



ROMAN SUMMER

E. Breheny (Planning Department)
Halton Council
Municipal Building
Kingsway
Widnes
Cheshire
WA8 7QF

Our Ref: RG/G1058/L001
Date: 30th March 2026

Dear Emma

OBJECTION ON BEHALF OF HALEBANK PARISH COUNCIL

APPLICATION 26/00073/COU

MERSEY VIEW HOTEL, 2 MERSEY VIEW ROAD WIDNES CHESHIRE WA8 8LP

PROPOSED CHANGE OF USE FROM PUBLIC HOUSE AT GROUND FLOOR AND 7 BED HOTEL AT FIRST FLOOR TO 2NO. APARTMENTS AT GROUND FLOOR AND 7 BED HMO AT FIRST FLOOR

We are instructed by Halebank Parish Council to submit this objection to the above planning application.

Summary of Concerns

1. The Parish Council is concerned about the loss of this pub as a valued community asset.
2. The Applicant has singularly failed to address any of Halton's policy requirements, and perhaps most particularly Policy HC5 and the recently updated Houses in Multiple Occupation SPD.
3. The Parish Council is concerned about the introduction of an additional HMO into the local area, and particularly given that at least two existing HMOs are very close by. There is therefore direct conflict with the SPD.
4. The Parish Council is concerned about the poor quality, contrived layout of the HMO and the poor outlook and living conditions of the ground floor flats, with windows flanking the street, resulting in sub-standard, cramped and inadequate living conditions.



Loss of the pub and implications for the local community

The Parish Council echoes and supports the objection comments of Councillor Mike Wharton, Leader of Halton Borough Council, who states:

“The Mersey View is the last pub in the area of Halebank. The building is clearly viable and suitable, and no evidence has been submitted to show that this is the case. Therefore, the application does not comply with HC5 of the Halton Local Plan.”

As important context to considering this application, NPPF §96 makes it clear that planning decisions should aim to achieve healthy, inclusive and safe places which, *inter alia*:

‘promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other’

§98 states that, in order to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- *‘plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*

And:

- ***guard against the unnecessary loss of valued facilities and services***, particularly where this would reduce the community’s ability to meet its day-to-day needs.’

Policy HC5 ‘Community Facilities and Services’ of Halton’s Allocations and Delivery Local Plan carries forward those sentiments. Part 2 states that:

‘The Council will support the retention and enhancement of existing Community Facilities.’

Part 5 of the policy focuses on the loss of community facilities and sets out a very clear set of criteria against which such applications will be assessed. It states that proposals involving the loss of community facilities land or buildings ***‘will only be permitted’*** where it is demonstrated that:

a. The loss of the existing community use would not create, or add to, a shortfall in the provision or quality of such uses within the locality; or

b. The building or site is no longer suitable or viable to accommodate the current community use, or the use has already ceased, and the building or site cannot viably be retained or sensitively adapted to accommodate other community facilities; or



c. In the case of commercial community facilities, whether the use is no longer viable (applicants will need to submit evidence to demonstrate that the site is no longer viable for that use

d. Marketing of the land/property will be required to indicate that there is no demand for the land/property in its existing use.

e. Details of the current occupation of the buildings, and where this function would be relocated, will also be required.

f. Where an application relies upon a marketing exercise to demonstrate that there is no demand for the land/premises in its current use, the applicant will be expected to submit evidence to

g. Demonstrate that the marketing was adequate and that no reasonable offers were refused. This will include evidence demonstrating that:

i. The marketing has been undertaken by an appropriate agent or surveyor at a price which reflects the current market or rental value of the land/premises for its current use and that no reasonable offer has been refused.

ii. The land/premises has been marketed for an appropriate period of time which will usually be for 12 months.

iii. The land/premises has been regularly advertised and targeted at the appropriate audience. Consideration will be given to the nature and frequency of advertisements in the press or specialist trade networks etc. and contact with local property agents.

iv. The community facility can be fully retained, enhanced or reinstated as part of any redevelopment of the building or site; or

v. Alternative replacement community facilities are provided in a suitable alternative location.

