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Ms L Smith  
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20 May 2022

Dear Ms Smith,

**Virtual Public Consultation Exercise by Avison Young for Harworth Group**

**Site Address: Land to the west of Hale Gate Road and to the south of Halebank Road, Halebank**

We act on behalf of Hale Bank Parish Council (HBPC) and refer to the above referenced public consultation exercise in respect of a forthcoming hybrid planning application for a prospective residential development on land to the west of Hale Gate Road and to the south of Halebank Road in Halebank.

We have reviewed the consultation material and accompanying covering letter and are pleased to respond with comments by the deadline date of 30 May 2022.

HBPC takes an interest in development proposals within the area in the interests of the community and made representations regarding Land to the South of Hale Gate Road (Sites W24 and EDU3) through the Examination of the Halton Delivery and Allocations Plan (DALP).

The Sites were successfully promoted for development and removed from the Green Belt by Halton Council.

Accordingly, HBPC's interest at this stage is to ensure that Halton Council's aspiration to secure a comprehensive, coordinated development which will provide a sustainable extension of Halebank, without detriment to the existing community as well as compensatory improvements to the environmental quality and accessibility of remaining Green Belt land in Halebank is achieved.

## Scope of the Public Consultation Exercise

The consultation material provides advance notice of a planning application for residential-led development promoted by Harworth Group (hereafter 'the applicant'). The Presentation Board includes:

- An introduction to the Project Team.
- A description of a site comprising 23 hectares (ha), stated to be allocated for residential development in the DALP. However, the accompanying aerial view indicates a site bound by a red line which excludes approximately 6.2ha of the allocation (approximately 2.6ha to the south of Pickering Farm, 3.3ha including and around Hope Farm and 0.3ha to the northwest corner) and includes existing privately owned residential properties (including 96 Hale Gate Road) and an incursion of around 2.5ha into adjacent Green Belt.
- A description of the vision for the site which includes 500 dwellings, primary access from Hale Gate Road, 2000m<sup>2</sup> for a local centre, land reserved for a new primary school and a 100-bed residential care home with associated landscaping and infrastructure.
- A proposed Masterplan emphasising retained hedges, trees, woodland and PROW, new green space/corridors with pedestrian and cycle links, potential new school, potential new shop, spine road and flood management.
- A list of benefits arising from the proposals including the provision of well-designed, high-quality housing.
- An invitation to make comments.

The presentation is accompanied by a document entitled 'Technical Reports' which states that assessments related to Flooding, Drainage, Ground Conditions, Landscape, Transport and Ecology have been carried out.

The covering letter to HBPC invites a meeting between the applicant, Ward Councillors and key stakeholders prior to submission of a hybrid application this summer. The letter states that the application would seek detailed consent for access and an internal road alignment only. Permission would be sought in outline for 500 dwellings, a care home, primary school, landscaping and associated infrastructure.

HBPC welcomes opportunity to provide feedback prior to any planning submission and accepts the invitation of a meeting to discuss the proposals. HBPC makes the following comments on the public consultation, reserving the right to formally object to any subsequent application and/or legally challenge any approval granted by the LPA.

## The Issues

### 1. Comprehensive Development of the Allocated Site

The site proposed described in the public consultation is similar to areas of land, identified in the DALP as Site W24 and EDU3 (West of Hale Gate Road). Site W24 comprises 23.06ha and is allocated for residential development, with a notional capacity of 484 dwellings. EDU3 comprises approximately

2ha in between Summerhill Farm and Nos. 94-96, which is allocated under DALP Policy HC10 to accommodate any required expansion of Halebank Primary School.

HBPC acknowledges that the principle of residential and educational development is established by virtue of DALP allocations W24 and EDU3. However, this statement applies only to the corresponding areas identified within the Policies Map (2022) indicated below.

