or other vulnerable elements within the area affected by surface water flooding. On this basis, it is not considered that a sequential test needs to be undertaken.

A flood risk assessment, drainage strategy and submission of the drainage pro-forma 1 should be submitted with any planning application. The scheme should include SUDS that are fully integrated with the natural environment. Engineered attenuation basins with 1:3 slopes are not considered to be acceptable within public open space. Permeable surfacing, ditches, swales and rain gardens should be considered to reduce the rate of flow and size of attenuation basin.

Please also note that the site lies within 20m of a main river and so consultation with the Environment Agency will be required.



The LLFA has raised no objection to the development and has stated that increased surface water generation as a result of residential development should be managed by proposing a sustainable way of surface water discharge from the site and utilising a range of appropriate SuDS. The LLFA has requested that the LLFA give consideration to the following points in the preparation of a sustainable drainage strategy:

- An explanation of existing drainage system and flow paths of the site and that how the site is affected by off-site surface water runoff and how the natural flow paths will be retained within the proposed drainage design after development shall be required.
- Evidence and justification (e.g. infiltration tests and groundwater levels) shall be required to demonstrate that in choosing drainage features for post development, the surface water drainage discharge hierarchy has appropriately been followed.
- A SuDS aims to minimise the impacts from a proposed development on water quantity and quality and maximise amenity and biodiversity. In designing an

appropriate set of SuDS techniques for a development site, the LLFA will therefore be expecting surface water runoff to be managed close to source (Source control / property level control) , only conveying downstream what cannot be managed at source. Therefore, provision of large attenuation basins (regional control) with a single discharge point will not be acceptable. The LLFA expect an interconnected drainage design to include source control/ property level control (e.g. permeable pavement and rain gardens), green and open conveying systems / green corridors (e.g. green swales and ditches) and regional controls (e.g. attenuation basins).

- Should there be any ditches/watercourse and/or water body within the site, they must be retained and act part of the proposed drainage system. The development of drainage design should therefore be planned as early as possible before the setting the property layout in close collaboration with the landscape and biodiversity team.
- The maximum discharge rate from the development site should be set to the greenfield Qbar. Discharge rate and connection point should be agreed with the LLFA.
- Where the proposals are connecting to an existing drainage system, it is likely that the authorities responsible for maintaining those systems will have their own design requirements. These requirements will need to be reviewed and agreed as part of any surface water drainage scheme.
- Detailed Drainage Scheme Plan showing the layout of the proposed drainage network, post development impermeable area, the location of storage within the proposed development and how these relate to the submitted calculations, including any chamber, pipe numbers, direction of flow, invert and cover levels, gradients diameters and dimensions will be required. The methods of flow control must be detailed as should non-conventional elements such as pond and permeable paving.
- Sufficient information on the correct number of treatment stages in the surface water management train will also be required, for further information see the CIRIA SuDS Manual (C753).
- The mechanism for securing long-term maintenance will need to be considered and agreed between the applicant and the Local Planning Authority. This may involve discussions with those adopting and/or maintaining the proposed systems, which could include the Highway Authority, Planning Authority, Parish Councils, Water Companies and private management companies.
- Evidence that exceedance flows and runoff in excess of design criteria shall be considered - calculations and plans shall be provided to show where above ground flooding might occur and where this would pool and flow.
- An assessment of groundwater levels and its fluctuations will be required.
- A Management and Maintenance Plan for the sustainable drainage system relating to the lifetime of the development through an appropriate legally binding agreement shall be submitted to and approved in writing by the Local Planning Authority. This shall include:

- (i) The arrangements for adoption by an appropriate public body or statutory undertaker or details of provision for management and maintenance by a resident's management company.
- (ii) Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime.
- (iii) Details for planned maintenance and a mechanism for remedial and urgent repair works.
- (iv) Means of access for inspection and maintenance purposes.
- (v) The plan shall be implemented in accordance with the timeframes contained within it.

Waste

The development will involve excavation and construction activities which are likely to generate significant volumes of waste. Policy WM8 Waste Prevention and Resource Management of the Merseyside and Halton Joint Waste Local Plan (WLP), the National Planning Policy for Waste (paragraph 8) and Planning Practice Guidance (paragraph 49) therefore apply.

Any planning application should be accompanied by details of the steps taken to design out waste, how waste production will be minimized and how wastes arising will be re-used and recycled and off-site disposal minimized. This should be in the form of a waste audit or a similar mechanism such as a demolition method statement or site waste management plan.

Policy WM9 (Sustainable Waste Management Design and Layout for New Development) of the Merseyside and Halton Joint Waste Local Plan (WLP) and the National Planning Policy for Waste (paragraph 8) also apply. It is advised that information relating to household waste storage and collection is required by policy WM9 and should be included with any planning application.

Environmental Impact Assessment

Whilst the current proposal does not require EIA screening, if phase 2 were to come forward as well, then the thresholds for a Schedule 2 10 (b) Urban Development Project were exceeded, EIA screening would be required.

Agricultural Land

The site includes agricultural land classed as grade 2 'Very Good'. Local Plan UDP Saved Policy G3 states that new development involving the loss of best and most versatile agricultural land (grades 1, 2 or 3A) in a way which would practically prevent it from future return to agricultural use will not be permitted unless:

- A) It has been demonstrated that the development cannot be accommodated on PDL or on land within the boundaries of an urban area; and

- B) It has been demonstrated that sufficient land of lower agricultural quality is unavailable or if available should not be developed in preference taking into account landscape, wildlife, historic or archaeological considerations.

As the proposal would result in the loss of best and most versatile agricultural land, an Assessment would be required to be submitted with any application, demonstrating how the proposal would comply with parts A and B of policy G3 above.

Additional

The validation checklist sets out the documents that would need to be submitted in support of any major planning application. These documents are available to view at the following link: [Planning Application Local Validation Requirements | Knowsley Council](#)

Please note that a drainage pro-forma 1 would also be required as part of the submission criteria; the above link includes access to the pro-forma 1. I have listed the documents required below:

- Design and Access Statement
- 3D Visuals (for schemes of 150 dwellings +)
- ATE (Active Travel England) Assessment Toolkit (for schemes of 150 dwellings + or a site area of more than 5 hectares)
- Affordable Housing Statement
- Air Quality Assessment
- Preliminary Ecological Appraisal and Surveys
- Archaeology Assessment
- Economic Statement (where the application seeks to justify a proposal based on the economic benefits of the scheme)
- Lighting including details of light spillage
- Flood Risk Assessment and Sustainable Urban Drainage and Surface Water Management
- Drainage Proforma 1
- Health Impact Assessment
- Heritage Impact Assessment
- Contaminated Land Desk Study
- Landscape and Visual Impact Assessment
- Levels
- Noise Impact Assessment. A vibration Impact Assessment would be required for development close to existing buildings where piling will be required for construction of the proposed buildings
- Parking and Access Details
- Photographs and Photomontages
- Planning Statement
- Social Value Strategy

- Transport Assessment including consideration of how sustainable the site is in terms of access by modes of transport other than the private car
- Travel Plan
- Viability Assessment
- AIA and AMS
- Housing Delivery Statement – Full details are required of how the proposed development will demonstrate in helping the Council to meet its housing supply requirements. This should include a timetable for implementing the development, proposed build out rates, evidence of agreement with landowners, a sustainability appraisal to demonstrate the suitability of the site for development and an explanation of how the development will meet the Golden Rules.
- Construction Environmental Management Plan
- Statutory BNG Metric Assessment calculations with pre and post development baseline habitats
- Statutory Metric Condition Assessment spreadsheets
- GIS layers in table format of pre and post development baselines
- Draft Landscape and Planting Plan
- Draft Biodiversity Gain Plan
- Draft Habitat Management and Monitoring Plan for any on site significant enhancements or gain
- Agreement to pay the Council's biodiversity monitoring fee/draft s106 heads of terms
- Agricultural Land Assessment

The advice given here does not indicate any formal decision by the Council as Local Planning Authority. Any views or opinions are given without prejudice to the formal consideration of any planning application and are based on the details submitted, site observations and other available information sources. A formal decision on any proposal can only be given on the submission of a planning application after its full consideration, which will involve consultation with local residents, statutory consultees and any other interested parties. You should also bear in mind that any subsequent changes to planning legislation or planning policies may affect the advice given.

Appendix 3 Lichfields Five Year Housing Land Supply Assessment

Briefing Note

Our ref 71327/01/SPM/CL
Date 23 December 2025
To Bellway Homes Limited (North West Division)

Subject Knowsley Five Year Housing Land Supply Review

1.0 Introduction

- 1.1 This note comprises a desk based assessment of Knowsley Council's [the Council] Five Year Housing Land Supply [5YHLS] position. It has been undertaken by Lichfields on behalf of Bellway Homes Limited (North West Division) [Bellway]. It considers the Council's 5YHLS position following the most recent publication of the National Planning Policy Framework [the Framework] (December 2024 and amended February 2025) and the introduction of the new standard methodology [SM3] for calculating local housing need [LHN].
- 1.2 The note comprises a summary of the Council's current development plan, relevant national planning policy and other material considerations. It then outlines the Council's latest claimed 5YHLS position and reviews the appropriate housing requirement to apply in the context of the recently published Framework. It then sets out our assessment of the Council's supply of deliverable sites and concludes what the Council's 5YHLS position is following the analysis undertaken.
- 1.3 This note accompanies an outline planning application for up to 120 homes at Land at Cronton Road, Cronton [the Site]. The application presents a Grey Belt case, on the basis that the Site meets the definition set out in the Framework. It is acknowledged that for residential development to not be considered inappropriate on Grey Belt land, the four criterion set out in Framework Paragraph 155 must be met. Specifically, Paragraph 155(b) requires there to be a demonstrable unmet need for the type of development proposed. For the provision of housing, this means the lack of a 5YHLS, including the relevant buffer, or where the Housing Delivery Test [HDT] was below 75% of the housing requirement over the previous three years.
- 1.4 This note seeks to demonstrate that the Council cannot demonstrate a 5YHLS and the relevant test in Paragraph 155 is met.

