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**ST HELENS**  
BOROUGH COUNCIL

**ST HELENS BOROUGH  
LOCAL PLAN 2020-2035**

**COPIES OF REGULATION 20  
REPRESENTATIONS (REGULATION 22 (1) (D))  
DOCUMENT**

**PLAN ORDER**

**PO0801 – PO0900**

**SEPTEMBER 2020**

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PO0801



St. Helens  
Council

730

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

**13 MAR 2019**

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;  
**Part A – Personal Details**  
**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>EMMA</i>	First name:
Last Name: <i>ROBY</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>50 CLAREMONT ROAD, BILLINGE</i>	Address:
Postcode: <i>WN5 7LT</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: <span style="background-color: black; color: black;">[REDACTED]</span>	Date: <i>10/03/19</i>
---	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>			
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓	
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

#### LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

***"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible"*** this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

#### Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase ***"as far as practicable"*** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

PO0803



St. Helens  
Council

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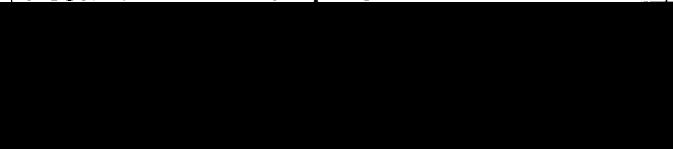
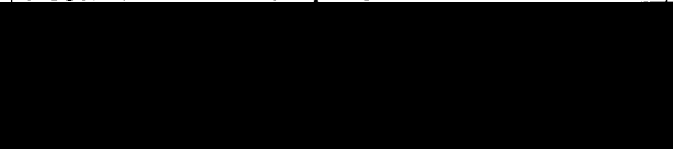
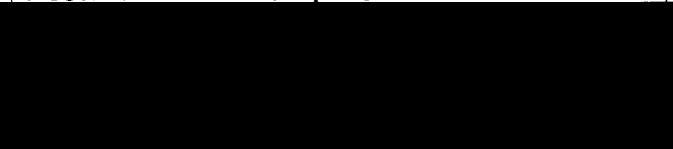
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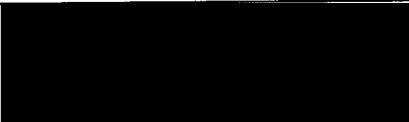
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Title: <i>MR</i>	Title:
First Name: <i>JOHN</i>	First name:
Last Name: <i>GASKELL</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>2A ROCKOLY LANE</i>	Address:
Postcode: <i>WAL1 8ER</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>11/02/19</i>
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Council

734

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Title: MR	Title:
First Name CRAIG	First name:
Last Name: AINSCOUGH.	Last Name:
Organisation/company:	Organisation/company:
Address: 23, Pigeonfield ST WIGAN	Address:
Postcode: WN6 7ED.	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date: 01/3/19.

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post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

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Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
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Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.
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***"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible"*** this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

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#### **Policy LPA02: Spatial Strategy**

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase ***"as far as practicable"*** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

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PO0805

736



### St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
**13 MAR 2019**  
(For official use only)

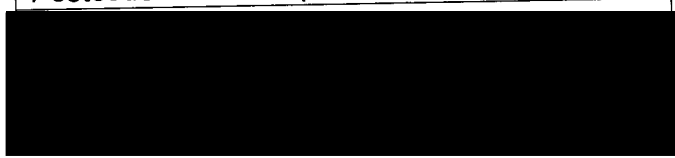
Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

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**Part A** – Personal Details  
**Part B** – Your Representation(s).

#### PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>BILLY</i>	First name:
Last Name: <i>RICHARDSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>9A VILLAGÉ TERR NEWTOWN,</i>	Address:
Postcode: <i>CA9 3PL</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: *06/03/19*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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Please tick as appropriate

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PO0806



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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- ① LPA02
- ② PARA 1.7.2 DEC
- ③ LPA04
- ④ GENERAL
- ⑤ IDP
- ⑥ LPA08

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Title:	Title:
First Name: <i>SRENDA</i>	First name:
Last Name: <i>WORRALL</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>10 CALDERHURST DRIVE WINDLE</i>	Address:
Postcode: <i>WA10 6ED</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED] Date: *28/2/2019*

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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Please tick as appropriate		

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see attached sheet

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N/A

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

N/A

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

Dear Sirs

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated.

I believe that this Submission Draft does not satisfy the requirement for sustainable development because the plan promotes increased car dependency, the housing targets are based upon outdated NPPF guidelines and are extremely aspirational, ignores the requirement to preserve food security by ignoring Agricultural Land Quality and the demand for green spaces as a community requirement.

The Plan is not legally compliant because:

As late as 12<sup>th</sup> December 2018 the Council Cabinet meetings stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met. Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the following matters:

Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities.

**Employment Land:** I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

**Brownfield sites:** St Helens Council states that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. Monies were available via the Liverpool City Council for this purpose. I have not seen any report of the Council's effort to bid for these monies, successful or not.

#### Traffic Issues and Duty to Cooperate

St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private cars to the new business parks as there is no existing public transport or any published plans for the future.

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions and the Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable. The plans also show a planned route for walkers and cyclist along Calderhurst Road to Bleak Hill road where there is a traffic problem with school parking. I fear that these plans will be altered to allow access/egress for the new home residents.

## Windle Island

The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction.

As part of the Northern Powerhouse initiative, it is proposed to build 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool.

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – **"Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"**

This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

"3. New development will only be permitted if it would: a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services."

