

Highway Officer – Response 1

Highway Holding Objection.

Additional information and/or modification is required for full highway support to be offered.

In highway terms, when reviewing such a submission, consideration is given, but not limited to, the following: **traffic generation; access to the site for all modes; parking, turning and servicing facilities; and the impact on highway safety.**

Site and Situation

Egerton Street is one-way in operation, with parking restrictions – no waiting at any time - on both sides of the carriageway.

Houses on this street have no front boundary, with residents exiting houses directly onto the footpath.

Waterloo Road has parking restrictions only on the opposite side of the carriageway to the site and the houses have small private areas to the front of the properties. Resident parking is therefore on-street and site visits have shown that there is limited capacity for additional vehicles with the potential for potential inconvenience and safety issues to both local residents and highway users about the site due to increased on street parking pressures attributable to the development and traffic generation/attraction associated.

The proposed site access is opposite a priority junction with Speakman Street, a residential street. It appears this was some form of previous access though it is not understood if it was historically for vehicles and/or pedestrians.

Traffic Generation

With no Transport Assessment or Statement offered there was no traffic generation or associated information supplied.

It is considered, in accordance with Policy C1 Transport Assessments and Travel Plans, Point 16 that such a submission is required given the above mentioned location specific issues.

The level and content of the supporting TA/TS should be scoped with the Highway Authority in advice, as per afore, mentioned policy point 16.

TRICS database with comparative sites is generally utilised, where direct comparison of similar sites, in sufficient numbers, is not available, to provide trip generation/attraction information and also can be utilised for parking accumulation assessment.

For 85th Percentile Trip Generation, requested, a minimum of 20 sites will be required. If any reduction from the 85th Percentile rate is proposed then robust justification is required and sensitivity analysis using both average (50th percentile) and 85th percentile trip rates should be presented.

Whilst it is not anticipated that there will be a detrimental impact on the highway network, in terms of traffic generation, robust information, in the form of analysis and assessment, is required to be presented and from this the adequacy of parking provision can be supported, or otherwise.

A questionable (see 10.1 of the D&A) beat survey was not considered robust, nor was the raw data/results found, and was not undertaken in a neutral period as per guidance.

Access to the site for all modes

The proposed access to the car park area off Waterloo Road is unsatisfactory in terms of accessibility for vehicles and pedestrians.

However, it is noted that a previous query as to whether this is intended for pedestrian access has not been satisfactorily answered.

Given the Fire Escape egress point, and the secure gate to the communal garden form the parking area (see query below) at the top of the ramp is it is presumed that this is.

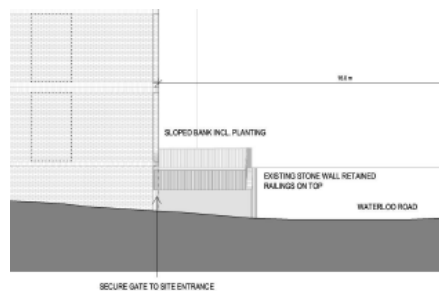
The ramp, with a 1:14 gradient, is not compliant for vehicles or pedestrians and there is no footpath or protected walkway for pedestrian/vulnerable users.

The gate detail in terms of effective width of the access opening is not forthcoming and therefore the ability of vehicles to pass on the ramp has not been demonstrated.

If only one vehicle is able to utilise the ramp at a same time there are safety concerns should accessing and egressing vehicles coincide; with either an excessively long reverse up a steep slope or backing out to Waterloo Road with the Speakman Rd junction opposite required.

Tracking for the largest vehicle likely to utilise this access is required, as well as tracking of the above mentioned manoeuvres i.e. passing on the ramp or otherwise.

Gate detail to understand effective width is also required.



Whilst historic (2009) the snippet above also demonstrated that the visibility splay information is not accurate.

The pillar to the existing house about the access will be within the 0.6m to 2m visibility envelope and, although described as a low wall and railing, as can be seen from the second snippet from DWG No. 1351 Rev B, Proposed Elevations this side of the access would have obstructed sightlines.

Moreover, the visibility splay “y” distance is required to be 25m, not 20m, for a 20mph street, see MfS Table 7.1. However, this street is subject to a 30mph speed limit and therefore 43m is the required distance.

Further, as can be seen from the Streetview snippet that cars parked adjacent to the entrance will further undermine visibility and therefore parking restriction, i.e. a TRO and signing/lining would be required to be sought (with public consultation part of the process), at the applicant's expense, to protect highway users' safety.

However, it should be noted that whilst the other side of the junction has double yellow lines there are cars parked indiscriminately underlining the local issues, as aforementioned.

See MfS 7.8.5 Obstacles to visibility for further consideration.

Another query that remains unresolved regards pedestrian access to the site, from the rear parking court, and the "Secure Gate". How is access acquired i.e. intercom and remote operation, passcode or suchlike?

Regardless the position is not acceptable, discharging into the turning area of the car park and a dedicate/protected walkway should be offered to all parking spaces. The disabled space would require a user to wheel through the centre of the turning aisle and then negotiate the non DDA compliant slope

With regards to cycle accessibility, again the ramp is not acceptable in terms of gradient and again the secure area, with the cycle storage being on the other side of the secure gate in the communal garden, or access is via a secure gate at the Egerton street entrance and through the courtyard to the furthest point of the communal garden.

Please see LCR CA Cycle Parking Guidance (2022), MfS and LTN 1/20 for guidance on secure, convenient and accessible cycle parking provision that will encourage and enable alternative journeys to vehicles.

The entrance lobby on Egerton Street does not have connection to Community Hub 1 or elsewhere – it is assumed this is a drawing error.

Access and manoeuvring for a fire appliance should be demonstrated; they should be able to get to within 45 metres of a dwelling, with a maximum reversing distance of 20 metres (MfS 6.7.2).

Parking, turning and servicing facilities

As well as the access to the rear parking court being unacceptable, the overall provision in terms of amount and location have significant shortcomings.

The information offered in the D&A Section 4.2 Care Needs and Staffing in the D&A is considered conflicting, and not robust or clear.

The notional split of occupants care needs does not consider the worsening condition that the residents will experience at differing rates, though a higher level of staffing for end of life care is mentioned, as well as overnight care for high care needs, it is stated that two carers per resident may be required.

However, only a single overnight staff member is suggested which is incongruous. 4 staff for 36 residents in the daytime also seems underprovision. Also, is there a staff member at the front entrance?

The information presented only pertains to the C2 Use, not the Community Centre(s), for which no information or insight has been offered in terms of staffing, visitor numbers, traffic generation or indeed general operational use or detail.

As aforementioned TRICS can be utilised to provide parking accumulation information, alternatively similar actual such facilities could be surveyed to offer operational insight into traffic generation and parking use of such establishments.

See section above re cycle parking shortcomings that need addressing.

No motorcycle parking has been offered and is required.

Scooter storage is offered. The location, central in the building with several door to navigate is not considered an accessible position given the nature of users.

No EV charging infrastructure was offered and is required.

No ambulance parking is offered and this is required to be considered given the nature of the residents' needs and the care given - to end of life.

The visitor restrictions are not clearly understood, or agreed with. Do the numbers refer to parking spaces or all visitors?

How would access be controlled, see above re secure gate access/front entrance staffing? Given the number of residents (36 No), their condition, which only deteriorates to end of life, the number of visitors is not considered realistic.

Shift times, visitor times and other operational information was not forthcoming and is required to understand the functioning building and therefore review and assess the proposal comprehensively..

The levels about the car park given the apparent difference about the Fire Escape need clarification - see snippet below from DWG No. 1351 Rev B, Proposed Elevations. It should be noted this is adjacent to the disabled parking space



Road marking detail, nor signage, for deliveries and drop/off and a disabled parking bay were not presented, only annotated on a plan.

The distance from the bin store to the kerbside collection point appears in excess of prescribed distance for the dragging of bins, see MfS 6.8.9, Bldg Regs H, and BS5906. The route also does not appear level given the levels presented.

It should be noted that Halton Planning Applications 10/00500/FUL, Naughton Fields, and 13/00112/FUL, Ashley Green, both for extra care provision, offered 30 and 27 spaces, for 47 and 50 units, respectively, a significantly higher number of parking

spaces, proportionally (0.64 and 0.54) , than this proposal, with 11 for 36 (0.3). The latter application explicitly references minimising potential on-street parking with sufficiency of on-site provision.#'

Impact on highway safety

Notwithstanding the lack of required intervisibility about the access junction and further compromised safety of all highway and site users given the excessive slope the Waterloo Road access to the car park is not clearly apparent, being a narrow opening between buildings (existing and proposed).

The inconspicuousness of the access/parking is another outstanding matter, see 10.1 Vehicle and Car Parking Strategy.

Further, positioned at the rear of the building, with undetermined access to the building, i.e. via secure gate or long walk down an excessively steep slope and round to the principal entrance(s) on Egerton Street, as well as the considered underprovision of spaces the parking provision is not considered conducive to use of this allocated off-street rear parking court and more convenient, closer and accessible on-street parking will ensue.

The Egerton Street Car Park, offered as able to accommodate any shortfall in parking is before the building, on a one way street/circuit, and similarly requires a walk, where the propensity to park as close to an entrance/destination as possible is well documented

It is considered that whilst a limited shortfall in on-site parking would not be significant the insufficiencies of the access and parking will create on-street parking pressures in the vicinity of the site with inconvenience and potential danger to local residents and highway users.

As well as indiscriminate parking, manoeuvres associated with the lack of adequate on-site provision manoeuvres associated with the inadequacies of the access also present potential hazard to highway users.

Highway Officer – Response 2

No Highway Objection, with suggested conditions.

