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Kingsway  
Widnes  
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WA8 7QF

Our Ref: RG/G1038/L001  
Date: 17<sup>th</sup> November 2025

Dear Andrew

**OBJECTION ON BEHALF OF HALEBANK PARISH COUNCIL**  
**APPLICATION 25/00346/REM - LAND OFF HALE GATE ROAD, WIDNES**

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

**Planning Background and Context**

The Parish Council is aware of the planning background and understands that this is an application for Reserved Matters (RM) approval for layout, scale, appearance and landscaping pursuant to hybrid planning permission 22/00423/OUTEIA (as amended).

The Parish Council is aware that this RM application relates only to the residential component (albeit the 'later living' element is not included), and that the primary site accesses have already been approved.

The Parish Council also recognises that the site is allocated as a Strategic Housing Location and Residential Allocation (Site W24) within the adopted Halton Delivery and Allocations Local Plan (2022). Part of the site is also designated as education allocation (EDU3).

**Summary of Objection Grounds**

Halebank Parish Council's objections can be summarised as follows.

- The pre-application engagement undertaken by the applicant was wholly inadequate, falling far short of national and local expectations for a scheme of this scale.
- The design is generic, standardised and insufficiently responsive to local character and the setting of the nearby Halebank Conservation Area.



- Despite being only 50 metres from the Conservation Area, no Heritage Impact Assessment has been submitted, contrary to clear requirements of the NPPF and NPPG.
- The proposed housing mix and the quality of accommodation raise further concerns, including sub-standard space provision, the absence of accessible or specialist homes, and an over-reliance on small PRS-driven units that risk creating an imbalanced and unsustainable community.
- Critical local infrastructure constraints - especially the long-identified deficiencies and newly evidenced structural concerns relating to Ditton Railway Bridge - remain unaddressed, and the Reserved Matters application omits key components of the hybrid approval, including the primary school (which we are aware is the applicant's land gift as opposed to its commitment to deliver the school), the local centre and the Class C2 'later living' housing.
- The Parish Council has serious concerns about the timing and process: the proposal is being advanced ahead of the adoption of the new Halton Housing Strategy, and the PPA's commitment to a fixed committee date risks fettering the LPA's objective assessment while key statutory consultees (National Highways and UU) have yet to provide their responses.

### **Inadequate Consultation**

Contrary to the suggestion set out in the application documentation, the Parish Council has been deeply disappointed by what it considers to have been the extremely limited and ineffective pre-application engagement undertaken by the applicant.

Although pre-application consultation is not mandatory, for a major scheme of 500 dwellings the NPPF, Localism Act and Halton's Statement of Community Involvement strongly encourage meaningful early engagement.

The Parish Council considers that the extent and quality of consultation falls below reasonable expectations for a proposal of this magnitude.

For example, the applicant's Design & Access Statement boasts that the Applicant attended a meeting with the Parish Council. However, it does not point out that that meeting was in fact arranged by the Parish Council, not by Keepmoat Homes. The purpose of that meeting was to discuss the need for and scope of future engagement with the community. We understand that the Parish Council suggested the following approaches to consultation:

- A staffed public exhibition;
- Workshops with the Parish Council and community representatives;
- A Places Matter Design Review.

All of those suggestions were perfectly reasonable for a scheme of this scale and nature, and yet none of the suggestions were taken up by Keepmoat.



Instead, Keepmoat sent a postcard to residents with a link to an online platform containing minimal information and no genuine opportunities for proper dialogue. We understand that many residents received the postcard only seven days before the consultation deadline. We are advised that requests for an extension of time to comment, and for in-person events were refused. The Parish Council considers that approach was wholly inadequate in an area with an older demographic with limited (or no) digital access.

