

Dear Lee,

RESIDENTIAL DEVELOPMENT COMPROMISING ERECTION OF UP TO 204 HOUSES WITH PARKING TOGETHER WITH CONSTRUCTION OF VEHICULAR/PEDESTRIAN ACCESSES OFF STONEY LANE, PEDESTRIAN ACCESS OFF CUMBER LANE, SUB-STATIONS, FOUL WATER PUMP STATION, SUDS BALANCNG POND AND ASSOCIATED PUBLIC OPEN SPACE, LANDSCAPING AND ASSOCIATED WORKS.

PLANNING REFERENCE 25/00672/FUL

In response to the comments received from Louise Fortune of the Highways Team, dated 24th March 2026, in relation to the application above, please find our responses below with any relevant information or updated documents attached.

Comments and/or Queries

1. Site Access & Visibility

Please see attached the following document(s):

- 22970-PL-1001-Coloured Planning Layout (Rev A)
- 4726-01 Rev F (Visibility)
- 4726-F03 Rev I (Proposed Site Access)
- 4726-02 Rev B (Speed Cushion Location Plan)
- 5078-D001 GENERAL ARRANGEMENT REV C
- 5078-D002 SITE CLEARANCE REV C
- 5078-D003 CONSTRUCTION MATERIALS REV C
- 5078-D004 SIGNS AND MARKINGS REV C
- 4726-SP03 Rev B (Tracking - Tanker)
- 4726-SP02 Rev F (Tracking - Fire Appliance)
- 4726-SP01 Rev F (Tracking - Refuse Vehicle)
- SHD2326-SHD-HLG-GLEN-CA-EO-Lighting Calculation-R1
- SHD2326-SHD-HLG-GLEN-DR-EO-Lighting Layout-R1
- SHD2326-SHD-HLG-GLEN-DR-EO-Lighting Layout-R1 (Excel Document)
- SHD2326-SHD-HLG-GLEN-RA-EO-Lighting Design Risk Assessment-R1
- SHD2326-SHD-HLG-GLEN-SH-EO-Lighting Schedule-R1
- SHD2828-SHD-HLG-GLEN-CA-EO-Lighting Calculation-R0
- SHD2828-SHD-HLG-GLEN-DR-EO-Lighting Layout-R0
- SHD2828-SHD-HLG-GLEN-DR-EO-Lighting Layout-R0 (Excel Document)

- SHD2828-SHD-HLG-GLEN-RA-EO-Lighting Design Risk Assessment-R0
- SHD2828-SHD-HLG-GLEN-SH-EO-Lighting Schedule-R8
- SHD2828-SHD-HEL-GLEN-DR-EO-Electrical-R0

In conjunction with the document(s) above, please see our responses below in *italics*:

Main Access

The submitted drawings show two proposed vehicular site accesses within Knowsley's administrative boundary: one approximately 70m east of the Stoney Lane / Cumber Lane junction and another approximately 230m east of the same junction.

At pre-application stage, highways raised concern regarding the positioning of any residential access opposite the operational accesses serving the Ambulance Station on Stoney Lane. Although the applicant has marginally repositioned the access serving the cul-de-sac fronting Stoney Lane, the revised location now sits almost directly opposite the ambulance station's eastern access. This remains unacceptable.

Routine residential turning movements would directly conflict with emergency vehicle egress, particularly during blue-light departures where ambulances require immediate, unobstructed priority. Opposing accesses in such close proximity increase driver hesitation, complicate decision-making, and introduce avoidable obstruction risk. Given that there is a clear length of frontage between the ambulance station's two accesses where a residential junction could be positioned without directly opposing either, the current arrangement represents a design choice rather than a constraint.

The access should therefore be repositioned to remove direct conflict with emergency operations and maintain a predictable, low-conflict highway environment.

Please see attached our Revised Coloured Planning Layout, as well as our Revised Access and Visibility Drawings. You will note, as requested, that we have re-sited and widened the accesses on Stoney Lane to accommodate your comments.

Emergency Access

The planning layout shows a number of "emergency-only" vehicular accesses around the site perimeter, significantly more than would normally be required for a development of this scale. While pedestrian and cycle permeability is strongly supported, the number of vehicular emergency accesses proposed is excessive and unjustified.

The emergency accesses positioned on Stoney Lane create unnecessary frontage breaks, undermine hierarchy, and increase the likelihood of informal vehicular use over time. Standard practice would typically expect no more than one well-located emergency vehicular access if deemed it was required operationally. If a single emergency vehicular access is required, the access located near Plot 138 is the preferred location. The emergency access strategy therefore requires rationalisation, with vehicular emergency access reduced to a single appropriate location, and all other boundary breaks redesigned as pedestrian and cycle links only.

All other boundary breaks currently shown as “emergency access” should be removed or redesigned for pedestrian/cycle use only. Any retained emergency access must be supported by a clear, enforceable management plan and all must show that they meet current visibility requirements on a scaled plan.

As discussed during the meeting held with the Case Officer and Highways, the emergency-only vehicular accesses were shown in accordance with NHBC requirements for private drives without adequate turning provision. However, we believe that based on the new layout design we have removed the requirement for these as any private drives meet the regulated maximum distance requirements for a fire tender.

In respect of the Emergency Access, this has been relocated from the Cumber Lane access point to an adopted road that abuts Stoney Lane fronting Plot 176 and 179.

Access to Plots 176-178

The access arrangement serving Plots 176–178 is currently unacceptable. These dwellings are served via a route labelled as an “emergency access” that in practice functions as the sole vehicular access. The route exceeds acceptable private-drive lengths, incorporates an adopted footway running alongside a privately managed surface, and fails to meet either private shared drive or adoptable cul-de-sac standards. It also does not support compliant refuse servicing or fire appliance access.

This arrangement must be fundamentally redesigned so that these plots are served by either:

- a properly designed adoptable cul-de-sac; or
- a compliant private shared driveway with a single, clearly defined access.

Hybrid emergency corridors cannot be supported.

It is acknowledged that the applicant may have intended this area to function similar to a standard private drive, however, the arrangement shown with an adopted footway running across the access is also unacceptable.

As per the previous comment regarding Emergency Access, this area has now been redesigned to accommodate a fully adopted Emergency Access point onto Stoney Lane. We trust that this is now acceptable.

Access Adjacent to Plot 13

The proposed connection adjacent to Plot 13 linking to Cumber Lane requires redesign. While pedestrian permeability is supported, this route is enclosed between rear boundaries and areas of vegetation not in the control of the applicant, poorly overlooked, and presents significant personal-safety and anti-social behaviour risks. If intended as emergency vehicle access, the geometry is unsuitable and not accepted by highways; if intended as a pedestrian route, it must be redesigned to be clearly non-vehicular, well-overlooked, and well-lit.

