



INDEPENDENT EXAMINATION OF HALTON DELIVERY AND ALLOCATIONS LOCAL PLAN

Response to Inspector's Matters, Issues and
Questions (MIQs)

Matter 12 – Strategic Residential Allocations –
Widnes and Hale

On Behalf of Hale Bank Parish Council

February 2020

LANDOR Planning
Consultants Ltd

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1.0 INTRODUCTION

- 1.1 This representation is prepared and submitted by Landor Planning Consultants Ltd, acting on behalf of Hale Bank Parish Council (HBPC) in relation to the Independent Examination Halton Delivery and Allocations Local Plan 2014-2037.
- 1.2 This submission follows on from previous representations made by and on behalf of HBPC. The representations made in this statement should be considered in the context of previous representations.
- 1.3 In addition, this representation is to be read in conjunction with the response to Matter 4: The Housing Requirement, prepared by Startegic Planning Research Unit at DLP Planning Ltd, for and on behalf of HBPC.



Figure 1: The extent of 75 hectares of land proposed for release from the Green Belt around Hale Bank (in a combination of sites for residential allocation and safeguarded land) (Source: Google Earth Pro). As can be seen from the aerial imagery, the land is open, undeveloped, in agricultural use and has no correlation with any existing settlement. The proposed release of 75 hectares of Green Belt does not provide a sustainable urban extension and does not 'round off' the existing urban area.

2.0 MIQ12B- RESIDENTIAL ALLOCATIONS – WIDNES AND HALE

- 2.1 Site W24, Land to the West of Hale Gate Road comprises 23.06 hectares of open land allocated for residential development of 484 dwellings. The allocation of W24 is an incursion into the Green Belt and Open Countryside for which there is no site-specific benefit or justification. For example, there is no evidence of a specific housing need in this location.
- 2.2 HBPC takes no issue with the methodology used in the Halton Green Belt Review 2017 (EL003). However, there is a lack of analysis to indicate how the application of the methodology has resulted in the decision to allocate W24 for residential development.
- 2.3 Paragraph 3.78 of EL003 refers to sites with particularly strong Green Belt function, which are *'sites that are generally open in character with weak boundaries, used for countryside purposes and generally not encroached or contained by development'*. Around Hale and south Widnes, these sites with strong Green Belt function are described as, *'predominantly located to the east of Liverpool and round an arc between Hale and Halebank down towards the River Mersey and stretching from just south of Pickering's Pasture all the way to Hale Lighthouse.'*
- 2.4 Site W24 is therefore located in a zone with a strong Green Belt function. It is poorly contained as with the exception of the north boundary (Hale Bank Road), the site is not defined by recognisable, permanent physical features (contrary to NPPF 139f)). To the west and south is open land in agricultural use, which is not contained or enclosed by landscape features. Meanwhile the eastern boundary clings to the back gardens of properties on Hale Gate Road which itself is a ribbon of development which encroaches into the countryside.
- 2.5 The Green Belt that separates Hale Bank, Hale and the south-west edge of Liverpool (including John Lennon Airport) has form and cohesion. It constitutes a buffer that serves to separate and protect the identity of these communities. Moreover, Site W24 results in an encroachment into the countryside contrary to NPPF paragraph 134c).
- 2.6 The perimeter of Site W24 measures circa 2,520m. Approximately 71% of the perimeter boundary is adjacent to open land. Therefore, its connection to existing development is insignificant.
- 2.7 The site is not a sustainable urban extension as it has no apparent connection to any existing settlement. Accessibility to the site is poor. The Green Belt Review Methodology confirms that the site is not within reasonable proximity of any of the following essential services and facilities: railway station, secondary school , further education, town centre, district centre, local centre, leisure centre, GP or Health Centre.
- 2.8 The site is open, undeveloped land Grade 2, (i.e. very good quality) agricultural land within the Hale Shore and Farmland Landscape Character Area. The proposed removal of W24 from the

Green Belt may only be justified against fully evidenced exceptional circumstances (NPPF 136). Exceptional circumstances have not been demonstrated as Halton Council is proposing to allocate a quantum of land which potentially will deliver 39% more houses than required over the plan period. In addition to persistent housing over delivery since 2014, brownfield sites consistently come forward for residential development (for example, outline planning approval was granted for 86 houses on former industrial land at Foundry Lane on 1 February 2021 ref 20/00352/HBCOUT).

- 2.9 In addition, and in keeping with adjacent safeguarded sites (SG11 and SG13), W24 is located within an area at High Risk of Surface Water/Drainage issues, as indicated in Figure 2. The following images were taken in between 20 January-29 January 2021 at Potters Lane/ Halebank Road (WN8 8NG), overlooking W24 and demonstrate that the land drainage issues are acute during periods of heavy rainfall.



Figure 2 – Surface Water High Risk Areas (Source: Gov.uk)





Figures 3-8: Site W24 from Halebank Road/Potters Lane (20-29 January 2021)

- 2.10 The combination of these factors render W24 unsuitable for development. In the absence of fully evidenced exceptional circumstances, the justification for the allocation of Site W24 is not justified and the Halton Local Plan is unsound as it is not positively prepared, justified, effective or consistent with national planning policy (NPPF, February 2019) .
- 2.11 The Inspector is invited to modify Local Plan Policy CS(R)3: Housing Supply and Locational Priorities and delete reference to SLR- Halebank as a Strategic Residential Location, and remove Site W24 from the list of sites allocated under Policy RD1: Residential Development Allocations and as identified on the Halton Local Plan Policies Map.