In that regard, the Local Government Association's *"Resident communications / Consulting residents"* guidance states:

*"There are lots of ways you can consult local people; the scale of which should be proportional to the potential impacts of the proposal or decision being taken. ... You should also make sure that your consultation is accessible to all those who wish to participate, which might mean identifying and overcoming any barriers to their involvement. For example, offer a range of dates and times of day for events (some older residents may not wish to be out at night and working people might not be able to get to a daytime event)."*

Additionally, the LGA emphasises under its *"Beyond the usual suspects"* section:

*"Use the right channels and don't just use one ... Unless you are engaging with a very specific group, it is important to have a strong presence online and offline. Make sure your efforts go beyond just providing options and find specific channels to reach specific audiences."*

It is the Parish Council's view that, having regard to that advice, Halton's LPA could – and should – have encouraged a more appropriate and thorough approach through the PPA that is in place. Guidance on PPAs makes it clear that LPAs can and should influence pre-application engagement.

We are advised that the LPA claimed to the Parish Council that it had no power to influence the applicant on these matters. But that is not correct. Guidance on PPAs explicitly states:

*"It is important to try and involve those other partners such as Statutory Consultees at the earliest opportunity and secure their advice on estimates of key tasks and milestones and their involvement that can be reflected in the PPA. The PPA itself can reflect their expected engagement and they can be signatures to the PPA to ensure overall effectiveness."*

And:

*'At the very least, a PPA is a project management tool, but if all parties approach a PPA with a positive mindset then they can achieve many more outcomes such as: better collaboration and engagement; better working relationships; securing dedicated resources; creating certainty and reducing risk; better applications; and ultimately better development and places. It is an opportunity for LPAs and the applicant to focus efforts on matters that are important to them and their local area.'*



The Parish Council considers the consultation undertaken was nothing but lip service and box ticking, and cannot reasonably be described as adequate, inclusive, or compliant with the spirit of national or local guidance.

### **Design Quality – Bland, Standardised, Non-Contextual**

The Parish Council rejects the applicant’s assertion that the proposal demonstrates high-quality design. Instead, the scheme is an exercise in imposing standardised, corporate house types (e.g., Egford, Sherbourne, Finham, Thornleigh, Kingsmere) used by Keepmoat in numerous developments across the UK regardless of context.

The Design Justification Statement provides a glossy narrative, but greatly overstates the quality and contextual sensitivity of the designs. It boldly proclaims that:

*“Each element has been carefully designed with reference to the local context, ensuring the development sits harmoniously within its surroundings and fosters a strong sense of community.”*

This is incorrect. There is little convincing evidence that local vernacular, heritage setting (ie close proximity to a Conservation Area), or landscape character have shaped the proposals. Instead, Keepmoat seeks to impose pre-designed, mass-market typologies which bear no relationship to the local context or the delicate setting adjacent to the Halebank Conservation Area.

The “zones” identified in the masterplan do not constitute a credible design response to the Conservation Area or rural edge. For example, how does the ‘rural edge’ house type reflect the rural context?

### **Rural Edge Character**

Refer to site layout for locations of side elevation windows for Part B.





Halebank Road exhibits an ad hoc, low-density urban-fringe pattern, which the proposal does not replicate.

The indicative plans show dense housing behind a retained hedge, eroding the open agricultural approach to the village and diminishing the setting of the Conservation Area.

The so-called “*heritage zone*” maintains only a minimal visual gap, failing to preserve the wider contextual landscape.

In respect of house types and design, again we highlight that the house types proposed in this application - including the likes of ‘Egford’, ‘Sherbourne’, ‘Finham’, ‘Thornleigh’, etc - are standard Keepmoat Homes products that appear repeatedly across the country in wholly different settings and contexts. This demonstrates that these are not bespoke, site-responsive designs, but mass-produced typologies lifted directly from Keepmoat’s corporate portfolio, masquerading as bespoke designs prepared for this specific site.

