Knowsley Local Plan: Core Strategy Examination

Written Statement
Relating to Matter 5: Green Belt

In respect of
Land off Fox’s Bank Lane, Whiston
(In Support of Release of Sites from the Green Belt
and Reallocation for Residential Development)

October 2013
# Contents

1. Introduction .............................................................................................................................................. 3
2. Response to Matter 5 ................................................................................................................................. 5
3. Response to Additional Questions Raised by the Inspector in Relation to Matter 5 .......................... 6
4. Conclusions ............................................................................................................................................... 12

Appendix: Transport Issues Note (April 2013), prepared by Croft Transport Solutions
1 Introduction

1.1 Purpose

This Written Statement has been prepared by Frost Planning Ltd in connection with the Examination of the Knowsley Local Plan Core Strategy ('KLPCS').

It specifically addresses the Inspector’s Matter 5 (Green Belt) and the issue of: “Whether the selection of broad locations for development in the Green Belt is justified by the evidence and whether the mechanisms for release are clear and effective.”

This Statement also addresses the additional questions raised by the Inspector in relation to Matter 2. It concludes why the Core Strategy is currently unsound and what changes are required to make it sound.

1.2 Context

The context for this Statement concerns two parcels of land (edged red below), located to the west of Fox’s Bank Lane, Whiston.

These were the subject of representations submitted to earlier stages of the KLPCS process on behalf of the landowners by Jones Lang LaSalle and Frost Planning Ltd.
Both sites form part of a larger strategic site ("reserve location") for Green belt release within the KLPCS (reference: KGBS14 South of Whiston), as identified below.

1.3 References

This Written Statement relies upon and should be read in conjunction with the documents constituting the Examination Library.
2 Response to Matter 5

In general we welcome the Council’s selection of broad “reserve” locations for development in the Green Belt, including land ‘South of Whiston (reference: KGBS14)’, as listed under policy CS5. We believe this is robustly supported by the Evidence Base.

However, we do not agree that the mechanisms for the release of Green Belt sites are either clear or effective at the present time for the reasons amplified in section 3 of this Statement.
3 Response to Additional Questions Raised by the Inspector in Relation to Matter 5

3.1 Question 5.1
Response – no comment.

3.2 Question 5.2
Response – no comment.

3.3 Question 5.3
Response – no comment.

3.4 Question 5.4
Response – no comment.

3.5 Question 5.5
Response – no comment.

3.6 Question 5.6
We would support a change to policy CS5 which incorporates detailed boundary plans showing the sites to be released from the Green Belt, as prescribed already within the Evidence Base. This would have the benefit of attaching statutory weight to these boundaries. It would thereby remove doubt and dispute over what is and what is not to be excluded from the Green Belt as and when they are released.

3.7 Question 5.7
We are concerned about how the phased release of Green Belt sites envisaged under policy CS5 will work. In our view such a phasing approach is seriously flawed at the outset as it assumes there is not already a need to release Green Belt land. For the reasons we have given in relation to Matters 2 and 3 there is clearly an urgent need to release a substantial area of Green Belt land both immediately and over the course of the Plan period. Our other specific concerns relate to the detailed criteria under policy CS5 as follows:

a) “First priority shall be given to development of land in the current urban area…”

As an unqualified statement on its own, this is counter-productive to achieving one of the main aims of the KLPCS – to maintain a reliable 5 years housing land supply throughout the Plan period. It ignores the benefits of and necessity for releasing Green Belt sites ahead of urban sites (e.g. maintaining a 5 years land supply, affordable housing provision, infrastructure improvements, attracting investment to the borough). It also fails to take into account the market/commercial frailties of house building in less attractive urban areas for the foreseeable future due to the prevailing economic conditions. A blanket prioritisation of urban sites is therefore unfair, impractical and ineffective. Furthermore, it would not deliver the variety and choice of housing sites required to make the housing market and wider local economy function successfully in Knowsley.
b) “The timing of the release of the "reserve" locations must not undermine the Council's urban regeneration objectives, including the delivery of programmes of regeneration within the Principal Regeneration Areas...or in other areas of regeneration need within the Borough and wider sub-region.”