The Parish Council is concerned that no attention has been paid to the above policy requirements in the application submission.

Considering part (a), bearing in mind that this is now one of only two pubs in what is a growing village (with planning permission for hundreds of more homes in place locally), it is self evident that the loss of this existing community use would create a shortfall in the provision or quality of pubs within the locality.

As an aside, we understand that the only other pub in the village (The Goldmine) remains a pub but is also used as an Indian restaurant. We are uncertain of its planning position.



Notwithstanding that matter, this planning application – if it is approved – will result in the loss of only one of two remaining pubs serving the village.

In respect of parts (b) and (c) of the policy, the applicant has not provided adequate information to demonstrate that the building is no longer suitable or viable to accommodate the current use, or that the building cannot viably be retained or sensitively adapted to accommodate other community facilities.

The application is supported by a short statement that states that demand for the pub has hit “an all time low” and that the business is now “almost unsustainable”.

Our client questions that and advises that all evidence - based on quite frequent use of the pub by certain members of the Parish Council and others in the community - suggests that the pub remains a popular and well used community facility. Furthermore, we are mindful that the property is currently being marketed, with an advertised annual turnover of “around £520,000”. We suggest that such a level of turnover is in fact very healthy, and in turn the test set out in part (b) of Policy HC5 – ie demonstrating that the use is no longer suitable or viable – has not been satisfied.

In respect of part (d) of the policy, the Applicant has presented no marketing information whatsoever. The Parish Council is aware that the property is being marketed, but it is the Applicant’s responsibility to present that, explain the outcome, and demonstrate that the marketing has been robust and reasonable.

In conclusion, the Parish Council considers this proposal to fall far short of addressing the clear requirements of Policy HC5, which was obviously introduced to protect community facilities and reflect the urgings of the NPPF to:

‘guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs.’

The analysis presented to justify the proposal is superficial, with no attempt to engage with the strict requirements of Policy HC5.

The Parish Council maintains that the proposal will result in a shortfall of both provision and quality. Once that community use is extinguished (which would be the outcome of this proposal), it is likely to be lost forever. It is precisely this type of community asset that Policy HC5 is intended to protect.

The Parish Council has accordingly submitted an application seeking the listing of the pub as an Asset of Community Value (ACV). We respectfully suggest that the determination of that AVC application is a material consideration and should be awaited prior to the determination of the current planning application. To grant planning permission in advance of that process would be premature and could prejudice the proper consideration of the building’s true



community value. Furthermore, if planning permission were to be granted in advance of the ACV application being dealt with, it would likely result in the irreversible loss of the public house, bringing its use to an end in perpetuity, leaving Halebank Village and its increasing population devoid of pubs.

Inconsistency with Halton's Houses in Multiple Occupation SPD (Amended) (September 2025)

The Parish Council is concerned that the proposal is inconsistent with the above SPD, which was recently updated in response to the Council's growing concerns about the impact of clustering of HMOs on local character, community cohesion and residential amenity.

The SPD aligns with the introduction of the Article 4 Direction in September 2025, which applies to Halebank Village (amongst other parts of Halton), including the application site, removing permitted development rights for changes of use from Class C3 (dwellinghouses) to Class C4 (HMOs). We acknowledge that there is no *direct* relevance of that Article 4 Direction to this proposal in that PD rights would not have applied in this case. However, the introduction of that Article 4 Direction is very clear evidence of the Council's concern about the increase of HMOs on the local community.

That concern was articulated in the Article 4 *"Background Document: Context, Proposals and Evidence and Justification"*, which expressed worry about changes to the character of neighbourhoods and the erosion of community cohesion and resilience. It highlighted that HMOs can give rise to increased intensity of use, leading to adverse impacts on neighbouring amenity, including noise and disturbance from more frequent comings and goings at unsocial hours. The document identified pressure on parking provision, waste storage and litter, alongside harm to the physical environment and streetscape, and concerns regarding the quality of accommodation provided to occupiers. It further noted that concentrations of HMOs, often occupied by younger single persons with differing lifestyles and working patterns to traditional family households, can alter the established character of suburban areas and, when clustered, can materially undermine community cohesion.