A safe pedestrian and cycle route should be delivered here, but the current configuration cannot be supported.

This area has now been redesigned to accommodate your comments. In summary, plots now front out onto the pedestrian/cycle connection onto Cumber Lane and we are also

proposing a Lighting Column to provide adequate lighting. It is to be noted however, that we'd request this column be reduced to a few bollard lights to reduce the impact on the adjacent dwellings.

Please find attached the updated Lighting Designs in accordance with this.

Visibility

Visibility splays of 2.4m × 43m are shown at the proposed access points on Stoney Lane that are consistent with Manual for Streets guidance for a 30mph road. However, internal junctions are designed using 20mph visibility parameters despite no TRO being proposed to reduce the legal speed limit.

In the absence of a legally enforceable 20mph TRO, all visibility splays, including at internal junctions and emergency accesses, must be designed to 30mph standards. Visibility drawings must therefore be revised accordingly. For clarity, it is acknowledged that it is generally accepted that residential speeds can be lower, but visibility splays should be demonstrated for the posted speed limit rather than the design speed.

To ensure visibility splays at the Stoney Lane accesses can be maintained, junction protection will be required. This will include extensions of double-yellow-line restrictions on Stoney Lane and into the site. TRO costs (£7,000 as of 1 April 2026) will be secured via Section 106, with lining and signing works delivered via Section 278 before occupation. A plan will be secured depicting the agreed extents of the proposed restriction markings.

Noted, please review our latest Planning Layout and Access Drawings.

Boundary Treatments

Boundary treatments and intervisibility relationships have not been fully assessed at this stage, given the higher-level access, layout and safety concerns identified elsewhere in this response, and will be reviewed in detail once revised plans are submitted for further consideration.

Noted, we look forward to receiving your feedback on our latest design.

2. Traffic Impact & Trip Generation

In conjunction with the comments received in orange, please see our responses below in *italics*:

The submitted Transport Assessment (TA) provides trip generation, distribution and traffic impact calculations based on TRICS-derived residential trip rates. For 204 dwellings, the TA forecasts 98 two-way AM peak trips and 95 two-way PM peak trips from the development. These trip rates are within the typical range for suburban residential schemes and are not a point of concern in isolation.

However, the TA applies a full 500-employee industrial fallback as the assumed "existing" site trip generation, resulting in baseline flows of 130 AM peak and 85 PM peak two-way trips attributed to the former B2 use. This approach has the effect of reducing the net impact of the residential development, as the assumed industrial flows are subtracted from the

residential trip generation. While this is presented as a robust assessment approach, the TA itself acknowledges that only around 100 employees are currently present on the site and that the buildings are proposed for demolition, meaning the likelihood of the site operating at a 500-employee industrial intensity in future is limited. As a result, the fallback assumption artificially suppresses the net development impact when considering the realistic existing situation. This issue has also been specifically identified in comments received from St Helens Council, who note that the industrial trip distribution method is not correct.

Because the TA nets off a large industrial fallback, it concludes that the development would result in a reduction in AM peak traffic and only negligible increases (2–4 vehicles) in the PM peak at surrounding junctions, equating to impacts ranging from approximately –1.1% to +0.4%. On this basis, the TA states that the development would have a minimal or negligible impact on the local highway network. These conclusions, however, are directly dependent on the industrial fallback assumption and therefore cannot be relied upon without further scrutiny.

In addition, the TA only undertakes capacity modelling for the new primary site access using PICADY, which shows RFC values of 0.14 (AM) and 0.09 (PM) and a Level of Service (LOS) A in both peaks, with queues <0.2 PCU. While these results indicate the primary access operates well within capacity, the TA does not model any of the surrounding junctions, including:

- Stoney Lane / Cumber Lane
- Stoney Lane / Dragon Lane
- Stoney Lane / Old Lane
- Whiston Hospital and ambulance station access points

Although these junctions were within the agreed study area and traffic survey data has been collected, their performance under 2031 “with development” scenarios has not been assessed using junction modelling. Instead, the TA relies solely on percentage change analysis. Given the sensitivity of Stoney Lane, serving Whiston Hospital, the ambulance station, nearby schools, and forming a key east–west distributor route, this approach does not demonstrate whether the surrounding junctions would continue to operate satisfactorily once development traffic is added, particularly where the industrial fallback is discounted and realistic net increases are applied.

Collision data referenced within the TA indicates six recorded accidents across the wider network in recent years, with no clusters or systemic safety issues identified. While this suggests no existing highway safety problems, the absence of junction modelling means it is not possible to confirm whether additional turning movements associated with the proposed accesses particularly the secondary access located close to the ambulance station could introduce new operational or safety risks. St Helens Council has similarly requested further detail in relation to emergency access operation and the provision of swept-path tracking to ensure safe emergency vehicle manoeuvring.

Overall, the TA in its current form does not provide sufficient evidence to confirm that:

- the forecast trips can be accommodated at existing junctions without undue delay.
- the cumulative impact on the highway network would remain below the NPPF “severe” threshold; or

- no localised mitigation is required.

Until the applicant provides the missing operational modelling for the agreed surrounding junctions, using realistic baseline assumptions, it is not possible to conclude whether mitigation measures or financial contributions are necessary to address the development's impact on the local highway network.

Based on the evidence currently presented, the Transport Assessment does not demonstrate that the surrounding network can accommodate the additional development traffic without intervention. Furthermore, the TA does not provide a robust cumulative impact assessment, as it relies on an unrealistic industrial fallback, does not explicitly account for committed or emerging development, and fails to model key junctions under future-year conditions. As such, it does not demonstrate that the cumulative traffic impacts arising from the development would not be severe.

As discussed at the meeting with the Case Officer and Highways, scenario testing is being undertaken, and we will submit the revised TA in due course for review.