Following the submission of additional information, and amendments, the holding objection is removed.

It is considered that the development as proposed and any shortfall in on-site parking would not be significant to the local network nor create undue on-street parking pressures to the inconvenience of local residents in the vicinity of the site, nor severe highway safety for highway users.

Additional cycle parking provision for visitors/short-term, suggested to be in the courtyard, separate from the staff/long-term cycle parking is required. A suitable condition should therefore be applied. This condition should include details of the CCTV mentioned and the cycle storage facility in the rear parking area.

LCR CA Cycle Parking Guidance (2022), MfS and LTN 1/20 offer guidance on secure, convenient and accessible cycle parking provision that will encourage and enable alternative journeys to vehicles.

Short-term (visitor) cycle parking does not need to be covered, like the staff cycle parking store, but must be secure, overlooked and accessible as well as adequate in quantity; a provision for a minimum of four bikes is required.

Highway Officer – Response 3.

No Highway Objection, with suggested conditions.

Following the submission of additional information, and amendments, including changes to the description of development, to more accurately reflect the proposal in hand, the holding objection is removed.

The application was offered, in the D&A, to be considered neither as C2, nor C3, but as Sui Generis; a pragmatic approach was therefore undertaken by Highways to ensure all potential uses, and impacts, were satisfactorily covered in terms of review and assessment of Highway considerations.

The scheme is for 29 Apartments which, according to the DALP Policy C2, Appendix D Parking Standards, viewed as being a Town Centre location, though technically just outside the recognised boundary, requires (assessed as C3 domestic dwellings) between 0.5 and 1 space per apartment i.e., between 15 and 29 spaces.

Twenty car parking spaces are offered in compliance with policy, as above assessed, though this could be increased by reconfiguring the overprovision of disabled spaces:

this overprovision being reflective of the proposed actual use as supported living/extra care apartments, for adults with early onset dementia and/or other special needs, as per the D&A.

Extra-care housing offers more support than [sheltered housing](#) but still allows independently living, in this instance in a self-contained flats, with staff available up to 24 hours per day to provide personal care and support services. Against such residential institution (C2) use proposed there is a satisfactory amount of car parking offered in excess of standards.

The applicant has worked collaboratively to improve and increase parking provision, for all modes, and other scheme improvements, such that the offering is on balance deemed supportable in highway terms.

Any considered shortfall in on-site parking would not be significant to the local network, nor create undue on-street parking pressures to the inconvenience of local residents, nor severe highway safety for highway users in the vicinity of the accessibly located site. Further, should an appeal be lodged against a refusal based on parking grounds it would be unlikely to be upheld. It should be noted the adjacent and surrounding homes are not afforded in-curtilage parking.

A Car Park Management Plan (CPMP) can be utilised as a tool to manage parking demand by identifying the users of a parking area (residents, staff, visitors, deliveries etc.) and planning for their respective needs, with the practical measures enabling the building management organisation to control who parks in the available spaces, with supporting monitoring and enforcement measures, sometimes as an integral part of a Residential Travel Plan which should serve to demonstrate the developer's commitment to controlling residents', and other site users, future parking habits, long after initial occupation, through ongoing and dynamic measures.

A CPMP, nor Travel Plan condition are considered necessary conditions given the special needs of the proposed residents.

Additional cycle parking provision for visitors/short-term, suggested to be in the courtyard, separate from the staff/long-term cycle parking, is required through suitably worded condition, which should include details of CCTV mentioned by the applicant, for additional surveillance/security, for the cycle storage facility in the rear parking area.

The LCR CA Cycle Parking Guidance (2022), MfS and LTN 1/20 offer guidance on secure, convenient, and accessible cycle parking provision that will encourage and enable alternative journeys to vehicles. Short-term (visitor) cycle parking does not need to be covered, like the staff cycle parking store, but must be secure, overlooked, and accessible as well as adequate in quantity; a provision for a minimum of four bikes is required, again to be covered in the suitably worded condition.

A Construction Management Plan (CMP) will be required pre-commencement which will cover, but not be limited to; the management of vehicle movement associated with the site on the public highway, parking for site associated vehicles, time of working and the management of debris on the highway.

Suggested Conditions

Should permission be granted the following conditions are suggested:

- **Car Parking Details:** Notwithstanding the submitted plans, development shall not take place until a scheme identifying areas of parking; including disabled, EV spaces and charging infrastructure, motorcycle and cycle parking, servicing, vehicular manoeuvring (including provision for pedestrians) has been submitted to and approved in writing by the Council as Local Planning Authority. The development shall not be brought into use until the areas identified have been hard surfaced, drained within the site and permanently marked out or demarcated in accordance with the details agreed. These areas shall be retained as such thereafter. For the avoidance of doubt, long stay cycle parking must be convenient, covered and offer a means to secure the cycles. Motorcycle parking should offer an anchor point securely attached to the ground, or similar.
- **Off Site Highway Improvements:** No development shall take place until a scheme for the design and layout of improvement works on the public highway about the site has been submitted to, and approved in writing by, the Council as Local Planning Authority. For the avoidance of doubt, the works shall include, but not be limited to:
 - Formation of the new vehicular access to the site from, including pedestrian crossing facilities, and,
 - Resurfacing of the footpath about the entire frontage of the development and any applicable kerbing, drainage, lining and signing modifications (parking bays on Egerton St.).

The approved scheme shall be implemented before the development is brought into use.

- **Demolition and Construction Management Plan(s)**

A Demolition/Construction Management Plan will have to be submitted to and agreed in writing by the Local Planning Authority that details the means of mitigation of construction effects. This shall detail, but not be limited to, the following:

- Layout of the site compound including identification of areas for the storage of plant and materials, loading/unloading and turning areas for delivery vehicles [for each phase as necessary].
- Management of deliveries including prevention of waiting/layover of construction related traffic on the highway, measures for the control of traffic to and from the site and consideration of any temporary traffic management arrangements which may be necessary during periods of construction.
- Note - reversing on the highway is not permitted without a Banksman.
- Construction staff parking arrangements - on site with sufficiency to accommodate all.
- Control of transfer of mud out of the site - details of wheel washing facilities including location and type.

- Note – Road sweeping at the request of HBC, about the access(es) and vicinity of the site is required to be referenced in the D/CMP document(s),
- Methods for the mitigation of noise and vibration from building works also from the operation of any temporary power generation or pumping plant which will operate overnight, if applicable.
- Methods for dust control and suppression.
- Measures to protect highway users when demolition/construction work is carried out adjacent to the highway.
- A programme of works including phasing, if applicable.
- Adequate provision for addressing any abnormal wear and tear to the highway, if applicable.

Note: Pre- and post-inspection visits will be required to ascertain if any damage has occurred, to be rectified at the developer's expense.

All site works shall then be carried out in accordance with the approved Plan unless otherwise agreed in writing beforehand with the Local Planning Authority.

Informatives

Notwithstanding LLFA comments, provision shall be made within the site for the disposal of surface water such that none runs onto the highway. The applicant should ensure they have met their obligations under NPPF particularly regarding discharge rates.

The developer will be responsible for paying for the installation of new and/or relocation of any existing signs/columns which must be agreed in advance.

A S278 highway agreement will be required prior to the commencement of any construction work to undertake works on the existing adopted highway about the site frontage and the signing and lining of the parking bays on Egerton Street.

Council's Ecological and Waste Advisor – Response 1.

Habitats Regulations Assessment

3. The development site is located in close proximity to the following European designated sites and Core Strategy Local Plan policy CS20 applies:

- Mersey Estuary SPA (400m)
- Mersey Estuary Ramsar (400m)

4. I have considered the proposals and the possibility of likely significant effects on European sites using the source-pathway-receptor model. I advise that there is no pathway that could result in likely significant effects on the European sites and the proposals do not warrant a detailed Habitats Regulations Assessment for the following reasons:

- Limited direct accessibility to European sites due to the Manchester Ship Canal,

- Low recreational pressure impacts from the additional care nature of this residential development, as it is unlikely that new homeowners will travel to European sites; and,
- Provision of SANGs within development i.e. courtyard garden.
- Nearest 'gateway access' point is Wigg Island which has moderate access to the European Sites,

Bats Roosting

5. The applicant has submitted a Bat Activity Surveys Report (Jeff Clarke Ecology, 30/09/2019) in accordance with Core Strategy Local Plan policy CS20. The report is not acceptable because of significant limitations. An updated bat survey report is required, in line with Recommendations of the Bat Activity Surveys Report commissioned by the applicant. See Part Two for justification.

6. An updated emergence and re-entry or activity bat survey is required prior to determination. Bats are protected species and Core Strategy Local Plan policy CS20 applies. Protected Species are a material consideration.

The survey and report are essential to determine if bats are present. If present the Local Planning Authority is required to assess the proposals against the three tests (Habitats Regulations) and determine whether an EPS licence is likely to be granted. Surveys must follow Standing Advice and best practice guidance (Collins J (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd edition, Bat Conservation Trust ISBN-13: 978-1-872745-96-1). Any deviation from these guidelines must be fully justified. The applicant should note that timing for this survey is May to September inclusive.

Foraging and Commuting

7. Habitats adjacent to the site provides foraging and commuting habitat for bats. Lighting for the development may affect the use of these areas. A lighting scheme can be designed so that it protects ecology and does not result in excessive light spill onto the habitats in line with NPPF (paragraph 180). This can be secured by a suitably worded planning condition. It would be helpful for the applicant to refer to Bat Conservation Trust website <https://www.bats.org.uk/news/2018/09/new-guidance-on-bats-and-lighting>

Breeding birds

8. Built features or vegetation on site may provide nesting opportunities for breeding birds, which are protected and Core Strategy Local Plan policy CS20 applies. The following planning condition is required and included within a CEMP.