As above, this criterion fails to recognise the benefits and overriding necessity to release Green Belt land immediately. It also implies that development on Green Belt land will be generally incompatible with efforts to regenerate the urban areas. This is an overly simplistic view. In reality, both can co-exist as they will most likely depend on different housing markets. Higher value housing in Green Belt locations will also help to attract investment interest and drive spend to other areas of the borough, including the Priority Regeneration Areas. There is also no logical justification for deferring the release of Green Belt sites for the sake of protecting regeneration sites which may not be deliverable during the early stages of the Plan period anyway.

c) “In the case of locations proposed for housing, permission will only be granted when this is necessary to maintain a five-year "deliverable" supply of housing sites in accordance with Policy CS 3 Housing Supply, Delivery and Distribution”

In principle, this criterion does offer a more practical and effective way forward. However, it should not be used to either drip-feed or top-up land supply on a first past the post basis. It should make it clear that a substantial area of Green Belt land will be approved for housing at the beginning of the Plan period in order to correct the existing shortfall, and thereafter permissions for Green Belt sites will be granted to ensure there is a healthy ‘headroom’ of land supply throughout the Plan period. It therefore needs rewording to reflect this.

For reasons we have explained in response to Matters 2 and 3, criterion c) would need to be aligned with a reworded version of policy CS3.

For reasons explained we also consider that reference to Green Belt sites only serving “longer-term needs” should be changed. These sites need to be released both now and throughout the Plan period if a reliable supply is to be maintained.

3.8 Question 5.8

At present there does not appear to be any mechanism for the phased release of individual Green Belt sites. However, should the Inspector and the Council be minded to propose such a mechanism then we would strongly advocate the land South of Whiston (reference: KGBS14) for the first phase of residential development. The combined strategic importance, sustainability credentials, and potential housing yield (within 0-5 and 6-10 years) of this single contained site outweighs the first phase candidacy of all other reserve locations identified to come forward during the Plan period.

3.9 Question 5.9

In light of the Evidence Base and land supply from the release of the “reserve” locations up to 2028, there is clearly no need to release the “safeguarded location” prior to 2028. For the avoidance of doubt policy CS5 should make this explicitly clear.

3.10 Question 5.10

In relation to the currently identified shortfall to 2028, the excess allocation is justified for a number of reasons. Firstly, it will give a high degree of confidence that the borough’s housing needs can be met. Secondly, based on the ‘deliverability’ test outlined in the NPPF we consider the Council’s estimate of existing housing capacity in
policy CS5 (table 5.2) is considerably over-estimated. As paragraphs 5.48 and 5.49 of the KLPCS concede, there are also uncertainties over the rate at which proposed development locations will be delivered and their potential development capacity. National policy also requires that in reviewing the Green Belt boundaries, the Council should consider a timescale beyond the length of the plan, i.e. beyond 2028. This ensures the revised Green Belt boundaries will endure, and prevent further incremental amendments over a longer period. The KLPCS therefore correctly identifies sufficient “headroom” in terms of the total required Green Belt release before 2028.

An additional reason to exceed the shortfall is that it will improve housing choice, competition and affordability.

The KLPCS housing target to 2028 may also need to be adjusted ‘upwards’ in light of new evidence to be presented by the Council and debated at the Examination.

3.11 Question 5.11
Response – no comment.

3.12 Question 5.12
Response – no comment.

3.13 Question 5.22 (KGBS14 South of Whiston)

Overall Justification
In our opinion the selection of land South of Whiston (reference: KSBS14) as a “reserve” location for Green Belt release to serve housing needs up to 2028 is based on a robust Evidence Base.

At the macro-level, the evidence demonstrates that there are “exceptional circumstances” to justify the release of land from the Green Belt to meet future housing needs in the short, medium and longer term up to 2028. Indeed, the evidence of under-delivery over a number of years, and the unreliability of the current 5 year land supply, firmly point to the need to release a substantial area of Green Belt land immediately.