3. Internal Layout and Circulation

Please see attached the following document(s):

- 22970-PL-1001-Coloured Planning Layout (Rev A)
- 4726-01 Rev F (Visibility)
- 4726-F03 Rev I (Proposed Site Access)
- 4726-02 Rev B (Speed Cushion Location Plan)
- 5078-D001 GENERAL ARRANGEMENT REV C
- 5078-D002 SITE CLEARANCE REV C
- 5078-D003 CONSTRUCTION MATERIALS REV C
- 5078-D004 SIGNS AND MARKINGS REV C
- 4726-SP03 Rev B (Tracking - Tanker)
- 4726-SP02 Rev F (Tracking - Fire Appliance)
- 4726-SP01 Rev F (Tracking - Refuse Vehicle)

In conjunction with the document(s) above, please see our responses below in *italics*:

Internal Layout

The layout is structured around a single continuous road with long straight sections, minimal deflection and little variation in street character. While a primary route is expected, the layout fails to establish hierarchy. Uniform geometry, extensive forward visibility and large junction radii create a car-dominated environment, reliant on a single raised table for speed management.

The reliance on a singular table traffic-calming feature is insufficient to deliver a self-enforcing 20mph environment. Streetscapes are further weakened by extensive frontage parking, limited soft landscaping and minimal enclosure, conflicting with Manual for Streets, the National Design Guide and the Council Plan ambitions for healthy, walkable neighbourhoods. These concerns were raised at pre-application stage and remain unresolved.

Beyond speed management, the overall streetscape lacks pedestrian-friendly qualities. The majority of properties have double front driveways, minimal or no front garden space, and very limited soft landscaping or street trees. This results in a visually harsh environment dominated by parked vehicles and hard surfacing, rather than greenery, enclosure or active frontage. National design guidance, including *Manual for Streets*, the *National Design Guide* and the *National Model Design Code*, emphasises walkable neighbourhoods, street greening, varied enclosure, and environments that support outdoor play, social interaction and healthy lifestyles. The proposed layout does not reflect these principles: long rows of driveways, limited soft landscaping and a lack of street-edge variety create an exposed, vehicle-oriented environment rather than the human-scaled residential character expected in contemporary developments.

This concern is exacerbated by the lack of any dedicated on-street visitor parking. With frontage streets already dominated by private driveways, there will be significant pressure for informal kerbside parking. This is likely to narrow carriageways, obstruct footways, reduce visibility and further intensify car dominance, undermining safe pedestrian movement along the street edge.

From a Knowsley Council perspective, the design conflicts with ambitions set out in the KMBC Council Plan, which prioritises improving residents' health, promoting active travel, delivering high-quality and distinctive neighbourhoods, and creating streets that people enjoy living in. Highways must play a role in achieving these corporate objectives by ensuring new residential developments provide safe, attractive, inclusive and welcoming public realms, where residents feel comfortable walking and where children can play safely. As currently configured, the street network prioritises frontage parking and maximising plot numbers, resulting in a layout that feels compressed, vehicle-dominated and lacking in meaningful amenity, greening or place-making.

As discussed at the aforementioned meeting with the Case Officer and Highways, we have introduced speed cushions to aid our self-enforcing 20mph strategy.

Also, in conjunction with your comments above, and those subsequently raised during the meeting previously mentioned, the layout and plotting of dwellings has been extensively redesigned. We have, where possible, ensured that there is a maximum of 4 parking spaces in a run before a meaningful landscape buffer is introduced to soften car dominance and increase soft landscaping – this is in-line with Building for a Healthy Life.

Also, you will note that we have reduced the density of block structures and now only have a maximum mews length of 3 dwellings rather than 4 or 5. This enables us to provide more plots with side tandem drives, rather than upfront parking arrangements, to further increase greening along the street edge and providing larger and more frequent front gardens.

Inherently, there is a balance to be had between reducing block sizes and providing meaningful green landscape buffers along the street edge. We believe the revised layout provides the improvement you sought.

Junction Geometry

Uniform 6 m kerb radii are applied to all internal junctions. While appropriate at the main access, their use on all streets removes opportunities to reduce speeds or reinforce hierarchy. Junction geometry must be tailored to street function and revised accordingly.

In summary, while straight roads can be acceptable within residential developments, they must be accompanied by a coherent design strategy that moderates vehicle speeds, creates visual interest and promotes pedestrian comfort. The current layout does not achieve this. Without further horizontal deflection, street tree planting, landscaping, visual narrowing, varied enclosure and properly designed visitor-parking provision, the streets risk functioning as long, hard, vehicle-priority corridors rather than attractive, healthy residential places. A more balanced, resident-centred layout will be required to bring the scheme in line with national design guidance and the expectations of the Council Plan.

Considering comments above relating to the Internal Layout, we believe that this has been addressed by the replanning of the street scene and inclusion of speed cushions.

Adoptable Areas

A review of the Adoptable Areas plan identifies a fragmented adoption strategy, with multiple locations where adopted footways run directly alongside private shared driveways or privately managed verges. This hybrid arrangement is unacceptable and will not be supported under KMBC Section 38 Technical Approval. Footways forming part of the public highway must be contained within a continuous adopted corridor to ensure clear maintenance responsibility, statutory undertaker access, enforceability and long-term operational consistency. Mixed adoption boundaries risk future conflict, uncertainty over maintenance liability and complications during street works.

Several private shared driveways exceed KMBC standards of a maximum of four dwellings and 25 m in length, which is unacceptable for long-term safety and operation. These arrangements require redesign, either by bringing them into adoption or reconfiguring the layout to reduce the number of dwellings served privately.

The plan also shows the pumping station accessed from a privately managed drive, which is unacceptable. Pumping stations require reliable access for 12 m tankers directly from an adopted highway, with provision for forward entry and exit. The proposed arrangement presents unacceptable risks relating to access rights, surface condition, maintenance liability and operational resilience.

The fragmented adoption proposal therefore requires substantial revision to deliver a clean, logical and maintainable highway layout.

The layout has been redesigned to ensure that the maximum number of dwellings served off a Private Drive is 4 in-line with KMBC standards, where possible they do not exceed 25m in length. Where they do exceed 25m in length, they comply with Part B Fire Tender distances.

The private driveway serving the Pump Station, to which we've had approval for from the Utilities Supplier, will be placed under the Management Company's remit thus removing risk of impeded access. The area around the Pump Station has also been redesigned to

accommodate Eddison's tanker tracking and gated access has been provided in-line with Merseyside Police comments.

Upon review and acceptance of the revised layout, the Adoptions Plan will be updated to ensure it reflects your concerns above and have distinct delineation between what is Adopted, Managed or Private.

Swept Path Analysis

The swept path analysis for the refuse vehicle, fire appliance and service tanker identifies multiple instances of encroachment into opposing lanes and overrun of footways, tactile crossing areas and verge space. In several locations, the tracking shows vehicles overrunning areas where pedestrians would be expected to wait to cross, including tactile paving at junctions. While limited overrun can be acceptable in isolated or low-conflict circumstances, the extent and frequency of overrun shown on the submitted drawings raise material highway safety concerns, particularly in relation to the operation of both proposed accesses onto Stoney Lane for larger service vehicles.

