

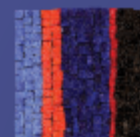
Planning and Affordable Housing Statement

**Proposed Development of 136 Affordable
Homes**

**Former St Dominics School, North Huyton
L14 8UL**

On Behalf of Breck Homes

SEPTEMBER 2025



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town planning

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1 Introduction

- 1.1 This Planning and Affordable Housing Statement accompanies an application for 136 affordable homes on land off Southdean Road in North Huyton, submitted on behalf of Breck Homes Ltd.
- 1.2 Breck Homes will develop the site and transfer it to a local registered provider on completion, who will manage and maintain the homes.
- 1.3 This Statement will describe the proposals in more detail, along with the site and surroundings. It will then consider relevant planning policy, the evidence base and the planning history of the site, before providing an analysis, setting out the relevant planning issues. It concludes that the proposals constitute sustainable development and should be approved.
- 1.4 The application is accompanied by the following plans:
- Proposed Site Layout (Ref: P01 - Southdean Road) Rev K
 - Materials Distribution Plan (Ref: P02 - Southdean Road) Rev A
 - Boundary Treatments Plan (Ref: P03 - Southdean Road) Rev A
 - Boundary Details (Ref: P04 - Southdean Road)
 - Car Charging Plan (Ref: P05 - Southdean Road) Rev A
 - Bird & Bat Box Plan (Ref: P06 - Southdean Road) Rev A
 - Garden Areas Plan (Ref: P07 - Southdean Road)
 - Site Location Plan (Ref: P08 - Southdean Road)
 - Street Scene Elevations (Ref: P09 - Southdean Road) Rev A
 - 1B2P 50 Bungalow – Semi-Detached (Ref: P10 - Southdean Road)
 - 1B2P 50 Bungalow – Terrace of 03 (Ref: P11 - Southdean Road)
 - 2B3P 61 Bungalow – Semi-Detached (Ref: P12 - Southdean Road)
 - Type P1 1b2p 50 & P2 1b2p 57 Maisonettes (Ref: P13 - Southdean Road)
 - Type P1 1b2p 50 & P2 1b2p 57 Maisonettes (Ref: P14 - Southdean Road)
 - Type P1 1b2p 50 & P2 1b2p 57 Maisonettes (Ref: P15 - Southdean Road)
 - Type C 2B3P 74 Semi-Detached (Ref: P16 - Southdean Road)
 - Type C 2B3P 74 Semi-Detached (Ref: P17 - Southdean Road)
 - Type D 2b4p 81 & Type F 3b4p 86 Semi-Detached (Ref: P18 - Southdean Road)
 - Type D 2b4p 81 & Type F 3b4p 86 Semi-Detached (Ref: P19 - Southdean Road)
 - Type F 3b4p 86 Semi-Detached (Ref: P20 - Southdean Road)
 - Type F 3b4p 86 Semi-Detached (Ref: P21 - Southdean Road)
 - Type F 3b4p 86 Semi-Detached (Ref: P22 - Southdean Road)
 - Type H 3b5p 93 Semi-Detached (Ref: P23 - Southdean Road)
 - Type H 3b5p 93 Semi-Detached (Ref: P24 - Southdean Road)
 - Type H 4b5p 100 Semi-Detached (Ref: P25 - Southdean Road)
 - Type H 4b5p 100 Semi-Detached (Ref: P26 - Southdean Road)
 - Type M1 2b3p – M2 1b2p & M3 1b2p Apartments (Ref: P27 - Southdean Road)

- Apartments Bike & Bin Store (Ref: P28 - Southdean Road)
- Maisonette Bike & Bin Stores (Ref: P29 - Southdean Road)
- Topographical Survey
- Landscape Plans (x3)

1.5 The application is accompanied by the following documents:

- Air Quality Impact Assessment
- Arboricultural Impact Assessment / Tree Survey / Tree Protection Plan and Method Statement
- Baseline BNG Assessment
- BNG Assessment (to follow)
- Construction Method Statement
- Design and Access Statement
- Drainage and SUDS Strategy
- Environmental, Dust & Surface Water Management Plan
- Flood Risk Assessment
- Health Impact Assessment
- Noise Technical Note
- Phase 1 Site Investigations
- Planning and Affordable Housing Statement
- Preliminary Ecological Assessment & Ground Level Roost Assessment
- Statement of Community Involvement
- Sustainability Statement
- Transport Assessment
- Travel Plan
- Waste Management Strategy