Site-specifically, the Evidence Base has adequately tested the environmental and other constraints associated with site KGBS14. The evidence provides a strategic-level assessment of the site in relation to such matters as its Green Belt function, infrastructure capacity, flood risk, landscape impact and accessibility. The clear conclusion is that this site, at a strategic level, is suitable for residential development. As demonstrated within the Evidence Base (refer to Knowsley and Sefton Green Belt Study 2012), the site does not fulfil essential Green Belt functions. Neither would its development constitute unrestricted sprawl as it is already well contained by easily identifiable urban features such as Fox’s Bank Lane to the east, M62 to the south, and the urban areas of Whiston to the north and west. It is also relatively free from any infrastructure constraints given its close relationship to Whiston (shops, public transport, schools, hospital, etc.). In housing terms, the site will be seen as a prime market location. This means that there is a very strong degree of certainty it will come forward for development within the first 5 years of the Plan (with completion anticipated within 10 years). It also means it will attract relatively higher land values than elsewhere and will thus be able to provide a significant degree of affordable housing provision as well as a good mix of tenures. Its location is also likely to have a cumulative benefit in terms of access to existing employment hubs such as Huyton Business Park, new employment areas (e.g. Cronton Colliery), and employment centres elsewhere (noting close proximity to Whiston train station and the junction of the M62 and M57). Put simply, its early release for development is essential if Knowsley is to maintain a 5 year land supply and deliver its wider Plan objectives. Its early delivery would have no adverse impact on urban regeneration, including the Priority Regeneration Areas, as they will serve different housing market sectors.
Agricultural Land Quality

Government policy on the loss of agricultural land to development in England is set out in the NPPF. It is clear that decisions should rest with the relevant planning authorities who should take into account the economic and other benefits of the best and most versatile agricultural land. The Agricultural Land Classification (‘ALC’) helpfully provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile (‘bmv’) land is defined as Grades 1, 2 and 3a (see NPPF Glossary). The current agricultural use, or intensity of use, does not affect the ALC grade.

As can be seen from the plan below, neither of the two parcels of land we are promoting for residential development off Fox’s Bank Lane are classified as bmv agricultural land. Indeed, both sites are unclassified in terms of the ALC system. Only a small fraction of the wider site KGBS14 (located off Windy Arbor Road) is classified as Grade 3a. We also note that many other Green Belt sites which are identified as “reserved locations” involve the loss of bmv land. Furthermore, any negative impacts are far outweighed by the significant social and economic benefits of releasing site KGBS14 for housing as soon as possible.

In summary, neither the specific land parcels we are promoting off Fox’s Bank Lane, nor site KGBS14 in a general sense, are constrained by reference to the ALC system.

Case ‘Against’ Smaller Development Parcels

We do not consider that separate consideration should be given to smaller development parcels for the reasons clearly set out in the Evidence Base. The entirety of Site KGBS14 is needed to satisfy the borough’s housing needs to 2028. The site forms a well contained and coherent land mass which is enclosed by strong and easily recognisable physical features on all sides. Fox’s Bank Lane itself, and the high sandstone wall which runs along it, provide a very strong and logical new Green Belt boundary line. To release any parcel from the Green Belt in isolation would undermine the future containment of built development within this area and thereby conflict with
the purpose of the Green Belt – to keep land permanently open. Grouping the parcels in the way site KGBS14 proposes will result in a consistent Green Belt boundary in this area.

Phasing

In relation to the phasing of land within site KGBS14 (and other reserve sites) the KLPCS is silent on the matter. We understand the Council intends to address this at the Site Allocation stage. However, we note the Inspector has raised this as an issue and it should therefore be addressed.

In respect of the land which we are promoting, it is worth emphasising that the deliverability of both parcels is unconstrained by land ownerships, legal or technical difficulties. Neither parcel is classified as best or most versatile agricultural quality. They are not at risk of flooding. They are not significantly affected by any ecological constraints. They are well related to the settlement and town centre of Whiston and therefore well connected to necessary infrastructure (e.g. retail shops, schools, train station). The existence of suburban road connections to the east, north and west, and direct access to Fox’s Bank Lane means the site can be easily accessed and future phases enabled, as illustrated below.