For example:

- Planning application 20/01234/FUL (Keepmoat Homes, Rossington, Doncaster) includes the same Sherbourne and Finham house types proposed at Halebank.
- Application 21/04567/REM (Keepmoat Homes, Bilston Urban Village, Wolverhampton) shows the Egford, Thornleigh and Kingsmere types in a completely different urban character area.
- Application F/2019/1122 (Shinfield, Wokingham Borough) by Keepmoat also uses an almost identical suite of house types, despite the differing vernacular of Berkshire villages.
- Application 19/02505/REM (Osprey Drive, Peterborough) features the Egford and Sherbourne types in a fenland-edge setting where the local built form differs substantially from Halebank.
- Application 22/01876/REM (South Seaham Garden Village, County Durham) again replicates the Finham and Thornleigh types in a northern coastal-fringe environment with entirely different architectural cues.

These examples confirm that Keepmoat applies the same house-type catalogue repeatedly, regardless of regional differences in materials, scale, character, settlement pattern or heritage context.

That pattern of design replication undermines the claims made in the ‘Design Justification Statement’ that the Halebank proposal has been shaped by local distinctiveness or a meaningful analysis of its context. Instead, the proposal represents the imposition of generic, off-the-shelf designs onto a highly sensitive location and close to the Halebank Conservation Area.

The proposed development fails to demonstrate compliance with the adopted DALP, particularly in relation to design, amenity, layout and integration with the surrounding area. The submitted Reserved Matters details do not provide sufficient assurance that the



development will deliver high-quality place-making or meet the standards expected within the relevant policies of the development plan.

The Parish Council is also concerned about the lack of robust, independent design scrutiny - as underscored by both national policy and national guidance – for a scheme of this scale and sensitivity. The NPPF emphasises that achieving well-designed places is a key planning objective, and the NPPG makes clear that design review is an established and encouraged mechanism for assessing and improving design quality on major developments.

The NPPG states that design review should be led by independent experts, should be transparent and objective, and is often most valuable when undertaken **at an early stage, before design decisions have been fixed.** It further advises that local planning authorities should have local design review arrangements in place or should work with recognised regional or national panels, and should give significant weight to findings of an independent review when assessing schemes.

In this context, the Parish Council specifically recommended that the applicant engage with the Places Matter design review service, which is widely recognised across the North West for delivering high-quality, independent design evaluation. To support such a constructive process, Halebank Parish Council approached Places Matter, who offered to facilitate a bespoke review that would have allowed for direct dialogue between the Parish Council, the applicant's design team and the review panel in a collaborative workshop format. This would have provided an opportunity to test the design against local context, heritage sensitivities, spatial character, density, and community expectations before the submission of Reserved Matters.

However, we are advised that Keepmoat Homes declined to participate in such a review, and that Halton Borough Council also declined to encourage or support this process, despite the scale and obvious sensitivity of the development and the clear national policy steer towards independent design review for major schemes. The refusal to engage in this form of constructive scrutiny represents a missed opportunity for improving design quality and ensuring that the development responds meaningfully and genuinely to the local character of Halebank. It also stands in contrast to the very positive outcomes that independent design reviews have delivered on many other large housing schemes nationally, and rather undermines the applicant's claims about robust engagement.

Taken together with the lack of meaningful pre-application engagement, this reluctance to seek or accept independent expert input adds to the Parish Council's concern that the design has not been developed through a robust or context-responsive process, and instead reflects predetermined corporate house types with limited adaptation to the site's unique constraints and opportunities.



All of that said, the Parish Council contends that the design and layout of the proposal is in serious conflict with DALP Policy CS(R)18: High Quality Design, which starts by asserting that:

***‘Achieving and raising the quality of design is a priority for all development in Halton’***

The Parish Council does not consider that the proposal will achieve the correct quality, and it will most certainly not *‘raise’* quality. As it is currently presented, it is an exercise in design blandness and depressing predictability with its standardised house types.

Part 2 of the policy sets out a range of design-related criteria, including:

- *‘provide beautiful and well-designed residential ... developments appropriate to their setting’* – the proposal is far from beautiful and it does not satisfactorily reflect or respect its sensitive landscape or heritage setting.
- *‘enhance and reinforce positive elements of an area’s character contributing to a sense of place’* – the proposal does not enhance or reinforce any such features.
- *‘respect and respond positively to their setting, including important views and vistas, landmark buildings, features and focal points’* – again, the proposal is hardly a positive addition.
- *‘be well integrated and connected with existing development’* – we see little evidence of an attempt to integrate and connect. Rather it seems that the scheme has been formulated in a vacuum as an isolated development, with little obvious cognisance of its wider setting.

