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Mr E Harvey
Avison Young
Norfolk House
7 Norfolk Street
Manchester
M2 1DW

2 February 2022

Dear Mr Harvey,

Virtual Public Consultation Exercise by Avison Young for Marshall CDP

Site Address: HBC Fields, Lovel Way, Widnes, WA8 8WQ

Proposed Storage and Distribution Development with associated access, service yards, loading bays, HGV and car parking area with landscaping and associated works

We act on behalf of Hale Bank Parish Council (HBPC) and refer to the above referenced public consultation exercise in respect of a proposed storage and distribution development promoted by Marshall CDP on land at HBC Fields, Lovel Way, WA8 8WQ.

We have reviewed the consultation material and are pleased to respond with comments by the deadline date of 4 February 2021.

The Site

HBPC acknowledges that the site proposed for development corresponds to a parcel of land allocated in the Halton Delivery and Allocations Plan (DALP) primarily for employment purposes. Therefore, the proposals are in accordance with the development.

The southern and eastern periphery of the application site is designated as Greenspace/Green Infrastructure. In HBPC's view, this part of the site is not suitable for development for employment purposes and must be retained as accessible public open space.

The site is accessed via a roundabout in the southwest corner which connects to the A562 Speke Boulevard and A5300 Knowsley Expressway via Lovel Lane/Newstead Road.

The area to the immediate north, adjacent to the railways is occupied by Alstom Transport for General Industrial Purposes in Planning Use Class B2. The planning consent implemented by Alstom (reference 15/00549/FULEIA) applies to the wider site, including that now proposed for development.