2 The Proposals

- 2.1 This section provides additional information about the development proposals. It should be read in conjunction with the Design and Access Statement, which describes the physical characteristics of the development in more detail.
- 2.2 The application description is as follows: *“Planning application for the erection of 136 affordable homes with associated access, car parking, open space, and landscaping on land off Southdean Road, North Huyton.”*
- 2.3 The site consists of land between St Dominics Church to the north west and housing off Ashbury Road to the north east, situated off Southdean Road to the south west.
- 2.4 The development will consist of affordable homes to be constructed by Breck Homes and transferred to a reputable registered provider. They broadly comprise:
- 63 x Houses (46%)
 - 36 x Apartments (27%)
 - 26 x Maisonettes (19%)
 - 11 x Bungalows (8%)
- 2.5 The schedule of accommodation will comprise:
- 2-Bed Homes: 11 x Type C – 2B3P M4(2) (74sqm) & 7 x Type D – 2B4P Aspect (81 sqm)
 - 3-Bed Homes: 29 x Type F – 3B4P (86sqm) & 8 x Type H – 3B5P (93sqm)
 - 4-Bed Homes: 8 x Type T – 4B5P House (100sqm)
 - Apartments: 6 x Type M1 – 2B3P (61sqm) & 30 x Type M2 – 1B2P (61sqm)
 - Maisonettes: 13 x Type P1 – 1B2P Ground Floor (50sqm) & 13 x Type P2 – 1B2P First Floor (57sqm)
 - Bungalows: 9 x Type A – 1B2P M4(2) (50sqm) & 2 x Type B – 2B3P M4(2) (61sqm)
- 2.6 Breck Homes are currently in advance discussions with a local registered provider, who suggest a prospective tenure mix of 110 affordable rent and 26 shared ownership properties. This equates to a proposed tenure mix of 80% affordable rent and 20% shared ownership. The final tenure mix will be dependent on Homes England grant funding conditions.
- 2.7 All of the properties will meet nationally described spacing standards, with 16% of them being M42 accessible and adaptable units suitable for disabled people. This exceeds the local policy requirements.
- 2.8 The layout makes optimal use of the site with a predominant north-east to south-west axis from Southdean Road, mirroring the layout of the neighbouring housing off Ashbury Road. The other north-east to south-west route can connect the site to a potential new link road along the northern boundary.

- 2.9 The internal road layout will loop back on itself, creating two blocks of housing between. The highways will be laid out with standard 5.5m width roads with 2m wide footways on either side. Traffic calming in the form of raised tables will help to slow traffic and create a safer, more inclusive environment.
- 2.10 Access to the homes is achieved via the adoptable highway throughout the scheme. Most of the homes will accommodate two in-curtilage spaces. Other dwellings, such as apartments or maisonettes will have a dedicated parking space in communal parking courts.
- 2.11 The homes will be of a traditional design, with the front elevations including detailing such as brick window headers and cills, soldier courses, gables and white render. The dwellings will comprise an alternative brick palette (Marshalls Winterbourne Berry and Amberley Corn).
- 2.12 The proposed boundary treatments includes 1.8m height brick pier walls with timber fencing, 1.8m and 1.5m height feathered edge fencing to the rear and side of plots, and 0.6m height post and rail fencing alongside areas of open space.
- 2.13 All of the dwellings benefit from rear gardens, with these being communal spaces for the maisonettes. Front gardens or verges are also provided, where available. Amenity open space is provided in the north eastern corner of the site.
- 2.14 Site peripherals such as bin stores are largely located within the curtilage of the dwellings, with alleys allowing for ease of access for collection. An electricity sub-station is located to the north of the site to the back of the adoptable highway, allowing ease of access for statutory undertakers.
- 2.15 The accompanying landscape plan uses a mix of native and decorative trees, hedges and shrubs. The use of native planting mix in these areas alongside new trees and the provision of bat and bird nest boxes will enhance biodiversity.

Section 106 Heads of Terms

- 2.16 These will be drafted prior to determination of the application once consultation responses have been received from statutory consultees and reviewed against Section 122(2) of the CIL Regulations.

3 Site and Surroundings

- 3.1 The site comprises circa 2.77ha of previously developed land off Southdean Road in North Huyton, within the Metropolitan Borough of Knowsley. The boundary to Liverpool is located to the north west of St Dominics Church nearby.
- 3.2 The land comprises hardstanding from the former St Dominics RC Primary School and part of the former site of Hope Primary School to the north. Part of this area is grassed over. Trees are located on the south eastern boundary and ruderal vegetation is scattered throughout. The site is flat and otherwise physically unconstrained. The former school area is closed off to public access by palisade fencing.
- 3.3 Inter-war municipal housing is situated to the south east and south west, off Southdean Road. Hope Primary School and Knowsley College and associated open land are situated to the north and north east of the site. Whilst in North Huyton, both Page Moss and Stockbridge Village are within walking distance.
- 3.4 The former pedestrian and vehicular access to the land is located off Southdean Road. This road is severed nearby to the west between the boundary of Knowsley and Liverpool. Southdean Road connects to Liverpool Road (A58) to the south, providing access to the wider highway network, including junction 2 of the M57 approximately 3km to the east.
- 3.5 The site is well served by public transport, with regular bus services (#12, #102, #611, #698, #898 and #899) stopping on Princess Drive, within a 4 minute walk. These services connect the area to Huyton nearby, as well as Liverpool City Centre to the west and Prescot to the north east.
- 3.6 In terms of local shops and services, a Tesco Express is located off Princess Drive within 600m walking distance. A GP and chemist is also located adjacent to it. Hope Primary and Knowsley Community College neighbour the site to the north west. Huyton Town Centre is located 3km to the south west.

Site Designation

- 3.7 The site is designated as Urban Greenspace / Educational Land in the Knowsley Unitary Development Plan (UDP) adopted in 2006. Policy OS2 has since been replaced by Knowsley Core Strategy (2016) Policy CS21 – Greenspace and Trees.