**To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.**

**Community Infrastructure:** Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity and to visit local supermarkets.

Taking into account these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure.

Yours sincerely



Mrs B Worrall

10 Calderhurst Drive

St Helens WA10 6ED

5

WEST MANCHESTER  
LP?

1

1

6

PO0807



Ref: LPSD  
(For official use only)



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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First Name: <u>EVERYN</u>	First name: _____
Last Name: <u>DODD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24 NICOLL ROAD</u> <u>ECCLESTON</u> <u>ST HELENS LANCES WA10 5LW</u>	Address: _____
Postcode: _____	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature:  Date: 12.3.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

- Yes (via email)                       No

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## RETURN DETAILS

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post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

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**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes ?	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>DOES NOT COMPLY WITH NPPF (2018) GUIDELINES            DOES NOT EXPLAIN HOW THE ROAD INFRASTRUCTURE PROBLEMS WILL BE OVERCOME            ALL FORECASTS ARE HIGHLY ASPIRATIONAL AND NOT EVIDENCED BY HARD FACTS —            SEE ATTACHED SHEET FOR MORE DETAILS</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

CLARIFICATION IS NEEDED ON THE NPPF METHOD OF CALCULATING HOUSING NUMBERS (2016 OR 2018) UNTIL THIS HIGHLY ASPIRATIONAL <sup>METHOD</sup> IS MODIFIED ON A REGIONAL AND NOT NATIONAL BASIS - NO FURTHER PROGRESS SHOULD BE MADE.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

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**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

Dear Sirs

This continuation sheet is further to my Representation/Comment form.

I believe that this Submission Draft does not satisfy the requirement for sustainable development because the plan promotes increased car dependency, the housing targets are based upon outdated NPPF guidelines, are extremely aspirational, and ignores the requirement to preserve food security by ignoring Agricultural Land Quality and the demand for green spaces as a community requirement.

①

**Employment Land:** I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

②

**Brownfield sites:** St Helens Council states that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. Monies were available via the Liverpool City Council for this purpose. I have not seen any report of the Council's effort to bid for these monies, successful or not.

③

**Traffic Issues and Duty to Cooperate:** St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private car to the new business estates, mainly along the A580 as there is no existing public transport nor any published plans for the future. The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

①

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions and the Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable.

**Windle Island:** The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction. As part of the Northern Powerhouse initiative, it is proposed to build 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool.

④

? WEST  
LANCS LP?

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – **“Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”**

①

This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

“3. New development will only be permitted if it would: a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services.”

**To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.**

①

**Community Infrastructure:** Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable.

③

I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land , providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring.

SUGGEST  
MOSS!

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection.

Yours sincerely



Mrs E Dodd

24 Nicoll Rd, Eccleston St Helens

PO0808



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

- ① PAR 1.7-2
- ② LPA02
- ③ LPA04
- ④ CREWEN
- ⑤ LPA06
- ⑥ IDP
- ⑦ LPA08

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>IRENE</u>	First name: _____
Last Name: <u>OXFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 WINDLEBROOK CREB</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 6DY</u>	Postcode: _____
Tel No:	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: Date: 13.3.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

- Yes (via email)                       No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



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or by hand delivery to:

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

NO DEVELOPMENT ON GREENBELT UNTIL ALL BROWNFIELD SITES ARE USED - NO DEVELOPMENT ON GREENBELT (BHS) UNTIL ROAD INFRASTRUCTURE FIXED -  
SEE ATTACHED SHEET

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	--------------------------	--

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**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

Dear Sirs

This continuation sheet is further to my Representation/Comment form. I find it necessary to use this continuation sheet because I find the format of the Comment Form too complicated and misleading to complete within the small spaces allocated. ✓

I think that the Local Plan Submission Draft is not legally compliant, sound or complies with the duty to cooperate and is certainly not justified or consistent with the national policy for the following reasons: ✓

I believe that the Plan is not legally compliant because:

As late as 12<sup>th</sup> December 2018 the Council Cabinet meeting stated that the Statement of Common Ground was still being prepared. Obviously this was too late for the preparation of the Local Plan and therefore the requirements of the plan making PPG para 054 have not been met. Not surprisingly it is lacking in evidence to demonstrate that it satisfies the Duty to Cooperate on the matters of Employment Land, Remediation of Brownfield land, Transport and Traffic, (including road infrastructure) and local amenities. ①

I believe that St Helens Council have not proved "exceptional circumstances" for removing land from Green Belt and I believe that the plan is not positively prepared, justified, effective or consistent with the National Planning Policy. ②

The Plan is not positively prepared because there is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily; the plan does not achieve sustainable development. ②

No statement is available on how the Council has fulfilled it's Duty to Cooperate. The Council are proposing significant development without showing how it will impact elsewhere. ①

#### **Duty to Cooperate.**

The economic growth predictions, not just for St Helens, but for the neighbouring boroughs within the Liverpool City Region (LCR) are based on the flawed methodology nationally using NPPF Guidelines, ONS statistics (2016) instead of (2018) which do not take into account differing regional requirements. (this has recently been debated in Government). ③

This has resulted in a "free for all" within the LCR with many houses being built needlessly, without any apparent collusion between boroughs. The latest plans by Lancashire County Council proposes the construction of 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool as up to 10000 cars (6000 x 1.8 national average car per household) could be involved. WEST LANC'S L.P.