The SPD sets out three key measures to be applied to proposals for new HMOs. The most relevant in this case is the *"Concentration Threshold"*, which states:

"Planning permission will not normally be granted for new HMOs, or for proposals to extend existing HMOs, where the proportion of HMOs exceeds, or will exceed, 10% of the properties (residential and commercial) within a 50 metre radius of the application property."

Within the local area, approximately 50 metres from the application property, there are at least two existing HMOs, namely 478 Hale Road and 11 Halebank Road.

Based on a review of the surrounding area, we count a total of 22 properties within the 50 metre radius.



Applying the SPD threshold, 10% of 22 properties equates to 2.2 properties. This limits the number of HMOs within the area to no more than two.

On that basis, the introduction of an additional HMO at the application site would exceed the 10% threshold, even before taking into account the possibility of any further unrecorded HMOs in the vicinity.

The SPD points out that there are limited circumstances where permission could be granted for an HMO that results in the 10% threshold being exceeded, namely:

- There is a strong physical barrier, such as a railway line, between the application property and established HMOs,
- There are a limited number of properties within the 50 metre radius, or
- The nature of the application property means that impacts will be lessened e.g., the property could be detached and have a substantial curtilage.

None of those exceptions apply in this case.

Accordingly, the proposal conflicts with the Council's adopted HMO SPD.

On a less contentious point, we also note the absence of any suitable, covered and secure convenient cycle parking within the curtilage of the property, which is a requirement of the SPD.

We would also point to Policy GR2, which looks to avoid detriment to the living environment of residential properties and to ensure a high standard of amenity, privacy and outlook. Here we invite the LPA to consider outlook, privacy and noise-related issues associated with the ground floor flat windows directly flanking the street.

Finally, in respect of the principle of HMO use, the Parish Council notes and is fully supportive of the comments below issued by Merseyside Police:

"I believe the mixed use of this site may present challenges and increase the likelihood of conflict between occupants of the development and neighbouring properties. Differences in lifestyle, tenancy type, and expectations between permanent residents and HMO occupants can lead to tensions, noise issues, and inconsistent behaviour within shared spaces. These issues, if not proactively managed, may escalate and result in increased demand on police and partner agencies."