4 Planning Policy and Evidence Base

National Planning Policy Framework

- 4.1 The National Planning Policy Framework (NPPF) was published in December of 2024 and provides relevant guidance.
- 4.2 Paragraph 8 of the Framework confirms that the three aims of sustainable development need to be pursued in mutually supportive ways; an economic objective, a social objective and an environmental objective.
- 4.3 Paragraph 9 states that planning decisions should “...play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”
- 4.4 Paragraph 11 states that the presumption in favour of sustainable development means “where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework 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.”*
- 4.5 Paragraph 61 states that “To support the Government’s objective of significantly boosting the supply of housing, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed”.
- 4.6 Paragraph 63 advises that the “size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies” including those who require affordable housing.
- 4.7 Paragraph 78 confirms that LPAs should maintain a specific deliverable supply of housing land against local housing need where policies are more than 5 years old. This should include a buffer of 5% to ensure choice and competition in the market for land.
- 4.8 Paragraphs 115 to 118 provide criteria for ensuring that development proposals promote safe and suitable access for all road users and promote sustainable transport modes. Permission “...should only

be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

- 4.9 Paragraph 127 of NPPF requires LPAs to reflect changes in the demand for land and regularly review designations, reallocating them to meet identified needs where necessary.
- 4.10 Paragraph 129 encourages planning decisions which support making efficient use of land that meets identified needs for different types of housing, reflecting local market conditions, the availability and capacity of infrastructure and the desirability of promoting change.
- 4.11 Paragraph 131 states that high quality, beautiful and sustainable buildings and places are fundamental to what planning should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and be supported by communities.

Local Policy

- 4.12 The development plan for the application site consists of the Knowsley Core Strategy (2016) and saved policies of the Knowsley Unitary Development Plan (2006).
- 4.13 The site is designated as Urban Greenspace / Educational Land in the composite Proposals Map which covers both saved UDP and Core Strategy policies.

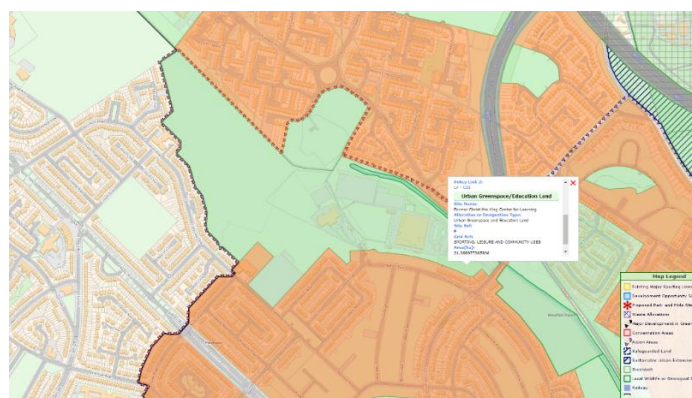


Figure 2. Knowsley Composite Proposals Map Extract

- 4.14 Core Strategy Policy CS21 replaced UDP Policy OS2 for decision making purposes and is relevant to the proposed development. It states that on Urban Greenspace that new development which would result in the loss of urban greenspace will not be permitted unless *“a. A surplus of provision for all types of greenspace would be maintained relative to local standards; b. The land is considered unsuitable in terms of size, location or character to prevent or address individual deficiencies of different types of*

greenspace relative to local standards; c. Appropriate mitigation is provided through replacement facilities of at least an equal quantity, quality and accessibility; d. The development is required to improve greenspace provision or for ancillary facilities to support sport or recreation; or, e. Where the proposal relates to indoor or outdoor sports provision, 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.”

- 4.15 The site also forms part of the North Huyton Action Area. Core Strategy Policy CS9 encourages the comprehensive regeneration of the area with new housing development of a range of types to meet local needs.
- 4.16 It states that *“New development should provide a. A surplus of provision for all types of greenspace would be maintained relative to local standards; b. The land is considered unsuitable in terms of size, location or character to prevent or address individual deficiencies of different types of greenspace relative to local standards; c. Appropriate mitigation is provided through replacement facilities of at least an equal quantity, quality and accessibility; d. The development is required to improve greenspace provision or for ancillary facilities to support sport or recreation; or,e. Where the proposal relates to indoor or outdoor sports provision, 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.”*
- 4.17 Policy CS1 sets out the Spatial Strategy for Knowsley. This seeks to focus development in the existing urban areas of the Borough, maintaining the existing settlement hierarchy. Part of the policy’s aims are to *“re-balance the housing stock by providing a wide choice of new market sector and affordable housing with supportive services and facilities appropriate to needs...The tenure, type and size of new housing delivered in Knowsley will support the re-balancing of the housing market to better meet housing needs and demands...”*
- 4.18 Policy CS3 provides the Housing Supply, Delivery and Distribution strategy. It confirms that an average of 450 dwellings per annum (net) will be provided in the Borough. Densities of a minimum of 30 dwellings per hectare will be required.
- 4.19 The site is located in the Huyton and Stockbridge Village Sub-Area. One of the priorities in this area is to *“re-balance the housing market to meet local needs and contribute to those of the wider Liverpool City Region through comprehensive housing-led regeneration...”*.
- 4.20 Policy CS15 sets out Affordable Housing requirements for Knowsley. Within market-led housing schemes over 15 units, the policy seeks a minimum of 10% affordable housing on urban sites and 25% on sustainable urban extensions. The tenure of affordable housing should be informed by local evidence

and should remain affordable in perpetuity. Finally, the Council state that they will work with registered providers and other agencies to provide new affordable housing developments.