Importantly, the early delivery of the larger land parcel fronting Fox’s Bank Lane will also help provide a north-south connection between Whiston and the former Cronton Colliery site to the south of the M62 which is identified for employment/country park uses.

Concept Masterplan (OS Context) – Larger Parcel fronting Fox’s Bank Lane

Please also refer to the Transport Issues Note prepared by Croft Transport Solutions, as appended to this Statement.
The smaller parcel of land to the west is also well related to adjoining land which enjoys good connectivity to both Windy Arbor Road and Lickers Lane and could also come forward as part of an early phased delivery of the wider site (KGBS14).

In total, both parcels could yield between up to 450 dwelling units. This represents 1 year’s housing land supply.
4 Conclusions

4.1 Which part of the Core Strategy is Unsound?
Policy CS5.

4.2 Which Soundness Test does it Fail?

4.3 Why does it fail?
- Not positively prepared because policy CS5 will fail to meet objectively assessed housing needs and infrastructure requirements throughout the Plan period, and particularly within years 0-5.

- Not justified because the evidence points firmly towards the need for an alternative strategy which should mean the immediate and substantial release of Green Belt in years 0-5. Policy CS5 is presently reliant on a flawed evidence base – specifically the current SHLAA. Policy CS5 should also contain detailed inset plans of all "reserve locations" to give their boundaries statutory weight.

- Not effective because policy CS5 will fail to meet objectively assessed needs for housing over years 0-5 and risks failing to meet longer terms needs for housing over the course of the Plan period.

- Not consistent with the NPPF because policy CS5 does not positively seek the opportunity to meet the objectively assessed housing and wider infrastructure needs of the borough throughout the Plan period, particularly in relation to paragraphs 14 and 47 of the NPPF.

4.4 How can the Core Strategy be made Sound?
Refer to section 3 and see below.

4.5 What is the precise change/wording that is being sought?
The precise change/wording should be:

- At #2, delete ‘longer term’ and insert: “…at the beginning and throughout the Plan period.”

- At #3, delete and replace with “Land South of Whiston (reference KGBS14) will be released for residential development as an immediate first phase in order to achieve and maintain a 5 year housing land supply during the early Plan period”

- At #4, change to state that “development in the safeguarded location will only take place post-2028 if necessary to maintain a 5 year deliverable supply of sites for housing”

- At #6 delete reference to the boundaries being defined at the Site Allocations stage and replace with detailed inset plans showing the precise boundaries of sites to be released from the Green Belt, including the identification of site KGBS14 as a first phase release.
Appendix: Transport Issues Note (April 2013), prepared by Croft Transport Solutions
PROPOSED RESIDENTIAL DEVELOPMENT, FOX'S BANK LANE, WHISTON (0388)

TRANSPORT ISSUES NOTE - APRIL 2013

Introduction

This note will consider the preliminary transport and highways issues relating to the potential residential development of a site on land off Fox's Bank Lane in the Whiston area of Knowsley.

The proposals could consist of up to 400 residential units on the site.

This note will consider the following issues:

- Vehicular access arrangements.
- Access to the site by sustainable modes of travel.
- Traffic impact.

Vehicular Access Arrangements

The site has an extensive frontage to Fox's Bank Lane which allows flexibility in terms of where the primary vehicular access can be located. The existing site currently has a formal vehicular access to Cherry Tree Farm along its frontage.

The proposed vehicular access has been located around half way along the extensive site frontage to Fox's Bank Lane which is around 275 metres long. The junction geometric parameters include a 5.5 metre wide carriageway and footways on either side of 2 metres in width. The junction radii will be 10 metres to accommodate HGV traffic and the junction will also incorporate a formal right turning lane to provide a safer and more efficient access arrangement.

The required visibility for a derestricted speed limit route would be 215 metres. However, the proposals would include improvements to the site frontage and along Fox's Bank Lane in general to allow a more pedestrian friendly environment as well as improving the safety of all road users by reducing the speed limit down to 40 mph. This could include formal traffic calming measures, gateway treatments, road markings and pedestrian facilities. The detail of which will be considered at a more advanced stage in the planning process.

The visibility required for a 40 mph road is 120 metres in each direction. This can adequately be achieved within the site frontage or the extent of adopted highway in the vicinity of the site.

