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Halsnead Farm LPA
Ref. 25/00617/FUL

Dear Clare,

This letter has been prepared by Eden Planning and Development Ltd [Eden] (the Agent) on behalf of Starship Build Ltd and Onward Homes Ltd (the Applicants).

The purpose of this letter is to respond to the comments received from the statutory consultees and neighbours on response to planning application reference 25/00617/FUL submitted on land at Halsnead Farm, Foxes Bank Lane, Cronton, Knowsley L35 3SU [the Site], which seeks permission for the:

"Demolition of existing buildings and construction of up to 88 affordable homes, creation of access from fox's bank lane, construction of internal roads and footways, landscaping works to trees and associated works."

This letter is supported by the following information which has been prepared in response to the consultation responses received:

- Illustrative Mound Sections 01 (drawing ref. 458-LYR-XX-ZZ-DWG-L-5001)
- Illustrative Mound Sections 02 (drawing ref. 458-LYR-XX-ZZ-DWG-L-5002)
- Illustrative Mound Sections 03 (drawing ref. 458-LYR-XX-ZZ-DWG-L-5003)
- Illustrative Screening Section (drawing ref. 458-LYR-XX-ZZ-DWG-L-5004)
- Apartment Block A – Ground Floor (drawing ref. 1367-150C)
- Apartment Block A – First Floor (drawing ref. 1367-151C)
- Apartment Block A – Second Floor (drawing ref. 1367-152C)
- Apartment Block A – Proposed Elevations (drawing ref. 1367-154C)
- Waste and Servicing (drawing ref. 1367-1050A)
- Parking Allocation (drawing ref. 1367-1051)
- Cycle Allocation (drawing ref. 1367-1052)
- Environmental Statement (ref. 11382.002)



- Environmental Statement Volume 2 – Appendices (ref. 11382.002)
- Non-Technical Summary (ref. IN11382.001)
- Preliminary Risk Assessment and Coal Mining Risk Assessment (ref. 087052-CUR-XX-XX-T-GE-00002-P03)
- Ground Investigation Report (ref. 087052-CUR-XX-XX-T-GE-00002-P03)
- Memorandum (ref. 087052-CUR-XX-XX-T-GE-00002-P01)
- Response to Local Highway Authority (ref. 087052-CUR-XX-XX-T-TP-00003_KC TN-01)
- Response to National Highways (ref. 087052-CUR-XX-XX-T-TP-00004-P01)

Statutory Consultation Responses

We have received responses from the following statutory consultees:

- Coal Authority – no comment
- Community Safety – no comment
- Fire Authority – objection
- Natural England – no objection
- Merseyside Environmental Advisory Service [MEAS] (Planning Archaeologist) – comments, but no further action required
- Whiston Town Council – comments
- Public Health – comments
- Social Value Strategy – comments
- Environment Agency – no objection
- Scottish Power Energy Network [SPEN] – no objection
- National Highways – objection
- Planning Policy – comments
- Conservation and Design – comments
- Merseyside Police – comments
- MEAS (Environment) – comments
- Waste Management – comments
- Environmental Health and Customer Protection Services – comments
- Strategic Housing – comments, but no further action required
- Cronton Parish Council – no comments
- National Grid – no comments
- Local Highway Authority – comments
- Lead Local Flood Authority – no objection
- MEAS (Ecology) – comments
- Environmental Sustainability Service – comments

We have set out below how this revised submission responds to the comments and objections received from the statutory consultees.



Fire Authority

The following information is submitted in response to the objection received:

- For plots 1-4 the intention is to install a fire main under the road with an outlet facing the doors to this block. The inlet and outlet cabinets are built into boundary walls/piers to ensure they are in-keeping with the rest of the scheme. This is as opposed to providing a turning head facility which cannot be achieved due to the proximity to the overhead pylon cables.
- Updated elevational and floor plans for the apartment blocks which detail the location of the dry riser.

Whiston Town Council

Comments were received from Whiston Town Council expressing concerns regarding the:

- Infrastructure and highway capacity, and whether this is sufficient to accommodate the development; and,
- Potential visual and environmental impact of the development.