2.0 Planning Policy

Local Planning Policy

- 2.1 The Council's development plan of relevance to this assessment comprises:
- Knowsley Local Plan Core Strategy [LPCS] (adopted January 2016);
 - Saved policies from the Knowsley Replacement Unitary Development Plan [UDP] (adopted June 2006); and,

- Merseyside and Halton Joint Waste Local Plan (adopted July 2013).

- 2.2 LPCS Policy CS3 (Housing Supply, Delivery and Distribution) states that provision will be made for 8,100 new dwellings to be delivered between 2010 and 2028, at an annual average of 450 dwellings per annum [dpa]. The policy confirms that land for housing development will be identified to ensure that a five year supply of deliverable sites is maintained at all times.
- 2.3 Clearly the plan is in excess of 5 years old and has not been reviewed. The Council's Local Development Scheme [LDS] published in March 2025 states that the earliest practicable start date for a new local plan would be October 2025 however this is subject to change when more information becomes available from Government in respect of a new planning making system. We understand that the Council is yet to commence their plan making process.

National Planning Policy

National Planning Policy Framework (December 2024)

- 2.4 The Framework was most recently published in December 2024 and amended in February 2025. Of particular relevance, paragraph 78 states that local planning authorities [LPA] should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:
- a 5% to ensure choice and competition in the market for land; or,
 - b 20% where there has been significant under delivery of housing over the previous three years (specifically where the HDT indicates that delivery was below 85% of the housing requirement), to improve the prospect of achieving the planned supply; or,
 - c From 1 July 2026, for the purposes of decision-making only, 20% where a LPA has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.

Other Material Considerations

Standard Methodology

- 2.5 Alongside the Framework publication, the Government introduced a new stock-based SM3 for calculating LHN. The methodology uses 0.8% of existing stock as the starting point for calculating need in each authority, which is then adjusted upwards to account for affordability. The SM3 figure for Knowsley is 608 dpa, which is significantly higher than the

SM2 figure of 245 dpa (c. 148% increase) and the adopted Local Plan requirement of 450 dpa (c. 35% increase).

Housing Delivery Test

- 2.6 In December 2024 the Government published the Housing Delivery Test [HDT] results for 2023. The 2023 HDT for Knowsley is 316%, down from 372% in 2022. Given the Council's HDT exceeds 85%, they are not required to apply a 20% buffer to their 5YHLS calculation in line with Framework §78(b).

3.0 Knowsley's Claimed 5YHLS Position and Requirement

Knowsley's Latest Published Position

- 3.1 The Council published the Knowsley Strategic Housing Land Availability Assessment [SHLAA] (2024 Update) in December 2024. It sets out the Council's latest claimed 5YHLS position of **7.2 years**.
- 3.2 This position has been calculated by the Council, as summarised in Table 1 below.

Table 1 Council's Claimed 5YHLS Position at 1st April 2024

Claimed Position at 1 st April 2024		
A. Basis requirement	The borough's housing requirement of 450 per annum multiplied by 4 for the years 2024/25 to 2027-28. The housing requirement of 255 for the year 2028/29 is then added.	2,055
B. 5% buffer	No longer requirement by the Framework	0
C. Total requirement		2,055
D. Number of homes identified in years 0-5	Via commitments, allocations and SHLAA sites	2,958
E. Annual requirement over 5 years	C divided by 5	411
F. Number of years supply	D divided by E	7.20

Source: Council's SHLAA 2024 Update (December 2024)

Has the Council Correctly Calculated its Five-Year Requirement?

- 3.3 The Council's 5YHLS position was calculated based upon their LPCS housing requirement figure of 450 dpa for the first four years and then 255 dpa for the fifth year (based on SM2 and applying no 5% buffer which was removed in the Government's December 2023 publication of the Framework).

- 3.4 However, the Council adopted its LPCS in January 2016, more than five years ago. Consequently, the provisions of the recently published Framework [§78] require the Council to calculate their 5YHLS position against SM3.
- 3.5 Whilst the Council's HDT figure is above 85%, the Council is not required to apply a 20% buffer to the 5YHLS calculation. However, under paragraph 78(a), the Council should apply a 5% buffer to ensure choice and competition in the market for land.
- 3.6 It is important to note that, from 1st July 2026, for the purposes of decision-making, a 20% buffer will apply to the Council's calculation. This is because Framework paragraph 78(c) will kick in as the Council's housing requirement of 450dpa is less than 80% of the Council's SM3 figure (608dpa).

Council's Current Requirement

- 3.7 The Council's current requirement, reflecting the changes introduced in the Framework (December 2024) to use SM3 for calculating LHN and adding a 5% buffer, is set out in Table 2.

Table 2 Council's Current Five Year Requirement

Current Five Year Requirement	
Annual Requirement (r) (based on SM3)	608
Five Year Requirement (5*r)	3,040
Five Year Requirement with 5% Buffer (1.05*(5*r))	3,192

Source: Lichfields Analysis

- 3.8 If the above figure is used in the Council's calculation (in rows A and B of Table 1 above) then their housing land supply immediately drops to the equivalent of 4.6 years.

4.0 Deliverability Review

- 4.1 Table 6 of the Council's SHLAA (2024 Update) (December 2024) sets out the Council's claimed housing land supply to 2039, as of 1st April 2024. We have extracted the supply figures for the period 2024-29 (0-5 years) shown in Table 3 below.

Table 3 Housing land supply to 2029, as of 1st April 2024

Supply type	2024-29 (0-5 years)
Commitments from planning permissions	382
Local Plan Housing Allocations	1,456
SHLAA sites	1,070
Small sites windfall allowance (10 dpa x 5)	50
Total	2,958

Source: Council's SHLAA 2024 Update (December 2024)

- 4.2 In total, there are 43 sites that contribute at least one dwelling to the Council's claimed 5YHLS. 29 of the 43 sites contribute at least 10 or more dwellings to the Council's claimed

5YHLS. These sites of 10 or more dwellings make up 2,820 dwellings (c.95% of supply), with the remainder coming from sites that contribute less than 10 dwellings (c.3%) and the remainder on small site windfalls (50 dwellings – c.2%).

- 4.3 The Council's stated 5YHLS position at 1st April 2024 has been comprehensively reviewed, using Lichfields' Deliverability Review Framework set out at Appendix 1 of this report, to determine whether sites that have been included within the Council's five year trajectory should be considered 'deliverable'.
- 4.4 The consideration of deliverable has relied upon the definition in the Framework (at Annex 2) including sites with full planning permission (and small sites with outline planning permission) unless there is evidence to the contrary, and excluding other sites (that have outline planning permission for major development, have been allocated in a development plan, have a grant of permission in principle, or are identified on a brownfield register) unless there is clear evidence that housing completions will begin on site within five years.
- 4.5 The Deliverability Review Framework also sets out the lead-in time and build out rate assumptions for sites of 50 or more dwellings, taken from Lichfields Start to Finish 3 [STF3], which has informed this deliverability review. We have used this as a basis for reviewing the Council's assumptions on lead-in times and built out rates, given the lack of conclusive evidence behind the indicative lead-in times set out in Table 3 of the Council's SHLAA Update (December 2024).
- 4.6 Lichfields has undertaken analysis of all 43 sites that contribute towards the Council's claimed 5YHLS. We have considered each site proposed to be delivered within years 1-5 set out in the Council's Housing Commitments Forecast, Local Plan Housing Allocations Forecast, and SHLAA Sites Forecast.
- 4.7 Our analysis has broken these sites down by Category A sites and Category B sites. Specifically, Category A sites are those listed within the definition of deliverable and as such it is only when these sites expire or there is clear evidence that these sites will not deliver within the five-year period that they should not be considered deliverable. However, for Category B sites, as set out in Appendix 1, policy, guidance and precedent establish that it is for an LPA to demonstrate that such sites are deliverable, with 'clear evidence' that housing completions will begin on site within five-years published. We have set out below where we do not consider the Council's evidence represents 'clear evidence' to meet the Framework's definition of deliverable. A breakdown of these sites and our amendments to the Council's supply trajectory can be found in Appendix 2.
- 4.8 In the absence of any published updated SHLAA for 2025, we have supplemented the Council's Housing Commitments Forecast with our own review of new planning permissions for residential development granted between 1st April 2024 and 31st March 2025. We have then rebased the Housing Commitments Forecast, Local Plan Housing Allocations Forecast and SHLAA Sites Forecast for the five year period starting on 1st April 2025 i.e. to cover the period 2025/26 to 2029/30.

Housing Commitments Forecast

- 4.9 23 Housing Commitment Sites have been included within the Council's five year trajectory, and we have manually added a further 34 Sites that secured planning permission between 1st April 2024 and 31st March 2025. Of the 23 sites included within the Council's evidence, we consider there are three that do not meet the Framework's definition of deliverable (all of which are Category A sites given that they do not involve major development and have planning permission, or have detailed planning permission).