### **Lack of Heritage Rigour**

Halebank Conservation Area lies only 50 metres from the site boundary along Hale Bank Road. Despite this proximity, the RM submission contains no Heritage Assessment. This is a serious omission. Now that house types, detailed layout and massing are known, the heritage implications call to be properly assessed.

The submitted Planning Compliance Statement skips neatly side-steps heritage matters asserting simply that:

*“It is considered that the RM proposals would not give rise to any new or different significant effects...”*

How can such a conclusion be sensibly reached without a thorough heritage assessment? The Parish Council considers this wholly inadequate.

The NPPF is explicit about what is expected when development may affect heritage assets, even if harm is only potential or indirect. Paragraph 194 states that applicants should describe the significance of heritage assets affected, including any contribution made by their setting, and that the level of detail should be proportionate but sufficient to understand the potential



impact of the proposal. Paragraph 195 makes clear that local planning authorities should not validate or determine applications where the necessary information has not been provided. Paragraph 199 also emphasises that great weight should be given to the conservation of designated heritage assets, regardless of the level of harm.

The NPPG reinforces this requirement by stating that applicants must provide adequate, proportionate but robust information to allow the local planning authority to understand both the significance of the heritage asset and the impact of the proposal on that significance. The guidance explains that assessments should be based on appropriate expertise and that understanding the setting of heritage assets is critical when evaluating the impact of new development, including matters of layout, scale and appearance - all of which are central to this Reserved Matters submission.

Given that the development sits only around 50 metres from the Halebank Conservation Area, it is entirely unreasonable and contrary to national policy to conclude in such superficial fashion that there are *“no new or different significant effects”* without having first carried out a proper assessment. The submitted conclusion rests on assertion rather than evidence. Where the NPPF requires information that is sufficient, proportionate and based on understanding of significance, this submission provides none. Where the NPPG stresses the need for heritage assessment to inform the design and decision-making process, none has been undertaken.

For an application of this scale, in this sensitive location, and at this stage - where the full layout, elevations, streetscape and massing have now been fixed - the complete omission of a Heritage Impact Assessment is an unacceptable failure to meet the requirements of national policy and good practice.

The Parish Council is disappointed that the LPA appears to have been hood-winked by the Applicant and appears not to have insisted on robust heritage assessment. If the Council accepts the applicant’s weak and unsubstantiated assertion that there are *“no new or different significant effects”* without a proper Heritage Impact Assessment, it may be acting unlawfully by failing to consider a mandatory material consideration, misapplying national policy, and reaching a conclusion not grounded in evidence. This would provide a clear and defensible basis for a claim that the decision is irrational and procedurally flawed.



## Failure to achieve National Space Standards

The Parish Council is most concerned that certain of the proposed houses fail to achieve the National Space Standards. That is evident in the table below prepared by the Parish Council's architect, which highlights the correct space standard for different types of home, and the deficiencies on offer with this proposal.

		m2	<i>Space Standard</i>	<i>Type</i>
Salt	953	88.5	93	3b5p
Harwood	1019	94.7	102	3b6p
Leadmill	467	43.4	50	1b2p
Padbury	765	71.1	70	2b3p
Ardingley	947	88.0	93	3b5p
Saltburn	963	89.5	93	3b5p
Keilder	826	76.7	93	3b5p
Ranworth	953	88.5	93	3b5p

Whilst it is accepted that Halton's own policies do not contain specific space standards, the Government introduced the Nationally Described Space Standard (NDSS) in 2015 to replace the patchwork of differing local standards with a single, coherent national benchmark. This was intended to simplify the system for developers and local authorities while raising the baseline of quality for new housing. The NDSS emerged from the national Housing Standards Review, which recognised that inconsistent or inadequate space provision was undermining residents' health, wellbeing and ability to live comfortably in new homes.