CONDITION No tree felling, scrub clearance or building works is to take place during the period 1 March to 31 August inclusive. If it is necessary to undertake works during the bird breeding season then all buildings are to be checked first by an appropriately experienced ecologist to ensure no breeding birds are present. If present, details of how they will be protected are required to be submitted for approval.

9. The proposed development will result in the loss of bird breeding habitat and UDP policy OE5 applies. To mitigate for this loss, details of bird nesting boxes (e.g. number, type and location on an appropriately scaled plan) that will be erected on the site for agreement with the Council are required. This can be secured by a suitably worded planning condition.

CONDITION The development hereby permitted shall not be occupied until details of bird boxes (e.g. number, type and location on an appropriately scaled plan) and timing, has been provided for approval and implemented in accordance with those details.

Waste Local Plan

Policy WM8

10. The proposal is major development involves demolition and construction activities which are likely to generate significant volumes of waste. Policy WM8 of the Merseyside and Halton Waste Joint Local Plan (WLP), the National Planning Policy for Waste (paragraph 8) and Planning Practice Guidance (paragraph 49) apply. These policies require the minimisation of waste production and implementation of measures to achieve efficient use of resources, including designing out waste and minimisation of off-site disposal.

In accordance with policy WM8, evidence through a waste audit or a similar mechanism (e.g. a site waste management plan) demonstrating how this will be achieved must be submitted and can be secured by a suitably worded planning condition. The details required within the waste audit or similar mechanism is provided in Part Two. Policy WM9 11. The applicant has provided sufficient information in Proposed site plan (Pozzoni, 08/18) to comply with policy WM9 (Sustainable Waste Management Design and Layout for New Development) of the Merseyside and Halton Joint Waste Local Plan (WLP) and the National Planning Policy for Waste (paragraph 8). The Proposed site plan can be secured as an Approved Drawing by a suitably worded planning condition.

Part Two 12.

The Bat Activity Surveys Report (Jeff Clarke Ecology, 30/09/2019) is not acceptable because of the following limitations:

- Age of survey – over 12 months old,
- High level of bat activity recorded during all three surveys,
- Numerous bat records in the area,
- Possible emergence from the north side of the building; and,
- Good foraging habitat on and adjacent to the site.

Waste Local Plan – WM8

13. A waste audit or similar mechanism provides a mechanism for managing and monitoring construction, demolition and excavation waste. This is a requirement of WLP policy WM8 and the National Planning Policy for Waste (paragraph 8); and is advised for projects that are likely to produce significant volumes of waste (nPPG, paragraph 49). Implementation of such mechanisms may also deliver cost savings and

efficiencies for the applicant. The following information could be included within the waste audit (or similar mechanism) as stated in the Planning Practice Guidance:

- the anticipated nature and volumes of waste that the development will generate;
- where appropriate, the steps to be taken to ensure the maximum amount of waste arising from development on previously developed land is incorporated within the new development;
- the steps to be taken to ensure effective segregation of wastes at source including, as appropriate, the provision of waste sorting, storage, recovery and recycling facilities; and
- any other steps to be taken to manage the waste that cannot be incorporated within the new development or that arises once development is complete.

Information to comply with policy WM8 could be integrated into a Construction Environment Management Plan (CEMP) if one is to be produced for the development. This would have the benefit of ensuring that the principles of sustainable waste management are integrated into the management of construction on-site to improve resource efficiency and minimise environmental impacts.

Guidance and templates are available at:

- <http://www.meas.org.uk/1090>
- <https://www.gov.uk/guidance/waste>
- <http://www.wrap.org.uk>
- http://ec.europa.eu/growth/tools-databases/newsroom/cf/itemdetail.cfm?item_id=8983

Council's Ecological and Waste Advisor – Response 2.

Bats

1. The applicant has submitted an Ecological Statement Update (*Jeff Clarke Ecology, 11/12/2020*) in accordance with Core Strategy Local Plan policy CS20. The Ecological Statement does not address the issues raised by MEAS previously (07/10/2020 and 30/11/2020) regarding bats.
2. The Ecological Statement Update concludes that there is 'no material change' in deterioration of the existing building and demolition can proceed on the basis of the Reasonable Avoidance Measures (RAMs) outlined in the 2019 Bat Activity Surveys Report (*Jeff Clarke Ecology, 30/09/2019*),
3. In section 3.19 of the Bat Activity Surveys Report it is stated that possible bat emergence was observed from the north side of the existing building during emergence survey, the validity of which is still to be fully evaluated by the consultant. This is a significant limitation of the report as it is also stated that the building has potential as a maternity roost of high conservation value (Table in 3.5 of the report).

4. As the consultant has not adequately responded to previous attempts to address these issues, including direct contact by myself (29/09/2020), I advise the conclusions of the 2019 survey effort are not accepted due to a possible emergence event, the high bat roost potential and possible high conservation potential of the building. In addition, paragraph 5.4 of the Bat Activity Surveys Report states survey effort should be updated if works had not begun by 1st June 2020. Further information is provided in Part Two of this response.
5. Updated emergence and re-entry bat survey effort, in line with Collins¹ (2016) guidelines for buildings of high bat roost potential, is required **prior to determination**. Bats are protected species and Core Strategy Local Plan policy CS20 applies. Protected Species are a material consideration.

The survey and report are essential to determine if bats are present. If present the Local Planning Authority is required to assess the proposals against the three tests (Habitats Regulations) and determine whether an EPS licence is likely to be granted. Surveys must follow Standing Advice and best practice guidance². Any deviation from these guidelines must be fully justified. The applicant should note that timing for this survey is May to September inclusive.

Breeding birds

6. Built features or vegetation on site may provide nesting opportunities for breeding birds, which are protected and Core Strategy Local Plan policy CS20 applies. The following planning condition is required and included within a CEMP.

CONDITION

No tree felling, scrub clearance or building works is to take place during the period 1 March to 31 August inclusive. If it is necessary to undertake works during the bird breeding season then all buildings are to be checked first by an appropriately experienced ecologist to ensure no breeding birds are present. If present, details of how they will be protected are required to be submitted for approval.

7. The proposed development will result in the loss of bird breeding habitat and Local Plan policy CS20 applies. To mitigate for this loss, details of bird nesting boxes (e.g. number, type and location on an appropriately scaled plan) that will be erected on the site for agreement with the Council are required. This can be secured by a suitably worded planning condition.

CONDITION

¹ Collins J (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd edition, Bat Conservation Trust ISBN-13: 978-1-872745-96-1

² Collins J (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd edition, Bat Conservation Trust ISBN-13: 978-1-872745-96-1

The development hereby permitted shall not be occupied until details of bird boxes (e.g. number, type and location on an appropriately scaled plan) and timing, has been provided for approval and implemented in accordance with those details.

Part 2

8. MEAS have stated updated emergence and re-entry bat survey is required due to the following:
 - Several potential roost features identified, including features of high bat roost potential and possible high conservation value (*Jeff Clarke Ecology, 11/12/2020*);
 - High level of bat activity recorded during all three surveys;
 - Numerous bat records in the area;
 - Bats are highly transient species;
 - Possible emergence from the north side of the building (*section 3.19 of the Bat Activity Surveys Report, Jeff Clarke Ecology, 30/09/2019*); and,
 - Good foraging habitat on and adjacent to the site.
9. Due to the ongoing situation with Covid-19, we understand that ecological survey work may need to be postponed or undertaken using a risk-based approach. The Government has released [guidance](#) for ecologists carrying out field survey or mitigation works during the coronavirus pandemic. CIEEM has also published [Guidance on Ecological Survey and Assessment in the UK During the Covid-19 Outbreak](#). This is a tool which is intended to help ecologists undertake ecological survey and assessments during the restrictions necessitated by the Covid-19 outbreak.

Council's Ecological and Waste Advisor – Response 3.

3. The ecological consultant has provided additional information to clarify the possible bat emergence from the north side of the building as part of Bat Activity Surveys Report (*Jeff Clarke Ecology, email to A. Coffey (MEAS)- RE: Re ecology conditions for Waterloo Centre & Carnegie Library, Egerton Street Waterloo Road Runcorn WA7 1JN, 30/09/2019*).
4. The additional information provided by the ecologist in relation to possible bat emergence is accepted and can be discounted as a reason for resurvey.
5. However, previous comments made by MEAS (27/05/2021) remain valid and further bat surveys are required.
6. Updated emergence and re-entry bat survey effort, in line with Collins³ (2016) guidelines for buildings of high bat roost potential, is required **prior to determination**. Bats are protected species and Core Strategy Local Plan policy CS20 applies. Protected Species are a material consideration.

³ Collins J (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd edition, Bat Conservation Trust ISBN-13: 978-1-872745-96-1

The survey and report are essential to determine if bats are present. If present the Local Planning Authority is required to assess the proposals against the three tests (Habitats Regulations) and determine whether an EPS licence is likely to be granted. Surveys must follow Standing Advice and best practice guidance⁴. Any deviation from these guidelines must be fully justified. The applicant should note that timing for this survey is May to September inclusive.

Part 2

7. MEAS have asked for an updated emergence and re-entry bat survey due to the following:
 - a. High level of bat activity recorded during all three surveys,
 - b. Numerous bat records in the area,
 - c. Bats are highly transient species,
 - d. Uncertainties over the bat roost potential categorisation in the Bat Activity Surveys Report (as the table in paragraph 3.5 states conclusions of high bat roost potential for day/transient roosts and moderate maternity potential but fails to elaborate)
 - e. Paragraph 5.4 of the Bat Activity Surveys Report states survey effort should be updated if works had not begun by 1st June 2020; and,
 - f. Good foraging habitat on and adjacent to the site.