Land at Knowsley Road Farm, Knowsley Lane, Knowsley

- 4.10 Permission in principle (ref. 20/00664/PIP) was granted for the demolition of existing buildings and erection of up to a maximum of 8 no. dwellings on Land at Knowsley Road Farm, Knowsley on 22nd March 2021. The decision notice required an application for approval of Technical Details Consent to be made no later than three years from the date of planning permission. No Technical Details Consent has been forthcoming on the site and consequently, the permission in principle has lapsed.
- 4.11 The Council's trajectory suggests that 4 dwellings would be completed by March 2029, with a further 4 completed by March 2030 (outside of the five year period).
- 4.12 As a result of the permission expiring, the trajectory has been amended to remove the delivery of 4 dwellings within the five year monitoring period, and the additional 4 dwellings in 2029/30.

Foxhill Farm, Foxhill Lane, Halewood

- 4.13 Outline planning permission (ref. 20/00470/OUT) was granted on 4th February 2022 for a residential development on the site of 7 no. dwellings with appearance and landscaping reserved for future approval. No reserved matters application has been submitted pursuant to the outline planning permission within three years of the date of the permission. As such, the outline planning permission has now expired.
- 4.14 The Council's trajectory suggests that 7 dwellings would be delivered within the five year monitoring period (4 by March 2025 and 3 by March 2026). The trajectory has been revised to remove these 7 dwellings from the Council's 5YHLS.

Land to the rear of 36 to 46 Mintor Road, Northwood, Kirkby

- 4.15 Detailed planning permission (ref. 20/00695/FUL) was granted on 8th July 2021 on the site for the "erection of 2no 3 bed semi-detached houses. 1no 4 bed detached house and 2no 2 bed apartments together with parking, access and landscaping/boundary treatments." Development was required to commence within three years of the date of the planning permission (by 7th July 2024), however, there is no evidence that the permission has been implemented. A discharge of condition application has been submitted but is awaiting determination – this claims the permission was implemented on 3rd June 2024 however this cannot have been done lawfully without pre-commencement conditions being discharged.

- 4.16 The Council's trajectory suggests that 5 dwellings would be implemented within the first two years of the five year monitoring period (3 dwellings by March 2025 and 2 dwellings by March 2026). The trajectory has been revised to remove these 5 dwellings.

Other Sites

- 4.17 For the remaining 20 Housing Commitment Sites from the Council's five year trajectory we rebased the supply by rolling out any stated supply for the 2024/25 period on the assumption that all of those dwellings were delivered as expected (236 total). Whether these units were actually delivered would require individual site visits in the absence of the Council's monitoring data for the 2024/25 period, nor availability of MHCLG completions data.
- 4.18 For the additional 34 Sites that secured planning permission between 1st April 2024 and 31st March 2025 we have manually incorporated these into the five year trajectory for the years 2025/26 through to 2029/30 using the methodology set out in Appendix 1.
- 4.19 Overall, through our review and rebasing exercise we have reduced the Council's five year supply from commitments to 337 dwellings, from 382 – a net reduction of 45.

Local Plan Housing Allocations Forecast

- 4.20 The Council's five year trajectory for 2024/25 to 2028/29 includes five Local Plan Allocations, with the supply from these allocations totalling 1,456 dwellings between years 1 to 5. Two sites, specifically East of Halewood and South of Whiston (Halsnead) contribute 1,221 dwellings to the Council's 5YHLS (base date 1st April 2024) (c.84% of the total supply identified from Local Plan Allocations).
- 4.21 Land east of Halewood is being brought forward by Redrow Homes, Miller Homes and Bellway Homes and the entirety of the site is consented for residential development. Furthermore, the majority of Land South of Whiston (Halsnead) has either detailed planning permission or reserved matters approval pursuant to the outline planning permissions granted on the site. We have not contested the build-out rates for these two sites, which appear to have been informed by the developers' build out programmes, however we have been rebased the trajectory to the 5 year period 2025/26 to 2029/30 on the assumption that all 2024/25 projected supply was delivered as expected. As above, whether these units were actually delivered would require individual site visits in the absence of the Council's monitoring data for the 2024/25 period.
- 4.22 Both Land bounded by the A58, Prescott and the Former Kirkby Stadium, Valley Road have detailed planning permission for residential development were under construction or close to completion. We have not contested the build out rates on these two sites as there is evidence to conclude that these sites will be completed within the next five years, however we have rebased the supply by rolling out any stated supply for the 2024/25 period on the assumption that all of those units were delivered as expected (50 and 9 units, respectively). In the case of the Former Kirkby Stadium at Valley Road this means that the development is assumed to be complete, with two further years of completions expected at Land bounded by A58 Prescott.

- 4.23 Land at Carr Lane, Prescott received detailed planning permission (ref. 23/02677/FUL) for the erection of 88 affordable dwellings on 23rd January 2025. The Council's trajectory anticipates that all 88 homes will be delivered in the next 5 years (specifically 35 dwellings by March 2026, 35 dwellings by March 2027 and 18 dwellings by March 2028). However, based on Lichfields' STF3, the average lead in time between securing the planning permission to the completion of the first dwellings for sites between 50 and 99 dwellings is 2.3 years. 2.3 years from January 2025 (the date of the permission) would result in the first dwellings being completed on-site in the 2027/28 monitoring year. The trajectory for Land at Carr Lane, Prescott has therefore been revised to reflect delivery commencing in 2027/28.
- 4.24 Overall, through our review and rebasing exercise we have reduced the Council's five year supply from site allocations to 1,331 units, from 1,456 – a net reduction of 125.

SHLAA Sites Forecast

- 4.25 The Council has identified 15 SHLAA sites that contribute towards the Council's claimed 5YHLS for years 1 to 5, which we have assessed as part of this review. The following section highlights the Council's claimed Category A and Category B sites that we consider do not meet the definition of deliverable set out in the Framework.

Category A sites

Land at Copthorne Walk, Kirkby (ref. K0108)

- 4.26 The site identified in the SHLAA sites forecast is part of a larger site that has full planning permission (ref. 20/00695/FUL) for "*residential development for the erection of 15 no. dwellings comprising 4 no. semi-detached dwellings, 3 no. terraced dwellings and 2 no. two storey apartment blocks including 8 no. apartments together with associated parking, access, landscaping and boundary treatments.*" Permission was granted on 24th November 2021.
- 4.27 However, it appears that the Council has double counted the dwellings to be delivered on the site, given that the 15 dwellings consented under ref. 20/00695/FUL have been included within the Council's Housing Commitments Forecast (site ref. Land Adjacent To 86 Meverley Road and Land to the Rear of 2 - 18 Hanmer Road, Westvale, Kirkby).
- 4.28 As such, the 13 dwellings included for ref. K0108 have already been accounted for within the Council's five year trajectory. The trajectory has therefore been deleted.

Land south of Cherryfield Drive, Kirkby (ref. K0705)

- 4.29 Full planning permission (ref. 24/00068/FUL) was granted by the Council on 11th April 2025 on behalf of Barratt David Wilson Homes. The permission granted demolition of the existing buildings on the site and erection of 800 dwellings (use class C3). There is a live s96a application and a number of conditions subject to application for discharge which indicates the intent to deliver.
- 4.30 The Council's five year trajectory accounts for the delivery of 338 dwellings by March 2029, specifically 26 dwellings by the end of March 2025, and 78 dwellings for the four years

thereafter. Clearly, the Council's trajectory was overly ambitious given permission was granted after the Council assumed completions would have occurred.

- 4.31 The Council's indicative lead-in times, set out in Table 3 of the SHLAA Update (December 2024), outline a lead-time of 2 years from the date of planning permission to the completion of the first dwelling on sites of 50 dwellings and above. Therefore, this would point to a start on-site at the earliest in 2027/28.
- 4.32 Lichfields' STF3 does not set out average timeframes from securing a resolution to grant to the completion of first dwellings. Notwithstanding the above, we have assumed that planning permission will be implemented and that completions will begin from 2027/2028. We have rebased the Council's trajectory and based the build-out rate assumptions on STF3, reducing the yearly delivery rates from 78 dpa to 67 dpa for the three years starting from 2027/28.
- 4.33 Whilst this permission was granted after our 31st March 2025 cutoff for rebasing, given the significant scale of development permitted we have opted to include it in supply rather than exclude completely.

Category B sites

Little Moss Hey, Stockbridge, Huyton (ref. K0201)

- 4.34 The site comprises an existing playing field that is designated as Urban Greenspace within the Council's LPCS. The Council claim that the site is deliverable given that this Council owned site was formerly used for a comprehensive school, which was vacated in the early 1990s, and the site is no longer required for education or sporting provision and is surplus to the Council's requirements. However, it is noted that the loss of greenspace would need to be assessed. LPCS Policy CS21 (Greenspaces and Trees) states that new development resulting in the loss of urban greenspace will not be permitted unless one of the following tests is met, specifically a surplus of all types of greenspace provision would be maintained; the land is considered unsuitable; appropriate mitigation is provided; the development is required to improve greenspace provision of for ancillary facilities to support sport or recreation; or, where the proposal relates to the loss of indoor or outdoor sports provision, and there is no evidence of future or continuing need for sports use, or alternatively only land incapable of forming a playing pitch or sporting facility is affected.
- 4.35 The Council's own evidence states that the site is within the Council's Housing Land Disposal Programme and will come to the market in due course. No launch date is yet confirmed.
- 4.36 Since the publication of the Council's SHLAA 2024 Update (December 2024), it appears that the site is being marketed as a development opportunity by Invest Knowsley. However, there is no planning history of relevance on the site and the site is not currently the subject of any live planning applications.
- 4.37 The Council has accounted for the delivery of 26 dwellings by March 2028 and 26 dwellings by March 2029. The Council is unable to provide clear evidence to demonstrate that the 52

dwellings included within the Council's five year trajectory will come forward. Therefore, these dwellings have been removed from the Council's 5YHLS.