At this stage only one vehicular access is proposed. However, there is likely to be other potential secondary or emergency access routes as the surrounding sites are promoted/developed and the current site frontage to Fox's Bank Lane provides the opportunity to provide an emergency access if required.

In conclusion, a vehicular access into the site could adequately be provided off Fox's Bank Lane which meets with current design guidance to serve the proposed residential development.

Access to The Site by Sustainable Modes of Travel

Within the recently released National Planning Policy Framework (NPPF), there is a presumption in favour of sustainable development. Transport is recognised as having an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The NPPF therefore advises that decisions should take account of the opportunities for sustainable transport modes.
New proposals should therefore be located and designed where practical to have access to high quality public transport facilities and to give priority to pedestrian and cycle movements. Planning policies are also to aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment and other activities.

Having regard to this, the accessibility of the site has been considered by the following modes of transport.

- Accessibility on foot.
- Accessibility by cycle.
- Accessibility by bus.
- Accessibility by rail.

### Access by Foot

It is important to create a choice of direct, safe and attractive routes between where people live and where they need to travel in their day-to-day life. This philosophy clearly encourages the opportunity to walk whatever the journey purpose and also helps to create more active streets and a more vibrant neighbourhood.

Fox's Bank Lane forms the eastern boundary of the site and has footways travelling north from the site. These link to Lickers Lane which in turn provides links towards the centre of Whiston. Fox's Bank Lane has a short section where no footway exists on the western side of the carriageway, however, this could be provided within this proposal given the amount of adopted highway verge available to utilise for a footway link.

Existing footways of at least two metres in width are located on both sides of Lickers Lane and these link to the footways located on Windy Arbor Road.

Within the Institution of Highways and Transportation (IHT) document, entitled “Guidelines for Providing for Journeys on Foot”, a distance of 800 metres is identified as the preferred maximum distance for town centres, whilst a distance of 2 kilometres is defined as a preferred maximum for commuting.

Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car journeys, particularly those under 2 kilometres. In addition, the DFT National Travel Survey of 2006 confirms that 78% of all trips less than a mile (1.6km) are carried out on foot.

**Plan 3** shows the pedestrian catchment for 800 metres and 2 kilometres from the centre of the site and provides an illustrative indication of the areas that can be reached based on a leisurely walk from the site. These distances assume that the wider masterplan area is developed in conjunction with this particular site.

In addition, to the pedestrian catchment plan, a review of the proximity of local facilities such as local shops and leisure facilities has been undertaken. The location of such facilities in relation to the site is shown in **Plan 3** as are the nearest active bus stops to the site.

The 800 metre catchment also includes St Leos & Southmead Catholic Primary School and Little Treasures Nursery. Along with these education facilities are the bus stops located on Lickers Lane, and also St Leos R C Church and St Nicholas C of E Church. The 800 metre catchment also connects to the larger potential redevelopment site at Cronton Colliery to the south of this development site which can be accessed via the footway on the western side of Fox's Bank Lane. This is envisaged to be a major employment area as well as a Country Park and will allow numerous short commuting journeys between this site and the Cronton Colliery site increasing its sustainable credentials.
Included within the 2,000 metre catchment are a number of schools, such as Halsnead Community Primary and Training School, Whiston Willis Community Primary School, Whiston and Prescot City Leaning Centre, St Lukes Roman Catholic Primary School and Saint Mary and St. Paul’s Church of England Primary School.

There are also a number of retail and healthcare facilities included in the 2,000 metre catchment, such as, a Londis convenience store, a Co-op food store, Bargain Booze, Neil’s Pharmacy, Whiston Primary Care Resource Centre and Whiston Hospital. Two post offices and Whiston Library are also included in the 2,000 metre catchment.

As illustrated, the development site benefits from being located within close proximity to a range of local amenities, with the largest choice of facilities located around Windy Arbor Road and Molyneux Drive.

There is also likely to be a range of local amenities contained within the wider masterplan area of South Whiston to ensure even greater accessibility to these facilities from the proposed residential development.