Of particular concern is the swept path at the cul-de-sac access fronting Stoney Lane, where the tracking for the refuse vehicle demonstrates significant overrun across the full width of the junction, fully encroaching into the area of pedestrian waiting space at the junction, including the tactile paving, thereby removing any safe standing area for pedestrians awaiting a crossing opportunity. This compromises the safety of anybody standing at the tactile crossing area. Further to this, the swept path drawings show that refuse vehicles exiting the estate from both accesses onto Stoney Lane are required to significantly overrun opposing lanes to a degree that exceeds what would normally be considered acceptable onto a busy distributor road. These arrangements present an unacceptable risk at a location that already experiences high pedestrian activity.

The tracking also demonstrates that service vehicles are expected to rely on private shared drives, narrow internal corridors and routes labelled as "emergency access" in order to reach dwellings or infrastructure such as the pumping station. As previously advised, KMBC refuse vehicles will not enter private drives or unadopted roads, and all bin collections must take place within 25 m of an adopted collection point. The proposed tanker route is likewise unacceptable, as heavy service vehicles should not be reliant on private access roads for routine operation. Fire appliance tracking further fails to demonstrate adequate hose reach to several dwellings served by constrained private drives.

In addition, the swept path analysis for the service tanker demonstrates that the vehicle would be required to reverse for an excessive and concerning distance in order to access and service the pumping station. This arrangement is unacceptable. Service tankers must be able to enter and leave the pumping station in forward gear, without reliance on extended reversing manoeuvres, particularly within a residential environment. The degree of reversing shown raises clear safety and operational concerns and confirms that the servicing arrangement is not acceptable in its current form.

To address the access-related overrun issues on Stoney Lane, the estate access road should be widened to a minimum of 6.0 m from the junction with Stoney Lane to at least the

first internal junction, allowing larger vehicles to enter and exit without unacceptable encroachment. Beyond that point, carriageway widths should reduce appropriately to reinforce the residential hierarchy and traffic-calmed environment. Similarly, the cul-de-sac access fronting Stoney Lane must be widened to accommodate refuse and service vehicles safely, with internal road widths reduced once vehicles have cleared the junction. Junction geometry and carriageway widths must be designed to safely accommodate necessary service vehicles at the point of access, rather than relying on overrun of pedestrian areas.

Taken together, the swept path results indicate that localised amendments will be insufficient, and that a more fundamental redesign of elements of the internal street network and site access geometry is required to ensure safe, compliant and adoptable servicing and emergency access arrangements.

The swept-path analysis/access drawings have been updated to show the widened road junctions which connect onto Stoney Lane, please review these but trust that these are now acceptable.

I can confirm that all bin collection points are within 25m of an adopted highway, the waste management plans will be updated upon confirmation all consultees are happy with the revised Coloured Planning Layout.

Also, as noted in our response to your comments on Adoptable Areas, we have had confirmation from the Utilities Supplier, that the access arrangements are acceptable should they be under a Management Company.

Again, as noted above in our response to comments on Adoptable areas, we have redesigned the area around the Pump Station to accommodate the originally submitted swept-path analysis to ensure no encroachment occurs.

4. Parking and Servicing

Please see attached the following document(s):

- 22970-PL-1001-Coloured Planning Layout (Rev A)
- CYC 06_Cycle Shed 1.76 x 0.75m

In conjunction with the document(s) above, please see our responses below in *italics*:

Parking Provision

A review of the housetype distribution confirms that 73 dwellings within the development, equivalent to approximately 36% of the total site, are 4-bed units. Under the Council's Ensuring a Choice of Travel SPD, all 4-bed properties are required to provide three off-street parking spaces. The submitted layout does not achieve this.

Many of the identified 4-bed plots are shown with only two spaces, and whilst a number of dwellings include garages, there are some plots without indication of a garage space. This results in a significant site-wide shortfall against the SPD standards. Given the site's immediate proximity to Whiston Hospital, its location within an existing Residents' Parking Zone (RPZ), and the concerns already raised about long straight streets, car-dominated frontages and the lack of visitor parking, it is particularly important that on-plot parking

provision reflects the realistic car-ownership levels of 4-bed family homes. Without SPD-compliant on-plot parking, there is a high risk of overspill onto the internal estate roads, creating operational issues for refuse and emergency access, obstructing footways, and undermining the Council's objectives for delivering high-quality, safe and attractive residential neighbourhoods consistent with the ambitions of the KMBC Council Plan. Revised plans will therefore be required to demonstrate three dedicated parking spaces for each 4-bed dwelling in a manner that is convenient, legible and usable in day-to-day practice.

As previously discussed, the Council's SPD is a maximum requirement not minimum. However, we have removed the 4-bedroom semi-detached units with only 2 upfront parking spaces and replaced them with a slightly larger 4-bedroom detached unit with 2 parking spaces and a detached garage. It is to be noted that most tandem driveways to the 4-bedroom units are long enough to adequately accommodate 3 parked vehicles.

Plot-Specific Parking Issues

Parking arrangements for Plots 50–55, 68–71, 50, 72, 103 and 110 involve remote or ambiguous parking locations and inter-plot conflicts. Such arrangements are unlikely to function, risk on-street overspill, and would not be supported under Section 38. Revised layouts are required ensuring parking is close, attributable and independently usable.

These areas have been redesigned to accommodate the comments above, as well as those received by the Case Officer. Please review the attached revised Coloured Planning Layout.

Residents Parking Zone

Given the site's immediate proximity to Whiston Hospital, the surrounding area is already subject to a Residents' Parking Zone (RPZ) due to long-standing issues with overspill and commuter parking. Any new dwellings added to this location would place additional pressure on the existing RPZ unless they are incorporated into an extended zone from the outset. As previously advised, the internal layout provides very limited on-street visitor parking, and the dominance of frontage parking and narrow street corridors means there is little capacity within the development to absorb overspill without obstructing footways, restricting vehicle movements, or compromising visibility. In such a constrained layout, unmanaged external parking pressures, particularly from hospital users, would quickly lead to unsafe and inconvenient parking patterns within the estate. For these reasons, the proposed development must be included within the existing RPZ, with the applicant required to fund the necessary Traffic Regulation Order (TRO), consultation and implementation costs. This is essential to protect the operational function of the internal road layout, maintain safe pedestrian routes, ensure emergency and refuse access, and prevent the new streets becoming overwhelmed by non-resident parking demand.