Hollow Croft, Stockbridge, Huyton (ref. K0390)

- 4.38 The site comprises existing green space that is designed as Urban Greenspace within the Council's LPCS. The Council claim that the site is deliverable given this Council owned site was formerly used for a school, but it is no longer required for education or sporting provision, it is currently vacant and has been identified as surplus by the Council's asset review. Given the site's Urban Greenspace designation, the loss of greenspace would need to be assessed in accordance with LPCS Policy CS21 (Greenspaces and Trees). The policy states that new development resulting in the loss of urban greenspace will not be permitted unless one of the following tests is met, specifically a surplus of all types of greenspace provision would be maintained; the land is considered unsuitable; appropriate mitigation is provided; the development is required to improve greenspace provision of for ancillary facilities to support sport or recreation; or, where the proposal relates to the loss of indoor or outdoor sports provision, and there is no evidence of future or continuing need for sports use, or alternatively only land incapable of forming a playing pitch or sporting facility is affected.
- 4.39 The Council's own evidence states that the site is within the Council's Housing Land Disposal Programme and will come to the market in due course. No launch date is yet confirmed.
- 4.40 Since the publication of the Council's SHLAA 2024 Update (December 2024), it appears that the site is being marketed as a development opportunity by Invest Knowsley. However, there is no planning history of relevance on the site and the site is not presently the subject of any live planning applications.
- 4.41 The Council has accounted for the delivery of 32 dwellings by March 2028 and 18 dwellings by March 2029. The Council is unable to provide clear evidence to demonstrate that the 50 dwellings included within the Council's five year trajectory will come forward, particularly given that the site remains on the market and is not the subject of a live planning application. Therefore, these dwellings have been removed from the Council's 5YHLS.

Former Municipal Building and Adjoining Land, Cherryfield Drive, Kirkby (ref. K0700)

- 4.42 The site, comprising land of the Council's former Municipal building and adjoining informal open space, is unallocated within the Council's LPCS. The Council claim that the site is deliverable, is owned by the Council and able to support up to 150 apartments. The Council's evidence states that the site comprises a multi-storey car park and informal open space which formerly sited the Knowsley Council municipal services building. With the exception of the car park there are no planning policy or known physical constraints that would make the site unsuitable for housing.
- 4.43 It appears that the site is being marketed as a development opportunity by Invest Knowsley. However, there is no planning history of relevance on the site and the site is not presently the subject of any live planning applications.

- 4.44 The Council has accounted for the delivery of 32 dwellings by March 2028 and 32 dwellings by March 2029. The Council is unable to provide clear evidence to demonstrate that the 64 dwellings included within the Council's five year trajectory will come forward, particularly in the absence of a live planning application on the site. Therefore, these dwellings have been removed from the Council's 5YHLS.

North Huyton, Phase 5 (ref. K0701)

- 4.45 The site, comprising North Huyton Phase 5, is informal open space that is designated as Urban Greenspace in the Council's LPCS. The loss of greenspace would need to be assessed in accordance with LPCS Policy CS21 (Greenspaces and Trees). The policy states that new development resulting in the loss of urban greenspace will not be permitted unless one of the following tests is met, specifically a surplus of all types of greenspace provision would be maintained; the land is considered unsuitable; appropriate mitigation is provided; the development is required to improve greenspace provision of for ancillary facilities to support sport or recreation; or, where the proposal relates to the loss of indoor or outdoor sports provision, and there is no evidence of future or continuing need for sports use, or alternatively only land incapable of forming a playing pitch or sporting facility is affected.
- 4.46 The Council's own evidence outlines that this Council owned site is currently vacant and functions as informal open space, which is poor quality and deemed surplus to requirements for the area. Consequently, the site is considered suitable for residential development. There is no planning policy or known physical constraints that would make the site unsuitable for housing (subject to justifying the loss of greenspace).
- 4.47 We understand that since the publication of the Council's SHLAA 2024 Update (December 2024), a full planning application (ref. 25/00540/FUL) for 136 dwellings has been submitted by Breck Homes (validated on 11th November 2025) and is currently awaiting determination. Applying STF3 to the date of validation, this assumes 6.0 years from validation to the completion of the first dwellings on-site (November 2030). This is outside of the five year period (base date 1st April 2025).
- 4.48 Therefore, in the absence of a full planning permission on the site, the lack of clear evidence provided by the Council and the application of STF3, all 81 dwellings have been removed from the 5YHLS. However we note that the site may come back into supply at a future point in time.

Boundary Hotel, Pilch Lane, Huyton (ref. K0706)

- 4.49 This brownfield site previously accommodated the Boundary Hotel in Huyton, which has since been demolished and remains vacant. The site is unallocated within the Council's LPCS. The Council's own evidence states that this previously developed site has been cleared of any built structures and is located within a sustainable location. There are no other planning policy or known physical constraints that would make the site unsuitable for housing.
- 4.50 The site is subject of a live planning application for residential development of 35 units (ref. 25/00344/FUL) which was validated on 23rd June 2025.

- 4.51 The Council has accounted for the delivery of 10 dwellings by March 2027 and 10 dwellings by March 2028. Whilst there is a live planning application, it has only been recently submitted and therefore the Council is unable to count it towards their supply until it is permissioned (in the absence of an outline planning permission on the site; lack of housing allocation on the site; no permission in principle on the site; or its identification on the Council's brownfield land register). Therefore, these dwellings have been removed from the Council's 5YHLS, however we note that 35 units may come back into supply at a future point in time.

Fallows Way, Whiston, Liverpool (ref. K0707)

- 4.52 The site comprises land situated adjacent to the Village Hotel, Whiston, that is currently in use as a car park. The site is therefore brownfield in nature. However, the site is partly located within a primarily residential area, with the remainder of the site situated within a primarily industrial area. LPCS Policy CS4 (Economy and Employment) is therefore of relevance, which seeks to safeguard existing employment land from other types of development, except where there is no current or likely future demand for employment uses on the land; or where other uses would bring wider regeneration, environmental and amenity benefits.
- 4.53 The Council's own evidence states that the site is deliverable, and whilst the site currently forms part of the operational land of Village Hotel Liverpool, it is considered surplus to requirements. The site is partly located within a primarily industrial area, but it is considered that residential development would have no impact on employment uses or the wider industrial area. It is also considered the proposal would not result in an unacceptable loss of industrial land because the site has been lost to the hotel use already. The Council consider that there no other planning policy or known physical constraints that would make the site unsuitable for housing development.
- 4.54 There is no planning history of relevance on the site and the site is not currently the subject of any live planning applications.
- 4.55 The Council's five year trajectory includes the delivery of a total of 10 dwellings, 5 by March 2028 and 5 by March 2029. However, the Council is unable to provide clear evidence to demonstrate that these 10 dwellings will come forward in year 0 to 5. This is particularly in the absence of an outline planning permission on the site; the site's part designation as a primarily industrial area; no permission in principle on the site; or its identification on the Council's brownfield land register. The dwellings have been excluded from the Council's 5YHLS.

Huyton Campus (ref. K0710)

- 4.56 The Huyton Campus site, comprising the Municipal office buildings for the operations of the Council alongside associated car parking provision, is identified within the SHLAA (ref. K0710). Full planning permission (ref. 23/02803/FUL) for enabling and engineering works for the demolition of the municipal building and computer building; existing car parks and hardstanding, removal of trees, ground reprofiling and remediation and installation of below ground infrastructure and formation of a temporary car park was granted on the site

on 19th March 2024. The demolition and enabling works approved under ref. 23/02803/FUL are yet to be undertaken and the buildings appear to still be in operational use. An EIA screening opinion request was received on 28th July 2025 for a hotel, up to 420 residential dwellings and community and commercial space (up to 5,600sqm).

- 4.57 The Council's own evidence confirms that the site is Council owned and that the 10-year development plan for Huyton Village Centre establishes the principle of residential development on the site in the context of the wider town centre. The Council considers that there are no known planning policy or physical constraints that would make the site unsuitable for housing development, and the site can be considered deliverable.
- 4.58 Despite the EIA screening request, no detailed planning applications have been submitted on the site to bring forward residential development and prior to bringing forward any future development on the site, the Council employees will need to be relocated out of their current offices. The SHLAA identifies a potential yield on the site of 450 dwellings, with the Council's trajectory accounting for the delivery of 210 dwellings in years 0 to 5 (specifically 70 dwellings by March 2027, 70 dwellings by March 2028 and 70 dwellings by March 2029). In the absence of a live planning application for housing on the site, Lichfields' STF3 states that for schemes between 100 and 499 dwellings, the medium timeframe from validation of the application to securing planning permission is 2.8 years and a further 3.2 years from the grant of planning permission to the completion of the first dwellings (6 years in total). Consequently, the dwellings have been discounted from the Council's 5YHLS. It is, however, recognised that c.420 dwellings may come back into the supply in future years should the mixed-use hotel, residential, community and commercial scheme secure detailed planning permission and progress to delivery.

Sewell Street/Kemble Street (ref. KO712)

- 4.59 Land on Sewell Street / Kemble Street is an unallocated brownfield site located in Prescott. It contains a number of existing buildings, vacant land and an existing car park. We understand that that the Council has granted a number of planning applications on the site in the past 20 years, including most recently granting outline planning permission (ref. 16/00788/OUT) (all matters reserved) for mixed use development (classes A1, A2, A3, A4, and A5) on 10th April 2017. However, in the absence of a reserved matters application being submitted pursuant to the outline permission, the permission has now expired.
- 4.60 The Council's evidence regarding the site's deliverability states that this parcel of land is owned by the Council. It highlights that previous proposals for the site related to hotel development. As this hasn't been forthcoming, the Council consider the site would be suitable for residential. There is no other planning policy or known physical constraints that would make the site unsuitable for housing development.
- 4.61 However, the site is located within a Conservation Area and contains the Grade II Listed Former Picture Palace Cinema, Prescott, which will need to be considered when bringing forward the site for development. Additionally, from a review of the land titles that cover the site, it appears that the site isn't solely owned by the Council (as claimed in their evidence).