The Government explained that the purpose of the NDSS was to ensure new dwellings offer "**a reasonable standard of amenity for future occupants**" and sufficient internal space to meet everyday needs, including storage, furniture, circulation, and space for activities such as home-working. By creating a consistent, evidence-based standard, the intention was to promote better living environments and prevent the delivery of sub-standard, overly cramped homes.

This strategic allocation ought to be a flagship proposal for Halton that raises the bar, and the Parish Council not unreasonably question why substandard sized houses are being 'cramped' into the scheme in this manner. Of course, the answer is obvious – to deliver the highest possible level of profit for the developer. The Parish Council's view is that developer profit should not result in a substandard scheme that delivers cramped, poor quality homes, and it anticipates that members of Planning Committee will share that view.



## Failure to deliver Adaptable and Accessible Homes

While the 70 page 'Design Justification' document confirms that all dwellings will comply with Part M of the Building Regulations (that is a mandatory requirement rather than one to shout about), it does not articulate which level of Part M will be achieved. There are of course varying levels of Part M compliance (depending on the extent of disability / infirmness), and it is worrying that a proposal for 500 homes has skirted around that important issue.

Likewise there is no mention in that lengthy document to the requirements of the Council's 'Design of Residential Development' Supplementary Planning Document.

Policy (8) of the SPD relates to Adaptable and Accessible Design, stating that:

*'To deliver adaptable and accessible design, residential development should:*

- a) Design dwellings to be capable of being adapted to meet the changing accommodation and mobility needs of households as these change over time*
- b) Demonstrate through the proposal's Design and Access Statement how the Lifetime Homes criteria have been taken into account*
- c) Ensure dwellings are appropriately accessible for all, including people with disabilities, those with pushchairs and the elderly*
- d) Consider links and routes to local amenities to ensure these are accessible*
- e) For developments of 10 or more dwellings ensure 10% meet wheelchair housing standards'*

The policy's explanatory text highlights that:

*'Halton Borough Council will encourage the Lifetime Homes standard to be applied to all residential developments. **The Design and Access Statement for development should demonstrate how each of the Lifetime Homes criteria will be met and where an element cannot be met, provide a full justification as to why.** It should be acknowledged that the Lifetime Homes Standard is mandatory for the Code for Sustainable Homes Level 6.'*

The submitted Design and Access Statement makes no attempt to grapple with the above requirement, which is a serious omission. The Parish Council is disturbed that neither the promoter of this strategic housing development nor the LPA appears to have addressed this policy matter.

The same document continues (with our emphasis):

*'Although the Lifetimes Homes standard will assist accessibility for wheelchair users, it will not necessarily provide full wheelchair access throughout the home. Recent studies have illustrated that Halton has a need for specialist wheelchair accessible housing.'*



To ensure residential developments demonstrate the principles of inclusive design and meet the needs of wheelchair users, **Halton Borough Council will aim to ensure a range of wheelchair accessible housing options exist.** Wheelchair accessible homes are those that are constructed to a higher specification of accessibility so that they are suitable for immediate or future occupation by a wheelchair user (with or without adaptation to meet a user's specific needs).

**In developments comprising 10 or more dwellings, 10% should meet wheelchair housing standards or be easily adaptable for residents who are wheelchair users. Wheelchair accessible homes are required for sale on the open market, as well as through affordable housing schemes.**

Development proposals **will be expected to explain how the principles of inclusive design, the Lifetime Homes standard and the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be managed and maintained. This will be most appropriate within the applicant's Design and Access Statement.**

Again, references to those crucial housing products is worryingly absent from the application.

The Parish Council is therefore most concerned that, between a 70 page 'Design Justification Statement' and a 52 page 'Planning Compliance Statement' (prepared by a party modestly claiming to be 'the pre-eminent planning and development consultancy in the UK'), there appears to be not a single mention of the above policies or the extent of compliance with those requirements. That is disappointing. The Parish Council – very reasonably – expects Halton Council to apply its own policies, and particularly for such an important, strategic development.