4.21 Policy CS17 provides Housing Sizes and Design Standards for the Borough. This seeks to achieve an appropriate mix of dwelling sizes and achieve residential design standards. The policy provides the following breakdown on housing sizes; however, this is based on out-of-date evidence.

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

Figure 2. Core Strategy Suggested Housing Mix (2010 Evidence Base)

4.22 The following policies are also relevant to the determination of this application:

- Policy CS2 – Development Principles
- Policy CS8 – Green Infrastructure
- Policy CS19 – Design Quality and Accessibility in New Development
- Policy CS24 – Drainage
- Policy CS27 – Planning and Paying for New Infrastructure

4.23 There are also a small number of saved development management policies within the UDP which have been saved and are relevant to this proposal. These include:

- Policy ENV2 – Noise and Vibration
- Policy DQ2 – Security in the Built Environment
- Policy DQ4 – Trees and Development

Supplementary Planning Guidance

4.24 The North Huyton Action Area Supplementary Planning Document was adopted by the Council in 2007. This cross references Unitary Development Plan (UDP) Policy CP1, covering ‘Regeneration and Development Priority Areas’. North Huyton was designated as one such Action Area within this policy.

Policy H3 of the UDP provides criteria for their development. Both of these policies have been superseded by Core Strategy Policy CS9 to some extent.

- 4.25 Whilst the policies have limited weight, it is of some interest that they required the erection of up to 1,450 new net dwellings in North Huyton as part of a comprehensive development programme. Development would be expected to provide new areas of greenspace or significant qualitative improvements to the existing green infrastructure. The criteria also acknowledges that housing development may be located on poorly performing urban greenspace.
- 4.26 Figures 4.3, 4.4 and 4.5 confirm that the Council identified the land containing the former school to be cleared to make way for 'community uses', as shown below:



Figure 3. North Huyton SPD Masterplan Extract

Evidence Base

- 4.27 Where strategic policies are more than five years old, the National Planning Policy Framework requires LPAs to follow the standard method for assessing local housing need unless these strategic policies have been reviewed and found not to require updating. The standard method uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for.

- 4.28 The government adopted a new **Standard Method** to calculate housing need in December 2024. This establishes a minimum annual requirement of 600 homes for Knowsley. As per paragraph 78c of the 2024 NPPF, a 5% buffer must now be applied to allow for choice in the housing market.
- 4.29 The **Strategic Housing Land Availability Assessment (SHLAA)** was published in December 2024 and updates the five-year housing land position of the Authority, as well as reviewing the deliverable supply of housing.
- 4.30 In terms of the requirement, paragraph 4.2 states that the strategic housing policies in the Core Strategy (2016) have been reviewed in the last 5 years and found not to need updating. The Core Strategy figure of 450 dwellings per annum has therefore been used. This is not updated in line with the Standard Method increase to 600 dwellings per annum.
- 4.31 Additionally, the SHLAA appears to have used a previous version of NPPF which did not require LPAs to provide a 5% buffer to allow for choice in the housing market. This provision has now been reversed in the latest version of NPPF. Again, this is now an out-of-date methodology to calculate the housing requirement.
- 4.32 Regardless, the Assessment claims that for the period 2024/25 to the 2028/29 the deliverable sites can yield an estimated 2,958 dwellings within Knowsley via commitments, allocations and SHLAA sites. This equates to a 7.2 year supply of housing land when assessed against the Local Plan housing requirement (450 dwellings per annum).
- 4.33 The Assessment also provides an update on housing completions during the 2019-2022 period. It confirms that 2406 dwellings were completed. This equates to 372% delivery and passes the Housing Delivery Test. It must be noted, however, that only 499 dwellings were completed during 2021/22. This falls 101 homes short of the Standard Method (2024) annual requirement.
- 4.34 The **Knowsley Annual Monitoring Report (2023/24)** published in December 2024 confirms that 2,345 affordable homes have been built over the period 2010/11 to 2023/24. This equates to a total of 167.5 affordable homes per annum. Set against overall housing completions, it represents 28% of the overall level of completions.
- 4.35 The **Knowsley Housing Strategy (2022)** states that in Huyton, the objectives will be:
- Delivering on-site, truly affordable, social housing for rent to support households with lower quartile incomes.
 - A greater emphasis on affordable housing that offers smaller (1 and 2) bed homes and larger (4 bed) homes.

- Creating a balanced offer of affordable housing.
- Developing a range of intermediate housing products that support newly forming households and households on median incomes trying to get onto the housing ladder.

4.36 The **Knowsley Housing Needs Assessment (2021)** sets out the level of affordable housing need for the Borough. It identifies that the Page Moss Ward, which comprises the site has a lower quartile price of £93,000, and a lower quartile rent of £498. This is about average for the Borough. The Assessment identifies that there are 9,230 households in need, with 2,869 of these being existing affordable tenants.

4.37 The Assessment recommends a total affordable housing need figure of 243 dwellings per annum. This recommends a split between 67% affordable rent and 33% intermediate tenure.

4.38 The **2021 Knowsley Playing Pitch Strategy (PPS)** evidences the supply and demand position for playing pitches and artificial grass pitches in Knowsley. At a local level, the site is located within the Huyton analysis area. The PPS identifies that there is a projected (2028) shortfall of 3.5 match equivalent sessions for youth 11 x 11 pitches and 1.5 match equivalent sessions for youth 9 x 9 matches.