We have provided a response to these concerns below:

- A Transport Assessment, prepared by an independent professional consultant, supports the application submission and evidences there is sufficient capacity within the local highway network, and at surrounding junctions to accommodate the anticipated vehicular movements arising from the proposal.
- The Applicant has undertaken a utilities survey to establish the connections to the Site and understands there is capacity within the existing network to support the proposal.
- A Landscape and Visual Impact Assessment forms part of the Environmental Statement which supported the application submission. This concludes there will be a minor impact on the surrounding landscape as a result of the development, and that the provision of mature vegetation is expected to screen much of the proposal.

Public Health

Comments have been received from Public Health, who note the development to look well considered but raised the following concerns:

- The suitability of Foxes Bank Lane, as a means of accessing the Site, by means of multimodal forms of transport.
- Whether the footpaths through Symmetry Park would be well lit to facilitate use in darker hours.



The Applicant is in discussion with the Land Trust and Tritax Big Box Developments, as neighbouring landowners, to secure a new connection through Symmetry Park. This new connection will provide an alternate connection for pedestrians and cyclists wanting to gain access to Cronton Road. A letter of comfort has been prepared and co-signed by the Land Trust and Tritax Big Box, outlining their commitment to secure the delivery of this new connection.

Street lights are provided along the length Symmetry Park, the main internal access road, which will ensure the route is safe and well lit during the darker hours.

Social Value Strategy

Social Value Strategy are seeking a contribution of £8,800.00 which the Applicant agrees to providing.

National Highways

To respond to the transport objection from National Highways a statement (ref. 087052-CUR-XX-XX-T-TP-00004-P01) has been provided from Curtins.

Regarding the request for a 1.8m high close board fence between the boundary of the Site and the M62, the Applicant suggests a 1.8m mesh fence would be more appropriate from a cost and maintenance perspective, whilst still achieving highway safety. National Highways are requested to advice whether they would be agreeable to this alternate form of boundary treatment.

In response to the geotechnical comments, a series of cross sections are submitted which detail the proposed earth works along the northern boundary, including level details.

Planning Policy

The comments from Planning Policy highlights two key matters to consider:

1. The relationship between the proposal and the Listed Building, Old Halsnead.
2. Whether feasibility and deliverability testing has been undertaken to justify the increase from 30 dwellings.

In response to these comments:

- The Conservation and Design Officer has responded to the application and identified the level of harm to Old Halsnead as a negligible level of less than substantial as a result of development in its setting. Further landscaping is proposed between the proposal and Old Halsnead to further reduce the



level of harm, as required by paragraph 208 of the National Planning Policy Framework.

- As set out in the submitted Planning Statement and Affordable Housing Statement, evidence is provided to justify the increase from 30 dwellings.

Conservation and Design

As set out above, the Conservation and Design Officer has assessed the proposal as having a negligible level of less than substantial harm to Old Halsnead, as a result of development in the setting. To further reduce the level of harm, in accordance with paragraph 208 of the National Planning Policy Framework, a revised landscaping plan (drawing ref. 458-LYR-XX-ZZ-DWG-L-5004) is submitted, which details additional tree planting between the Site and Old Halsnead.

The revised landscaping plans details additional screening and woodland fringe planting which further limits the intervisibility between Old Halsnead and the development proposal.

Merseyside Police

Merseyside Police raised several observations and concerns in relation to:

- The speed change in proximity to the Site access and whether the risk of this has been assessed.
- Potential noise pollution from the M62.
- The footpath proposed along the western boundary, and where this connects.
- The impact of the proposal on the amenity of neighbouring residents.
- The network of northern footpaths providing minimal amenity benefits, and are neither clearly defined nor supported by any lighting of surveillance.

We have responded to these comments in turn below:

- Regarding the varying speed limit along Foxes Bank Lane, as set out in the response from Curtins to the Local Highway Authority (ref. 087052-CUR-XX-XX-T-TP-00003_KC TN-01), the intention is to either amend the existing Traffic Regulation Order [TRO] to reposition the speed limit terminals, to achieve maximum visibility splays, along with committing to any speed management or gateway measures recommended through the Road Safety Audit. These measures will further reduce any potential road safety risks for users of Foxes Bank Lane.
- In terms of noise pollution from the M62, this is assessed in Section 3.0 of the Noise Impact Assessment, with Section 5.0



outlining appropriate mitigation measures to ensure acceptable internal and external acoustic conditions.