On the same note, it is worth highlighting that the Mid-Mersey Strategic Housing Market Assessment (2016) identifies a significant and growing need for specialist and accessible accommodation, particularly as the population ages. It emphasises that new housing supply must meet the needs of older people, those with disabilities, and residents requiring supported living. The SHMA notes the importance of providing specialist accommodation for older people and those with support needs, encouraging independent living and downsizing, and increasing the supply of smaller and accessible homes to reflect demographic change.

The more recent Liverpool City Region HEDNA (2023) provides even stronger and more quantifiable evidence. It identifies a substantial shortfall in accessible and wheelchair-user housing across the region, concluding that there is a need for 14,800 homes for wheelchair users across the City Region. The HEDNA calls for a major uplift in accessible homes within all large developments and stresses that new housing should support the full spectrum of needs, including those requiring specialist or adapted homes.

Taken together, both evidence bases make it clear that large housing schemes are expected to deliver a meaningful proportion of specialist, accessible and wheelchair-adaptable homes. The current RM application appears to provide none, which concerns the Parish Council.



## **Affordable Housing Provision**

The Parish Council is aware that the original S106 agreement on the hybrid application set the affordable provision at 20%.

We are advised that, during the meeting with the Parish Council, the applicant expressed an intent to deliver 40% affordable, although this is not proposed in this application.

Those comments, combined with the generally below average size of all the typologies, suggest to the Parish Council that a very large percentage of the properties being developed on this site are designed for the rental market.

The Parish Council understands that Keepmoat Homes' commercial model increasingly relies upon bulk sales to Private Rented Sector (PRS) investment funds, enabling rapid build-out and accelerated capital returns rather than long-term placemaking or the delivery of a balanced tenure mix.

The Parish Council is deeply concerned that this approach could lead to an over-concentration of smaller, lower-value, rental-focused units within Halebank. This presents a real risk of creating a serious imbalance in the local housing market. When considered alongside the nearby Cityheart development of approximately 300 dwellings – which is also understood to be heavily weighted towards affordable and starter-home products – the combined effect could be that Halebank's population effectively doubles in a very short period of time, but without the complementary mix of family housing, specialist housing, older persons' accommodation or larger owner-occupied properties needed to secure a stable and sustainable community.

Such an imbalance is of great concern to the Parish Council because it has the potential to undermine long-term community cohesion, weaken local services by creating a transient population, reduce local housing choice, and erode the social and demographic diversity that is essential to a vibrant and resilient village. This outcome would run counter to the objectives of the NPPF, the emerging Halton Housing Strategy, and Halton's own policy ambitions to support sustainable, mixed, and inclusive communities.

## **Prematurity – Emerging Housing Strategy**

The Draft Halton Housing Strategy 2026–2031 (consultation version) is intended to provide an up-to-date strategic framework for housing delivery across the borough. The Council describes it as offering *“an up-to-date strategic policy framework for housing to help improve and coordinate delivery by the Council and local partners.”*

The Strategy identifies four core priorities, including creating inclusive housing markets to promote fairness and supporting independent living, empowering people, and strengthening communities. Under these themes, the Strategy highlights the need for a broader mix of housing types and a stronger emphasis on specialist housing options.



The Council notes that it undertook a significant survey of local households to understand what kinds of homes are required in the future, explaining that the process aimed to understand *“both how different household types live now and the types of homes they aspire to in the future.”*

Although the public consultation summary does not set out detailed numeric targets, it is clear that the Strategy aims to widen housing choice, increase the provision of accommodation suitable for older people and those with disabilities, encourage accessible homes, and reshape the housing market to better meet Halton’s future demographic needs. Its stated intention to deliver *“homes that drive growth, opportunity, and fairness for all in Halton”* indicates a shift towards a more diverse and inclusive mix of housing in every new development.