5 Analysis

Principle and Open Space Analysis

- 5.1 As per Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990, any planning application must be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.
- 5.2 The development plan for the application site consists of the Knowsley Core Strategy (2016) and saved policies of the Knowsley Unitary Development Plan (2006). The site is designated as Urban Greenspace / Educational Land in the composite Proposals Map.
- 5.3 Core Strategy Policy CS21 establishes that the loss of such land must be shown to be either:
- a) surplus to all types of greenspace, relative to local standards;
 - b) unsuitable in terms of size, location or character to prevent or address individual deficiencies of different types of greenspace relative to local standards;
 - c) mitigated through replacement facilities of at least an equal quantity, quality and accessibility;
 - d) required to improve greenspace provision or for ancillary facilities to support sport or recreation; or
 - e) there is no evidence of future or continuing need for it, if it is a sports use, and accords with criteria a) or b).

The policy also requires applicants to demonstrate the benefits of proposals outweigh the loss of open space, in addition to the above criteria.

- 5.4 In addressing the compliance of the proposal with this policy it is important to note that the site did not previously contain marked out playing pitches according to historical Google Earth images, this is addressed in the satellite images below.
- 5.5 The LPA has confirmed that the proposal site was not used as playing fields, nor would this have been suitable as it was immediately adjacent to former school buildings. The former schools used playing fields off-site to the north. Sport England are therefore not a statutory consultee to this application.
- 5.6 Both primary schools had been demolished and the sites cleared by 2011. However, the footings of the primary schools remain and the area requires remediation to bring it up to developable standards.
- 5.7 As shown below, following the clearance of the schools the area was fenced off and has not been accessible to members of the public for recreational use.



Figure 4. 2000 Google Earth Image

The site is occupied by St Dominic’s Primary School on land to the south and the former Hope Primary School on land to the north. None of the proposal site is marked out as playing fields. The vast majority of the site is comprised of hardstanding in the form of playground and circulation space around the school buildings. The local authority has confirmed that both schools used off-site land to the north as a playing field.



Figure 5. 2010 Google Earth Image

The site is occupied by St Dominic’s Primary School on land to the south and the former Hope Primary School on land to the north. None of the proposal site is marked out as playing fields. The vast majority of the site is comprised of hardstanding in the form of playground and circulation space around the school buildings. Hope Primary School will be demolished and relocated in 2011 and St Dominic’s follows in 2012.



Figure 6. 2020 Google Earth Image

Both schools on the site have now been demolished, with Hope Primary now relocated to the north with a palisade fence now dividing the two sites. The area has become overgrown, however much of the playground on the St Dominic’s Primary School site remains. The frontage on Southdean Road is now entirely closed off to public access by palisade fencing.

- 5.8 Whilst the development plan is the starting point for decision making and applications should be determined against it; this is only unless material considerations dictate otherwise. We have established that the proposal site is not ‘educational land’ and has a very limited function as ‘urban greenspace’ being inaccessible and unsafe (see Ground Conditions) to members of the public.
- 5.9 The policy designation is out-of-date and inconsistent with paragraph 127 of NPPF, which requires LPAs to regularly review the status of land and re-allocate for more deliverable uses that can help to address identified needs.
- 5.10 For these reasons, Policy CS21 can be given very limited weight in the determination of this application. Regardless, the applicant will aim to work proactively with the Council to ensure that the proposed development offers a proportionate level of open space compensation, if required.
- 5.11 Whilst somewhat outdated, the North Huyton Masterplan SPD is a material consideration of limited weight. This originally intended a wider area including the subject site to come forward as housing off Southdean Road. The objectives of the SPD are to achieve a wider choice of popular and high-quality housing and regenerate suburban living, which is exactly what the proposal will achieve, removing a derelict eyesore and promoting regeneration in North Huyton with much needed affordable homes. There has been no change in circumstances which would suggest that this approach is no longer appropriate.
- 5.12 Paragraph 61 of the 2024 NPPF sets out the Government’s objective to significantly boost the supply of homes with a sufficient amount in the right places to meet identified housing needs.
- 5.13 Paragraph 124 of the Framework promotes effective use of land, paragraph 129 seeks appropriate densities in doing so, and paragraph 125 (c) gives “*substantial*” weight to the value of using suitable brownfield land within settlements for homes.
- 5.14 The NPPF seeks to maintain delivery of new homes by requiring a deliverable supply over a five year period, with a 5% buffer to ensure choice and competition in the market for land. Accordingly, the 2024 SHLAA claimed a 7.2 year supply based on the Core Strategy annual requirement of 450 dwellings.
- 5.15 However, the government has since released a new Standard Method for calculating housing need. This has uplifted the annual requirement to 600 dwellings in Knowsley. The Local Plan requirement of 450 dwellings per annum represents 75% of this figure.
- 5.16 Whilst paragraph 4.2 of the 2024 SHLAA claims that the strategic housing policies in the Core Strategy do not require updating, the release of the new Standard Method figure is a significant change in

circumstances that underlines that Policy CS3 (housing supply policy) is out-of-date and that the minimum 600 dpa Standard Method figure should be used for calculating supply immediately.