- In relation to the footpath along the western boundary of the Site, this is necessary to secure the objectives of the Halsnead Garden Village which is to create an accessible and well-connected masterplan of the area. This westerly connection will provide access on to the private drive, through Symmetry Park, to Cronton Road.
- In terms of the network of footpaths on the northern amenity space, these are being indicated as part of a sculpture park, which is included in the open space strategy for the Site and is intended to provide recreational benefits for future and existing residents.

Waste Management

Comments have been received from Waste Management requesting further information on:

- Road surface areas.
- Swept path analysis opposite plot 9 to establish whether a bin lorry can gain access when parked cars are in-situ.
- The collection points for the dwellings located on the northern part of the Site.
- The number of receptacles in the apartment buildings, along with the number required for the dwellings.

In the first instance, it is important to highlight that much of this information is provided in the submitted Design and Access Statement [DAS]. A Waste and Servicing Plan (drawing ref. 1367-1050A) has been extracted from the DAS with the requested details added. In summary, for the dwellings:

- All dwelling have access to the rear to enable bins to be stored in private gardens.
- Properties with direct road side collection access will place bins at the end of driveways for collection.
- Allocated collection points have been identified within each private drive road arrangement, within compliant dragging distance from the collection point.
- An appropriately sized area of hardstanding will be provided in each location.
- Residents will be made aware of waste collection arrangements.

For apartments:

- Each apartment block (communal access and own-front-door) have designated, secure external bin storage within compliant travel distance from the entrance door to each residential unit.



- Communal bin stores will be secured through a coded or fob access mechanism.
- Communal bin stores will be constructed of appropriately robust materials and structure and sit on a concrete slab.
- Drainage points for effective wash-down will be provided to all external bin stores.

MEAS (Environment)

The following comments were received from MEAS in response to the submitted Environmental Statement [ES]:

- The 2017 EIA Regulations (Schedule 4.5(f)) require that the ES includes the likely significant effects including the impact of the project on climate and the vulnerability of the project to climate change. Further details, proportionate to the scale of the Proposed Development, should be provided as to how this has been accounted for within the assessment.
- The Noise Impact Assessment (Hepworth Acoustics, November 2025) refers to earth bunding forming part of the landscaped public open space with a height of 4 metres. This feature does not appear to be in the main Project Description, is not assessed within other relevant ES chapters, and is not reflected in the NTS. To ensure clarity regarding the development being assessed, and to allow understanding of the environmental effects, further information is required that:
 - Clarifies whether the referenced feature forms part of the Proposed Development, and if so, incorporates a clear description within the ES, supported by any necessary plans, sections or indicative construction details;
 - Updates any relevant topic assessments to reflect the inclusion of this feature, demonstrating whether it alters previous significance conclusions;
 - Updates the NTS, where necessary, to ensure consistency with the ES.

In response to the comments received regarding the impact of the development on climate change, and how vulnerable to scheme is to future climate change, TEP has responded to advise:

“Although a scoping exercise as described in the EIA Regulations was not carried out, the scope of the EIA was agreed through correspondence with planning officers at Knowsley Council. Specific discussion of climate change was not included in the scope. Given the size of the development, which would not ordinarily be subject to EIA, it was determined that inclusion of a climate change chapter would be disproportionate.



Furthermore, the site is part of the wider Halsnead Garden Village Sustainable Urban Extension, which is allocated for development under the Local Plan (Policy SUE2c). As an allocated site, the proposed development has been subject to sustainability appraisal through the adoption process of the Local Plan, and has been found to be acceptable and sustainable.

The ES shows that the development is not expected to lead to significant increases in traffic and therefore significant transport emissions with a significant climate impact would not be anticipated. Construction phase emissions would be controlled through measures included in a Construction Environmental Management Plan (CEMP).