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PO0809

Ref: LPSD  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

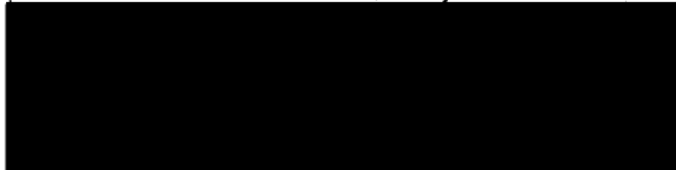
**Part A - Personal Details**

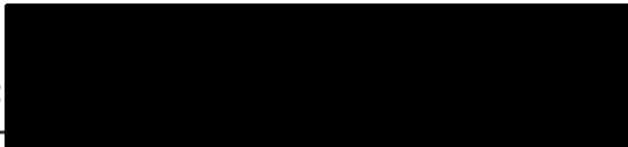
**Part B - Your Representation(s)**

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- ③ LPA04
- ④ GENERAL
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- ⑥ IDP
- ⑦ LPA08

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>DAVID</u>	First name: _____
Last Name: <u>OXFORD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>39 WINDLEBROOK PASS</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6DY</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 13-3-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)                       No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?								
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>Not Sound - SEE ATTACHED</p>

Please continue on a separate sheet if necessary



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NO BUILDING SHOULD TAKE PLACE UNTIL  
HIGHWAY INFRASTRUCTURE IS IN PLACE —  
SEE ATTACHED

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The Plan is not positively prepared because there is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily; the plan does not achieve sustainable development.

No statement is available on how the Council has fulfilled it's Duty to Cooperate. The Council are proposing significant development without showing how it will impact elsewhere.

#### Duty to Cooperate.

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## Employment Land

The Oxford Economics transformational Growth forecasts (2016) are all quoted as being critical in informing assumptions about industry growth and the demand for employment land but are nowhere to be accessed despite formal enquiries being made to SHBC and the Liverpool City Region.

The Employment Land Needs Study addendum report (January 2109) states that "this modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focused on logistics and warehousing schemes, including potential Green Belt sites around Haydock, west of Omega and Parkside West and East"

**If this statement is true, it means that the Council itself set the criteria for transformational growth including the use of Green Belt land is a subjective and aspirational scenario and not an objectively based needs assessment of economic and market trends.**

It follows that SHBC have directly informed a set of economic aspirations which have become joint planning policy. **For this reason I believe that the plan has not been positively prepared.**

SHMBC must be aware of the extent of the aspirational numbers of jobs being promised by developers without any hard evidence of these jobs materialising eg The Amazon warehouse at Florida Farm promises many jobs, but the trade press heralds Amazon's recent acquisition of robotisation software to ensure efficiency and cost savings by reducing workplace numbers. I do not believe that the actual jobs created will match the number of jobs promised.

I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land.

## Brownfield sites

St Helens Councillors state that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. This is without any apparent investigation into the feasibility of cleaning Brownfield sites as they are brought onto the Brownfield register. I have not seen any report of the Council's effort to bid for these monies, successful or not.

The Council, in conjunction with Liverpool City Combined Authority have no policy for bringing unsuitable sites outside the Brownfield register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year safeguarded plan period.

## Traffic Issues

The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6.

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions.

The Council's plan to build 1027 new homes on **8HS** states that there will be an access road onto the A580 by rerouting Houghtons Lane. The stretch of the A580 between Windle Island and the junction of Blindfoot Road only is 1.4 miles, with 3 intersections onto a busy crowded freeway. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable.

**Windle Island**

The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction.

⑥

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – "Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

②

This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

"3. New development will only be permitted if it would: a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services."

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.

②

**Community Infrastructure:** Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable.

⑦

I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land , providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring.

Subverts  
road ?

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection.

Yours Sincerely



D A Oxford

39 Windlebrook Crescent, St Helens WA10 6DY

PO0810

13 MAR 2019



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

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This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Stephen	First name:
Last Name: Brine	Last Name:
Organisation/company:	Organisation/company:
Address: Friars Cottage Houghtons Lane, Eccleston, St Helens Postcode: WA10 5QE	Address:  Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 12-3-19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us by no later than **5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

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**Email:** **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**  
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## Please use a separate copy of Part B for each separate comment/representation.

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?				
Policy	01, 02, 03, 04, 05, 06, 08	Paragraph	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment
				Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate</u> . Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments
Please see attached representation.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached representation

Please continue on a separate sheet if necessary

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8. If you have already indicated that you are seeking a modification, do you consider it necessary to participate at the oral part of the examination? (This is not a public question)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

STEPHEN BRINE  
FLIMS COTTAGE  
HOLGATE LANE  
ECCLESTON  
ST. HELENS, WAT0 5QE

## **PART B -YOUR REPRESENTATION**

I firmly believe that the Submission Draft fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF)

I believe that St Helens Borough Council ("the Council") has failed to meet legal and procedural requirements in preparing the Submission Draft and have provided no evidence that they have complied with their Duty to Cooperate. The Submission Draft is not positively prepared, justified, effective or consistent with National Planning Policy.

Please note that I am in agreement to the representations made by **St Helens Green Belt Association (SHGBA)** and **Eccleston Community Residents Association (ECRA)** but in addition I would also make the following specific points:

### **Duty to Cooperate**

The Submission Draft provides no evidence that the Council have satisfied their Duty to Cooperate. There is no evidence that the Council has satisfied this legal requirement. The Council seems to be competing with neighbouring local authorities for the same residents which will just create inward migration

①

### **LPA01 Presumption in Favour of Sustainable Development**

I support Policy the Presumption in Favour of Sustainable Development but I am concerned that some policies in the Submission Draft will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just

②

### **LPA02 Spatial Strategy**

In setting out this very ambitious strategy for St Helens there is one notable omission from the Submission Draft Spatial Strategy. This is the failure to highlight the great importance government attached to Green Belts. The "essential characteristics of Green Belts are their openness and their permanence". The Submission Draft Spatial Strategy (Policy LPA02, page 17) makes no mention of the "great importance" of Green Belt, their essential characteristics or purposes.