- 5.17 Accordingly, the new requirement for Knowsley is 600 dpa x 5 years with a 5% buffer added. This equates to a new housing requirement of 3,150 dwellings over a five year period. Set against the claimed deliverable supply of 2,958 homes in the 2024 SHLAA, this equates to a 4.6 year housing land supply.
- 5.18 Where LPAs cannot demonstrate a deliverable, five year housing land supply then paragraph 11(d) of NPPF is engaged. As there are no adverse impacts which significantly and demonstrably outweigh the benefits of development, permission should be granted.

Affordable Housing Statement

- 5.19 In accordance with Paragraph 63 and 71 of NPPF, it is vital that the needs of different groups, including those requiring affordable homes should be met. Mixed tenure sites are also recommended, including a blend of ownership and rental tenures, including Social Rent. These sites are identified as having a range of benefits, including creating diverse communities and supporting timely build out rates.
- 5.20 The proposed development comprises 136 homes for affordable rent and shared ownership, to be constructed by Breck Homes and transferred to a registered provider on completion.
- 5.21 Core Strategy Policy CS15 Delivering Affordable Housing confirms that 10% of new housing developments of 15 dwellings or more should be an affordable tenure. As the proposed development comprises 100% affordable housing this level of provision goes significantly beyond this requirement. Such a benefit is a powerful material consideration in favour of this application.
- 5.22 The most up-to-date assessment of affordable housing need is established in the Knowsley Housing Needs Assessment (2021). The site is located in the Page Moss Ward in the report which has a lower quartile price of £93,000 and a lower quartile rent of £498. This is below average for the Borough, however, higher quality affordable homes are required in this ward to modernise its stock.
- 5.23 The Assessment identifies that there are 9,230 households in need across the Borough, with 2,869 of these being existing affordable tenants. There is also a Boroughwide annual shortfall of 243 affordable homes. This is set against the context of an average annual completion rate of 167.5 dpa over the period 2010 to 2024. A step change of affordable housing delivery is therefore required, which the proposals can help to address. This level of need should also not be considered a ceiling.

- 5.24 Analysis released in April 2025 from the National Housing Federation (NHF), Crisis and Shelter found that there is a 1.7 year waiting list for a three-bed affordable home in Knowsley. This has been verified by local registered providers, who identify a strong local need for affordable homes in the area.
- 5.25 In terms of tenure recommendations, the Assessment seeks a split between 67% affordable rent and 33% intermediate tenure. The proposed tenure mix is broadly compliant with this approach, providing 110 affordable rent and 26 shared ownership properties. This is broadly in line with the evidence base, which identifies that the need for affordable rent is predominant in Knowsley. The final tenure split may be subject to change, pending Homes England grant funding announcements.
- 5.26 As per the evidence base, 27% of the provision comprises 3 bed-dwellings, also offering a significant amount (48%) of one-bedroom properties to address the need for smaller properties in the area. This generally reflects the need for a mix of affordable homes, whilst providing a viable scheme on a previously developed site.
- 5.27 The proposed affordable homes are of a sufficient size to provide a good standard of living space and accord with the Nationally Described Space Standards and Core Strategy Policy CS17 Housing Sizes and Design Standards. Additionally, around a third of the homes proposed will offer M4(2) compliance, offering adaptable and inclusive accommodation.
- 5.28 A local registered provider will maintain and manage the homes on completion. Breck are current in advanced negotiations to finalise details on this.
- 5.29 The occupancy criteria for the dwellings will be controlled by a planning condition, the draft wording of which is proposed below. The allocation of the homes will be determined by a registered provider, according to their waiting list and need criteria.
- 5.30 To qualify for potential Homes England grant funding the affordable nature of the dwellings can be secured via a suitably worded planning condition. The following condition based on Planning Inspectorate wording would be appropriate for this purpose:

“The development shall not begin until a scheme for the provision of affordable housing as part of the development has been submitted to and approved in writing by the local planning authority. The affordable housing shall be provided in accordance with the approved scheme and shall meet the definition of affordable housing in Annex 2 of the National Planning Policy Framework 2024 or any future guidance that replaces it. The scheme shall include:

- i. the numbers, type, and tenure of the affordable housing provision to be made which shall consist of 100% of housing units;*

ii. the arrangements to ensure that such provision is affordable for both first and subsequent occupiers of the affordable housing; and

iii. the occupancy criteria to be used for determining the identity of occupiers of the affordable housing and the means by which such occupancy criteria shall be enforced.”

Development Management Considerations

- 5.31 The applicant has sought the views of the Council during **pre-application discussions**. Informal comments have been made and various suggestions have been incorporated into the final submission plans. These include aspect plots being added to corner units, side elevations added to maisonettes, public open space relocated, enhanced landscape design, bungalows added and dropping a unit to allow for better residential amenity. The submitted proposals are the sum of these discussions with officers, and we believe that the final design is generally acceptable to the Council.
- 5.32 In terms of the **design and layout**, the site represents an opportunity to develop partially brownfield land in an accessible location. The proposals will make efficient use of this land and provide an attractive living environment for future residents. The layout will blend-in seamlessly with the local urban grain and provide a logical built addition to the area, mirroring the north-east to south-west axis of Ashbury Road adjacent. The design and choice of materials, such as the use of brick window headers and cills, soldier courses, gables, red and gold contrasting brick and the use of a traditional two-storey form, will complement the area. The homes will help to minimise energy consumption. The internal layout will create a good standard of accessibility and amenity for both new and existing residents. The proposals therefore comply with paragraph 131 of NPPF and Policy CS19 of the Core Strategy.
- 5.33 The **density of development** comprises 136 homes over a net developable area of 2.66ha which equates to 51 dwellings per hectare. This level of density reflects the sustainable location, located within close walking distance to a bus corridor on Princess Drive, shops and services. It is also supported by paragraph 129 of NPPF which recommends the efficient use of land to meet identified needs, reflecting local market conditions, the availability and capacity of infrastructure and the desirability of promoting change.
- 5.34 A **Drainage Strategy** has been provided by Ironside Farrar, which proposes a surface water and foul water connection to the mains along Southdean Road. A control manhole with vortex flow is proposed near to this connection to limit flow to 18.6 l/s. Permeable drives and filter drains are to be used and a large attenuation tank is proposed to reduce surface water runoff to a greenfield rate.