- 4.62 The Council's five year trajectory accounts for the delivery of 23 dwellings, specifically 20 by March 2027 and 3 by March 2028. However, there is no clear evidence that the Site will come forward for housing in the next five years. All dwellings have therefore been discounted from the supply.

Junction of Church Street and High Street (ref. KO713)

- 4.63 The land parcel located on the Junction of Church Street and High Street, Prescot is an unallocated brownfield site comprising a number of existing buildings, including a car garage. The Council's own evidence outlines that the land parcel is owned by the Council and owing to the principle of residential development in the surrounding residential area, and of the current site ownership, the site can be considered deliverable. There is no other planning policy or known physical constraints that would make the site unsuitable for housing development.
- 4.64 However, the site is not currently the subject of any live planning applications and the only planning application of relevance to the site (ref. 12/00602/FUL) for the erection of a three storey apartment block on part of the site was refused on 19th December 2012 and dismissed at appeal on 7th October 2013.
- 4.65 Any development to come forward on the site will also need to give consideration to its location within a Conservation Area.
- 4.66 The Council's five year trajectory includes the delivery of 23 dwellings, specifically 20 by March 2027 and 3 by March 2028. However, there is no clear evidence that the Site will come forward for housing in the next five years. All dwellings have therefore been discounted from the supply.

SHLAA Summary

- 4.67 Overall, through our review of SHLAA sites and rebasing exercise we have reduced the Council's five year supply from SHLAA sites to 367 units, from 1,070 – a net reduction of 703. We note, however, that some large SHLAA sites may come into supply in future years, namely an annual delivery of the c.599 homes not yet counted in our supply for Cherryfield Drive in Kirkby which have detailed planning permission, the live planning application for 35 dwellings at Boundary Hotel in Huyton, and the prospective 420 dwellings at the Huyton Campus subject to a live EIA screening request.
- 4.68 It is important to note that we have also undertaken a review of sites identified in the SHLAA (base date 1st April 2024) to come forward in year 6 (2029/30). This is to better understand whether, when rolling the position forward to base date 1st April 2025, any of this supply should be included. The Council identified an additional 70 dwellings to come forward on 8 SHLAA sites in year 6. Having undertaken a review of these sites, all remain unpermissioned and are not currently subject to a live planning application. No clear evidence is provided by the Council to meet the Framework's definition of deliverable for Category B sites. This supply has not been included.

Windfalls

- 4.69 A total supply of 50 dwellings from small site windfalls (10 dpa) is included within the Council's 5YHLS. In relation to windfall allowances, the Framework [§75] states that:
- "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."*
- 4.70 The Council's windfall allowance, as set out in the SHLAA Update (December 2024), has been informed by the total net windfall completions over the previous five years. However, the windfall allowance has been applied to year 1 to 5 in the Council's 5YHLS.
- 4.71 By their nature, windfall sites have not yet obtained planning permission and will take time to come forward through the planning process and progress to completion. It is therefore not appropriate to allow for windfalls in years 1 to 3. This approach has been widely accepted and applied by Planning Inspectors examining local plans and considering planning appeals.
- 4.72 We consider that it is currently a reasonable approach to include an allowance for 10 dpa in years four and five.

5.0 Knowsley 5YHLS Position

- 5.1 A summary of our assessment of the Council's 5YHLS is set out in Table 4 below.

Table 4 Knowsley Five Year Supply

	Council (base date 1 st April 2024)	Lichfields (base date 1 st April 2025)
Housing Commitments	382	337
Local Plan Allocations	1,456	1,331
SHLAA Sites	1,070	367
Windfalls	50	20
Total	2,958	2,055

Source: Knowsley Five Year Supply / Lichfields Assessment

- 5.2 As set out above, the Council's total claimed 5YHLS at 1st April 2024 was 2,958 dwellings.
- 5.3 Lichfields' assessment of the 43 sites included within the Council's 5YHLS, together with our rebasing exercise to 1st April 2025, has concluded that a total of 2,055 dwellings contribute to the Council's five year supply. We have supplemented the Council's commitments data with residential planning permissions granted between 1st April 2024 and 31st March 2025 which contribute to this supply figure.

- 5.4 We consider that the Council can demonstrate **a deliverable supply of 2,055 dwellings at 1st April 2025** (noting we have been overly cautious by including 3 years' worth of supply from Cherryfield Drive although granted just after the 31st March 2025 cutoff).

Amended 5YHLS Position

- 5.5 The Council's 5YHLS position, based on the changes published in the Framework (December 2024) and revised methodology for calculating LHN, is set out in Table 5 below.

Table 5 Council's Amended 5YHLS Position (at 1st April 2025)

Estimated Position at 1 st April 2025		
Annual Requirement	LHN for Knowsley based on SM3	608
Five Year Requirement	608*5	3,040
Buffer	5%	152
Five Year Requirement (2025-2030)	3,040 + 152	3,192
Five Year Supply		2,055
Five Year Position	(2,055 / 3,192)*5	3.22 years

Source: Lichfields' Analysis

- 5.6 Based on our analysis and applying the new SM3 figure of 608 dpa for Knowsley, alongside a 5% buffer in accordance with the Framework, we estimate that **the Council would only be able to demonstrate 3.22 years' supply at 1st April 2025.**
- 5.7 This is significantly below the Council's claimed position of 7.20 years as at 1st April 2024. This position was based upon the previous publication of the Framework (December 2023) and applied their Local Plan requirement figure of 450 dpa for the first four years and then 255 dpa for the fifth year (based on SM2 and applying no 5% buffer). This methodology for calculating 5YHLS is now out-of-date.
- 5.8 **It is therefore considered on our analysis and the facts as far as we understand them and explained in this note, that the Council cannot demonstrate a 5YHLS position.**
- 5.9 **The position will likely worsen from 1st July 2026 when a 20% buffer will apply to the calculation for the purposes of decision-making.**
- 5.10 The Council mentioned verbally through the pre-app that they may be able to rely upon the delivery of dwellings on the safeguarded site at Knowsley Village (LPCS Policy SUE1 – Sustainable Urban Extensions and Safeguarded Land) in discussions around the Council's 5YHLS position. This site has not been accounted for in the Council's most recent SHLAA. Part of the site is subject to a live outline planning application (ref. 25/00486/OUT) for the erection of 700 dwellings. The application was validated on 21st August 2025 and is currently awaiting determination.
- 5.11 There is currently an absence of clear evidence from the Council to confirm this site will come forward in the next five years. Therefore, in the absence of this, the site fails to meet the Framework's definition of deliverable for Category B sites. Notwithstanding this, STF3

outlines a 4.9 year timeframe for schemes of this size from the validation of a planning application (to include outline applications) to the completion of the first dwellings. This would result in the site first delivering dwellings in around July 2030 (of the year 2030/31). This is outside of the five year period (base date 1st April 2025).

Appendix 1 Lichfields Deliverability Review Framework

- A1.1 For the purposes of assessing the Council's 5YHLS deliverable supply the below sets out a review of relevant policy and guidance in terms of what is required of LPAs to demonstrate that they have sufficient land to meet five years' requirement for housing. This sets out a framework for how we review the Council's supply in the following section of this report.
- A1.2 To demonstrate a 5YHLS, paragraph 78 of the Framework sets out that LPAs should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.
- A1.3 The Framework defines a 'deliverable' site as:
- To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
- a *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
 - b *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*
- A1.4 The Secretary of State has confirmed his interpretation that the definition of 'deliverable' should not be taken as being a 'closed list'¹. It was stated that "*examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition*" (Paragraph B of the Consent Order). Therefore, sites not specifically listed in the definition of deliverable can be found to be 'deliverable' where that site can be shown to be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- A1.5 The PPG provides further guidance on what constitutes a 'deliverable' site in the context of decision-making:
- "In order to demonstrate 5 years' worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:*

¹ See Consent Order for East Northamptonshire Council v Secretary of State for Communities and Local Government (Co/917/2020) - <https://cached.offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/CO009192020.pdf>

- *have outline planning permission for major development;*
- *are allocated in a development plan;*
- *have a grant of permission in principle; or*
- *are identified on a brownfield register.*

Such evidence, to demonstrate deliverability, may include:

- *current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
- *firm progress with site assessment work; or*
- *clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.” [ID: 68-007]*

A1.6 Further guidance on the interpretation of what constitutes a deliverable site has also come through appeal decisions and Inspectors’ reports regarding Annual Position Statements.

Interpreting the Policy and Guidance

A1.7 The below sets out our interpretation of policy and guidance in relation to what constitutes a ‘deliverable site’:

- ‘Category A’ sites are those listed in the definition of ‘deliverable’ (i.e. sites with a detailed permission) and – in accordance with the PPG (ID: 68-007- 20190722) – are sites that are ‘in principle’ deliverable. It is only when these sites expire or the third-party present ‘clear evidence’ that these sites will not deliver within the five-year period that they should not be considered deliverable (i.e. to overturn the presumption that they are ‘deliverable’).
- ‘Category B’ sites are – in effect – any site that does not have a detailed permission (including those types of sites not specifically listed in the definition). It is for an LPA to demonstrate these sites are deliverable with published ‘clear evidence’ that housing completions will begin on site within five-years. The test is not whether or not the Council’s assumptions on any one site are unrealistic, it is that they have to be shown to be clearly realistic².