I understand that "exceptional circumstances" need to be demonstrated to release land from Green Belt. I cannot see anywhere in the Submission Draft where "exceptional circumstances" have been demonstrated.

③

### **LPA04 A Strong and Sustainable Economy**

The Submission Draft suggests that St Helens growth trends are significantly higher than historic annual growth rates.

The economic outlook in the Submission Draft is based on out of date forecasts and employment growth is highly aspirational and optimistic. It is relying almost entirely on significant growth of logistic warehousing and does not take into account that warehousing jobs will be at risk because of future automation. It also does not take into account the influence that Brexit could have on the Liverpool Super Port and employment in transportation and warehousing in the region.

PO0811



St. Helens  
Council

301

13 MAR 2019

Ref: LPSD

(For official use only)

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name: FRANCES	First name:
Last Name: HARROP	Last Name:
Organisation/company:	Organisation/company:
Address: FRANKS COTTAGE, HOUGHTONS, LANG, ECCLESTON ST. HELENS	Address:
Postcode: WA10 5QG	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 12/3/19

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St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Other documents (please name document and relevant part/section)					

*Handwritten notes: Circled numbers 1, 2, 3, 4, 5, 6 are present. Lines connect 1 to Policy, 2 to Paragraph, 3 to Paragraph, 4 to Paragraph, 5 to Paragraph, and 6 to Paragraph.*

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see attached representation.

Please continue on a separate sheet if necessary

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Please see attached representation

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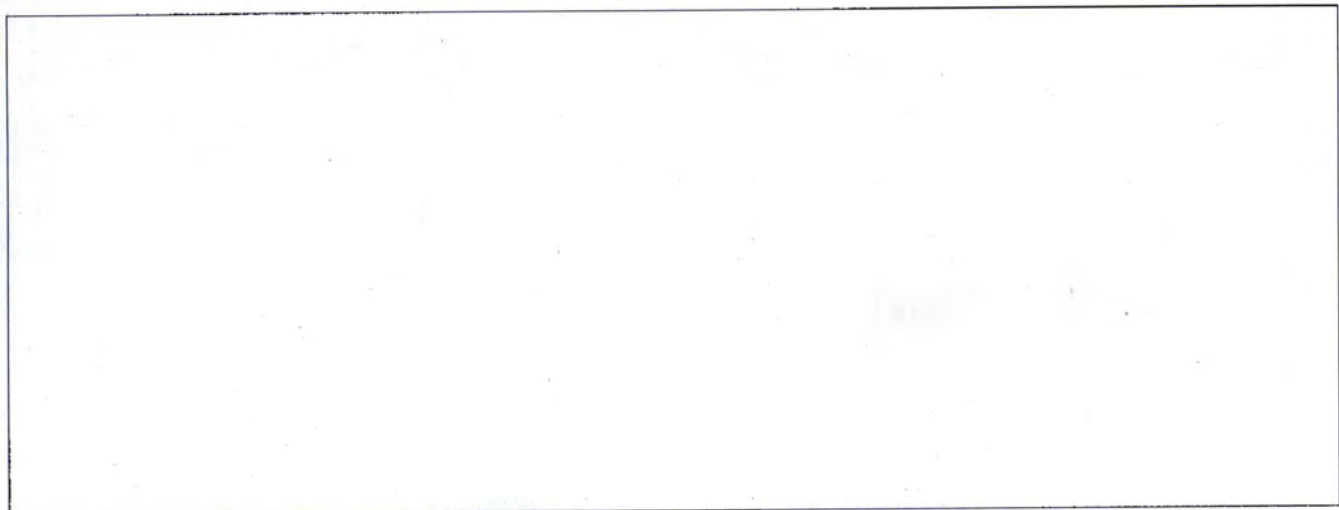
8. If your representation is seeking a modification, do you wish to participate at the oral part of the examination? (The benefits of doing so are:

**No, I do not wish to participate at the oral examination**

**Yes, I wish to participate at the oral examination**

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.





***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination***

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

### **Brownfield Sites.**

I understand that there are many brownfield sites across St Helens that could be used for housing and employment development before Green Belt sites are released. I believe the Council should develop a strategy so that those sites can be utilised before Green Belt sites. Those sites which are contaminated should have a plan in place to make the land uncontaminated. The developers who wish to build houses in St Helens should only be given the option of Brownfield sites with the cost of cleaning up the sites being borne by the developers.

1 Brownfield sites tend to be closer the Town Centre and already have road infrastructure in place. New homes being built on the sites closer to the Town Centre would mean the residents would have greater access to public transport, both buses and trains, and the services in the Town Centre. I believe developing the Brownfield sites which are closer to the Town Centre would help regenerate the Town Centre.

2 Releasing Green Belt land should be a last resort because when it is released it is lost forever. Developers should not be given the option of building houses on Green Belt land when there are Brownfield sites that could be cleaned up and developed. Cleaning up contaminated land in St Helens in this way would benefit all the residents of St Helens. If developers are allowed to build houses on Green Belt land and make greater profits then there is no incentive for them whatsoever to clean up and develop Brownfield sites.