Noted. We believe we have improved the parking arrangements on our latest revised layout, please review the attached documents.

Servicing Alleyways

Rear and side alleyways serving terraced blocks exceed permitted drag distances in some cases the drag distances are more than double the maximum 25m permitted under Building Regulations Part H. They are also poorly overlooked and present ASB risks.

Manual for Streets emphasises that bin routes should be short, convenient, direct and well overlooked, enabling residents to present waste without passing through hidden or insecure areas. The proposed alleys fail these tests. If these routes become unsafe or unpleasant to use, it is highly likely that residents will present bins on the nearest street frontage, which, given the already constrained carriageway widths and limited visitor-parking capacity, will further obstruct footways, compound existing car-dominance issues and impede refuse and emergency access.

In conjunction with the comments above and discussions at the meeting with the Case Officer and Highways, mews blocks have been reduced and redesigned, which in turn means that bin run drag distances have been removed. Please review the attached Coloured Planning Layout.

Cycle Parking Provision

The submitted layout does not show any cycle parking provision or specification for individual dwellings, which is a requirement of the Council's Ensuring a Choice of Travel SPD, and sets minimum standards for secure, covered and conveniently located cycle storage for all new homes.

Cycle parking must be clearly identified for each plot, with the specification, location and enclosure type confirmed prior to occupation. This is particularly important for affordable units and households on lower incomes, who are more likely to rely on cycling as an essential mode of travel for work, education and local trips. In these cases, the absence of secure, usable cycle storage can become a genuine barrier to sustainable mobility.

Furthermore, the growing prevalence of e-bikes and e-cargo bikes introduces additional requirements: many insurance providers now stipulate that electric bicycles must be stored within a secure, lockable structure, and must not be charged outdoors or in unsecured sheds due to fire-safety risks. National guidance is increasingly clear that cycle storage must be designed to accommodate larger and more valuable cycle types, including e-bikes, adapted cycles, cargo cycles and trikes, which require more generous footprints than traditional units. The layout submitted does not show how such provision will be achieved.

Given the constrained street widths, car-dominated frontages and the limited space for on-street visitor parking identified elsewhere in this response, it is essential that cycle parking is designed to be convenient, attractive and easy to use, ensuring residents have realistic alternatives to car ownership. Appropriate cycle storage therefore forms a key part of reducing parking pressures within a site that will be located inside an expanded Residents' Parking Zone and adjacent to Whiston Hospital, where unmanaged demand would otherwise be displaced onto internal estate roads.

Cycle parking details can be secured by condition; however, the applicant must demonstrate that every dwelling can be provided with high-quality, secure and usable cycle storage, giving residents genuine ability to choose active modes and ensuring compliance with KMBC's adopted standards.

Cycle Parking has been shown on our submitted information, this is shown both on the layout and key of the Planning Layout (ref: 22970-PL-1000-Planning Layout).

To confirm, all dwellings without a garage are to be provided a Cycle Shed in accordance with the attached detail (ref: CYC 06_Cycle Shed 1.76 x 0.75m). All dwellings with a detached or integral garage will not receive a dedicated external cycle store, as it is deemed that they will utilise the garage for such storage.

5. Pedestrian and Cycle Connectivity

Please see attached the following document(s):

- 22970-PL-1001-Coloured Planning Layout (Rev A)

In conjunction with the document(s) above, please see our responses below in *italics*:

A development of 204 dwellings in this location must demonstrate safe, attractive and continuous pedestrian and cycle routes both within the site and connecting to the wider active travel network. Neither the Design & Access Statement (DAS) nor the Transport Assessment (TA) provides any meaningful assessment of walking or cycling conditions. No walking or cycling audits have been undertaken and no off-site improvements are proposed, despite clear policy requirements.

This approach does not comply with Manual for Streets, the Knowsley Local Cycling & Walking Infrastructure Plan (LCWIP), the Liverpool City Region LCWIP, or the Developer Contributions SPD (2023), all of which require new development to mitigate its transport impacts and contribute to infrastructure that supports sustainable travel, modal shift and healthy communities.

Eddisons have been instructed to provide a Cycle & Pedestrian Audit, upon receipt this will be submitted formally to you for review.

Internal Pedestrian and Cycle Connectivity

The proposed layout does not provide a safe or attractive environment for walking and cycling within the site:

- Internal streets are long, straight and car-dominated, offering little natural speed management.
- No dedicated cycle infrastructure is provided, requiring cyclists to share distributor-style corridors.
- Footways are narrow and run alongside extensive driveway parking, reducing comfort and continuity.
- The proposed link to Cumber Lane (adjacent to Plot 13) is enclosed between rear boundaries, poorly overlooked and presents a high risk of anti-social behaviour, contrary to Manual for Streets, LCWIP objectives and pre-application advice.
- The estate lacks quiet-street design, filtered permeability, green corridors or measures that support children walking or scootering safely.

Despite claims in the DAS that the scheme provides “good accessibility for walking and cycling” and “pedestrian permeability”, the submitted layout does not support these assertions.

Please review the attached revised Coloured Planning Layout, noting our previous responses on amendments made in-light of your comments relating to Visibility, Parking, Private Drives & Adoption Extent.

External Connectivity – Key Trip Generators

The site is strategically located with high active-travel potential, yet the TA and DAS do not assess safe walking or cycling routes to key destinations, including employment (Whiston Hospital, Prescot Town Centre, Cables Retail Park), education (St Edmund Arrowsmith and local schools), health and community facilities, public transport (Whiston, Prescot and Rainhill stations, and nearby bus stops), or leisure and recreation destinations. No audits have been undertaken, no gaps identified and no mitigation or improvements proposed. Given the Knowsley LCWIP's priority on improving access to jobs, education, healthcare, retail and transport hubs, this represents a serious deficiency.

Eddisons have been instructed to provide a Cycle & Pedestrian Audit, upon receipt this will be submitted formally to you for review.

Stoney Lane – Required Improvements

Stoney Lane is a high-traffic corridor serving Whiston Hospital and ambulance operations. Existing footways are narrow, uneven and poorly aligned, with no cycling provision. Despite this, the TA proposes no improvements to footway width or surfacing, dropped kerbs, tactile paving, pedestrian crossings, or cycle safety measures. Given the scale of development and sensitive location, this is unacceptable.

Both the Knowsley and Liverpool City Region LCWIPs prioritise walking and cycling access to Whiston Hospital, strategic routes connecting Prescot–Whiston–Lea Green, safe routes to rail stations and town centres, and improvements along key corridors such as Stoney Lane. The development provides little to support these objectives and offers no justification for omitting surrounding network improvements.