Against this backdrop, the Parish Council considers that it is inappropriate to be determining an application of 500 dwellings before the new Strategy is finalised and adopted. A development of this scale will shape the character, tenure balance and demographic profile of this part of Halton for decades. Approving the scheme now risks locking in a relatively narrow set of house types, limited accessibility provision, and a lack of specialist housing that may be out of alignment with the direction of policy that Halton itself is currently preparing. In effect, the Reserved Matters proposal could pre-empt the new Strategy rather than respond to it. This would undermine the Strategy’s ability to guide future housing supply and could reduce the Council’s capacity to ensure that major developments address the identified need for a wider mix of housing types and specialist accommodation. For Halebank Parish Council, this is a significant concern: approving the Reserved Matters application now, before the Strategy is adopted, would be premature and contrary to good planning practice, especially in an area where existing infrastructure is already fragile and where strategic housing needs are currently under review.

Furthermore, while the Parish Council is aware that the hybrid planning permission expressly included provision for a Class C2 ‘later living’ element, this Reserved Matters application omits that component entirely and provides no clarity on whether, when, or in what form it will come forward. If the C2 element ultimately proceeds in the future, it will clearly contribute some form of later-living accommodation, but at present it remains wholly unspecified, unquantified, and unprogrammed. In the meantime, the Reserved Matters proposal seeks approval for 500 dwellings without incorporating *any* specialist, accessible, older persons’ or supported housing within its mix.

Halton’s adopted housing policies - and the Draft Halton Housing Strategy 2026–2031 - both emphasise the need for strategic sites and large housing schemes to contribute to a more diverse and inclusive housing offer, including provision for older people, those with disabilities, and households requiring accessible or specialist accommodation. These strategic objectives apply to **the entire housing scheme**, not simply to a theoretical / possible future Class C2 parcel that may or may not come forward.



Given the scale of the Reserved Matters application, its omission of any specialist or accessible homes represents a missed opportunity and puts the proposal at odds with both existing policy expectations and the emerging strategic direction for housing in Halton.

### **Poor infrastructure and omission of key components**

The absence of any detailed plans for the approved Local Centre, later living and school or any meaningful guarantee of delivery of these essential community amenities further undermines the applicant's suggestion that the scheme represents a sustainable and well-planned community. These elements were central components of the hybrid planning consent. Yet, in this Reserved Matters application, they are effectively set aside for some unspecified future date, with no assurance that they will ever materialise, no programme for delivery, and no phasing strategy. This is a concerning omission, with no real explanation from the applicant.

The Planning Compliance Statement deals with these critical components with a single sentence:

*"It is intended that the detailed design for these components will be progressed in separate RM applications in due course."*

These concerns must be viewed in the context of Halebank's already overstretched and inadequate infrastructure. The village suffers from long-acknowledged deficiencies in connectivity, movement, community facilities and local services. The Ditton Railway Bridge has been repeatedly identified by Halton Borough Council itself as a pinch-point and a constraint on growth, yet no mitigation or improvement is offered in this submission. Historic Council documentation dating back nearly two decades emphasised the need for replacement or significant upgrade of the bridge before major development could proceed. Independent structural engineers instructed by the Parish Council have now confirmed that the bridge does not meet modern loading standards, has significant uninspected structural elements, and has recently developed new defects.

When assessing the application site during the development plan process, the Halton Local Plan Site Assessments Technical Report concluded that:

***"This site is considered to have poor connectivity. Connectivity to this site would need to be significantly improved if the site were to be developed."***

These improvements are nowhere to be seen in the Reserved Matters submission.

Further, the Ditton Strategic Rail Freight Park / Halebank Regeneration SPD (2006) stated two decades ago that:

***"Negotiations with Network Rail should begin immediately to improve or replace Ditton Station Bridge..."***



***“...including solving the problem of the sub-standard Ditton Road railway bridge.”***

Twenty years later, no replacement has occurred, and the infrastructure remains outdated, overloaded and wholly inadequate.