A1.8 What does and does not form ‘clear evidence’ to demonstrate Category B sites are deliverable has been a matter of much debate at planning appeals. Ultimately, there is no definition of ‘clear evidence’ and determining what does form ‘clear evidence’ is a matter of

² Appeal ref. 3236460 (IR65)

planning judgement. Having reviewed a large body of precedent in Inspector and Secretary of State decisions we consider the below points to be most important:

1 Deliverability is determined on the content and value of the evidence prepared, not simply the fact that evidence itself has been provided.

As confirmed by the ‘Popes Lane’ decision³, it is the evidential value of the evidence gathered that demonstrates that a development’s prospects of delivery are realistic: forming ‘clear evidence’. The value of any site-specific evidence is itself dependant on the site’s context and the specific circumstances of that site⁴. Evidence can also take account of information gathered after the base date as long as it is used to support sites identified as deliverable as of the base date⁵.

2 While there is no minimum criterion for clear evidence⁶, the type and form of ‘clear evidence’ for Category B sites will vary depending on circumstances of the site (e.g. its size or how quickly it is expected to deliver).

By way of example, the type and form of evidence that could be considered robust to demonstrate a ‘realistic prospect’ of completions beginning within the five-year period for a hypothetical Category (B) site that has outline permission for 50 homes and has a reserved matters application pending consideration with an assumed output in line with average lead-in times/build rates for the Borough will be markedly different to that required for either a large-scale strategic site for 1,500 homes that has an allocation but no extant outline permission, or a site that is assumed to be building out sooner and/or more quickly than has typically been the case for comparable sites in an LPA or elsewhere.

3 LPAs should undertake a critical analysis of whatever evidence is gathered from developers.

In the ‘Rectory Farm’ decision⁷ the Inspector noted that the Council did not simply accept the proforma returns from developers on face-value. Where the Council thought the rates overly ambitious the rates were altered. This appeared to give additional weight to the Council’s findings. Another Inspector in the earlier ‘Land to the south of Williamsfield Road’ decision⁸ echoed these comments.

Lead-in Times and Build Rates

A1.9 In determining the deliverability of a site, it is important to consider when the site might reasonably start delivering homes and at what rate it will deliver them. The Council has provided indicative lead-in times for schemes below 50 dwellings and 50 dwellings and above, however the table is not accompanied by local evidence. It also sets out a general

³ Appeal ref. 3216104 (IR 23)

⁴ Confirmed in both the ‘Popes Lane’ (ref. 3216104 (IR 23) and ‘Rectory Farm’ (ref. 3234204) (IR 32) decisions

⁵ As the Secretary of State confirmed in the ‘Woburn Sands’ decision (ref. 3169314) (DL 12)

⁶ Land to the South of Williamsfield Road (ref. 3207411) (IR 27)

⁷ Appeal ref. 3234204 (IR 32)

⁸ Appeal ref. 3207411 (IR 27)

build-out rate of 20 dpa per development for sites up to 49 dwellings and 35 dpa for sites of 50 dwellings or more.

A1.10 However, we have used Lichfields' recently published 'Start to Finish (3rd Edition)' (2024) report to benchmark sites. This report uses empirical evidence to inform the production of realistic housing trajectories for plan making and decision taking. This evidence has been used to inform numerous local plan examinations, s.78 inquiries and five-year land supply position statements.

A1.11 The medium average timeframes from validation of the first application to completion of the first dwelling, taken from Start to Finish (3rd Edition), are summarised in Appendix 1 Table 1 below. The 'planning approval period' represents the time taken from the validation of the first application to the first detailed permission. For large sites, this period typically comprises the determination of an outline application, and then a reserved matters application (but in some cases, it may be a single full/ hybrid application). The 'planning to delivery' period is from the first detailed permission to completion of the first dwellings.

Table 6 Lead in Time Assumptions

	50-99 dwellings	100-499 dwellings	500-999 dwellings	1,000-1,499 dwellings	1,500-1,999 dwellings	2,000+ dwellings
Planning approval period	1.5	2.8	3.4	4.9	5	5.1
Planning to delivery	2.3	3.2	1.5	1.3	1.6	1.6
Total	3.8	6.0	4.9	6.2	6.6	6.7

Source: Start to Finish (3rd Edition)

A1.12 The mean build-out rates, also taken from the Start to Finish (3rd Edition) report, are summarised in Table 2 below.

Table 2 Build-Out Rate Assumptions

	50-99 dwellings	100-499 dwellings	500-999 dwellings	1,000-1,499 dwellings	1,500-1,999 dwellings	2,000+ dwellings
Mean build out rates	20	49	67	90	110	150

Source: Start to Finish (3rd Edition)

**Appendix 2 Lichfields' Amendments to the
Council's Housing Supply
Trajectory (base date 1st April
2024, rebased to 1st April 2025)**



Housing Commitments Forecast

							Council's Supply						Lichfields Supply (rebased)					Comments
Status	Application Number	Address	Lichfields Ref	Pro forma?	Completions to date	Remaining dwellings at 01.04.2024	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2025/26	2026/27	2027/28	2028/29	2029/30	
Outline PlanningPermission	20/00664/PIP	Land At Knowsley Road Farm 315 Knowsley Lane Knowsley Knowsley L34 7HE	KNOW1	Yes	0	8					4	4						Permission in principle expired - removed
Outline PlanningPermission	20/00470/OUT	Foxhill Farm, Foxhill Lane, Halewood, Knowsley, L26 4XG	KNOW2	Yes	0	7	4	3										No reserved matters application come forward within 3 years of the expiration of the outline planning permission - removed
Under Construction	18/00178/FUL	The Park Hall Huyton Hey Road Huyton L36 5SE	KNOW3	No	0	5	5							5				Permission granted then superseded by 24/00041/FUL for CoU, 5 units, Granted 7th Feb 2025. Likely to come forward in next 5 years
Under Construction	19/00434/FUL	Former HSBC Bank 2, Eccleston Street, Prescot, L34 5SB	KNOW4	No	0	8	4	4					4	4				Permission granted, appears to have been implemented on StreetView. Application to discharge condition 5 (materials) refused in March 2025; revised application pending, but likely to come forward within next 5 years
Under Construction	20/00115/FUL	Land Adjacent To Hillside Avenue Huyton Knowsley	KNOW5	No	61	117	35	35	35	12			35	35	12			Under construction by Gleeson Homes - rolled forward delivery
Full PlanningPermission	20/00559/FUL	Land To The Rear Of 36 To 46 Minton Road Northwood Kirkby Knowsley L33 5XQ	KNOW6	Yes	0	5	3	2										Permission expiry 7th July 2024. Discharge of condition application has been submitted but is awaiting determination - claims permission was implemented on 3rd June 2024 however pre-commm conditions not discharged - removed
Under Construction	20/00622/FUL	Land To Rear Of 39 - 63 Ash Grove Prescot L35 5BE	KNOW7	No	10	26	13	13					13					Permission being built out - rolled forward
Under Construction	20/00695/FUL	Land Adjacent To 86 Melverley Road And Land To The Rear Of 2 - 18 Hanmer Road, Westvale, Kirkby	KNOW8	No	6	9	5	4					4					Permission being built out - rolled forward
Under Construction	19/00692/FUL, 16/00575/NMA	Land to Rear of Kingsnorth to 50 Mattock, Whiston	KNOW9	No	28	23	23											Permission being built out - assume completed
Under Construction	19/00297/FUL	Land At Greenwood Close, Cross Lane And At Former Watch Factory Site, Off Bookbinders Lane Prescot Knowsley	KNOW10	No	180	11	11											Permission being built out - assume completed
Under Construction	17/00647/REM	Land Bounded By And To The Rear Of Knowsley Community College Princess Drive, 43-127 Stockbridge Lane, 184-190 Lourdens Road, 79-153 Ashbury Road And Fronting Melbury Road, Huyton	KNOW11	No	257	46	35	11					11					Permission being built out - rolled forward
Under Construction	21/00534/FUL	41 Dinas Lane Roby L36 2NL	KNOW12	No	0	11	3	5	3				3	5	3			Permission granted on 28/09/2022. Applicant Prima housing Group and land within Prima's ownership. Application to discharge condition 4 approved in October 2024, discharge condition 3 submitted in November 2024 awaiting determination. From review of google earth development looks like it has commenced. Rolled back delivery
Under Construction	21/00742/FUL	Land At Junction Of Lickers Lane And Sherwood Drive Whiston Knowsley L35 3XZ	KNOW13	No	0	8	4	4						4	4			Permission granted 31/10/22 and expires on 31/10/25. Does not appear development has commenced but may still come forward. Rolled back delivery.
Under Construction	20/00064/ FUL	Weston House, North End Lane, Halewood, L26 5QB	KNOW14	No	0	7	3	4					4					Permission being built out - rolled forward
Under Construction	21/00491/FUL	Land At Junction Of Gerrads Lane And North End Lane (Adjacent To The Coachouse) Halewood Knowsley L26 5QA	KNOW15	No	2	5	5											Permission being built out - assume completed
Under Construction	18/00805/FUL	Land To Side Of 46, High Street, Prescot, L34 6HQ	KNOW16	No	0	5			5					5				Permission being built out - rolled forward
Full PlanningPermission	19/00469/FUL	Knowsley Village Stables School Lane Knowsley Business Park Knowsley L34 9ER	KNOW17	Yes	0	5		5						5				Permission granted on 16 June 2022. Permission to expire on 16 June 2025. Site visit required to understand if development has commenced on-site. Application to discharge condition 3 and 4 submitted in March 2025 awaiting determination. Revised scheme for 8 dwellings dismissed at appeal on 21st May 2025 ref. 24/00155/FUL - applicant stated intention to implement extant permission. Retained and rolled back.