- 5.35 A **Flood Risk Assessment** has been carried out by Townsend Water Engineering, which identifies that the site is not at risk of fluvial, pluvial, or other flooding. The Assessment cross references the IGE Consulting soil logs which identify that the ground is clay and infiltration does not appear to be feasible at the site. The Assessment also confirms that attenuation is required up to and including a 1 in 100-year event plus 45% for climate change for surface water flooding.
- 5.36 A **Transport Assessment** has been provided by Prime Transport. This states that the proposed access comprising a 5.5 carriageway, 6m corner radii and two 2m wide footways achieves a safe and accessible entrance to the site. An uncontrolled crossing with dropped kerbs and tactile paving will assist this. Off-site highways works requested by the Council will benefit existing and future residents. The internal highway layout will be suitable for cars and service vehicles, being able to enter and leave the site safely, with future connectivity and safeguarding given to access the North Huyton Phase 5 land to the rear. The proposed level of parking will conform with KMBC guidelines. The traffic generation levels created would be minimal during peak periods with impacts on local road junctions being negligible. It is concluded that the proposals 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, nor would the residual cumulative impact be 'severe', as per paragraph 116 of NPPF. As such, the proposals are acceptable in highways terms.
- 5.37 The accompanying **Travel Plan** shows that the site is well connected by walking, cycling, bus and rail, giving residents realistic alternatives to using the car for everyday trips. It commits to practical measures such as welcome packs, cycle and EV charging facilities, discounted public transport, and ongoing monitoring to encourage long-term use of sustainable transport and reduce car dependency.
- 5.38 **Ecology** has been addressed in a Preliminary Ecological Appraisal and Roost Assessment undertaken by Arbtech and is submitted with the application. It confirms that the site is not designated for wildlife purposes and contains hardstanding, other woodland, neutral grassland, willow, bramble scrub and scattered trees. The roost assessment found no features that could accommodate roosting bats. The Appraisal recommends precautionary working methods for birds, reptiles, badgers and hedgehogs. An ECoW is recommended to supervise vegetation clearance for reptiles, badgers and hedgehogs. A low impact strategy is advised to minimise disturbance to commuting bats and mitigation is to be provided including bird and bat boxes.
- 5.39 A **Biodiversity Net Gain Baseline** has also been produced by Arbtech. It confirms that there are no designated sites or irreplaceable habitats present on the site. It generates 19 area-based habitat units, and to achieve a 10% uplift circa 20 area-based habitat units are required. As it is unlikely that some

habitat types could be replaced on-site, off-site credits will need to be provided by the applicant. A full BNG Assessment will follow this submission.

- 5.40 The existing and proposed **Trees** on-site are addressed through an Arboricultural Impact Assessment and Method Statement undertaken by Tree Solutions. This identifies that there are seven individual tree specimens and ten groups of trees on-site or along its boundary. Most of these are young, self-seeding willows, birches, cherries and scrub that colonised the site after demolition of the former school. Only a few older trees (T3, T5, T7, G2, G4 and G5) pre-date its demolition. The vast majority of these trees are 'C' category. All of these trees are to be removed to accommodate the proposed development. Protective methodology will be used to ensure off-site trees are not harmed during the construction process.
- 5.41 The proposed **landscape planting** will allow a more structured layout for trees across the site, delivering a net gain in canopy, amenity value and biodiversity in the long-term. New tree planting includes silver birches, rowans, field maples, and whitebeams, equating to 92 specimens in total. A total of 1,916 native hedge plants and 5,068 non-native hedge plants are proposed as well as nearly 1,800 shrubs including bergenias, hebes and viburnums. The resultant proposals will offer a high-quality landscape for residents. The maintenance and management of the landscaping is detailed in the submitted plans and can be secured by way of a suitably worded planning condition.
- 5.42 Phase 1 **Site Investigations** have been carried out by IGE Consulting to support this submission. They confirm that the land has been previously developed with schools and contains areas of made ground of unknown composition, a former infilled pond, and potential asbestos from demolished buildings. These factors mean there are low to moderate risks of contamination to people and water, with possible pollutants such as metals, hydrocarbons and ground gases present. The land cannot safely be used as public open space in its current state; its remediation will only be delivered as part of its redevelopment, making the open space designation inappropriate and unsafe for public use.
- 5.43 A Technical Note has been produced by Enviro Solution to assess **Noise Impact**. This concludes that the site is predominantly surrounded by housing and that nearby roads do not attract significant volumes of traffic, with relatively low levels of noise during day and night time. No adverse levels of noise are expected; no mitigation is required nor is this a valid reason to refuse the application.
- 5.44 An **Air Quality Impact Assessment** undertaken by Enviro Solution also accompanies this submission. This concluded that impacts on pollutant levels as a result of operational phase pollutant emissions were predicted to be not significant at all sensitive locations in the vicinity of the site. Based on the

assessment results the site is considered suitable for the proposed end use and complies with the Local Plan and NPPF.