8. Due to the ongoing situation with Covid-19, we understand that ecological survey work may need to be postponed or undertaken using a risk-based approach. The Government has released [guidance](#) for ecologists carrying out field survey or mitigation works during the coronavirus pandemic. CIEEM has also published [Guidance on Ecological Survey and Assessment in the UK During the Covid-19 Outbreak](#). This is a tool which is intended to help ecologists undertake ecological survey and assessments during the restrictions necessitated by the Covid-19 outbreak.

Council's Ecological and Waste Advisor – Response 4.

The applicant has submitted additional information, Bat Survey Report (*Anser Ecology, 23/08/2021*) in accordance with Core Strategy Local Plan policy CS20. I advise that the survey is acceptable.

⁴ Collins J (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd edition, Bat Conservation Trust ISBN-13: 978-1-872745-96-1

Bats

Roosting

The updated emergence and re-entry survey were conducted by suitably qualified ecologists on 18th July and 5th August respectively (*Anser Ecology, 23/08/2021*). The report states that no bats were recorded emerging from, or re-entering, the building during the updated surveys. The Council **does not** need to consider the proposals against the three tests (Habitats Regulations). See comments below and Part Two.

As a precautionary approach, I advise that the building is demolished removed during the November and February. If this is not possible a licensed bat ecologist is required to directly supervise the removal of the roof as set out within the Recommendations section of the survey report (*Anser Ecology, 23/08/2021*). This can be secured by a suitably worded planning condition.

The report categorises the building as having high suitability for roosting bats and this habitat will be lost to facilitate development. To compensate for this loss, I advise that bat box provision recommended in section 5.6 of the survey report (*Anser Ecology, 23/08/2021*) is secured by a suitably worded planning condition.

Foraging

Habitats adjacent to the site provide foraging habitat for bats. Lighting for the development may affect the use of this area. A lighting scheme can be designed so that it protects ecology and does not result in excessive light spill onto the area in line with NPPF (paragraph 180). This can be secured by a suitably worded planning condition. It would be helpful for the applicant to refer to *Bat Conservation Trust website* <https://www.bats.org.uk/news/2018/09/new-guidance-on-bats-and-lighting>

Part Two

The applicant, their advisers and contractors should be made aware that if any bat species are found, then as a legal requirement, work must cease and advice must be sought from a licensed specialist.

Any landscaping on site should be with native tree and shrub species. These include:

- Willow (*Salix* spp.);
- Rowan (*Sorbus aucuparia*);
- Birch (*Betula pendula* or *B. pubescens*);
- Hawthorn (*Crataegus monogyna*);
- Blackthorn (*Prunus spinosa*);
- Alder (*Alnus glutinosa*); and
- Holly (*Ilex aquifolium*).

Council's Ecological and Waste Advisor – Response 5.

Bats

The applicant has submitted an Update Statement (Nocturnal Bat Survey 21/06/2023, Answer Ecology, undated, AE29-RO3) which includes the results of a single dusk emergence survey of 16/06/2023 supplemented with thermal camera at an area obscured by vegetation.

I advise that whilst the single 2023 emergence survey is not in line with Bat Conservation Trust guidelines for a high conservation roost (three surveys) it can be accepted alongside the 2019 and 2021 surveys to show consistency in bat usage and to confirm no roosting on site over a number of years. The survey and the Update Statement are accepted.

The report states that no evidence of bat use or presence was found. The Council does not need to consider the proposals against the three tests (Habitats Regulations).

The report categorises the building as having high suitability for roosting bats and this habitat will be lost to facilitate development. To compensate for this loss, I advise details of bat boxes (e.g. number, type and location on an appropriately scaled plan) that will be erected on the site be provided to the Local Planning Authority for agreement. This can be secured by the following planning condition:

CONDITION

The development hereby permitted shall not be occupied until details of bat boxes to include number, type and location on an appropriately scaled plan as well as timing of installation, has been provided for approval and implemented in accordance with those details

Bats – informative text.

The applicant, their advisers and contractors should be made aware that if any European protected species are found, then as a legal requirement, work must cease and advice must be sought from a licensed specialist.

Lead Local Flood Authority – Response 1

After reviewing 20/00476/FUL planning application, the LLFA has found the following:

- The site is approximately 0.22ha in size and is a brownfield site comprising the Carnegie Library and Waterloo Centre.
- The proposed development for refurbishment of the existing library building to provide a new Community Hub, and erection of 36 one bedroom apartments, with associated access, parking and landscaping.
- The proposed development site is classed as 'More vulnerable', according to the Table 2 of the *Planning Practice Guidance: Flood Risk and Coastal Change* (paragraph 66).

- The applicant has provided the following relevant documents:
 - o *Design Access Statement*, prepared by Pozzoni Architecture, revision A, dated 09.06.2020;
 - o *Site Investigation* report, prepared by Earth Environmental & Geotechnical, reference number A3501/20, dated August 2020;
 - o *Drawing Planning – Existing Site*, number 1100, prepared by Pozzoni Architecture, dated 14/05/20;
 - o *Drawing Planning – Proposed Site Plan*, number 1102, prepared by Pozzoni Architecture, dated 14/05/20;
 - o *Drawing Occupancy Floor Plan*, number 1103, prepared by Pozzoni Architecture, dated 14/05/20;
 - o *Drawing Planning – Proposed Elevations*, number 1350, prepared by Pozzoni Architecture, dated 14/05/20;
- No information on proposed management of surface water management has been provided.
- Records show this site is located within Flood Zone 1 (according to Environment Agency's *Flood Map for Planning*) and within very low surface water flood risk according to the Environment Agency's *Long Term Flood Risk Map*.
- Records show that the closest watercourse is Bridgewater Canal, located approximately 145m south of the site, and the Manchester Ship Canal, located 195m north of the site.
- The Halton Borough Council Strategic Flood Risk Assessment shows the site is located outside of a Critical Drainage Area.

Based on the above, the LLFA considers the applicant has not adequately assessed the site with regards to the drainage hierarchy.

The LLFA would require the following information to be provided, in a form of a drainage strategy:

- Proposed surface water discharge point, following the hierarchy of preference (as per the *Planning Practice Guidance*):
 - o Infiltration – based on the *Site Investigation* report, it is unlikely that infiltration is viable on site;
 - o Watercourse – as stated before, the closest watercourse is Bridgewater Canal. However, considering the distance to the site and presence of existing infrastructure, it's unlikely that this discharge point will be feasible;
 - o Surface water sewer – records show there are no surface water sewers in the area;
 - o Combined sewer – records show there is a combined sewer running along Waterloo Road (adjacent to western site boundary).
- Proposed discharge rate - appropriate discharge rates should be calculated for 1, 30 and 100yr flood events for use in drainage design. In line with NPPF this should be attenuated to Greenfield rates for greenfield sites/site area, and as

close as possible to greenfield rates for brownfield areas. Climate change should be considered appropriately.

- Proposed drainage layout, indicating runoff areas and calculations provided including attenuation. Interceptors/filtration may also be deemed appropriate in accordance with SUDS hierarchy/guidance.
- Details of the implementation, maintenance and management of the sustainable drainage (SuDS) scheme for the disposal of surface water in accordance with the SuDS hierarchy. This should be reported within the Drainage Strategy, this should include the following details:
 - A management and maintenance plan for the lifetime of the development which shall include the arrangements for i) drainage to soakaway, including calculations and arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime or ii) if i) not feasible connection to any system adopted by, any public body or statutory undertaker.
 - Interceptors, attenuation structures and calculations to demonstrate a reduction in surface water runoff rate to greenfield runoff rates for the new hardstanding areas as a minimum, with additional improvements for existing runoff where practical. Calculation should demonstrate no flooding to buildings in the NPPF design event (1 in 100 year + 40% climate change allowance).
 - Consultation with the Environment Agency and assessment of safe access and egress to the site.

The applicant has not provided sufficient details for the LLFA to make an informed decision on this planning application. The LLFA would therefore object to the application as proposed and would recommend the applicant provides the information and documents detailed above.

Lead Local Flood Authority - Response 2.

After reviewing 20/00476/FUL planning application the LLFA has found the following:

- The planning application boundary is stated to be 0.2ha.
- The proposed development would include residential dwellings. These are classified as “More Vulnerable” Development with regard to flood risk.
- The development area is shown to have a very low fluvial, tidal and surface water flood risk on the Environment Agency Long Term Flood Risk Maps. It is also outside of any critical drainage areas (CDA) as recorded in Halton BCs strategic flood risk assessment.
- Information presented with regard to flood risk and drainage is limited to statements within the design and access statement. It is identified that the site is within flood zone 1 and is at low risk of flooding and it is stated that the drainage design would include a sustainable drainage strategy for the building.

- No other information in relation to flood risk or drainage appears to have been included as part of the planning submission.

The LLFAs comments on the application are:

- As the development is less than 1ha and is within Flood Zone 1. No flood risk assessment is required and the LLFA agrees that the development would be suitable in terms of flood risk.
- A drainage strategy would be required to support the planning application prior to the commencement of construction. This strategy should demonstrate that the risk of surface water flooding to the development would remain low for its design life and that it would not increase flood risk elsewhere.

The LLFA would recommend the following conditions should the local planning authority be minded to approve the application on this basis.

No development should commence until a surface water drainage strategy is submitted to demonstrate that the development would comply with local and national policy regarding flood risk.