Full PlanningPermission	22/00703/FUL	Land Adj 71 Brook Hey Drive Northwood Kirkby Knowsley	KNOW18	No	0	20		5	10	5			5	10	5			Permission granted on 17th August 2023. Applicant Advent Construction Ltd / Livv Housing. Site fencing up. Application to discharge condition 10 submitted in June 2025 and awaiting determination. Retained
Full PlanningPermission	22/00630/FUL	Land At Mp Foods Lyneham Whiston Knowsley L35 3TN	KNOW19	No	0	19		5	9	5			5	9	5			Permission granted on 22nd September 2023. Discharge of condition 12 granted in September 2024 and discharge of conditions 4&10 granted in August 2025. Retained
Full PlanningPermission	22/00470/FUL	Woodend, Sterling Inks Uk Netherley Road Tarbock Green Knowsley L35 1QE	KNOW20	No	0	10		4	6				4	6				Permission granted on 25th October 2023 by GDB Property Investments Limited. Retained
Full PlanningPermission	23/00327/FUL	Land To The Rear 1 - 25 Hope Street Prescott Knowsley	KNOW21	No	0	6		1	3	2			1	3	2			Permission granted on 20th November 2023. Application to discharge conditions submitted in January 2025 and awaiting determination. Retained.
Full PlanningPermission	23/02818/PDC	25 Derby Road Huyton Knowsley L36 9UG	KNOW22	No	0	5		1	4				1	4				Permission granted on 23rd January 2024. Retained
Under Construction	23/02015/FUL	Mundoxpress Farmers Arms Moorfield Tower Hill Kirkby Knowsley L33 1XD	KNOW23	No	0	20		3	17				3	17				Permission granted on 12th September 2024. Building has been demolished and application for discharged conditions was submitted in January 2025. Retained
Granted - Full Planning Permission (15th Jan 2025)	24/00241/FUL	Land Adj 33 Lancaster Avenue, Whiston Knowsley L35 3QS	KNOW24	No	0	1			1					1				No discharge of Conditions have been granted. Detailed permission assumed to come forward within 5 years
Granted- Full Planning Permission (23rd Oct 2024)	23/02832/FUL	Dales Bar Okell Drive Halewood Knowsley	KNOW25	No	0	9			5	4				5	4			Google Earth shows no above ground work - Variaton of Condition 2 (Elevations) Approved: 19th March 2025 - 25/00087/FUL - App to discharge condition 3 (Highway) and 4 (CEMP) Awaiting Decision :25/00020/DISCON Detailed permission assumed to come forward within 5 years
Granted - Full Planning Permission (04 Oct 2024)	22/00233/FUL	Dye House Liverpool Road Prescott Knowsley The site is bound by LP Housing Allocation APP (19/00684/FUL) (Whitakers Garden Centre)	KNOW26	No	0	45									20	25	15	Google Earth shows no above ground work Application to vary conditions in process - Condition 11 (trees),12 (CEMP) 18(Bin Storage) 24/00624/DISCON :Discharged 8th April 2025 - Condition 17 (Archaeology) 24/00625/DISCON: Awaiting Decision - Conditon 8 (Contaminated Land) 24/00649/DISCON: Awaiting Decision - CONDITION 15 (LEVELS) 24/00650/DISCON; Awaiting Decision - APPLICATION FOR A NON-MATERIAL AMENDMENT FOLLOWING GRANT OF PLANNING PERMISSION 22/00233/FUL 22/00233/NMA:Granted (11th March 2025) - CONDITION 13 (HARD AND SOFT LANDSCAPING) 22/00233/COND2:Awaiting Decision -DISCHARGE CONDITION 5 (NOISE MITIGATION) 22/00233/COND3 - Discharged 20th June 2025 Detailed permission expected to come forward within 5 years
Granted- Full planning permission - (5th April 2024)	21/00972/FUL	Millbrook Manor Knowsley Lane Knowsley L34 0JN	KNOW28a	No	0	1				1						1		No Conditions discharged. Detailed permission assumed to come forward within 5 years
Granted - Full Planning Permission (5th April 2024)	23/02682/FUL	Wheathill Riding Centre, Naylors Road, Roby		No		4			4					4				Detailed planning permission granted in April 2024. Does not appear that the application has yet come forward. Detailed permission assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (10th June 2024)	23/02833/FUL	9 Lognor Road Westvale Kirkby Knowsley				-1			-1					-1				An application to discharge condition 3 submitted. Assumed to come forward within 5 years.
Granted - Full Planning Permission (30th July 2024)	24/00171/FUL	30 Evans Street, Prescott				1			1					1				COU application granted in July 2024. Assumed to come forward within 5 years.

Granted - Full Planning Permission (12th July 2024)	24/00140/FUL	St Helenas Residential Home, 6 Roby Road				16				16					16			An application to discharge conditions 4 and 5 pursuant to the planning permission was granted in February 2025. Assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (12th July 2024)	24/00055/FUL	Tray Ash Farm, Ash Lane, Tarbock Green				-1			-1					-1				COU application granted in July 2024. Assumed to come forward within 5 years.
Granted - Full Planning Permission for COU 9th July 2024)	22/00242/FUL	110-112 Tops Pharmacy Dinas Lane Roby				-1			-1					-1				COU application granted in July 2024. Assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (19th August 2024)	24/00350/FUL	18A Childwall Parade, Childwall Lane, Roby				-1			-1					-1				COU application granted in August 2024. Assumed to come forward within 5 years.
Granted - Certificate of Lawfulness (13th August 2024)	24/00264/CLD	21 Lancaster Road, Huyton				-1			-1					-1				Certificate of Lawful Use granted in August 2024. Assumed to come forward within 5 years.
Granted - Certificate of Lawfulness (13th August 2024)	24/00263/CLD	14 Wallace Avenue, Huyton				-1			-1					-1				Certificate of Lawful Use granted in August 2024. Assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (20th August 2024)	24/00009/FUL	Seel Arms, 22 Hall Lane, Huyton				3				3					3			Application to discharge condition 2 pursuant to the planning permission granted in March 2025.
Granted - Full Planning Permission (20th August 2024)	23/002149/FUL	Land at Chapel Street Prescott Knowsley				5				5					5			Application does not yet appear to have come forward, with no discharge of conditions applications yet submitted. However, given planning permission has been granted, it is assumed this will come forward in 5 years.
Granted - Full Planning Permission (11th August 2024)	24/00374/FUL	122 Sugar Lane Knowsley				-1			-1					-1				COU application granted in August 2024. Assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (25th September 2024)	22/00757/FUL	Former site of Prescott Police Station				11				11					11			Application does not yet appear to have come forward, with no discharge of conditions applications yet submitted. However, given planning permission has been granted, it is assumed this will come forward in 5 years.
Granted - Certificate of Lawfulness (29th October 2024)	24/00470/CLD	7 Edenfield Crescent Huyton Knowsley				-1			-1					-1				Certificate of Lawful Use granted in October 2024. Assumed to come forward within 5 years.
Granted - Certificate of Lawfulness (14th October 2024)	24/00266/COU	School House, 111 Tithebarn Road, Knowsley				-1			-1					-1				Certificate of Lawful Use granted in October 2024. Assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (18th November 2024)	24/00486/FUL	32 Minstead Avenue Northwood Kirkby				-1			-1					-1				COU application granted in November 2024. Assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (11th November 2024)	24/00386/FUL	177 Saxon Way Tower Hill Kirkby				-1			-1					-1				COU application granted in November 2024. Assumed to come forward within 5 years.
Granted - Certificate of Lawfulness (16th December 2024)	24/00607/CLD	6 Sycamore Avenue Halewood				-1			-1					-1				COU application granted in December 2024. Assumed to come forward within 5 years.
Granted - Certificate of Lawfulness (10th December 2024)	24/00567/CLD	14 Old Rough Lane Northwood Kirkby				-1			-1					-1				COU application granted in December 2024. Assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (10th January 2025)	24/00605/FUL	11 St Peters Close Tower Hill				-1			-1					-1				COU application granted in January 2025. Assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (21st January 2025)	24/00371/FUL	73 St Helens Road Prescott				-1			-1					-1				COU application granted in January 2025. Assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (26th February 2025)	25/00009/FUL	19 Copthorne Road Westvale Kirkby				-1			-1					-1				COU application granted in February 2025. Assumed to come forward within 5 years.
Granted - Full Planning Permission (18th February 2025)	24/00671/FUL	35 Greenes Road Whiston				1												Full Planning Permission granted in February 2025. Application does not appear to have come forward but assumed to come forward within 5 years.
Granted - Full Planning Permission for COU (26th February 2025)	24/00545/FUL	47 Childwall Lane Roby				-1			-1					-1				COU application granted in February 2025. Assumed to come forward within 5 years.
Granted - LBC and Full Planning Permission for COU (7th February 2025)	24/00042/LBC / 24/00041/FUL	The Park Hall Huyton Hey Road Huyton				5				5					5			Hoardings are up around site but does not appear to have yet been converted. LBC and full planning permission granted in February 2025. Assumed to come forward within 5 years.
Granted - Full Planning Permission (25th February 2025)	22/00501/FUL	Roby Hotel Public House 104 Greystone Road				9					9					9		It does not appear that works have commenced on-site. Full planning permission was granted in February 2025. Assumed to come forward within 5 years.