### **8HS - Land South of A580 between Houghtons Lane and Crantock Grove, Windle.**

As I have already stated I do not believe that there is a need in the future for an additional 486 new homes per year in St Helens. Further if there is a need for some new homes I believe they should be developed in and close to St Helens Town Centre by developing unused Brownfield sites and vacant buildings. I believe this would help regenerate St Helens Town centre.

I therefore believe that the land known as 8HS should **not** be released from Green Belt and should **not** be developed on and the Council should reconsider their Local Plan in relation to that land for the following reasons:

- 6
1. **Housing in Eccleston.** Eccleston has already provided its fair share of housing in recent years, with the most recent example being the 262-home development on the former Triplex site. The developers of that site have still not been able to sell all of the new houses and a number remain unsold and unoccupied.
  2. **Road Infrastructure.** The above new development in Eccleston has already put local infrastructure under great strain. The roads in and around the Eccleston area are already congested and are inadequate to support existing traffic levels never mind increased traffic levels. 1,027 new homes on this site alone could increase the number of vehicles in the locality by approximately 1,900.
  3. **Traffic Congestion.** Story Homes, developers who wish to develop this site, suggest access to this new development would be from a new junction where Houghtons Lane meets the A580. If a new junction was created then there would be approximately 1,900 cars exiting on to the A580 on a stretch of road which already backed up at peak times. Further if any of the new residents wished to travel into St Helens (which I am sure the Council would hope would happen) then they would have to travel east on the A580 and attempt to turn right at Windle Island. It is widely known and accepted that Windle Island at present cannot manage

**Conclusion.**

As I have stated I accept and support the Council in the need to regenerate and develop St Helens. I also appreciate that it is difficult for them but I would like to believe that when considering the Local Plan that the Council will listen to and take on board the views of the many residents in St Helens and in particular residents of the areas directly affected by the Local Plan. (3)

I firmly believe for the reasons that I have stated that the Council should not release any Green Belt land but instead should develop Brownfield sites and vacant buildings closer to the Town Centre. It seems illogical not to develop unused Brownfield sites and vacant buildings in this way which would clearly benefit the people of St Helens far greater than St Helens losing prime Green Belt land which would then be lost forever. (6)

I have already stated that I believe that Eccleston has already provided its fair share of housing in recent years. To release such a large area of Green Belt land at 8HS in Eccleston and Windle will reduce the attractiveness of the area and change the character of the area. This would be a significant loss of Green Belt land which is not only enjoyed by Eccleston residents but also residents of St Helens generally. (2)

If the development on the land at 8HS was to proceed there would be substantial over development in the Eccleston area which the existing road infrastructure and services would be unable to support. The local schools, doctors, dentists and other key services are already oversubscribed and would be unable to meet the demand of all the new residents. (6)

It is clear that financial contributions for education and off-site highway works are very likely to be required if 8HS was developed and there may be further requirements subject to detailed assessment of infrastructure needs. It is extremely worrying that the Council seems to have selected 8HS for such a large development without first fully identifying the needs and addressing fully how they will be met and funded. It is totally irresponsible to consider releasing Green Belt land to enable developers to develop on without first looking at the long term costs and detrimental effects to the locality and St Helens generally. (1)

I would urge the Council to reconsider their Local Plan with a view to creating a Plan which would help regenerate the Town Centre and also protect the Green Belt and attractiveness of it for the residents of St Helens and their future generations. (2)

Please can you acknowledge safe receipt and confirm that my comments will be considered.

Yours faithfully,



Frances Harrop

PO0812

① GEN

④ LPA05

SITE 4HA

PF0920

② GEN

⑤ LPA

③ LPA02

Ref: LPSD

(For official use only)



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

13 MAY 2019

## PART A - YOUR DETAILS

1000

Please note that you must complete Parts A and B of this form.

### 1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: SUSAN

Last Name: DAVEY

Organisation/company: BOLD + CLOCK FACE ACTION GROUP

Address: 12 FRENCHFIELD CRES  
CLOCK FACE  
ST HELENS

Postcode: WA9 4FZ

### 2. Your Agent's Details (if applicable)

Title: BOLD + CLOCK FACE ACTION GROUP

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: 11/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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St Helens  
WA10 1HP**

or by hand delivery to:

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setting out your representation/comment.**

**Please use a separate copy of Part B  
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Policy	✓	Paragraph / diagram / table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Draft Greenbelt Review 2016 – Appendix 4 PCPA 2004 section 20(5)(a) c, d, e					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

Not legally compliant because the local development scheme (LDS) for St Helens refers to the adherence to the Statement of Community Involvement 2013. Paragraph 3.12 states that it should "be well targeted and reach out to the seldom heard groups", which it didn't do. We live adjacent to the land to be developed and were not informed by the local council via letter. One notice had been posted on a lamppost on Gorsey Lane, which residents rarely walk past, after the consulting period on the revised plans had finished, nothing else. For the same reasons, this also contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, for the requirements about giving notice and publicity, inspection by the public of the local development document and the nature and extent of consultation with the public.

The NPPF paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There

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should be sufficient access to services, yet schools and doctors to name just two local services are full.

It is not justified and is unsound because the proposals are not consistent with National Policy. The proposals contravene NPPF (2019) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Furthermore insufficient justification is given for the exceptional need to release Green Belt for housing. Releasing the land from Green Belt operates at odds to the NPPF, it does promote the urban regeneration through recycling of derelict and other urban land.