- The drainage strategy should follow SUDS hierarchy – i.e. discharge locations should be considered in the following order –
 - o Soakaway,
 - o Watercourse,
 - o Surface Water Sewer,
 - o Combined Sewer.
- Infiltration tests are required to demonstrate whether soakaway is feasible. It should be noted that United Utilities also apply this strictly, and detailed consideration of the hierarchy will need to be demonstrated in supporting documentation.
- Appropriate discharge rates should be calculated for 1, 30 and 100yr flood events for use in drainage design. In line with NPPF runoff should be attenuated to greenfield rates for greenfield sites/site area, and as close as possible to greenfield rates for brownfield areas (Halton BC SFRA requires minimum 50% reduction from existing). Climate change should be considered appropriately with a 40% increase in rainfall intensity applied.
- A conceptual drainage layout should be prepared indicating runoff areas and calculations provided including attenuation. Interceptors/filtration may also be deemed appropriate in accordance with SUDS hierarchy/guidance.

No development shall be occupied until a verification report confirming that the SuDS system has been constructed in accordance with the approved design drawings (including off site alterations) and in accordance with best practice has been submitted to and approved by the local planning authority. This shall include:

- Evidence that the SuDS have been signed off by an appropriate, qualified, indemnified engineer and are explained to prospective owners & maintainers plus information that SuDS are entered into the land deeds of the property.

- An agreement that maintenance is in place over the lifetime of the development in accordance with submitted maintenance plan; and/or evidence that the SuDS will be adopted by third party.
- Submission of 'As-built drawings and specification sheets for materials used in the construction, plus a copy of Final Completion Certificate.

Conservation Advisor – Response 1.

I have dealt with the 3 elements of the proposal sequentially below.

Demolition of the Waterloo Building

As previously advised there needs to be a robust justification to remove the Waterloo Building. It is noted that the listing description for the Carnegie Library explicitly excludes Waterloo, however this is in the national context. Locally, it is part of the evolution of Runcorn and has, during its lifetime, served as the civic core. Waterloo House, therefore, is of local significance and is worthy of local listing.

The significance of Waterloo house is derived from the following heritage values:

Historic value - HIGH

Association with the industrial development of Runcorn – it was constructed for Charles Hazelhurst of Hazelhurst and Sons, a prominent manufacturing family in the town.

Use as Town Hall following creation of the Improvement Commissioners in 1852

Housing of first Public Library in Runcorn.

Clear historic connection with Carnegie Library both physically and in terms of historic uses.

Evidential value – HIGH

Evidence of the development of the immediate area as a civic centre

Map evidence shows Waterloo House in use as a library, then Town Hall, and a Technical Institute to the north of Waterloo House(now lost)

Purposeful design of Carnegie Library to abut Waterloo house – then in use as Town Hall (circa 1907).

Aesthetic value – MEDIUM

Early Victorian building constructed of red brick with detailed stone coursing and parapet.

The house is of five bays and takes on elements of the Georgian order and symmetry in its fenestration.

Although pre-dating the library Waterloo house makes a positive contribution to the setting of the Grade II listed library.

As such, there are reasonable grounds to consider it is a non-designated heritage asset.

It is noted that the Amenity Societies (SAVE and AMS) clearly consider the building to be of local importance within their earlier comments.

Halton does not have local list or a current policy in relation to non-designated heritage assets. I note one is proposed within the emerging local plan. As such, the NPPF must be followed. Paragraph 197 of the Framework states;

‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’

The heritage statement submitted with the application focuses heavily on the Grade II listed Carnegie Library, and the impact of the proposal on the setting of this heritage asset but fails to consider the local significance of Waterloo House. The report concludes that the proposed development, as a result of the demolition of Waterloo House, would have a slight beneficial impact on the setting of the Carnegie Library. I would disagree with this conclusion (detailed further below) and further state that as the significance of Waterloo house has not been duly considered and therefore not justified.

Furthermore, the application documents state that the building has been declared unsafe by the Council however this in itself does not justify the demolition of the building.

As such it is considered there would be substantial harm to this non-designated heritage asset by virtue of its demolition, as well as less than substantial harm to the setting of the Carnegie Library.

Proposed Development

The application proposes the construction of a large building and associated access, landscaping to form a 36 bed care facility. There is some inference within the heritage statement that the proposed development should be considered as enabling development to facilitate the renovation and re-opening of the Library building as a community hub.

The renovation and re-use of the Grade II Library building is welcomed and will bring with it a number of positive benefits both to the historic building and the community in continuing the philanthropic work its original benefactor, Andrew Carnegie.

However, the suggestion of enabling development is questioned here. Policy BE11 and of the HBC Local Plan and Para 202 of the NPPF deal with enabling development and place great emphasis on ensuring that the proposed enabling development would secure the conservation of the development and outweigh any harm or departure from development plan policies.

Policy BE 11 states that enabling development will only be permitted where it meets a number of criteria including

- A. The enabling development will not materially detract from the archaeological, architectural, historic or landscape interest of the asset, or materially harm its setting.
- F. It is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the heritage asset and that its form minimises disbenefits.

1, It is considered that proposal would materially harm the setting of the adjacent listed building for the following reasons:

- The Design and Access statement submitted with the proposal makes very little reference to the character of the area or the consideration of the setting of the Grade II listed Library as described in the Kathryn Sather and Associates Heritage Statement. A number of design precedence images are provided at pg 63 of the DAS but, again, there is no narrative demonstrating how the design evolution has considered the setting of the heritage asset.
- The proposal presents a large linear block which dwarfs the library building through its scale and massing. This may be trying to emulate the surrounding terrace housing form but results in the building dominating the street scene and failing to integrate itself into its setting.
- A mansard style roof with dormer windows is being utilised to create additional floor space within the roof – these features are uncharacteristic of the simple roof forms of the surrounding built environment.
- The east/west elevational treatments present a broad flat elevation increasing the building's visual scale – these elevations could benefit from being broken up to better fit the context and create interest.
- The Egerton Street elevation is poorly considered. Although an entrance is proposed to this elevation the solid to void ratio within the fenestration creates a discordant and in-active frontage. This combines with the setting of this elevation to the back of pavement creates a poor relationship with the adjacent library building, with the proposal dominating the form of the library and detrimentally impacting how the library is experienced.
- The proposed building seems confused at this corner as a change in design is introduced to include a square tower-like feature within dappled brickwork creating a discord within the building. This does not allow the building to turn the corner in an appropriate or sympathetic manner, producing a very hard edge to the building. This not only changes the spatial relationship of the proposed building to the street, but also intensifies its visual dominance to the detriment of the library's setting. It is considered that this section could benefit from being pulled back from the pavement edge, softening the corner and better revealing and framing the library.

2, It has not been demonstrated that the proposal is the minimum necessary to secure the future of the Library.

As such, the proposal does not meet the criteria of policy BE11 of the HBC Local Plan and would cause harm to the setting of the heritage asset for the reasons set out above and cannot be considered as enabling development.

The proposal fails to respond positively to its context – the predominant built form and the setting of the heritage asset – due to its scale, form, massing, and design treatment.

Works to Carnegie Library

The below comments are based on the description of works set out at para 6.2 of the Heritage Statement.

Roof

- Once survey completed a repair schedule should be submitted for review.

Walls (exterior)

- Again, following survey completion a repair schedule and method statement for the stone and brick work should be provided.
- If demolition is permitted then details of the proposed works to make good/resolve the loss of the junction between the buildings will need to be provided for consideration.
- Ground floor west wall – details of treatment should be provided.

RWG

- Acceptable.

Windows and doors

- Bespoke methodology should be provided as set out in the HS.
- Front door design will require elevation and section plans
- Details of additional windows and doors will also need to be submitted

Interior

- A room by room schedule of works to include photographs and methodology should be submitted.

Position

It is not considered that the local significance of Waterloo House and its status as non-designated heritage asset has been fully addressed within the application. Therefore, a robust case for its demolition has not been made. Its demolition cannot be supported.

(Should the Council consider the demolition to be acceptable then a programme of building recording should be required at Level 2 as set out in the Historic England Guidance – Understanding Historic Buildings: A guide to Good Recording Practice)

The proposed building is inferred as enabling development to facilitate the renovation and re-opening of the Carnegie Library as a community hub. Whilst the re-use of the currently vacant library is supported and welcomed, the proposal has not demonstrated it meets the requirements of enabling development. Furthermore, the proposed building is considered to be detrimental the setting of the Grade II listed

library by virtue of its scale, mass, siting, and design treatment and cannot be supported in its current form.

The works to the Grade II Library are supported subject to the submission of additional details as set out above.

As such it is recommended that the application be refused.

Conservation Advisor – Response 2.

We have assessed this application and are of the opinion that Planning Permission should be refused.

The application proposes the demolition of the Waterloo Building, a non-designated heritage asset, and the construction of a large residential building with access, parking, and ancillary facilities. The proposal also covers the adjacent Carnegie Library, a Grade II listed building. It is proposed to refurbish the Library and provide a community hub. The proposed works to the Carnegie Library are dealt with by separate listed building consent.

The key issues for consideration are the acceptability of the proposed demolition of Waterloo Building taking into account its significance as a building of high local importance, and its current condition. The impact of the proposed development on the character of the area and on the setting of Carnegie Library.

The significance of Waterloo House is derived from its special architectural interest as a fine example of a Georgian townhouse, as well as its local historic interest as Runcorn's former town hall and the first free library in the town. This significance has been described appropriately within the updated Heritage Impact Assessment by Nexus Heritage. It is also noted that the building has been submitted for inclusion on the emerging Cheshire Local List.

The applicant has submitted that the condition of Waterloo House has degraded to such a degree that demolition is now the only viable option. A structural and condition survey has been undertaken on behalf of the Local Authority by Woodbank Consulting. This also concludes that the building is so severely affected structurally that it is beyond repair and should be demolished. The condition of the building is agreed by both the Local Authority and the applicant. In this regard, demolition would be appropriate due to the risk of collapse identified.