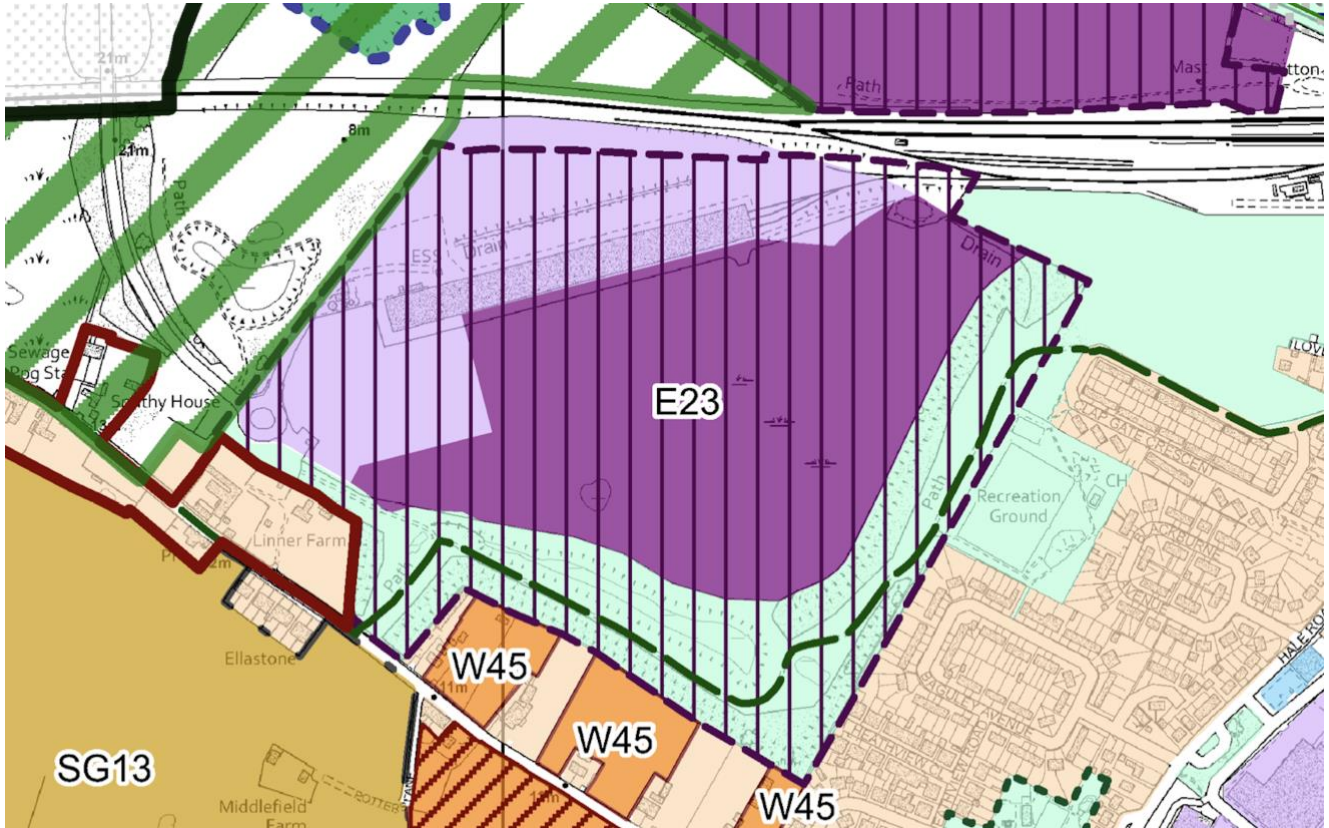


Figure 1: Map Extract indicating development site in context (Halton Local Plan Policy Map Submission Draft)

Public Consultation Exercise

The consultation material provides advance notice of a forthcoming planning application for a storage and distribution facility on land allocated in the development plan for this purpose. It includes:

- An introduction to the Project Team
- A description of the proposal including a Proposed Site Plan (Drawing No: M2999-P100 Rev F and Aerial Image Version)
- Confirmation that an EIA has been carried out to understand the impacts arising from the proposed development.
- 2 No. CGIs of the proposed development
- A list of benefits arising from the proposals
- An invitation to make comments.

HBPC welcomes the developer's positive approach to engagement and opportunity to provide feedback prior to submission of a full planning application.

The Issues

1. Highways

HBPC is concerned about the proposed access/highways arrangements as the proposals do not make efficient use of existing highways infrastructure and include an unnecessary and undesirable connection to Halebank Road.

At the southwest corner, a roundabout with three spurs has been constructed at public expense in order to provide access to the development site. It provides direct access to the A562/A5300. The second spur provides access the Alstom Transport site and the third is in situ ready to accommodate further development.

The highway works to create the roundabout were carried out as part of the 'A5300 Access and Connectivity Scheme' with Liverpool City Region (LCR) funding following devolution of funds from the Department of Transport. The purpose of the scheme was to reduce peak time congestion at the A562/A5300 junction in the interests of current and future economic growth and to provide access to development sites in Halton at Newstead Road and Level Lane.

In order to maximise the benefits of the A5300 Access and Connectivity Scheme and to avoid traffic and amenity impacts on the community of Halebank, HBPC consider that development proposals for the site must ensure that all traffic is routed directly to the A562 and A5300 avoiding the residential area of Halebank. This applies equally to traffic during the construction period, and for the lifetime of the development.

HBPC welcomes the proposal to separate HGVs and private vehicles via the one-way access/egress system for HGVs (indicated in Drawing No: M2999-P100 Rev F and Aerial Image Version in consultation material).

However, HBPC do not support the proposal for a further roundabout (also indicated in the drawings) and would strongly object to any proposal to provide a connection through to Halebank Road.

Moreover, HBPC notes that there is some ambiguity around the proposals as the CGIs do not include the second roundabout and indicate that the separation of HGV and private cars can be achieved via a T-Junction arrangement. HBPC favours this option as it would preserve Halebank Park as Greenspace and preclude an undesirable road connection to Halebank Road, which would result in 'rat-running' and HGV traffic on local roads.

In order to overcome an objection from HBPC, we request that the application submission must include highways/access arrangements which maximise the benefits of the publicly funded A5300 Access and Connectivity Scheme; must direct all construction and employment related traffic to the A562/A5300; must not propose any temporary construction access or permanent connection to Halebank Road; must avoid traffic and amenity impacts on the residential areas of Halebank and must fully protect areas of Greenspace and Halebank Park from development.