The NPPF (2019) Paragraph 137 states:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."

- (1) St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
- (2) On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
- (3) There is no substantive evidence to suggest that there is a need to remove such a large site as 4HA from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised. The regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

The NPPF (2019) paragraph 177 states:

"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."

Yet,

- (1) The Sustainability Assessment (SA) site assessment for 4HA scores "Likely to generate negative effects" for
  - a. SA1. To protect and enhance biodiversity and
  - b. SA2. To protect and improve land quality in St Helens
- (2) The Priority species of Grassland Assemblage - Farmland Birds, are present at level 3 for the whole of HA4 (MAGIC database, March 2019), in particular Local BAP species Lapwing and Skylark. Brown Hare is also presumed to be present. These species cannot be translocated nor loss of their habitat mitigated against. **Their presence is a material consideration.**
- (3) Removing HA4 from the Green Belt, let alone allowing housing allocation, will make the protection of these habitats and species much harder.

Additionally, it is unsound because there is no commonality of methodology from one year to the next to review Green Belt, it has fundamentally and substantially changed the results. The draft Green Belt Review 2016 assessed the parcel of land off Gorsey Lane against Green Belt purposes in terms of its Green Belt function as medium but then reduced them in 2018 with no change to the surrounding areas of land use. The parcels of land had also been divided up differently with insufficient explanation in the supporting documentation as to why this had changed or how Purpose 1, 2 and 3 had been assessed differently. Essentially no explanation provided why this lands purpose had dropped to make it favourable for removal from Green Belt. Additionally the arguments put forward to protect land to the south of Gorsey Lane can be equally applied to land to the north.

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans <sup>to ensure</sup> as the best effort made to engage with the community to develop a sustainable plan that meets the needs of the local community.

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.**

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination**

Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.

PO0813



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

① GCV ② GCV ③ LPA02 ④ LPA05 ⑤ GBR  
SIR 4HA

PF1273

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

134  
13 MAY 2019

### 1. Your Details

(we will correspond via your agent)

Title: MR

First Name: BRIAN

Last Name: DAVEY

Organisation/company: BOLD + CLOCK  
FACE ACTION GROUP

Address: 12 FRENCHFIELD CRES  
CLOCK FACE  
ST HELENS

Postcode: WA9 4E7

### 2. Your Agent's Details (if applicable)

Title: BOLD + CLOCK FACE ACTION

First name: GROUP

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Signature

Date: 11/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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## FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

# Please use a separate copy of Part B for each separate comment/representation.

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

<b>3. To which part of the plan does your comment refer?</b>							
Policy	✓	Paragraph / diagram / table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Draft Greenbelt Review 2016 – Appendix 4 PCPA 2004 section 20(5)(a) c, d, e			

<b>4. Do you consider the plan to be:</b>			
<i>Please read the Guidance Note on this form before you complete it.</i>			
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
Please tick as appropriate			

<b>5. If you consider the plan to be:</b>	
<i>Please read the Guidance Note on this form before you complete it.</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<b>6. Please give details of why you think the plan is not compliant or is unsound or fails to comply with the duty to cooperate.</b>
<i>If you wish to support the plan, please also use this box to set out your comments.</i>
<p>Not legally compliant because the local development scheme (LDS) for St Helens refers to the adherence to the Statement of Community Involvement 2013. Paragraph 3.12 states that it should "be well targeted and reach out to the seldom heard groups", which it didn't do. We live adjacent to the land to be developed and were not informed by the local council via letter. One notice had been posted on a lamppost on Gorsey Lane, which residents rarely walk past, after the consulting period on the revised plans had finished, nothing else. For the same reasons, this also contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, for the requirements about giving notice and publicity, inspection by the public of the local development document and the nature and extent of consultation with the public.</p> <p>The NPPF paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There</p>

①

②

should be sufficient access to services, yet schools and doctors to name just two local services are full.

It is not justified and is unsound because the proposals are not consistent with National Policy. The proposals contravene NPPF (2019) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Furthermore insufficient justification is given for the exceptional need to release Green Belt for housing. Releasing the land from Green Belt operates at odds to the NPPF, it does promote the urban regeneration through recycling of derelict and other urban land.

The NPPF (2019) Paragraph 137 states:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."

- (1) St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
- (2) On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
- (3) There is no substantive evidence to suggest that there is a need to remove such a large site as 4HA from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised. The regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

The NPPF (2019) paragraph 177 states:

"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."

Yet,

- (1) The Sustainability Assessment (SA) site assessment for 4HA scores "Likely to generate negative effects" for
  - a. SA1. To protect and enhance biodiversity and
  - b. SA2. To protect and improve land quality in St Helens
- (2) The Priority species of Grassland Assemblage - Farmland Birds, are present at level 3 for the whole of HA4 (MAGIC database, March 2019), in particular Local BAP species Lapwing and Skylark. Brown Hare is also presumed to be present. These species cannot be translocated nor loss of their habitat mitigated against. **Their presence is a material consideration.**
- (3) Removing HA4 from the Green Belt, let alone allowing housing allocation, will make the protection of these habitats and species much harder.