Eddisons have been instructed to provide a Cycle & Pedestrian Audit, upon receipt this will be submitted formally to you for review.

Required Mitigation

In accordance with the Developer Contributions SPD (2023), proportionate mitigation is required as a minimum.

Internal Layout Requirements

- A safe, well-overlooked pedestrian and cycle link to Cumber Lane.
- Continuous 3.0 m shared-use footways on both sides of adoptable streets.
- Traffic-calmed internal routes to support safe cycling.
- A cycle-friendly estate design.
- Secure cycle storage for every dwelling, including e-bike-compatible storage and charging within secure enclosures.

LCWIP-Linked Off-Site Improvements

Proportionate Section 38 and/or Section 106 contributions towards walking and cycling links between Whiston Hospital and Prescot (connecting onward to Lea Green), improved routes to Prescot and Whiston railway stations, improved access to Cables Retail Park and Prescot Town Centre, and safe school routes to St Edmund Arrowsmith.

Localised Network Enhancements

- Public realm improvements on connecting streets.
- Footway resurfacing and widening where required, particularly along the site frontage.
- Safe pedestrian access to nearby bus stops.

The applicant has proposed no off-site improvements, undertaken no walking or cycling audits, and provided no mitigation. This approach is contrary to the Knowsley and Liverpool City Region LCWIPs, the Ensuring a Choice of Travel SPD, the Developer Contributions SPD (2023), Manual for Streets, and KMBC Local Plan Policies CS7, T7 and CS2. A comprehensive package of internal and external pedestrian and cycle connectivity improvements is required before the development can be considered acceptable in highway terms.

Please review the attached revised Coloured Planning Layout, noting our previous responses on amendments made in-light of your comments relating to Visibility, Parking, Private Drives & Adoption Extent.

Eddisons have been instructed to provide a Cycle & Pedestrian Audit, upon receipt this will be submitted formally to you for review.

Travel Plan

The submitted Travel Plan is provided as an interim framework appended to the Transport Assessment and is largely generic in nature, setting out high-level aspirations rather than site-specific, evidence-based measures.

Given the number and scale of unresolved issues identified within this response, particularly in relation to pedestrian and cycle connectivity, public transport access, parking pressure, road safety and the need for meaningful modal shift, it has not been possible to undertake an assessment of the Travel Plan at this stage.

Notwithstanding this, it is clear that the interim document does not currently reflect the constraints of the site context, the proximity of Whiston Hospital, the Residents' Parking Zone, or the deficiencies in existing walking, cycling and public transport infrastructure identified elsewhere. A full Residential Travel Plan will therefore be required to be secured by planning condition and submitted for approval prior to first occupation.

This must include site-specific baseline data, realistic modal-split targets, detailed measures to support walking, cycling and public transport use, confirmation of off-site infrastructure improvements where required, and a robust monitoring and enforcement framework in accordance with KMBC and Merseytravel requirements.

The associated Travel Plan monitoring fee of £10,000 will be secured via planning condition, as set out within the legal and procedural matters below. The acceptability of the Travel Plan cannot be confirmed until both the wider transport issues are resolved, and the full Travel Plan demonstrates that genuine, deliverable modal shift will be achieved in practice.

Noted, the Travel Plan will be updated in accordance with previous comments on the Transport Assessment and the above. Upon receipt of these, they will be provided for your review and approval.

6. Public Transport Access

In conjunction with the comments received in orange, please see our responses below in *italics*:

A review has been undertaken of existing public transport provision, the quality of pedestrian routes to nearby stops, and the extent to which the submitted Transport Assessment (TA) and Travel Plan address these matters. This review is informed by independent mapping, publicly available bus timetable data and route information for services operating within the Whiston / Prescot corridor.

Bus Stop Locations and Walking Routes

Independent review confirms that several bus stops are located within acceptable walking distances of the site:

- **Whiston Hospital / Stoney Lane stops** (e.g. Stop H), approximately 150–250 m from the site access (2–5 minutes' walk), serving multiple high-frequency routes.
- **Cumber Lane / Stoney Lane stop**, approximately 100–200 m from the western edge of the site (2–4 minutes' walk).
- **Dragon Lane / Milton Avenue stops**, generally within 400–650 m (5–8 minutes' walk).

While walking distances fall within accepted national guidance, on-street assessment identifies several concerns:

- Footways on Stoney Lane vary in width and surface quality and run adjacent to high-volume hospital-related traffic.
- There is no controlled pedestrian crossing near the proposed site access, despite significant pedestrian movement between the site, hospital and bus stops.
- No pedestrian audit has been submitted, and the TA and DAS do not assess dropped kerbs, tactile paving, footway width or condition, lighting, or pinch points and trip hazards.

As a result, the quality, safety and comfort of walking routes to public transport stops have not been assessed or addressed. This is a significant omission for a development of 204 dwellings located opposite a major hospital.

Eddisons have been instructed to provide a Cycle & Pedestrian Audit, upon receipt this will be submitted formally to you for review.

Bus Service Frequency and Reliability

Independent timetable review confirms that the Stoney Lane / Whiston Hospital corridor is served by a range of frequent and strategically important services:

High-frequency urban services

- **10A** – Liverpool City Centre; frequent all-day service with early morning arrivals.
- **61** – Liverpool Queen Square; regular daytime service.
- **89** – Liverpool John Lennon Airport; 20–30 minute frequency.

Local services

- **239** – Regular service linking Prescot and surrounding areas.
- **99** – Hourly loop service connecting Whiston Station, Cumber Lane and Prescot.

Overall, the area benefits from good bus service coverage. However, the applicant has not assessed:

- Service reliability;
- Suitability for hospital shift patterns;
- Evening and weekend provision;
- Capacity at peak times; or
- Residents' ability to safely access bus services on foot.

The TA relies on generic statements and does not reflect actual service conditions or user experience.

The TA is being updated to reflect the requested information relating to the Bus Service Frequency and Reliability. Upon receipt, this will be submitted to you for review and approval.

Rail Access and Walking Routes to Whiston Station

Whiston Railway Station is located approximately 700–900m from the site and is also served directly by local bus routes. In walking terms, the most direct pedestrian route from the site to the station is via Keats Avenue and The Crescent, utilising a pedestrian cut-through that emerges onto Dragon Crescent before continuing to the station. This route equates to an approximate 16-minute walk. Alternative routes include walking via Milton Avenue (approximately 17 minutes), or via Stoney Lane and Dragon Lane, which may offer different levels of activity and perceived safety depending on the originating part of the development.