However, despite the physical condition of the building which has had a detrimental impact on the visual appearance of the building its aesthetic value remains high. We would concur with the findings of Nexus report in relation to the other heritage values of evidential – moderate/high, historical – high, and communal- moderate. The building is of moderate overall significance. Therefore, the proposed demolition would result in substantial harm to a heritage asset of moderate significance. It would also result in a

lower level of less than substantial harm to the setting of the Grade II listed Carnegie Library.

The proposed design would have a demonstrably different relationship to the street frontages, the adjacent Carnegie Library, and the surrounding buildings. The buildings entrance would be situated on Egerton Street, completely altering the orientation of the site from its historic form. This completely removes any activity and interrelationship with Waterloo Road. Not only the longest boundary to the site but removing any reference to the historic access points within the site evidenced through the orientation of Waterloo House and the former Technical College (now lost). The building is still very much read from Waterloo Road but fails to address this frontage satisfactorily.

The proposed building would be a large singular block punctuated at rhythmic intervals by full height glazing. Whilst this does help the design to follow the clear horizontal emphasis evident in the surrounding built form, the lack of response to the topography of the site creates a building of such great mass it dominates its surroundings.

The Egerton Street elevation remains poorly considered despite a replacement of a solid second story with a balcony. The seemingly random openings within this elevation combined with the width of the building create a poor visual and spatial relationship with the adjacent library building, with the proposal dominating the form of the library and detrimentally impacting how the library is experienced.

The mansard style roof with full length dormer windows being utilised to create additional floor space within the roof presents features that are uncharacteristic of the simple roof forms of the surrounding built environment. The southern end of the roof becomes hipped, in comparison to the northern end which finished in a gable. This detail seems slightly contrived in an attempt address the buildings dominance over the library at this juncture.

The proposal fails to respond positively to its context due to its scale, form, massing, and design treatment. The setting of the Carnegie Library would be harmed.

The renovation and re-use of the Grade II Library building is welcomed and will bring with it several positive benefits both to the historic building and the community in continuing the philanthropic works of its original benefactor, Andrew Carnegie

Impact

The proposal would result in total loss, substantial harm, of a non-designated heritage asset of moderate significance. Potential to mitigate this loss should be explored for example, would naming the new building Waterloo House preserve the memory of the asset? Creating some heritage interpretation, as well as design review to lessen the impact on setting of other buildings, as well as creating a more appropriate relationship to the character of the surrounding area.

The proposal would result in a low/moderate level of less than substantial harm to the setting of the Grade II Carnegie Library both because of the loss of Waterloo House, and the impact of the proposed development.

Conclusion

For the reasons set out above, we recommend that Planning Permission should be refused

Conservation Advisor – Response 3

I have discussed the additional documentation with the team. The team have concluded that although it goes some way to addressing the justification for the demolition of Waterloo House, as discussed at the meeting last year, it is not complete in demonstrating that all the options have been explored.

The additional document looks at the inclusion of Waterloo House into the proposed scheme by considering the approach to achieving the floor to ceiling heights and the level floor plates required for the type and use of the proposed building. One of the main arguments they present is that floors would cross over existing windows. Deeming this to be unacceptable. We would not consider this to be an immediate dismissal as there are ways to treat floor edgings as they cross windows for example. They also refer to the internal layout of Waterloo House being unsuitable for their proposed use, but this could be completely stripped out.

Furthermore, they have not demonstrated anything other than the current design in terms of layout on the site. I recall discussing at the meeting that splitting the buildings was not an ideal solution but this was not articulated in the options appraisal.

We have acknowledged previously that the likely outcome due to a combination of the degradation of the building and the associated costs to retain and repair the building in its full form would be to support demolition, based on the structural reports undertaken by both parties and the viability information supplied by the applicant. However, at present I am not aware that the Council has undertaken their own assessments in terms of costs to retain the building in whole or part. Is there any update on this?

The conclusion remains that, the total loss of Waterloo House would result in substantial harm. I do not consider that, despite the conclusions of the current surveys and the additional information submitted, that the requirements of Policy HE2 Part 12 have been satisfied. But this is for you to balance out!

Environmental Protection – Response 1

This development is situated in a predominantly residential area, on the edge of Runcorn town centre. The west boundary of the site is located approximately 70m from the Queensway (A533) flyover leading from the Silver Jubilee Bridge.

The proximity to the Queensway flyover could give rise to unacceptably high noise levels within the development properties, particularly to those on the 2nd floor and

towards the north of the proposed development, who may have an unobstructed line of sight to the flyover given their elevated position.

It is noted that this application does not include an acoustic report. However as the Silver Jubilee Bridge is currently closed to traffic, having such a report produced at this moment in time would not capture the true background noise level that would likely apply in the long term.

It would therefore be appropriate that prior to first occupation, the applicant commission an acoustic report, to ensure that noise levels inside the development properties do not exceed those specified in BS 2823:2014. If this report recommends any specific mitigation to achieve these levels, they will need to be implemented in full.

In addition to the above, we would also seek to ensure that construction activity is carried out at appropriate times.

Conclusion

Environmental Health has no objection to the application, subject to the following conditions being applied, in the interests of residential amenity;

- All noise generative construction activity should be restricted to the following hours;
 - Monday – Friday 08:00 to 18:00 hrs
 - Saturday 09:00 to 14:00 hrs
 - Sundays and Public Holidays Nil
- Prior to first occupation, an acoustic report shall be produced which demonstrates noise levels within the new residential units do not exceed the limits specified in BS 2823:2014, namely;

Area	07:00-23:00	23:00-07:00
Living Rooms	35 dBLAeq,16-Hour	--
Dining Rooms	40 dBLAeq,16-Hour	--
Bedrooms	35 dBLAeq,16-Hour	30 dBLAeq,16-Hour

Environment Protection – Response 2

Comments

As these four applications concern the same development site, please accept this response for all the above listed applications. Although there are different applicants, the proposed construction and demolition phase conditions will apply equally to them.

The proposed operational phase conditions will apply only to 20/00476/FUL.

Noise

This development is situated in a predominantly residential area, on the edge of Runcorn town centre. The west boundary of the site is located approximately 70m from the Queensway (A533) flyover leading from the Silver Jubilee Bridge.

The proximity to the Queensway flyover could give rise to unacceptably high noise levels within the development properties, particularly to those on the 2nd floor and towards the north of the proposed development, who may have an unobstructed line of sight to the flyover given their elevated position.

It is noted that 20/00476/FUL does not include an operational phase acoustic report. At the time of the submission of this application the Silver Jubilee Bridge was closed to traffic, and so an acoustic report submitted at this time would have had little relevance to the future noise levels that the occupants would be exposed to.

Given that the Silver Jubilee Bridge is now fully reopen however it would now be possible to conduct an acoustic risk assessment as described in ProPG: Planning & Noise (May 2017). This will advise the applicant that if a full acoustic report and subsequent scheme of mitigation is required to ensure that noise levels inside the development properties do not exceed those specified in BS 2823:2014.

In addition to the above, we would also seek to ensure that for all applicants, construction and demolition activity is carried out at appropriate times

Air Quality

No applicant has submitted an air quality assessment with their application. Whilst we would not require an operational phase report for a development of this size, appropriate consideration must be given to dust management during the construction and demolition phase of the development, particularly given the scale of demolition

works taking place and built up nature of the area immediately surrounding the development site. This dust management plan should adhere to the principles set out in 'Guidance on the Assessment of Dust from Demolition and Construction' published by the Institute of Air Quality Management.

Conclusion

Environmental Health has no objection to the applications, subject to the following conditions being applied, in accordance with Policy GR2 of the Halton Delivery and Allocations Plan, paragraph 185 of the National Planning Policy Framework 2021 plan and in the interests of residential amenity;

Construction and demolition phase – All applications;

- All construction & demolition activity should be restricted to the following hours;
- Monday – Friday 07:30 to 19:00 hrs
- Saturday 07:30 to 13:00 hrs
- Sundays and Public Holidays Nil
- Prior to the commencement of the construction and demolition phase, the applicant shall produce a Dust Management Plan, adhering to the principles set out in 'Guidance on the Assessment of Dust from Demolition and Construction' published by the Institute of Air Quality Management.

Operational Phase - 20/00476/FUL only

- Prior to first occupation, an acoustic risk assessment as described in ProPG: Planning & Noise (May 2017) Shall be undertaken and if deemed necessary an acoustic report shall be produced which demonstrates noise levels within the new residential units do not exceed the limits specified in BS 2823:2014, namely;

Area	07:00-23:00	23:00-07:00
Living Rooms	35 dBLAEQ,16-Hour	--
Dining Rooms	40 dBLAEQ,16-Hour	--
Bedrooms	35 dBLAEQ,16-Hour	30 dBLAEQ,16-Hour

And if this acoustic report recommends a scheme of mitigation to ensure these levels are achieved, it shall be implemented in full

Open Spaces Officer – Response 1.

The proposed site encompasses an area of HBC managed green space which will be lost to this development.

Trees

There are no formal tree constraints on site, and the site is not within a Conservation Area.

Trees T9 and T10 are part of HBC managed green space and will be removed as part of the plans suggested in this application. This is acceptable subject to re-planting.

The '*Tree Protection Plan*' and '*Arboricultural Impact Assessment*' maps identify that the trees located on the eastern boundary of the site have their Root Protection areas compromised by the plans shown on the 'Planning – Proposed Site Plan' map.

Trees T1, T3 and T7's RPA's will be particularly affected and encroached on by the proposed car park and communal garden.

Further information is required on what methods the developer will use in the construction of the site, taking RPA's into consideration as none have been submitted.