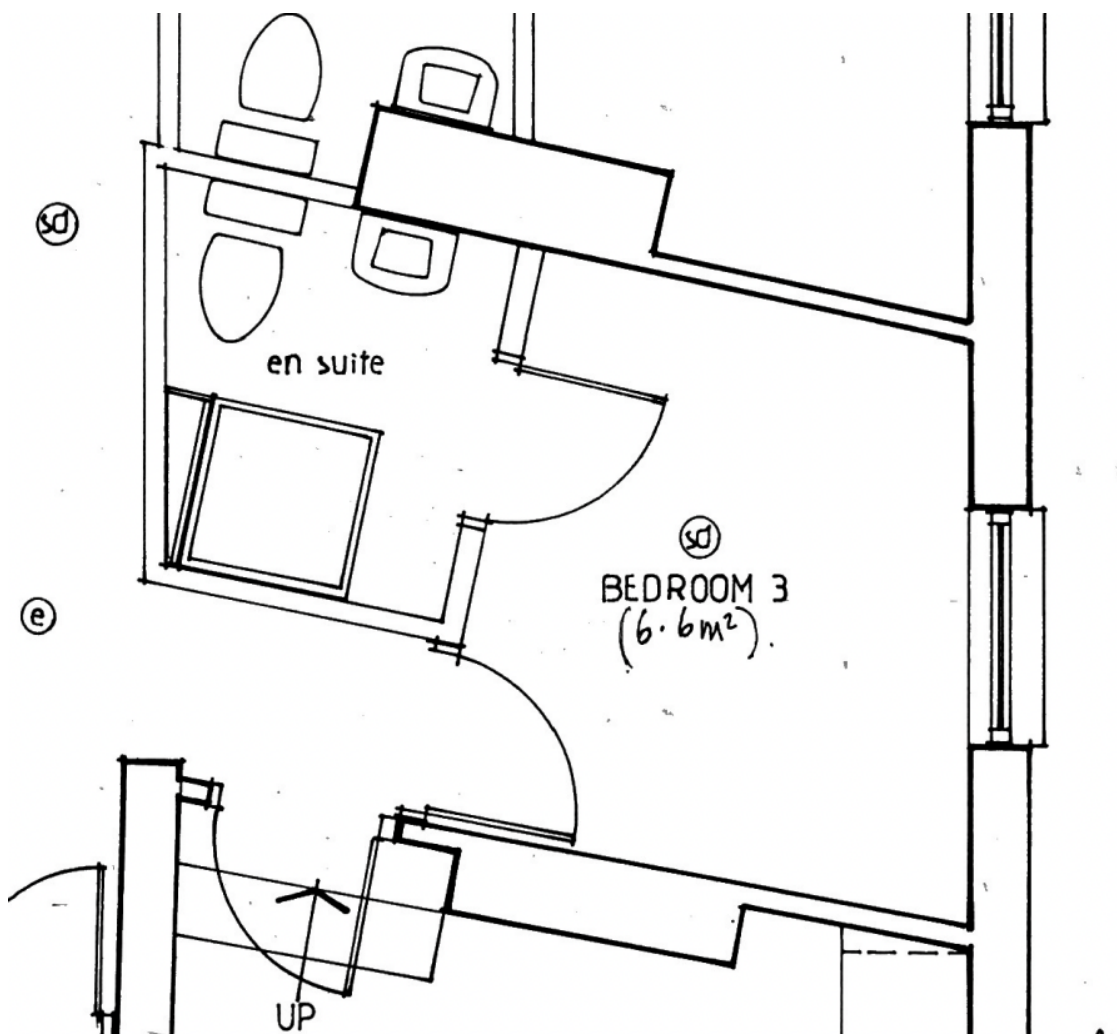


Inconsistency with HMO Standards

The proposed first floor layout raises a number of concerns in relation to compliance with Halton Borough Council's HMO amenity standards and room size requirements.