Table 1 below, shows the distance from the site to the local convenience store and other nearby key amenities in the vicinity of the site:

<table>
<thead>
<tr>
<th>Local Amenity</th>
<th>Distance (metres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>St Leos &amp; Southmead Catholic Primary School</td>
<td>300</td>
</tr>
<tr>
<td>Whiston Woods</td>
<td>500</td>
</tr>
<tr>
<td>Bargain Booze</td>
<td>900</td>
</tr>
<tr>
<td>Co-operative Food Store</td>
<td>900</td>
</tr>
<tr>
<td>Londis</td>
<td>900</td>
</tr>
<tr>
<td>Whiston Train Station</td>
<td>1,000</td>
</tr>
<tr>
<td>Whiston Post Office</td>
<td>1,000</td>
</tr>
<tr>
<td>Whiston Library</td>
<td>1,100</td>
</tr>
<tr>
<td>Whiston Hospital</td>
<td>1,400</td>
</tr>
</tbody>
</table>

**Table 1 - Distance from Site to Local Facilities**

As can be seen in the table above, the site is located within close proximity to a number of key local amenities including retail, health, education and leisure facilities.

It is therefore considered that the existing pedestrian infrastructure will facilitate safe and direct pedestrian linkages between the site and local destinations. There will also be pedestrian links to the surrounding residential areas through the adjacent potential residential developments and, as detailed earlier in this section, there will be a range of pedestrian improvements proposed to enhance the accessibility of the site which may include formal crossing facilities, increased pedestrian footway provision and reduced speed limits.

In conclusion, the development site can be considered as highly accessible on foot.
**Access by Cycle**

An alternative mode of travel to the site could be achieved by bicycle.

A distance of 5 kilometres is generally accepted as a distance where cycling has the potential to replace short car journeys. This distance equates to a journey of around 25 minutes based on a leisurely cycle speed of 12 kilometres per hour and would encompass the whole of Whiston, Prescot and Huyton.

This would help encourage cycling as an alternative form of transport to access the site and accord with the objectives of the Borough's cycling strategy, 'Encouraging Cycling', which has the aim of 'promoting and developing cycling to maximise its role as a safe, quick, convenient, healthy and environmentally friendly form of travel.'

National Cycle Route 56 is located approximately 1.4 kilometres west of the site, this runs through Stadt Moers Park and Whiston Greenway.

The site can, therefore, be considered as being accessible by cycle.

**Access by Bus**

An effective public transport system is essential in providing good accessibility for large parts of the population to opportunities for work, education, shopping, leisure and healthcare in the town and beyond.

The nearest bus stops to the site are located on Fox's Bank Lane and Lickers Lane. These are located approximately 300 and 400 metres from the site, respectively, which equates to walking times of approximately 4 and 5 minutes. These bus stops can be accessed via the footways on Fox's Bank Lane and Lickers Lane, or through the wider masterplan area.

The stops within 400 metres of the site are served by a number of scheduled public bus services which are summarised in Table 2 below:

<table>
<thead>
<tr>
<th>Serv. No.</th>
<th>Route</th>
<th>Mon-Fri Frequency Per Hour</th>
<th>Sat</th>
<th>Sun</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>AM Peak</td>
<td>Mid-day</td>
<td>PM Peak</td>
<td>Eve</td>
</tr>
<tr>
<td>99</td>
<td>Whiston Station – Prescot Circular</td>
<td>0</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>139</td>
<td>Liverpool – Prescot or St Helens</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>248</td>
<td>Huyton - Prescot - Huyton</td>
<td>2</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>265</td>
<td>Halewood - Whiston - Rainhill - Whiston - Halewood</td>
<td>0</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Table 2 - Existing Bus Services Operation in the Vicinity of the Site

As shown in Table 2, bus stops located within 400 metres provide up to 6 services an hour in peak periods to destinations including Liverpool, Prescot and St Helens.
In order to demonstrate the level of accessibility some example bus journey times from the bus stops in the vicinity of the site are presented in Table 3 below:

<table>
<thead>
<tr>
<th>Destination</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Whiston Hospital</td>
<td>7 mins</td>
</tr>
<tr>
<td>Prescot Bus Station</td>
<td>12 mins</td>
</tr>
<tr>
<td>Liverpool City Centre</td>
<td>43 mins</td>
</tr>
<tr>
<td>St Helens</td>
<td>51 mins</td>
</tr>
</tbody>
</table>

Table 3 - Example Bus Journey Times

The above table demonstrates that bus journeys to Prescot take approximately 12 minutes whilst bus journeys to Liverpool city centre take approximately 43 minutes. This is a good level of service and provides opportunities for residents to commute, and for visitors to travel, to and from the site by bus.