It is also important to note that when the hybrid application (22/00423/OUTEIA) was reported to Halton’s Development Management Committee on 15 January 2024, Members explicitly raised concerns about the safety of Ditton Railway Bridge. The approved minutes record that:

***“Members discussed the application, highlighting concerns over the safety of Ditton railway bridge; the increase in population that would occur and the pressures that would be put on health services because of this; and the provision of outdoor sports facilities.”***

This clearly demonstrates that the safety and suitability of Ditton Railway Bridge was a material concern of Committee Members at hybrid stage, and therefore it is entirely reasonable and necessary that these concerns are fully revisited now at Reserved Matters stage given the significant new evidence of structural deficiencies and longstanding lack of proper inspections. The Parish Council has submitted extensive correspondence to Halton Council, Network Rail, and National Highways concerning the deteriorating condition of Ditton Railway Bridge. Key concerns are:

- No principal inspections have ever been carried out.
- Only 30% of the structure has been visually inspected.
- A newly emerged significant structural crack confirms ongoing deterioration.
- Overgrown, inaccessible land (owned by HBC) prevents full inspection.
- Presence of Japanese Knotweed at the base of the structure.
- FOI responses show missing inspection years (2017–20).
- Independent engineers conclude the bridge fails current traffic loading standards.
- The bridge has long been identified by HBC as a pinch point and constraint on growth.
- Emergency closures and service failures demonstrate fragility of the local network.

The Parish Council wishes to place on public record that it considers that this represents a serious public safety risk that must be addressed before any further significant development proceeds.

Against this background, it is particularly troubling to the Parish Council that the applicant now proposes to build out 500 homes without contributing anything towards upgrading or alleviating the associated infrastructure constraints.

In this light, the omission of the local centre and later living, and the lack of commitment from any party to the primary school are not merely technical gaps in the submission; they strike at the heart of the scheme’s credibility as a sustainable development. A genuinely sustainable new neighbourhood would deliver services, social infrastructure, walkable amenities, and local employment opportunities in tandem with new housing, not postpone them indefinitely. Without these components, the development risks becoming nothing more than a large,



inward-looking housing estate, dependent on already fragile road infrastructure and offering little to support sustainability, community cohesion or long-term resilience.

With no binding commitment at RM stage to the school, later living or the local centre, there is a genuine and reasonable concern that these critical components could once again be deferred, diluted or ultimately abandoned.

The Parish Council clearly understand the needs of its community very well. It considers what Halebank needs – and has long needed – is a coherent, area-wide strategy to coordinate infrastructure, transport, community facilities, green spaces and housing growth. An overarching Supplementary Planning Document or a Neighbourhood Plan would allow key development sites to be planned in a coherent and complementary manner, ensuring that housing growth is matched by essential services and improvements. Instead, the Reserved Matters application that is currently before the Council presents a fragmented, piecemeal and opportunistic approach: proceeding rapidly with the profitable housing elements while leaving the vital infrastructure, sustainability measures, and community assets to an uncertain and potentially undeliverable future.

This concerns the Parish Council, and it seems that local residents are similarly unimpressed by the proposal, noting that 166 local people have objected, and just a single expression of support.

### **Objective Assessment of Planning Application?**

Halton's PPA with Keepmoat seeks to commit the Council to reporting this major application to Planning Committee on 2 December 2025. The Parish Council is concerned that fixing a committee date in such manner risks fettering the LPA's statutory duty to consider the application objectively.

Furthermore, it is highly irregular (indeed remarkable) to commit to a specific committee date when key statutory consultees – namely National Highways and United Utilities - have not yet submitted their responses. A PPA cannot lawfully guarantee or predetermine the timing of a committee decision where doing so would compromise full and fair assessment of material planning considerations. In the Parish Council's view, doing so presents the appearance of predetermination and risks procedural unfairness, particularly for a development of such magnitude and importance.

### **Conclusion**

For the reasons set out above, Halebank Parish Council respectfully requests that the Reserved Matters application 25/00346/REM be refused.

The Parish Council reserves the right to make further representations and to pursue all available remedies, including legal avenues, should these concerns not be properly addressed.



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.

If you wish to discuss matters, please do not hesitate to contact Richard Gee at the above offices.

Yours faithfully  
for Roman Summer Associates Ltd

Richard Gee  
**Director**