- 5.45 A **Statement of Community Involvement** briefly states that the applicant has worked alongside a local registered provider of affordable housing, to consult with local residents. This included a leaflet drop to all nearby homes including those on Southdean Road and Ashbury Road. Consultees can respond to a dedicated email address which the applicant will review. Further consultation through the local councillors is also offered.
- 5.46 A **Construction Method Statement** and an **Environmental, Dust and Surface Water Management Plan** have been developed by Breck. They confirm that construction will last around 36 months, with standard hours of construction. Measures will be in place to control noise, dust, traffic, surface water and waste, including secure boundaries, wheel washing, careful storage of materials, and restrictions on deliveries. Neighbours will be kept informed through leaflet drops, and the site will follow the Considerate Contractors Scheme to minimise disruption.
- 5.47 A **Health Impact Assessment** has been produced by Breck. It concludes the scheme will have strong positive impacts on health by improving housing quality and affordability, access to services and amenities, opportunities for physical activity, air quality, and community integration.

Presumption in Favour of Sustainable Development

- 5.48 Paragraph 8 of the NPPF sets out how there are three overarching objectives to achieving sustainable development: economic, social and environmental. It states that these are interdependent and need to be pursued in mutually supportive ways.
- 5.49 With regards to economic objectives, housebuilding plays a significant role in creating and supporting employment. This includes people directly employed by developers and their contractors, as well as employees supported in the wider supply chain and in the wider economy through the spending power of contractor and supply chain firm employees.
- 5.50 This is an important investment into the area to provide affordable housing. Housebuilding also delivers economic benefits for local authorities. The Housebuilders Federation has produced a calculator that indicates a scheme of 136 homes could generate £273,700 in Council Tax revenue and £3.6m in tax revenue. The new homes if approved would result in the further support of local services and facilities in North Huyton by new residents.

- 5.51 In terms of the social objectives, the proposals will significantly boost the supply of housing where there is an insufficient number coming forward in Knowsley. The provision of 1 and 2-bed affordable properties is responsive to local needs, which can be afforded significant weight. The scheme will also offer a well-designed, beautiful and safe place with access to open space to support health, social and cultural well-being.
- 5.52 For the environmental objectives, the development will provide open spaces, rear and front gardens where possible. High quality landscaping and the use of native planting along with the provision of bat and bird nest boxes will enhance biodiversity. Its proximity to shops, services and the availability public transport will limit dependence on the private car. The 'fabric first' mode of construction proposed will limit energy usage and avoid fuel poverty for residents.

6 Conclusion

- 6.1 This statement, in conjunction with supporting documents, has clearly demonstrated that the proposals for 136 affordable homes should be approved, having regard to the development plan, national guidance and other material considerations.
- 6.2 The Core Strategy is supportive of new residential development, seeking growth whilst rebalancing the housing stock to better meet housing needs and demands. On a site-specific level, the designation of the site is out-of-date; it is not 'educational land' and has a very limited function as 'urban greenspace' being inaccessible and unsafe to members of the public.
- 6.3 There are strong material considerations which allow the LPA to depart from the local plan designation. The overwhelming benefits of development include regeneration of a previously developed site and provision of 136 affordable homes; more than outweighing a historic designation in an outdated plan.
- 6.4 The proposals are also strongly supported by the NPPF, which seeks to significantly boost the supply of housing, building at appropriate densities on previously developed sites in accessible locations within existing urban areas. Paragraph 127 of NPPF also supports reclassification of sites to reflect changes in the demand for land where there is no reasonable prospect of the designated use being reinstated.
- 6.5 We have demonstrated that, when set against the Standard Method figure of 600 dpa, the Council can no longer demonstrate a deliverable five-year supply of housing. As such, the tilted balance applies and the application must be approved unless the adverse impacts of development significantly and demonstrably outweigh the benefits.
- 6.6 We have demonstrated that the proposals can help to meet defined local needs for affordable homes in Knowsley. The provision of a 100% affordable housing scheme, which goes beyond the 10% policy requirement, is a significant material consideration. The homes will be constructed by Breck Homes, transferred to a local registered provider on completion, and occupied by local people in need.
- 6.7 The application is accompanied by documents, surveys and plans which detail the extent of the proposals and their effect on the surrounding built and natural environment. They demonstrate that there are no technical reasons to prevent the delivery of the scheme, subject to appropriate conditions.
- 6.8 The proposed design and layout will provide an attractive living environment with high quality homes and adaptable spaces for inclusivity. The residential amenity of existing and future residents will be secured and the proposals comply with UDP Policy H5 criteria.

- 6.9 We have shown that the development would be sustainable and meets the three dimensions of sustainability (social, economic and environmental) set out in paragraph 8 of NPPF and as such, a presumption in favour should be applied in line with paragraph 11 of the Framework.
- 6.10 For the reasons above and those discussed in the accompanying documents submitted alongside the application, we believe there is an overwhelming case to grant permission



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