As noted in the Design and Access Statement at section 5, the development will be inherently sustainable with buildings design to reduce energy consumption and therefore limit CO2 production and mitigating the development's climate impact. Window type and placement has also been designed to reduce the risk of overheating, therefore reducing this climate vulnerability. Further on in their response, MEAS confirm that the low-carbon measures are acceptable.

Increased flood risk is one of the main impacts of climate change predicted to affect the UK. Environment Agency Flood Maps show that the site is not at risk of flooding from rivers and the sea when accounting for climate change."

In respect of the earth bund, this feature is included in the proposed development, and cross sections have been submitted as part of the planning application. The Environmental Statement and the relevant chapters have been updated to reflect this; the consultants have confirmed the inclusion of the bund does impact the previous significance and effects conclusions. An updated Non-Technical Summary is also provided.

Further comments have been provided regarding the submitted ecological and biodiversity information; we respond to this later.

Further details are suggested to be secured via a planning condition, relating to:

- Programme of archaeological works.
- Site waste management plan.
- Securing the measures outlined in the DAS in relation to achieving a low carbon development.
- Securing an archaeological project design.

Environmental Health and Customer Protection Services

The following comments were received from Environmental Health:

- Earth Bund – The Environmental Statement does not assess the construction impacts of the proposed bund, including dust,



noise, vehicle movements, and the source/quantity of materials.

- Air Quality – The Air Quality chapter does not consider dust and vehicle movements associated with constructing the earth bund.
- Noise Assessment Gaps – The noise report assesses M62 motorway noise but does not consider noise from nearby electricity pylons or the proposed pumping station.
- Construction Hours – The Environmental Statement proposes 07:00–19:00 working hours, which conflicts with the council's standard hours of 08:00–18:00.
- Ground Investigation Coverage – The Phase 2 Ground Investigation does not fully assess several parts of the site, including areas beneath existing buildings, a recorded tank location, and a former pond.
- Ground Gas Monitoring – Monitoring did not capture worst-case atmospheric pressure conditions, so further justification or monitoring may be required.
- Coal Mining Risk Assessment Errors – The Phase 1 and Phase 2 reports contain inconsistencies and factual discrepancies regarding historic coal mining activity, which need to be corrected.

In response to these queries and updated Environmental Statement is submitted, including:

- The earth bund address to the description of development, and consultants have updated their assessments to reflect its inclusion.
- An updated Air Quality chapter which assesses the dust and vehicle movements associated with constructing the earth bund.
- An updated Landscape and Visual Impact Assessment with minor changes to the text to include reference to the bund, but no change to conclusions on impact.
- Updated Cultural Heritage chapter, with minor changes to the text to include reference to the bund, but no change to conclusions on effect.

In terms of the comments received in relation to the Noise Assessment, Hepworth Acoustics, the assessment has been updated. There are no changes to the main Environmental Statement chapter, with no change in identified impacts, other than updated working hours.

In summary, the assessment confirms that pylon-related noise does not represent a material constraint to the development. While it is not possible to isolate this source through measurement due to the



prevailing road traffic noise environment, reference data demonstrates that such noise is low in absolute terms. Importantly, within a site context already influenced by a continuous noise source, any contribution from the pylons would remain well below background levels and would not be perceptible. The update also confirms that façade specifications required to mitigate road traffic noise will inherently provide sufficient control of any residual high-frequency pylon noise, and that stand-off distances associated with the overhead lines prevent dwellings being located close to the pylons.

In respect of the proposed pumping station, this is in excess of 15m from the residential development. As such, it is not necessary for it to be assessed.

Updated versions of the Ground Investigation, Ground Gas Monitoring, and Coal Mining Risk Assessment to address the comments received are also submitted.

Local Highway Authority

Detailed comments were received from the Local Highway Authority. A response to these comments has been provided from Curtins, which has been supplemented with updated plans from DK Architects, including:

- Waste and Servicing (drawing ref. 1367-1050A)
- Parking Allocation (drawing ref. 1367-1051)
- Cycle Allocation (drawing ref. 1367-1052)

MEAS (Ecology)

Further information has been requested from MEAS in respect which will be provided separately. This includes:

- Ground Level Tree Assessment for Bats.
- DNA testing of the bat droppings found onsite.
- Responding to points of clarification in the Preliminary Ecological Appraisal and Bat Surveys.
- An assessment of the area of woodland – please note a 15m buffer has been included between the woodland area and the proposal, and there will be no access to these areas created because of the development.
- Updates to the Biodiversity Net Gain Assessment.
- A Shadow Habitat Regulation Assessment, including a Householder Information Pack.