2. Residential Amenity

When the full planning application is submitted, HBPC will be looking for assurances that the amenities of residents will be protected. The key areas of concern relate to the combined visual and noise impacts of the development, including the volume of movement to and from the site, hours of operation, lighting impacts and the detailed design of proposed structures.

There is no information in the consultation material provided to indicate how residential amenity will be preserved. However, HBPC welcomes the statement that the application submission will be supported by a broad range of technical reports including:

- Landscape and visual impact
- Ecology and Nature Conservation
- Archaeology and Heritage
- Ground Conditions
- Flood Risk and Drainage
- Traffic and Transport
- Air Quality and Dust
- Noise and Vibration
- Climate Change
- Habitat Regulations Assessment (HAR).

The impacts of noise and lighting are of specific concern. HBPC notes that planning permission previously granted for the site under 15/00549/FULEIA prevents delivery and despatch from the site by road and rail between the hours of 2300-0700 (Condition 34). Given the material changes to planning policy effected by the DALP which significantly increases the quantum of residential land in the immediate area, HBPC wishes these operational hours to be preserved as a baseline and not exceeded in any event.

In addition, HBPC is concerned that the proposed introduction of lighting can result in an intrusive glare which could unreasonably and substantially interfere with the use or enjoyment of property within the surrounding residential area. This is likely to result in complaints to the Council about artificial light nuisance which is classed as a 'statutory nuisance' (covered by the Environmental Protection Act 1990).

In order to overcome any objection on the grounds of amenity, HBPC requires a comprehensive range of measures and mitigation to ensure that there is no detrimental impact on residents. HBPC will expect to see appropriate measures and mitigation both for lifetime of the development, and for the construction period, which must be set out in a detailed Construction Environment Management Plan (CEMP) to be submitted with the planning application.

3. Greenspace

The development site includes circa 9 hectares of Greenspace, which includes Halebank Park and directly abuts residential areas to the east and south including Halebank Conservation Area.

High quality landscaping proposals will be key to the acceptability of the proposals in relation to residential amenity, particularly in terms of visual and acoustic screening. There is no detailed information in the consultation material to indicate how this will be achieved.

As already stated, HBPC would strongly object to any proposal for a road through designated Greenspace and Halebank Park. In any event, any such prospect would be contrary to the development plan (DALP Policy HE4).

When the full planning application is submitted, HBPC will be looking for assurances that Halebank Park and associated Greenspace/Green Infrastructure within the site will be protected and enhanced, with future management and maintenance secured. A comprehensive scheme for Greenspace enhancement to Halebank Park which will support biodiversity and contribute to the quality of the environment is expected by HBPC.

Planning Conditions should be imposed to guarantee that Halebank Park be accessible to the public at all times and also to ensure that landscaping works are completed prior to the first use of the development. Ongoing maintenance and management of greenspace within the site must be secured by planning obligation.

4. Employment

HBPC acknowledge that the principle of employment development of the site is established. Development of the site for employment purposes has been an unfulfilled aspiration since the adoption of the UDP in 2005. It is disappointing for HBPC that the proposed development is speculative and that there is no end-user identified to occupy the site.

On a matter of detail, we note that the proposed layout creates an isolated parcel of land to the northwest of the proposed carpark. However, the allocation of this parcel in the DALP is for employment purposes. As stated previously, the most efficient highway layout would be to use the existing roundabout as the main point of access into the site.

Summary

HBPC welcomes the prospect of a professionally prepared planning application aiming to attract investment, new business and create jobs in the area. HBPC's partial support for the proposals is subject to the proviso that the amenity of local residents must not be detrimentally impacted upon as a result of the development.

We trust that the above comments are helpful and will be considered in the preparation of any future planning submissions for the site. HBPC are willing to participate in discussions and to meet with the applicant and/or Project Team as appropriate.

HBPC reserves the right to make representations at the statutory planning application stage once a detailed planning application is submitted to the Local Planning Authority (LPA).

Yours sincerely,

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cc. Hale Bank Parish Council