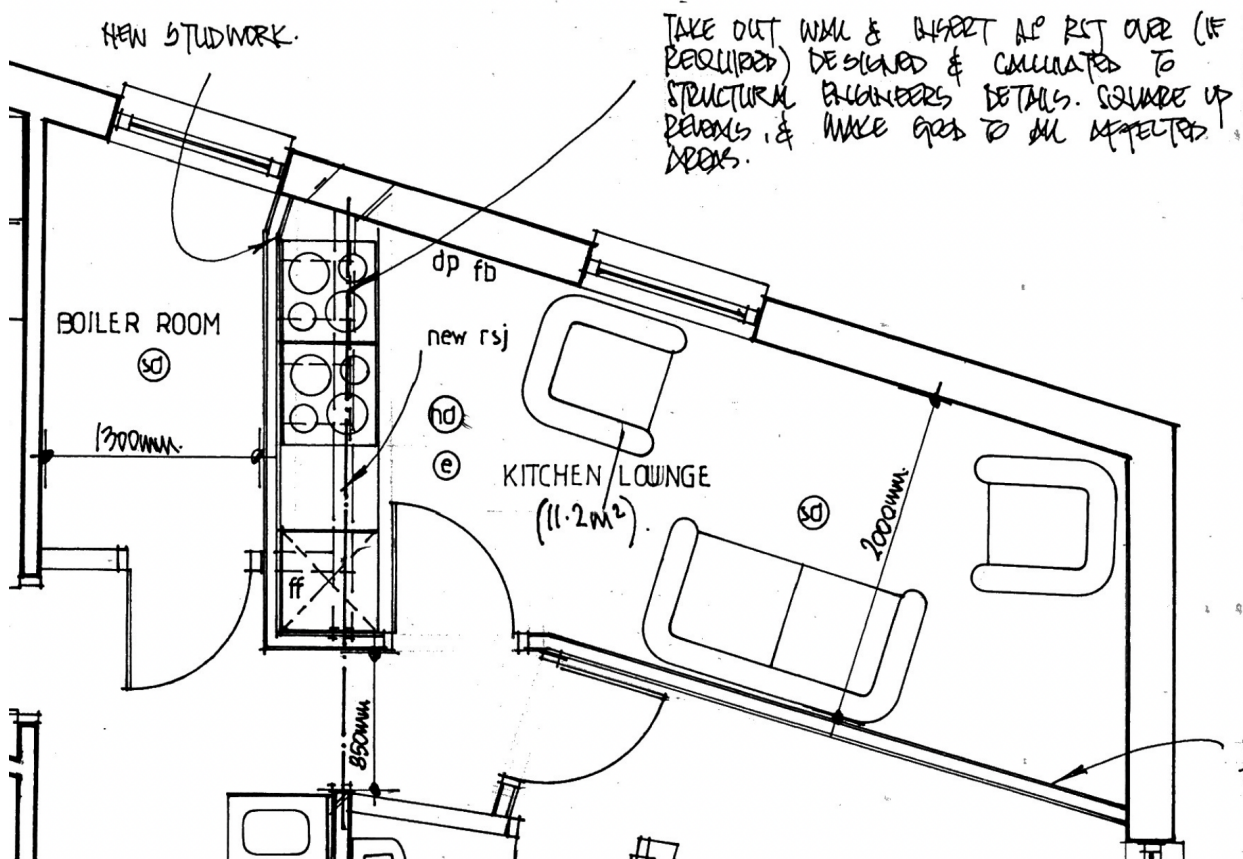
Based on the proposed first floor plan, several of the bedrooms suffer from highly constrained, contrived, irregular layouts and reduced usable floor areas, particularly where angled walls and circulation space limit effective occupancy. This gives rise to a risk that some rooms may fall below the nationally prescribed minimum of 6.51 sqm for single occupancy, or fail to provide adequate usable space as required by Halton's standards, which expect rooms to be capable of accommodating furniture and circulation in a practical manner.

It is important that the LPA interrogates the claimed room sizes, which appear to include *en suite* bathrooms as part of that space, which inevitably reduces the liveability and comfort of the main living space. For example, we point to Bedroom 3 below, which – like the remainder of the proposal – is contrived and barely capable of accommodating a single bed. The main living space is little bigger than the bathroom, and we venture that this is not the type or quality of living accommodation Halton Council aspires to.





In addition, the shared kitchen/living room provision (see extract below) appears limited in scale relative to a six person occupation. At 2.0 metres wide, this space is little more than a corridor. Halton's HMO standards require kitchen facilities to be proportionate to the number of occupants, including sufficient worktop space, storage, and circulation areas. The layout shown suggests an extremely compact arrangement, falling short of meeting these qualitative requirements, leading to issues of usability and conflict between occupants. This also engages broader amenity considerations, as reflected in Halton's HMO SPD, which seeks to ensure a good standard of living environment for residents.



The internal arrangement is characterised by a long central corridor serving multiple rooms, with several units accessed off constrained circulation space. This raises concerns regarding the overall quality of accommodation, including outlook, natural light and general residential amenity. Halton's standards and supporting planning policy place emphasis not only on quantitative compliance but also on the provision of a satisfactory living environment, and the submitted plan suggests that some rooms will have poor outlook and/or sub-optimal natural lighting.

Taken together, the scheme represents an unfortunate, over-intensive, contrived, awkward, uncomfortable "cram them in" use of the floorplate.



We trust that the concerns of the Parish Council will be taken seriously, and we request to be kept informed about any adjustments to the application, any new information that might be submitted, and the scheduling of reporting the application to Planning Committee.

If you wish to discuss matters or require anything else at this stage from the Parish Council, please do not hesitate to contact Richard Gee at the above offices.

Yours faithfully
for Roman Summer Associates Ltd

Richard Gee
Director