Environmental Sustainability Service [ESS]

ESS commented that the design has progressed very positively from the pre-application plan, with many of the concerns raised previously having been addressed.



Regarding the comments received in relation to the landscape planting and tree species, Layer Studio has responded to advise that whilst several Climax species have been proposed within the schedule, the decision was made to opt for semi-mature planting to assist with visual impact and provide maturity to the site. We can amend to a typical woodland grid layout of Climax and Subcanopy species; however, given the large area, this would defer to smaller whips/transplants, as opposed to larger trees. The preference is therefore to proceed with the tree species currently proposed.

In relation to the comments regarding the tree planting on the northern part of the Site, these have been positioned to avoid the “swing / sway” of the overhead pylon cables. Comments were also received in respect of the proposed hedge species – clarification is sought from ESS as to whether this requires amending.

In terms of the planting specification, details have been provided as part of the application submission, and it requested that further details are secured through a planning condition. Likewise with the Landscape Ecological Management Plan, it is requested this be secured by a planning condition.

Neighbour Comments

A total of 8 neighbour comments have been received, 7 of which object to the proposal. A summary of the comments received is provided below:

- Increased traffic congestion.
- Loss of green space.
- Impact on residential amenity.
- Over-intensification of development.
- Inadequate boundary treatments.
- Highway safety concerns in relation to Foxes Bank Lane.
- Pedestrian safety concerns.
- Poor access to sustainable transport.
- Pressure on local infrastructure.
- Drainage and surface water concerns.

We have provided a response to these queries below:

- The additional traffic arising from the development has been assessed as part of the submitted Transport Assessment and concludes there is sufficient capacity within the highway network to accommodate the proposal. This point has not been contested by the Local Highway Authority.
- The Site forms part of Halsnead Masterplan and is allocated for residential development. The redevelopment of the Site is therefore appropriate in this context.



- The proposed development has been designed and laid out to respect the amenity of neighbouring residents. Suitable separation distances have been provided to ensure there is no risk of overlooking or loss of privacy. Additional landscaping is also proposed along the boundaries of the Site to further screen views of the proposed development.
- The density of development is considered appropriate in the context of Policy CS3 which seeks to secure a minimum density of 30 dwellings per hectare [dph]. The proposal represents a density of 40 dph which can be achieved without compromising other policy requirements for new residential development.
- A Boundary Treatments Plan supports the application submission and details five different types of boundary treatment which will be present across the Site. Officers and statutory consultees have not raised concern with the proposed boundary treatments plan, with the exception of National Highways who have requested a 1.8m high fence along the boundary of the M62, which is currently being considered by the Applicant.
- The Transport Assessment assesses the safety of Foxes Bank Lane. Additional measures are being proposed as part of the development, including a TRO to increase the extent of 30mph speed limit to ensure all road users can safely access and egress the Site. Additionally, an alternate connection is proposed through Symmetry Park, meaning pedestrians would have the opportunity access Cronton Road without having to navigate Foxes Bank Lane.
- The provision of a new connection through Symmetry Park would enable pedestrians to safely access the bus stops on Cronton Road which provide access to Warrington and Liverpool.
- The proposed development has not been assessed as putting a pressure on local infrastructure. In the event the development does put pressure on local infrastructure, the Council would expect obligations / financial contributions towards expanding or improving such services / facilities.
- A Drainage Strategy supports the application submission. This has been assessed by the Lead Local Flood Authority, who have raised no objection to proposal.

Summary

This response summarises the revised information that is submitted to address the comments received from statutory consultees and neighbours.



E D E N

We trust the information submitted is sufficient to address any outstanding objections, or concerns raised about the application submission.

Yours sincerely,

Poppy Oakey MRTPI
ASSOCIATE DIRECTOR



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