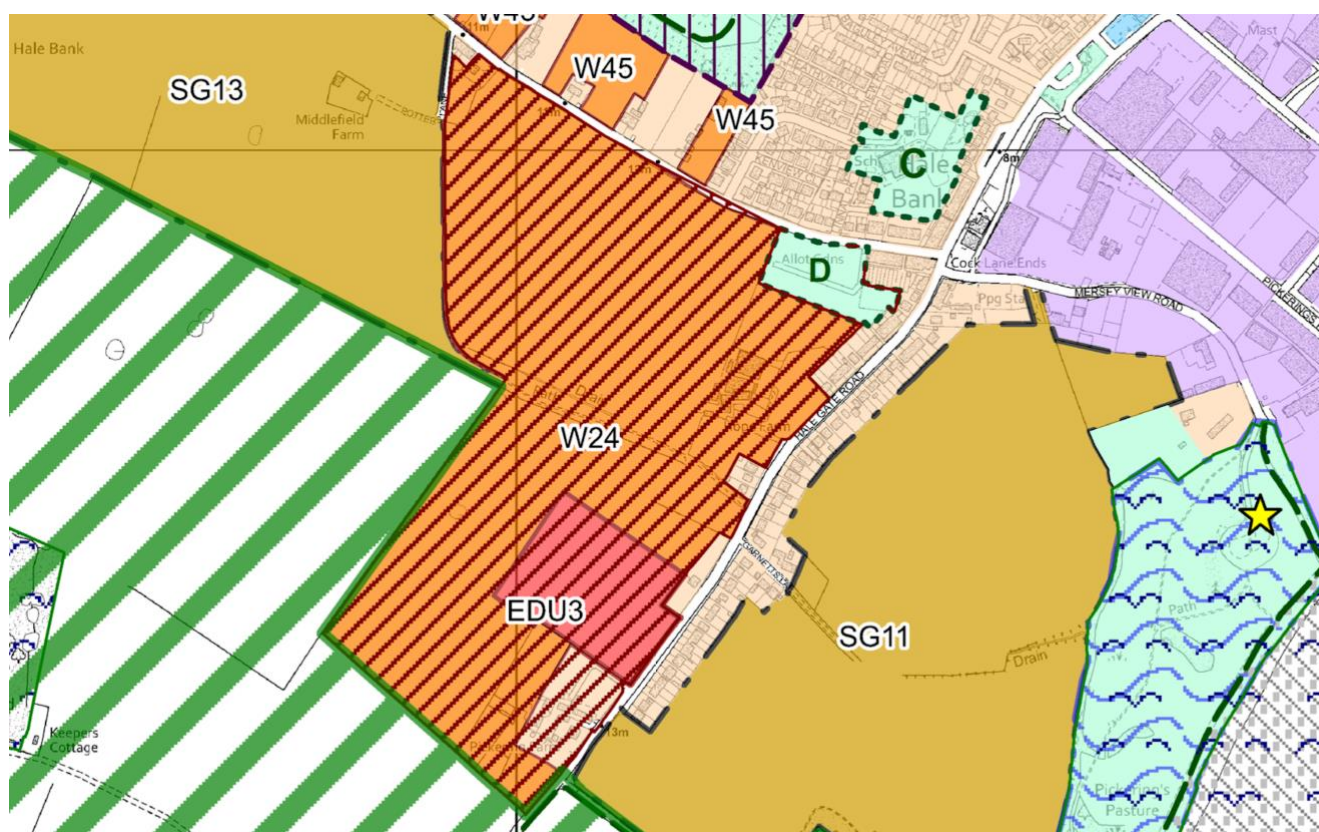


Figure 1: Map Extract indicating Allocated Sites W24 and EDU3 (DALP Policies Map 2022)

To ensure a comprehensive development, in HBPC's view, any forthcoming planning application (whether outline/hybrid/full permission) for development of Site W24 and EDU3 must include the entire allocated area.

The reason for this is stipulated in the Inspector's Report following the DALP Examination in Public explains the rationale for the allocation, which states in Paragraph 313:

*Parcel W24 is in single ownership and being promoted by the Harworth Group who has undertaken a significant amount of technical work. Based on the known infrastructural requirements and residential capacity, the promoter has confirmed that the site is viable. It is anticipated that development would commence in 2023/24 with an output of 30 dwellings followed by 60-70 dwellings per annum thereafter.*

The allocation was therefore predicated on the basis of single ownership and early delivery of a comprehensive development of the site.

As already stated, the site identified in the public consultation is reduced by circa 6.2ha and does not correctly correspond to the housing allocation W24. In addition, there is 2.5ha of Green Belt land and a privately owned residential property at 96 Hale Gate Road which are not part of the allocated site but are apparently actively promoted by the applicant for development.

Areas within the allocation which are excluded from any proposal will be inaccessible and sterilised for the purposes of future development, jeopardising housing delivery of the allocated site as a whole. Moreover, if the 6.2ha of land excluded from the current proposal is not required to accommodate development, then there was no justification for its removal from the Green Belt, casting doubt on the soundness of the allocation and the DALP as a whole.

In addition, there are concerns for the comprehensive and coordinated delivery of development arising from the proposed presentation of an application in hybrid format.

The applicant's covering letter indicates the intention to submit a hybrid planning application seeking full permission for primary site access and internal road alignment. No detail will be submitted in respect of the outline elements of the proposal including 500 dwellings, a care home, primary school, local centre, landscaping and associated infrastructure.

If approved and implemented, the result of such an application would be a meandering road from Hale Gate Road to Halebank Road through defunct former arable land. The houses and primary school envisaged by Halton Council and the DALP would not materialise.

This means that the Masterplan, information and attractive images in the public consultation are rather misleading as they are illustrative only. Meanwhile the benefits of the proposal, such as delivering high quality, well-designed houses are clearly exaggerated.