For example, a bus leaves the Whiston area at around 0726 hours to Liverpool and arrives in the city centre at around 0809 hours. There is also a service that leaves the city centre just after 1700 hours back to Whiston. Furthermore, there are frequent services to Whiston Hospital which is only around a 7 minute bus journey from the site. This is both a large local employer as well as a key amenity in the area and access to it from the site is considered to be a major asset of this area.

As such, the existing bus services are ideally placed to cater for the needs of the site's residents and visitors to numerous local and regional destinations in the area.

It is therefore concluded that the proposed development site is accessible by bus.

Access by Rail

Whiston railway station is located approximately a kilometre north of the proposed development site, around a 10 minute walk.

Whiston rail station is managed by Northern Rail and has 2 platforms located on the Liverpool to Manchester Line. The rail station offers approximately 4 services an hour to destinations including Warrington, Stalybridge, Edge Hill and Liverpool Lime Street.

There are numerous commuter opportunities from here with trains running to Liverpool Lime Street starting at 0619 hours, taking 24 minutes, to Manchester Victoria at 0605 hours at a journey time of 44 minutes and to Warrington Central from 0635 hours which take 26 minutes.

It is therefore concluded that the proposed development site is highly accessible by rail.

Traffic Impact

- In order to establish the number of trips which the proposed development is forecast to generate the TRICS database has been used for the 'private housing' range of sites. The trip rates summarised in Table 4, below, represent an average range of trip generation rates but based on similar sized and located sites without sites in London or Ireland which can 'skew' the results of any TRICS interrogation.
### Peak Hour Trip Rates

<table>
<thead>
<tr>
<th>Peak Hour</th>
<th>Trip Rates</th>
<th>Trip Generation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Arr</td>
<td>Dep</td>
</tr>
<tr>
<td>AM</td>
<td>0.156</td>
<td>0.432</td>
</tr>
<tr>
<td>PM</td>
<td>0.406</td>
<td>0.238</td>
</tr>
</tbody>
</table>

**Table 4 - Forecast Trip Generation of Proposed Residential Development**

As can be seen the proposed residential development is likely to generate somewhere in the region of 243 two way trips during the Weekday AM peak hour period and around 257 two way movements during the Weekday PM peak hour period.

From on site observations and our experience in this area of Knowsley the traffic generation is likely to be able to be accommodated on the local highway network with the potential for some off site improvements which will be discussed and agreed with officers at Knowsley Council.

Consideration will also be given in any formal submission to the South Whiston and Land South of M62 ICDO Study which is being carried out by Knowsley Council to ensure that the development complements any proposals in the area.

These issues will be covered in more detail within a formal Transport Assessment that would be required as part of a planning application or Local Plan submission.

**Conclusions**

In summary, this note has considered the preliminary transport and highways issues relating to the potential 400 unit residential development of a site on land off Fox's Bank Lane in the Whiston area of Knowsley.

- The proposed development site will be accessed by a safe, efficient and already consented vehicular access arrangement.
- The proposed development complies with local and national planning policy.
- Pedestrian and cycle access to the site can be considered as being good with extensive existing infrastructure located in the vicinity of the site.
- The site is also accessible by bus, with up to 6 buses per hour operating within 10 minute walk of the site.
- Additionally, the site is accessible via Whiston railway station which provides excellent opportunities for commuters/visitors to travel to and from the development via rail.
- The proposals are likely to be able to be accommodated on the local highway network with some potential off site improvements.

As such, there should be no objection to this proposed development on highways or transportation grounds.
Plan 3 showing pedestrian catchment with amenities