Granted - Certificate of Lawfulness (27th March 2025)	25/00124/CLD	8 Beldate Parl Kirkby Park				-1				-1					-1			Cerificate of Lawful Use granted in March 2025, Assumed to come forward within 5 years.
Granted - Certificate of Lawfulness (21st March 2025)	25/00105/CLD	48 Holland Road				-1				-1					-1			Cerificate of Lawful Use granted in March 2025, Assumed to come forward within 5 years.
Granted - Full Planning Permission (28th March 2025)	24/00533/FUL	Church Road, Roby, Knowsley				-4				-4					-4			A full planning application to convert 4 flats into a family assessment centre was granted in March 2025. Assumed the loss of 4 C3 dwellings will take place within the 5 year period.
Granted - Full Planning Permission for COU (31st March 2025)	24/00438/FUL	Prescot Dry Cleaning, 40 High Street, Prescot				-1				-1					-1			COU application for the converion of a flat into offices granted in March 2025. Assumed to come forward within 5 years.
							153	109	86	82	38	19	93	106	89	34	15	
							468							337				



Local Plan Housing Allocations Forecast

								Council's Supply						Lichfields' Supply (rebased)					Site update	
Status	Application Number(s)	Site Name	Column1	Lichfields Reference	Pro forma?	Completions to date	Remaining dwellings at 1/4/25	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2025/26	2026/27	2027/28	2028/29	2029/30	2024 comments	2025 update
Allocation	19/00684/FUL	Land Bounded by A58, Prescott		KNOWALL1	Yes	139*	88*	50	50	38	0	0	0	50	38				Being built out.	July 2024 Street view shows site to be around 3/4 completed. Site projected to be fully completed. Rolled forward
Allocation	23/02677/FUL	Carr Lane, Prescott		KNOWALL2	Yes	0	88	0	35	35	18	0	0	0	0	35	35	18	Permission granted in January.	No construction work has commenced. Discharge of Conditons 3, 8 and 32 (Awaiting decision) associated with pre-development groundwork. Validated 12th feb 2025 Retained but rolled back
Allocation	19/00104/FUL, 19/00521/HYB, 22/00466/REM, 20/00063/FUL, 21/00074/FUL, 23/02836/FUL	East of Halewood		KNOWALL3	Yes	515*	734*	159	143	149	103	70	70	143	149	103	70	70	Trajectory not contested - rolled forward	19/00104/FUL - Site Built out June 2024 (Street View) 19/00521/HYB - Coming up to completion June 2024 (Street View) 22/00466/REM - Coming up to completion June 2024 (street view) 20/00063/FUL - Construction completed June 2024 (Street View) 21/00074/FUL - Google earth/maps/street view show no construction. No discharge of condition (12 dwellings). 23/02836/FUL - Validated 10th July 2024 (Awaiting Decision) 18 dwellings which seeks to supercede 21/00074/FUL *Supply rolled forward*
Allocation	18/00283/HYB, 20/00399/OUT, 20/00417/FUL, 22/00213/REM, 23/02378/REM, 20/00329/FUL, 22/00600/FUL	South of Whiston (Halsnead)		KNOWALL4	Yes	279*	1120*	104	92	105	156	140	127	92	105	156	140	127	Trajectory not contested - rolled forward	18/00283/HYB - Phase one of permission built out (Street view) 20/00399/OUT - Under construction 20/00417/FUL - Built out - Phase 2 (208 dwellings) Under construction Aug 2024 (Street View) 23/02378/REM - Under construction, ground work Aug 2024 (Street View) 20/00329/FUL - No construction can be seen Discharge of condiiton Ref 24/00373/DISCON status : Unknown 22/00600/FUL - Full Planning Permission 30th May 2024, condition discharged (120 dwellings)
Allocation	20/00193/FUL	Former Kirkby Stadium, Valley Road		KNOWALL5	Yes	257	9	9	0	0	0	0	0						Being built out - assume completion	Under Construction July 2024 (Predominantly Built Out)
*assumed by Lichfields								322	320	327	277	210	197	285	292	294	245	215		
								1456						1331						

SHLAA Sites Forecast

									Council's Assumption						Lichfields' Assumption					Comments
Site ID	Gross Site Area (ha)	Density Assump tion	Net Developable Area	Site Name	Lichfields Reference	Pro forma?	Remaining Capacity at 1/4/2024	Potential Yield	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2025/ 26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	
K0108	0.23	100%	0.23	Land at Copthorne Walk, Kirkby	KNOW29	Yes	13	13	0	0	7	6	0	0	0	0	0	0	0	Dwelling numbers have been double counted. Included in ref. KNOW8.
K0163	0.54	100%	0.54	Former Huyton College, Huyton Hey, Huyton	KNOW30	Yes	40	40	2	20	18	0	0	0	20	18	0	0	0	Development currently being constructed - rolled forward
K0201	5.4	75%	4.05	Little Moss Hey, Stockbridge, Huyton	KNOW31	Yes	216	162	0	0	0	26	26	26	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites)
K0365	1.449	100%	1.449	Former Gas Works, Moss Street, Prescott/Whiston	KNOW32	Yes	40	40	0	0	20	20	0	0	0	0	20	20	0	Outline planning permission granted in June 2023. RM application ref. 25/00251/REM validated 10th June 2025. Reasonable evidence that dwellings will complete within five years (assumed 2027/28).
K0390	1.83	90%	1.647	Hollow Croft, Stockbridge Village, Stockbridge, Huyton	KNOW33	Yes	55	50	0	0	0	32	18	0	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites)
K0700	1.35	90%	1.215	Former Municipal Building and Adjoining Land, Cherryfield Drive, Kirkby	KNOW34	Yes	150	135	0	0	0	32	32	32	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites)
K0701	9	75%	6.75	North Huyton, Phase 5	KNOW35	Yes	350	263	0	0	29	26	26	26	0	0	0	0	0	Live planning application ref. 25/00540/FUL for 136 dwellings (validated 11th November 2025) awaiting determination. STF3 assumes 6 years from validation of application to completion of first dwellings (November 2030), which is outside of the 5 year period.
K0702	0.35	100%	0.35	Former St Chad’s Clinic, Kirkby	KNOW36	Yes	53	53	0	0	35	18	0	0	0	35	18	0	0	Permission being built out - rolled forward
K0702	0.95	100%	0.95	Huyton Fire and Ambulance Station	KNOW37	Yes	53	53	18	35	0	0	0	0	35	0	0	0	0	Permission being built out - rolled forward
K0705	22.54	100%	22.54	Land south of Cherryfield Drive, Kirkby	KNOW38	Yes	800	800	26	78	78	78	78	78	0	0	67	67	67	Planning permission for 800 dwellings was granted on 11th April 2025. Various discharge conditions applications submitted and NMA currently live. 5YHLS study rebased to 1st April 2025 and therefore these units are technically outside of scope, however given detailed permission granted they should be expected to come forward within 5 years are included in supply
K0706	0.725	90%	0.6525	Boundary Hotel, Pilch Lane, Huyton, Liverpool, L14 0JG	KNOW39	Yes	22	20	0	0	10	10	0	0	0	0	0	0	0	Does not meet the definition of deliverable (category b sites)/(2024). Note Application ref. 25/00344/FUL for 35 units validated on 23 June 2025 and awaiting decision.
K0707	0.32	100%	0.32	Fallows Way, Whiston, Liverpool, L35 1RZ	KNOW40	Yes	10	10	0	0	0	5	5	0	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites)
K0710	1.74	100%	1.74	Huyton Campus	KNOW41	Yes	450	450	0	0	70	70	70	70	0	0	0	0	0	Does not meet the definition of deliverable (category b sites) given no detailed planning application on site and Start to Finish states 6 years to start on site from validated application (beyond 5 years). EIA screening opinion (ref. 25/00446/SO) for a hotel, up to 420 residential dwellings and community and commercial space (up to 5,600sqm) validated on 28th July 2025 and awaiting determination. No other live planning applications on the site.
K0712	0.32	100%	0.32	Sewell Street/Kemble Street	KNOW42	Yes	23	23	0	0	20	3	0	0	0	0	0	0	0	Site remains unpermissioned, Does not meet the definition of deliverable (category b sites) given no detailed planning application on site
K0713	0.32	100%	0.32	Junction of Church Street and High Street	KNOW43	Yes	23	23	0	0	20	3	0	0	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites) given no detailed planning application on site
K0042	0.155	100%	0.155	Adj. to Farmers Arms Dinas Lane, Huyton			5	5	0	0	0	0	0	2	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites) given no detailed planning application on site
K0061	0.224	100%	0.224	Land at Pod 10 (west) Boode Court, Stockbridge, Huyton			7	7	0	0	0	0	0	3	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites) given no detailed planning application on site
K0062	0.222	100%	0.222	Land at Pod 10 (east) Boode Court, Stockbridge, Huyton			7	7	0	0	0	0	0	3	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites) given no detailed planning application on site
K0088	0.585	90%	0.5265	Pod 9 Boode Croft, Stockbridge, Huyton			18	16	0	0	0	0	0	4	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites) given no detailed planning application on site
K0175	0.188	100%	0.188	Land at Custley Hey, Stockbridge, Huyton			6	6	0	0	0	0	0	3	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites) given no detailed planning application on site
K0704	0.59	90%	0.531	Bewley Drive, Kirkby			17	15	0	0	0	0	0	15	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites) given no detailed planning application on site
K0708	0.51	90%	0.46	Land at Reeds Road (Parcel A)			22	20	0	0	0	0	0	20	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites) given no detailed planning application on site
K0709	0.35	100%	0.35	Land at Reeds Road (Parcel B)			24	24	0	0	0	0	0	20	0	0	0	0	0	Site remains unpermissioned. Does not meet the definition of deliverable (category b sites) given no detailed planning application on site
									46	133	307	329	255	302	55	53	105	87	67	
									1070						367					

Birmingham
0121 713 1530
birmingham@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Bristol
0117 403 1980
bristol@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk

@LichfieldsUK

lichfields.uk