However, none of these routes have been assessed within the TA, DAS or Framework Travel Plan. There is no consideration of:

- the attractiveness of the walking environment.
- levels of passive surveillance, particularly during darker evenings.
- lighting conditions.
- footway width and continuity; or
- user comfort and personal-safety perception.

Given the scale of the development, the introduction of 204 new households will materially increase demand for walking trips to Whiston Station. To achieve genuine modal shift, it is not sufficient for routes to exist in theory; they must be safe, legible, well-lit and attractive in practice. Without a clear commitment to auditing and upgrading key walking routes where

necessary, there is a high likelihood that residents will default to driving to the station or using the private car for onward trips, undermining sustainable transport objectives.

A walking audit of the primary and alternative routes to Whiston Station should therefore be undertaken, including routes via Keats Avenue / The Crescent, Milton Avenue, and Stoney Lane / Dragon Lane, with proportionate mitigation identified where deficiencies are found.

The TA and Travel Plan will be updated to access the routes requested above. Upon receipt, this will be submitted to you for review and approval.

Public Transport Connectivity to Key Destinations

Independent data confirms that bus services provide access to the following destinations:

Employment

- Whiston Hospital (directly opposite the site).
- Prescott Town Centre (via routes 239 and 99).
- Cables Retail Park (via Prescott connections).

Rail

- Whiston Station, approximately 700–900 m from the site and directly served by route 99.
- Prescott Station, accessible via the 99 or interchange at Prescott Bus Station.

Education and Community

- Local primary and secondary schools, including St Edmund Arrowsmith.
- Community facilities in Prescott and Huyton.

Despite this favourable public transport geography, the TA does not analyse:

- Walking safety to bus stops;
- Real-world journey times;
- Interchange quality;
- Accessibility for vulnerable users; or
- Connectivity to rail services.

Neither the TA, DAS nor Framework Travel Plan includes any assessment of the pedestrian environment along key routes to bus stops or stations. Based on available information, it cannot be confirmed that footways benefit from appropriate tactile paving, dropped kerbs, lighting, consistent surfacing or sufficient width to accommodate inclusive and safe pedestrian movement, particularly given the high levels of hospital-related footfall.

Where pedestrian infrastructure falls below modern accessibility standards, proportionate off-site mitigation will be required. This will include:

- Footway widening or resurfacing.
- Upgraded dropped kerbs and tactile paving.
- Enhanced lighting; and
- Improved pedestrian crossing facilities.

These measures are necessary to ensure residents, particularly vulnerable users, can safely and comfortably access bus stops, rail stations and local facilities, in line with Manual for Streets, the Ensuring a Choice of Travel SPD, the Developer Contributions SPD, and Knowsley LCWIP objectives for increasing everyday walking and public transport use.

It is also noted that no consultation response has been received from Merseytravel in relation to the submitted Transport Assessment or proposed development. Given Merseytravel's statutory role in public transport planning and infrastructure, their input is required to confirm whether the scale of development gives rise to a need for public transport service enhancements, bus stop upgrades or wider infrastructure improvements. Until Merseytravel's consultation response has been received and any necessary mitigation measures are identified and appropriately secured through Section 106 and/or Section 278 agreements, the Highway Authority is unable to conclude that the public transport impacts of the development have been satisfactorily addressed. Accordingly, the Highways objection will be maintained in respect of public transport and sustainable access matters pending completion of that consultation process.

The TA and Travel Plan will be updated to access the routes requested above. Upon receipt, this will be submitted to you for review and approval.

7. Road Safety Considerations

In conjunction with the comments received in orange, please see our responses below in *italics*:

The issues set out above identify a number of significant and unresolved road safety concerns, including deficiencies in collision analysis, access geometry, pedestrian protection, emergency access operation, internal speed environment and servicing arrangements. Collectively, these matters demonstrate that the scheme has not been adequately assessed against the site's known safety risks, particularly given its relationship with Whiston Hospital, the ambulance station, nearby school and high pedestrian activity. Until these issues are satisfactorily addressed through scheme redesign, supporting evidence and the submission of the required Road Safety Audits, the Highway Authority cannot be satisfied that the development will operate safely. Accordingly, the Highways objection will remain in place and cannot be removed until a robust, evidence-based resolution to the identified road safety concerns has been provided.

The Transport Assessment (TA) refers to general accident data; however, no detailed collision analysis has been provided for Stoney Lane, Cumber Lane, the Whiston Hospital frontage or surrounding junctions. In particular:

- No validated five-year collision dataset is included.
- No collision plots, contributory factor analysis or assessment of patterns or clusters are provided.
- No commentary is offered on collisions involving pedestrians, cyclists, vulnerable road users or emergency vehicles, despite the site's proximity to Whiston Hospital and the ambulance station.

In the absence of a robust collision review, the submission does not demonstrate that the proposed accesses or internal layout have been assessed against known road safety risks. This is a notable omission, particularly as the availability of validated five-year collision data was clearly raised at pre-application stage.

High-Risk Site Context

The site sits within a sensitive and high-risk road environment due to the following nearby uses and conditions:

Whiston Hospital (directly opposite the site)

- Very high pedestrian activity from staff, patients and visitors.
- Large numbers of vulnerable road users, including elderly and mobility-impaired pedestrians.
- Frequent ambulance arrivals and blue-light departures at multiple access points.

Ambulance Station

- The primary site access is directly opposite ambulance egress.
- The TA does not assess visibility during emergency departures, conflict risk between emerging ambulances and development traffic, or pedestrian movements near the access.

St Edmund Arrowsmith Catholic Academy

- Located immediately south of the site.
- Generates high volumes of pedestrian movement at school start and finish times.
- Creates a clear need for safe pedestrian crossing routes to bus stops and surrounding residential areas.

Stoney Lane Corridor

- Functions as a distributor road with high daily traffic volumes.
- No controlled pedestrian crossings near the proposed site accesses.
- Footways are narrow and inconsistently surfaced in places.
- High levels of informal on-street activity associated with hospital visitors.
- None of these location-specific risks are assessed within the TA.

Unassessed Safety Issues

The submission also fails to assess:

- Visibility splays for emergency and secondary accesses.
- Pedestrian safety implications at site access points.
- Potential misuse of emergency links by residents or visitors.
- Safety impacts of the proposed pedestrian access adjacent to Plot 13.

As identified elsewhere in this response, the internal layout further compounds risk through:

- Long, straight streets that encourage higher vehicle speeds.
- Uniform and generous junction radii.
- Limited opportunities for speed reduction.
- Poorly defined pedestrian priority at internal junctions.