The site area promoted by the applicant is a reduced form of the allocated site, and in the absence of a layout, there is no evidence that the outline elements of the proposal are feasibly deliverable. This is particularly relevant in relation to housing delivery as it is claimed that dwellings in excess of the notional capacity are achievable.

#### Issues with Proposed Access and Spine Road Alignment

There is no explanation within the presentation boards to explain why a vehicular connection between Halebank Road and Hale Gate Road is necessary. If a Spine Road is demonstrated to be necessary, at present it is proposed in the wrong location as it does not provide access to the whole allocated site and undermines delivery of the primary school.

HBPC strongly objects to the proposed access arrangements and spine road alignment for the following reasons:

The Masterplan indicates that the proposed main access into the site on Hale Gate Road will drive through the centre of EDU3 meaning that the requirement to accommodate primary school expansion will not be delivered.

The proposed alignment of the spine road does not provide access to all areas of W24. For example, the area to the south of Pickerings Farm (2.6 ha) would be landlocked by the proposed arrangement and would likely be sterilised for future development. The same applies to land around Hope Farm and in the northwest corner of the site is allocated for residential development but has no connection within the arrangements as proposed.

In addition, the spine road as proposed does not appear to provide access or parking for the proposed school (which is incorrectly located within W24 as opposed to EDU3 in any event).

The presentation board claims that existing hedges, trees, woodland and PROW will be retained and enhanced. However, this claim is incorrect as the proposed spine road traverses the PROW, removing a large tranche of mature hedgerow.

Meanwhile, the promise of cycle and pedestrian links within proposed green edges is meaningless. Aside from the spine road and existing PROW all proposed cycle and pedestrian route terminate within the site without providing connections to any purposeful location.

It is relevant to note that the applicant proposed a spine road connection from Halebank Road to Halegate Road and points of access to the site in the same locations as now in an alternative Masterplan discussed at the Examination in Public (Appendix 1 to the applicant's Hearing Statement for the Halton Borough Council Delivery and Allocations Local Plan Examination in Public: Matter 12b – Strategic Residential Allocations: Widnes and Hale Sub Area Respondent Ref: 03048, dated March 2021). The inspector allowed the applicant to make submissions on the alternative Masterplan. However, the Inspector's decision was to reject the Masterplan in full, including the spine road and accesses as proposed.

For all these reasons, HBPC requests the applicant to consider alternative arrangements which will provide access to all areas of W24, without undermining the delivery of EDU3. HBPC also considers that roads located to the south and western site boundaries would provide strong defensible boundaries to adjacent Green Belt land.

### Primary School Expansion

The Masterplan proposes a primary school to be sought in outline, sited within W24 (not EDU3) with grounds projecting into adjacent Green Belt to the west.

The proposed siting of the school would be contrary to the development plan and raises several other issues.

Allocated site EDU3 is sited within 2ha with frontage to Hale Gate Road. The purpose of the allocation is to provide for school expansion as and when needed in a location is accessible to the existing



community of Halebank via the existing road network. The proposed location of a school, embedded within a prospective housing development means that the school cannot be delivered in advance of the houses or spine road.

In addition, the proposed enclosure and change of use of adjacent land in the Green Belt would constitute operational development which would be contrary to national policy and the DALP.

The proposals must be reconsidered, with provision for EDU3 correctly located on Hale Gate Road and the openness of surrounding Green Belt preserved.

### Greenspace Amenity

The Masterplan indicates green areas internally within the site. As all matters are reserved except for access, HBPC requests reconsideration of the proposals to provide more green areas closer to existing housing areas which would be equally as accessible to the existing community, not just future occupants of the development.

### Compensatory Improvements to remaining Green Belt land

Where it is necessary to release Green Belt land for development, NPPF Paragraph 142 requires compensatory improvement to the environmental quality and accessibility of remaining Green Belt land.

There is no information within the presentation board to indicate how this requirement is to be addressed. Therefore, HBPC considers the current proposal to be contrary to national planning policy.

### Residential Amenity

When the planning application is submitted, HBPC will be looking for assurances that the amenities of residents will be protected. There is no information in the consultation material provided to indicate how residential amenity will be preserved, particularly during the construction period.

HBPC requests the planning application submission include a detailed Construction Environment Management Plan (CEMP) and Construction Traffic Management Plan (CTMP).

### Summary

The public consultation indicates that the applicant intends to seek full planning permission for access into to the site from Hale Gate Road. In addition, full permission will be sought for the alignment of a spine road through a site which does not represent the entirety of land allocated within W24 and EDU3 in the DALP.

There is no intention to seek detailed planning permission for a well-planned, comprehensive, coordinated development of the site or to delivery compensatory improvements to remaining Green

Belt land. Therefore, HBPC is unable to support the proposals and reserves the right to object and/or challenge any approval granted by the LPA.

We trust that the above comments are helpful and will be considered in the preparation of any future planning submissions for the site. HBPC accepts the invitation for a meeting and looks forward to hearing from you with arrangements.

Yours sincerely,

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