Tree work shall be carried out strictly in accordance with British Standard 3998:1989 "Recommendations for Tree Work" to safeguard the health and visual amenity of the tree and that the consent shall be valid for a period of two years from the date of this notice.

Work shall not be carried out between April and September if it would result in disturbance to nesting birds.

Open Space Officer – Response 2.

The proposed site encompasses an area of HBC managed green space which will be lost to this development.

Trees

There are no formal tree constraints on site, and the site is not within a Conservation Area.

Trees T9 and T10 are part of HBC managed green space and will be removed as part of the plans suggested in this application. This is acceptable subject to re-planting.

The '*Tree Protection Plan*' and '*Arboricultural Impact Assessment*' maps identify that the trees located on the eastern boundary of the site have their Root Protection areas compromised by the plans shown on the 'Planning – Proposed Site Plan' map.

Trees T1, T3 and T7's RPA's will be particularly affected and encroached on by the proposed car park and communal garden.

A soil assessment should be undertaken by a competent person to inform decisions relating to: the root protection area (RPA), tree protection, new planting design and foundation design to take account of retained, removed and new trees (potential soil subsidence/heave).

'Arboricultural Impact Assessment & Method Statement' (Soil Assessment 6.2.1)

Seek Arboricultural advice and undertake a phase 1 preliminary tree survey in order to inform the layout and design of the proposed development.

'Arboricultural Impact Assessment & Method Statement' (Conclusions 9.1)

Tree work shall be carried out strictly in accordance with British Standard 3998:1989 "Recommendations for Tree Work" to safeguard the health and visual amenity of the tree and that the consent shall be valid for a period of two years from the date of this notice.

Work shall not be carried out between April and September if it would result in disturbance to nesting birds.

Hedgerows

There are no hedgerow constraints on site.

Ecology

In order to mitigate risk of high Potential Roost Features (PRF) it is recommended that the clients agree a soft –lift roof strip strategy on the high risk areas of the building, under the supervision of a Suitable Qualified Ecologist (SQE).

'Bat Survey Report 2021 Waterloo Community Centre Runcorn'

There is no requirement for a Protected Species Licence.

The preferred option that demolition works be conducted outside of the active season for bats (i.e. November to end of February).

'Bat Survey Report 2021 Waterloo Community Centre Runcorn' (Recommendation 5.2)

Suitable bat boxes should be included in the building designs on both northerly and southerly aspects for varied climatic roost opportunities.

It is recommended that House Sparrow and Common Swift species are supported on this project through the provision of suitable nest box opportunities.

'Bat Survey Report 2021 Waterloo Community Centre Runcorn'. (Recommendation 5.7)

A significant number of birds were associating with the vegetation at the rear of the site, including a Siberian Chiffchaff – a scarce winter warbler. It is important that the site is inspected for breeding birds prior to demolition. It is further advised that the vegetation is cleared during the winter period. If this is not possible, then an ecologist will need to be appointed to carry out nesting bird checks before vegetation is removed.

'Ecological Statement Update Waterloo Centre Runcorn JCE ES04-1120' (Recommendation 1.9)

If this proposal is successful, we would recommend that all works comply with current bird nesting legislation.

Wildlife and Countryside Act 1981 Part 1 Section 1 (1)

Consult W&C Act 1981 (with amendments) for full details of protection afforded to wild birds.

Natural England – Response 1

Habitat Regulations Assessment (HRA) Screening required

For residential development in this area, proportionate assessment of recreational disturbance impacts on the coastal designated sites resulting from the development is required via the Screening stage of the Habitats Regulations Assessment, as required under the Conservation of Habitats and Species Regulations 2017 ('the Habitat Regulations').

Under Regulation 63 of the Habitat Regulations the determination of likely significant effect is for the competent authority, in this case the Local Planning Authority. If your authority can be satisfied that the proposal can conclude no likely significant effects there is no further need to consult Natural England.

Where the HRA Screening cannot rule out a likely significant effect on the coastal designated sites then an Appropriate Assessment is required, of which Natural England is a statutory consultee, please consult us again at this stage.

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of further comment from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Natural England – Response 2.

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 16 September 2020 – ref. 327518 which I have attached for your reference.

The advice provided in our previous response applies equally to this **amendment** although we made no objection to the original proposal.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed

will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Natural England – Response 3

Habitat Regulations Assessment (HRA) Screening required

For residential development in this area, proportionate assessment of recreational disturbance impacts on the coastal designated sites resulting from the development is required via the Screening stage of the Habitats Regulations Assessment, as required under the Conservation of Habitats and Species Regulations 2017 ('the Habitat Regulations').

Under Regulation 63 of the Habitat Regulations the determination of likely significant effect is for the competent authority, in this case the Local Planning Authority. If your authority can be satisfied that the proposal can conclude no likely significant effects there is no further need to consult Natural England.

Where the HRA Screening cannot rule out a likely significant effect on the coastal designated sites then an Appropriate Assessment is required, of which Natural England is a statutory consultee, please consult us again at this stage.

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Cheshire Constabulary – Response 1

I have reviewed the above plans for Carnegie Library, on speaking to the local offices they see the redevelopment in positive light and believe that it will assist with reducing crime and antisocial behaviour (currently the main crime issues) in the local area:-

I have listed the main points below for consideration:-

- There is a limited defensible space round the perimeter of the building
- I would recommend P1A glass for all ground floor and vulnerable windows, all doors and windows should be PAS 24:2016 or equivalent
- I would recommend that the railings to the west boundary are not easy to climb over. They should be a minimum of 1.2 metres.
- The main entrance systems should be covered with a video door entry system especially the entrance at the top of Waterloo Road which lacks natural surveillance.
- It is good to see there is a secure gate to the vehicle entrance.
- The communal garden needs to be well managed and ideally covered by CCTV. All trees and shrubs need to be well maintained. Bushes need to be a maximum of 1 metre and the trees above 2 metres to allow a clean line of sight.

Cheshire Constabulary – Response 2

I have reviewed the plans for the Carnegie Library and see not much appears to have changed with security, my priorities for consideration would still be:-

- The height of the secure access gates into the rear garden / how access is controlled and ensuring there are no climbing aids within the structure of the gate.
- The glazing on the exposed elevations should be P1A
- Consideration should be given to the width of the recessed doorway off Egerton Street. Where possible I would recommend such recesses are less than 600mm to discourage loitering.
- Appropriate lighting should also be in place to enhance natural surveillance and any CCTV coverage. Lights should comply to BS 5489:1-2020
- I would recommend each apartment is fitted with a PAS 24:2016 door set and 24 hour lighting (switched using a photoelectrical cell) should be fitted to all internal communal areas. Ground floor windows should also be fitted with locks and limiters
- An internal access control system complying to UL293 should be fitted so areas can be zoned and tenants just given access to areas they need to be in, the communal areas, scooter store and refuse should all be included.

I have also reviewed the statistics for the Mersey Ward over the last twelve months which are shown below:-



Cheshire Constabulary – Response 3.

My comments made in April 2022 have not changed:-

- The height of the secure access gates into the rear garden / how access is controlled and ensuring there are no climbing aids within the structure of the gate.
- The glazing on the exposed elevations should be P1A
- Consideration should be given to the width of the recessed doorway off Egerton Street. Where possible I would recommend such recesses are less than 600mm to discourage loitering.
- Appropriate lighting should also be in place to enhance natural surveillance and any CCTV coverage. Lights should comply to BS 5489:1-2020
- 24-hour communal lighting should be fitted to all internal communal areas.
- I would recommend each apartment is fitted with a PAS 24:2016 door set (or new upgraded PAS 24:2022 version)
- Ground floor windows should be fitted with locks and limiters.
- An internal access control system complying to UL293 should be fitted so areas can be zoned and tenants just given access to areas they need to be in, the communal areas, scooter store and refuse should all be included.
- I would ask for clarification that the recess indicated below is less than 600mm deep to discourage loitering and to ensure natural surveillance is not restricted
- I would also recommend that mitigations are put in place to ensure that the fence at the front of the block does not become a seating area, consideration could potentially be given to using prickly bushes instead.

General Information for Applicants

A design objective of the National Planning Policy Framework [NPPF], - Section 8, paragraph 92b states that planning policies and decisions should aim to achieve healthy, inclusive, and safe places which:

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example using attractive, well-designed, clear, and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas.

I recommend that all developments be designed to comply with the principles of Secured by Design (SBD) regardless of whether the award is being pursued. I would however welcome a Secured by Design Application for the scheme, which would enhance the development and provide greater benefits.

Applicants can get more information about Secured by Design (including Design Guides) available at www.securedbydesign.com. A summary of the relevant awards taken from the Design Guide is shown below: -

Silver

a) This award is issued by Secured by Design in recognition of the use of 'Police Preferred Specification' doorsets and windows and the steps taken to reduce the opportunity for crime and anti-social behaviour within and against the building(s) only. This award also provides evidence of compliance with Building regulations for domestic security in England, Scotland, and Wales.

b) This award is issued by Secured by design in recognition of the achievement to design out crime within the development. It acknowledges the measures taken to reduce the opportunity for crime and antisocial behaviour by improved layout, environmental design and the use of bespoke security enhanced door and window products. This award also provides evidence of compliance with Building regulations for domestic security in England, Scotland, and Wales.

Gold

This award is issued by Secured by design in recognition of the achievement to design out crime within the development. It acknowledges the measures to reduce the opportunity for crime and antisocial behaviour by improved layout, environmental design, and the use of Police Preferred Specification products. This award also provides evidence of compliance with Building regulations for domestic security in England, Scotland, and Wales'

Applicants for new developments also need to consider the carbon cost of crime. 'Destruction or theft of property requiring its replacement, and criminal harms to people requiring treatment, and the energy cost of both in emergency services and criminal justice response to crime events, taken together, represent the carbon cost of crime.'