Road Safety Audits (RSA)

Given the scale of the development, the sensitive context and the number of safety-critical interactions identified, Road Safety Audits (RSAs) are mandatory.

Section 278 Works – Access onto Stoney Lane

A Stage 1/2 RSA must be submitted at planning stage and cover:

- Junction design and geometry
- Visibility provision
- Pedestrian routes and crossing points
- Interaction with ambulance egress
- Conflicts between vehicles and vulnerable road users

Section 38 Works – Internal Road Layout

A Stage 1 RSA must accompany the planning application to identify safety issues early and avoid post-permission redesign. All RSAs must be undertaken by an independent, accredited team in accordance with DMRB GG119.

Given the site's location opposite a major hospital and adjacent to a school, early RSA submission is strongly recommended.

In summary, the submitted documents:

- Contain no validated collision analysis for key junctions or surrounding roads.
- Do not address known site-specific risks associated with the hospital, ambulance station or school.
- Do not assess pedestrian safety, visibility or the internal speed environment.
- Do not include any Road Safety Audits, despite clear pre-application advice.

Before the Highway Authority can support the scheme, a robust, evidence-based road safety assessment, including the required RSAs, must be submitted to demonstrate that the development will operate safely for all users.

Road Safety Audits will be commissioned once we have finalised the Planning Layout, these will be submitted to you for review and approval.

8. Construction Impacts

Please see attached the following document(s):

- Glen Dimplex_CEMP V2

In conjunction with the document(s) above, please see our responses below in *italics*:

A Construction Environmental Management Plan (CEMP) has been submitted (Taylor Wimpey, Rev 1, December 2025) and reviewed to assess whether construction-stage impacts are adequately managed and whether further controls are required.

The CEMP is comprehensive in relation to general environmental management and includes appropriate provisions for:

- Site management responsibilities and stakeholder engagement.
- Identification of environmental receptors.
- Mitigation for noise, vibration, dust, air quality, ecology, pollution control and waste.

- Wheel washing, road sweeping and construction traffic principles.
- Core working hours and limitations on out-of-hours activity.
- Commitment to prepare a Traffic Management Plan.

These are expected and appropriate inclusions for a development of this scale.

Noted.

Highway-Specific Issues and Sensitive Site Context

Despite the above, the CEMP does not adequately address highway safety and network management, particularly given the highly sensitive location:

- The site fronts Stoney Lane, a busy distributor road;
- It is located directly opposite Whiston Hospital and ambulance operations;
- It is adjacent to St Edmund Arrowsmith Catholic Academy;
- There are high levels of pedestrian movement, vulnerable users and emergency vehicle activity throughout the day.

In this context, detailed construction traffic and pedestrian safety controls are critical.

Additional information has been supplied in the CEMP document as per your request, however, note that some items can only be addressed by the appointed groundworker. Therefore, we are happy to accept that the CEMP document may need to be conditioned.

Construction Traffic and Routing

The CEMP confirms that:

- HGVs will route via Stoney Lane;
- Wheel washing and road sweeping will be undertaken;
- A Traffic Management Plan will be prepared.

While these commitments are welcomed, the document lacks the detail required to manage construction safely in this location. Specifically:

- No mapped HGV routing is provided;
- There is no reference to avoiding sensitive frontages, including hospital accesses and the school;
- No contractor or subcontractor parking strategy is included, creating a high risk of overspill onto already constrained streets;
- No measures are identified to manage interactions with ambulance movements or hospital servicing traffic.

Additional information has been supplied in the CEMP document as per your request, however, note that some items can only be addressed by the appointed groundworker. Therefore, we are happy to accept that the CEMP document may need to be conditioned.

Temporary Disruption, Pedestrian Safety and Site Operation

Although the CEMP addresses general site organisation, the following highway-critical matters are not addressed:

- How pedestrian safety will be maintained at the Stoney Lane access, particularly given hospital footfall;
- How bus stops, footways and pedestrian desire lines will be protected and kept unobstructed;
- How construction traffic movements will be coordinated with ambulance station egress opposite the site;
- How conflicts with school peak times and large vehicle movements will be managed.

These are standard Construction Traffic Management Plan (CTMP) requirements but are not included in the submitted CEMP.

Additional information has been supplied in the CEMP document as per your request, however, note that some items can only be addressed by the appointed groundworker. Therefore, we are happy to accept that the CEMP document may need to be conditioned. A revised CEMP has been submitted for review, and a CTMP will be supplied in due course.

Requirement for a Detailed CTMP

The submitted CEMP is acceptable as an environmental framework document, but it does not provide sufficient detail to satisfy the Highway Authority that construction can proceed safely and without unacceptable disruption.

Given the location adjacent to a hospital, ambulance station and school, a detailed, conditioned, pre-commencement Construction Traffic Management Plan (CTMP) is required and must include, as a minimum:

- a) Defined and mapped HGV routing.
- b) Construction traffic phasing and programme.
- c) Delivery timing controls and booking systems.
- d) Contractor and subcontractor parking arrangements.
- e) Pedestrian safety measures along Stoney Lane.
- f) Protection of bus stops, footways and pedestrian routes.
- g) Coordination measures to avoid conflicts with ambulance station movements.
- h) Temporary traffic control, signage, banksmen and marshalling.
- i) Any footway closures or temporary diversions (if required).
- j) Monitoring, enforcement and review arrangements.

The CEMP provides a useful environmental baseline but does not address the highway-specific risks associated with construction in a sensitive hospital-fronting location. Without the above measures, there is a clear risk to pedestrian safety, emergency access and network operation.

A planning condition should therefore require submission and approval of a detailed Construction Management Plan / Construction Traffic Management Plan prior to commencement, to ensure construction impacts are properly controlled and safety risks mitigated throughout the build programme.

Additional information has been supplied in the CEMP document as per your request, however, note that some items can only be addressed by the appointed groundworker. Therefore, we are happy to accept that the CEMP document may need to be conditioned. A revised CEMP has been submitted for review, and a CTMP will be supplied in due course.

It is noted that Item 9 on your consultation response document is, to an extent, an overarching summary of the above comments we have formally responded to. Therefore, I have not added Item 9 to this response document.

I trust the information I have submitted in response to the comments received from Louise Fortune provide the requested clarifications and information where possible at this time.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Bardsley', enclosed within a faint, light blue circular outline.

Brandon Bardsley
Senior Design & Planning Executive

E: brandon.bardsley@taylorwimpey.com

M: 07393 607 569