Additionally, it is unsound because there is no commonality of methodology from one year to the next to review Green Belt, it has fundamentally and substantially changed the results. The draft Green Belt Review 2016 assessed the parcel of land off Gorse Lane against Green Belt purposes in terms of its Green Belt function as medium but then reduced them in 2018 with no change to the surrounding areas of land use. The parcels of land had also been divided up differently with insufficient explanation in the supporting documentation as to why this had changed or how Purpose 1, 2 and 3 had been assessed differently. Essentially no explanation provided why this lands purpose had dropped to make it favourable for removal from Green Belt. Additionally the arguments put forward to protect land to the south of Gorse Lane can be equally applied to land to the north.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matters you have identified at 6. above where this relates to soundness. (NB please note that any modification with the duty to cooperate is incapable of modification or amendment.) If you believe that this modification will make the Local Plan legally compliant or sound, please state how you are able to put forward your suggested revised wording of any relevant policies. Please be as precise as possible.

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans <sup>to ensure</sup> <sup>is</sup> as the best effort made to engage with the community to develop a sustainable plan that meets the needs of the local community.

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.**

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination**

Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.

PO0814





St. Helens  
Council

① Para 1.4.1    ② LPA02

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

13 MAY 2019

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>DEBRA</u>	First name:
Last Name: <u>COONEY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>44 CRAWFORD STREET CLOCK FACE</u>	Address:
Postcode: <u>WA9 4XH</u>	Postcode:
[REDACTED]	Tel No:
	Mobile No:
	Email:

Signature

[REDACTED]

Date:

11/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us by no later than **5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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## **FURTHER INFORMATION**

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**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?					
Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

There has been no consultation or notification to residents.

No written notification displayed on lampposts etc.

The building goes against the protection of greenbelt land and destroys the natural habitats of the local wildlife.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5. above where this relates to soundness. (NB please note that any non-compliance with the duty to cooperate is incapable of modification or examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

<input type="checkbox"/> <b>No, I do not wish to participate at the oral examination</b>	<input type="checkbox"/> <b>Yes, I wish to participate at the oral examination</b>

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination**

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

PO0815

PF1299



St. Helens Council

- ①-LPA04
- ③-LPA02
- ⑤-LPC05
- ②-LPC12
- ④-LPA07
- ⑥-LPA03

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

13 MAY 2019  
1380

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: David	First name:
Last Name: Almond	Last Name:
Organisation/company:	Organisation/company:
Address: 33 Millbrook Lane Eccleston, St. Helens, Merseyside	Address:
Postcode: WA10 4QX	Postcode:
[Redacted]	el No:
[Redacted]	obile No:
[Redacted]	mail:

Signature: [Redacted] Date: 11th May 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

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post to: **Local Plan  
St.Helens Council  
Town Hall  
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St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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**Please use a separate copy of Part B for each separate comment/representation.**

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulation Assessment	<input checked="" type="checkbox"/>	
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>			
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/> No
Justified?	<input checked="" type="checkbox"/> No
Effective?	<input checked="" type="checkbox"/> No
Consistent with National Policy?	<input checked="" type="checkbox"/> No

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Because Greenbelt meant protected. The council is lifting Greenbelt when it suits them. St Helens hasn't provided lots of jobs that need housing. The site would be an area that floods. There is lots of brown field sites that need cleaning up and using first. Someone will have to clean the land up eventually. There is already too much traffic on the roads without additional pressure. The land is needed for food growing near to residential areas especially if food transport becomes more expensive. More of the natural environment is being lost.

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Build on brownfield first. Encourage good companies to the area such as aerospace jobs, light engineering. wind turbine factories. Then if they come and need employees, the Council would be able to justify the need for housing in the area.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.

PO0816



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: JULIE	First name:
Last Name: NILSON	Last Name:
Organisation/company:	Organisation/company:
Address: 76 Crawford Street-	Address:
Postcode: WA9 4XH	Postcode:
	Tel No:
	Mobile No:
	Email:

13 MAY 2019

Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us by no later than **5pm on Monday 13<sup>th</sup> May 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

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**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Build on brownfield first. Encourage good companies to the area such as aerospace jobs, light engineering, wind turbine factories. Then if they come and need employees, the Council would be able to justify the need for housing in the area.

Please continue on a separate sheet if necessary

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

Blank area for further information or comments.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

PO0817



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

1419

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

13 MAY 2019 6:02 AM E 1

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>KEITH</u>	First name: _____
Last Name: <u>BRIDGE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>22 STARTHAM AVENUE</u> <u>BILLINGE, WIGAN</u> <u>LANCS</u>	Address: _____
Postcode: <u>WN 5 7RZ</u>	Postcode: _____
Tel No:	Tel No: _____
Mobile No:	Mobile No: _____
Email:	Email: _____

Signature:

Date: 12/5/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>THE WAY IT IS WORDED ON THIS FORM AND LINKING IT TO THE PLAN IS MISLEADING AND DIFFICULT TO FOLLOW. I BELIEVE IT IS DESIGNED TO LEAD TO CONFUSION AND MISUNDERSTANDING. (SECTION 3 OF THIS DOCUMENT IS TOTALLY INADEQUATE AND) NOT FIT FOR PURPOSE AND) THEREFORE I CANNOT COMPLETE IT AS I WISH</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

THE WORDING OF THIS SECTION IMPLIES AGREEMENT WITH THE PLAN AND THAT ANY SUGGESTED MODIFICATIONS IMPLIES SUPPORT TO THE PLAN.

I TOTALLY DISAGREE TO ANY ALTERATIONS TO THE GREENBELT. THERE ARE MANY ARGUMENTS AGAINST THIS PLAN AND THE COUNCIL ARE JUST TAKING THE EASY OPTION BY USING LAND WHICH IS EASY TO BUILD AND DEVELOP WITHOUT CONSIDERING IMPLICATIONS (NEGATIVE) FOR THE RELEVANT COMMUNITIES CONCERNED.