Crime Prevention advice is given free without the intention of creating a contract. Cheshire Constabulary does not take any legal responsibility for the advice given; however, if the advice is implemented, it will reduce the opportunity for crimes to be committed. Cheshire Constabulary is unable to recommend specific companies for

security products. We do however recommend that you visit www.securedbydesign.com which gives details of products meeting Association of Chief Police Officers Approval.

United Utilities

Drainage

In accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), the site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way.

We request the following drainage conditions are attached to any subsequent approval to reflect the above approach:

Condition 1 – Surface water

Prior to the commencement of any development, a surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance with evidence of an assessment of the site conditions shall be submitted to and approved in writing by the Local Planning Authority.

The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards. In the event of surface water draining to the combined public sewer, the pass forward flow rate to the public sewer must be restricted to 7 l/s.

The development hereby permitted shall be carried out only in accordance with the approved drainage scheme.

Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution. This condition is imposed in light of policies within the NPPF and NPPG.

Condition 2 – Foul water

Foul and surface water shall be drained on separate systems.

Reason: To secure proper drainage and to manage the risk of flooding and pollution.

The applicant can discuss any of the above with Developer Engineer, Matthew Dodd, by email at wastewaterdeveloperservices@uuplc.co.uk.

Please note, United Utilities are not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local Flood Authority and / or the Environment Agency (if the watercourse is classified as main river).

If the applicant intends to offer wastewater assets forward for adoption by United Utilities, the proposed detailed design will be subject to a technical appraisal by an Adoptions Engineer as we need to be sure that the proposal meets the requirements

of Sewers for Adoption and United Utilities' Asset Standards. The detailed layout should be prepared with consideration of what is necessary to secure a development to an adoptable standard. This is important as drainage design can be a key determining factor of site levels and layout. The proposed design should give consideration to long term operability and give United Utilities a cost effective proposal for the life of the assets. Therefore, should this application be approved and the applicant wishes to progress a Section 104 agreement, we strongly recommend that no construction commences until the detailed drainage design, submitted as part of the Section 104 agreement, has been assessed and accepted in writing by United Utilities. Any works carried out prior to the technical assessment being approved is done entirely at the developers own risk and could be subject to change.

Management and Maintenance of Sustainable Drainage Systems

Without effective management and maintenance, sustainable drainage systems can fail or become ineffective. As a provider of wastewater services, we believe we have a duty to advise the Local Planning Authority of this potential risk to ensure the longevity of the surface water drainage system and the service it provides to people. We also wish to minimise the risk of a sustainable drainage system having a detrimental impact on the public sewer network should the two systems interact. We therefore recommend the Local Planning Authority include a condition in their Decision Notice regarding a management and maintenance regime for any sustainable drainage system that is included as part of the proposed development.

For schemes of 10 or more units and other major development, we recommend the Local Planning Authority consults with the Lead Local Flood Authority regarding the exact wording of any condition. You may find the below a useful example:

Prior to occupation of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the local planning authority and agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum: a. Arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company; and b. Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime. The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To ensure that management arrangements are in place for the sustainable drainage system in order to manage the risk of flooding and pollution during the lifetime of the development.

Please note United Utilities cannot provide comment on the management and maintenance of an asset that is owned by a third party management and maintenance company. We would not be involved in the discharge of the management and maintenance condition in these circumstances.

Water Supply

Water pressure in this area is regulated to around 20 metres head. This should be taken into account when designing the internal plumbing.

For larger premises or developments of more than one property, including multiple connections, where additional infrastructure is required, a water network behaviour/demand modelling exercise would be required to determine the network reinforcements required to support the proposed development. With this in mind we recommend the applicant contacts us at the earliest opportunity.

Should this application be approved the applicant must contact our water fittings section at Warrington North WwTW, Gatewarth Industrial Estate, off Liverpool Road, Sankey Bridges, Warrington, WA5 1DS.

If the applicant intends to obtain a water supply from United Utilities for the proposed development, we strongly recommend they engage with us at the earliest opportunity. If reinforcement of the water network is required to meet the demand, this could be a significant project and the design and construction period should be accounted for.

To discuss a potential water supply or any of the water comments detailed above, the applicant can contact the team at DeveloperServicesWater@uuplc.co.uk. Please note, all internal pipework must comply with current Water Supply (water fittings) Regulations 1999.

United Utilities' Property, Assets and Infrastructure Where United Utilities' assets exist, the level of cover to the water mains and public sewers must not be compromised either during or after construction. For advice regarding protection of United Utilities assets, the applicant should contact the teams as follows:

Water assets – DeveloperServicesWater@uuplc.co.uk

Wastewater assets – WastewaterDeveloperServices@uuplc.co.uk

It is the applicant's responsibility to investigate the possibility of any United Utilities' assets potentially impacted by their proposals and to demonstrate the exact relationship between any United Utilities' assets and the proposed development.

A number of providers offer a paid for mapping service including United Utilities. To find out how to purchase a sewer and water plan from United Utilities, please visit the Property Searches website; <https://www.unitedutilities.com/property-searches/>

You can also view the plans for free. To make an appointment to view our sewer records at your local authority please contact them direct, alternatively if you wish to view the water and the sewer records at our Lingley Mere offices based in Warrington please ring 0370 751 0101 to book an appointment.

Due to the public sewer transfer in 2011, not all sewers are currently shown on the statutory sewer records and we do not always show private pipes on our plans. If a sewer is discovered during construction; please contact a Building Control Body to discuss the matter further.

Should this planning application be approved the applicant should contact United Utilities regarding a potential water supply or connection to public sewers. Additional

information is available on our website <http://www.unitedutilities.com/builders-developers.aspx>

Council's Archaeological Advisor

Thank you for consulting with APAS in regard to the above application, which sits within Runcorn's area of archaeological potential as outlined in the Cheshire Historic Town Survey. I can see from the supporting documentation that this application is for the refurbishment of an existing structure along with the construction of a new structure to accommodate 36 dwellings.

Having reviewed the supporting documentation, including the heritage statement provided by Kathryn Sather & Associates and the information held on the Cheshire Historic Environment Records, I can see that the area of the propose new structure has some potential for the below ground remains of the technical institute seen on the second edition OS Map.

As the new building will undoubtedly impact these remains, it would be advisable that a programme of archaeological observation is undertaken in order to identify and record these remains during key phases of development.

This programme of archaeological observation may take the form of a developer funded watching brief during key aspects of the development. These key aspect would be the initial ground clearance and excavations for foundations and services. This work may be secured by condition, a recommended wording for this is offered below:

No development shall take place within the area indicated until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority. The work shall be carried out strictly in accordance with the approved scheme.

The use of such a condition is in line with the guidance set out in Paragraphs 189 & 199, Section 16 (Conserving and Enhancing the Historic Environment) of the National Planning Policy Framework (Revised 2018), published by the Department for Communities and Local Government and Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning: 2 (Historic England 2015).

Please note that the Cheshire Archaeology Planning Advisory Service (APAS) does not carry out archaeological work and the applicants will need to appoint an archaeological contractor to organise the mitigation

Health and Safety Executive

HSE's Advice: Do Not Advise Against, consequently, HSE does not advise, on safety grounds, against the granting of planning permission in this case.

Historic England

On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

Contaminated Land Officer

I have reviewed the application and the key supporting documents and have the following comments in relation to land contamination.

The application is supported by the following;

- Site investigation, Runcorn Old Library on behalf of Signature Housing Group, ref A3501/20, Earth Environmental & Geotechnical Ltd, August 2020

The application includes residential use (apartment units) along with landscaped/garden areas, which is a land use that is considered to be sensitive to the presence of contamination.

The above report presents the findings of a desk study and site visit in the form of a preliminary risk assessment, and a follow on site investigation and quantitative risk assessment.

The site has undergone various stages of development and subsequent clearance, with a mix of public buildings and residential. The current site is the former public library and unused open land.

Potential pollutant linkages identified by the preliminary risk assessment include soil bound contamination from the various phases of occupation and demolition, along with the potential for adverse ground gases.

The site investigation is based around five shallow boreholes and the sampling of soils and ground gases. The scale of the investigation is relatively small with the five sample positions and five soil samples sent for chemical analysis.

All the samples exhibited some contaminants above the selected assessment criteria, with the most significant contamination being PAHs and other hydrocarbons in two of the sample locations. The analysis suggests that the near surface soils have been impacted by heavy fuel oil and potentially coal tar derived substances.

The report recommends that the current near surface soils are not suitable for the proposed end use, and that some form of remediation will be necessary.

Taking the above into account I do not object to the scheme, however, if planning permission is to be granted, I should be conditioned to require further investigation (the current assessment is based on a small number of samples) and the development and submission of a remediation strategy. Conditions requiring the submission of a verification report to demonstrate that the remedial objectives have been met will also be necessary.

Suggested condition wording;

No development shall take place until the following has been undertaken:

A remediation strategy, which may include further site investigation to formulate the strategy, shall be formulated that includes a timetable for implementation, monitoring proposals and remediation verification methodology. This shall be submitted to and approved in writing by the Local Planning Authority.

Prior to the occupation of the development;

A Site Verification/Completion Report shall be submitted to and approved in writing by the Local Planning Authority, and shall be completed by a suitably qualified professional. This shall include details on the remediation works undertaken; validation testing of the adequacy of the remediation; certificates of the suitability of the imported cover materials from a suitably qualified independent person; the fate of any excavated material; and any necessary verification-monitoring programme including details of any installed post-completion monitoring devices, together with measures to be undertaken should action limits be exceeded.