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination	✓	Yes, I wish to participate at the oral examination
--	---	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

BECAUSE THE COUNCIL / PLANNERS NEED TO UNDERSTAND THE FEELINGS OF THE COMMUNITY AND THE STRESS IT IS CAUSING. ALSO (ONLY HEARD) OF THIS PLAN YESTERDAY WHICH IS INSUFFICIENT TIME TO IT SHOWS THAT THE COMMUNITY WAS NOT FULLY INFORMED WHICH I ASSUME IS ILLEGAL

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PO0818

PF1347



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

1428  
13 MAY 2019 6:02 AM E 1

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Jodie	First name:
Last Name: Goulbourn	Last Name:
Organisation/company: Self-builder	Organisation/company:
Address: The Lantern House 9 Frenchfields Crescent Clock Face St Helen's Postcode: WA9 4FZ	Address:  Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 13/05/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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### **NEXT STEPS**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
	LPA02						
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones  
We wish to put forward arguments against the removal of green belt of land parcel HA4/GBP 074 and its allocation for housing as we believe the council's position is flawed, all the arguments we wish to put forward are within the attached document. Which is a assessment of the St Helens local plan and green belt review and phase one <sup>summary</sup> ~~outline~~

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.  
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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

[Empty box for response to question 9]

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination  
Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

## Foreword and additions for the May 2019 representation:

The following report was submitted as part of one or more representations to the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016 during the consultation process in January 2017.

It was written on behalf of the then owners, now mostly residents of, the ground-breaking and major self-build project, known as French Fields, of 18 homes built on brownfield, derelict, industrial land (old coal mine buildings) within the Green Belt.

***The proposed Local Area Plan 2020-2035 and Green Belt Review 2018 have fundamentally and substantially changed, since the publication drafts put forward in January 2017, in particular to the detriment of the land allocations once known collectively as Location 21 or HS03/HA4, but now (with some modification) as HA4 - and are in conflict with the Bold Forest Park AAP (adopted July 2017).***

Therefore, the contents of and arguments in this report are even more relevant and it is re-submitted with maps incorporated as land parcel labels have also changed significantly since the Council's 2016/2017 drafts.

### **For the May 2019 representation it should be noted that:**

1. The National Planning Policy Framework (February 2019) Paragraph 177 states:
 

*"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."*

  - 1.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:
 

***"Likely to generate negative effects" for***

 SA1. To protect and enhance biodiversity  
 SA2. To protect and improve land quality in St Helens
  - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citronella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.  
**These species are a material consideration for planning.**
  - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3<sup>rd</sup> edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
  - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.



---

1.5. Removing HA4 and its mosaic habitat of grade 3 agricultural land and areas of broadleaved woodland from the Green Belt, let alone allowing housing allocation, will remove the protection of these habitats and make the Priority Species more vulnerable. It would also impact plant communities, reptiles and amphibians as well as invertebrates, which are not covered in this document.

02

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1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS\_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat.  
**This is significant.**

03

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1.7. It is extremely misleading that the maps for HA4 in the LAP appear to show buildings AND the Local Wildlife Site adjacent to HA4 as not being in the Green Belt. This is NOT the case, these buildings and LWS are still in the Green Belt, and planning applications are still being dealt with under that premise.

04

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2. The National Planning Policy Framework (February 2019) Paragraph 137 (part) states:

*"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."*

2.1. In January 2017, the original report did not put forward arguments to include purpose 5 as part of the representation against removing HA4 from Green Belt, the score was High+ without. However, that now seems to be an oversight due to the following points:

2.2. St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).

05

2.3. On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.

2.4. There is no substantive evidence to suggest that there is a need to remove such a large site as HA4 from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised.

2.5. It could be argued that the regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

---

3. The National Planning Policy Framework sets out obligations when considering flood risk and the effects of climate change. Concerns on these issues are highlighted in the original report, but the effects will be far worse under the new proposals;

3.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:

***"Likely to promote positive effects "***

SA5. To mitigate and adapt to the impacts of climate change.

SA6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.

*reasoning that: "Site overlaps with Bold Forest Park (0m) and the site presents opportunities for enhancement of GI network."*

It also scores SA5 using similar designations at several other land parcels for similar reasons.

PO0819

PF1348



St. Helens  
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

14209  
13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John	First name:
Last Name: Goulbourn	Last Name:
Organisation/company: Self-builder	Organisation/company:
Address: The Lantern House 9 Frenchfields Crescent Clock Face St Helen's Postcode: WA9 4FZ	Address:  Postcode:
[REDACTED]	Tel No:
	Mobile No:
	Email:

Signature: [REDACTED]	Date: 13/5/19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

**RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

**or** by e-mail to: **planningpolicy@sthelens.gov.uk**

*Please note we are unable to accept faxed copies of this form.*

**FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

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We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

#### **3. To which part of the Local Plan does this representation relate?**

Policy	LPA02	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
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Other documents (please name document and relevant part/section)

#### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:** *Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

#### **5. If you consider the Local Plan is unsound, is it because it is not:** *Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

#### **6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Large empty box for providing details and comments.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones  
We wish to put forward arguments against the removal of green belt of land parcel HA4/GBP 074 and its allocation for housing as we believe the council's position is flawed, all the arguments we wish to put forward are within the attached document. Which is an assessment of the St Helens local plan and green belt review and phase one habitats <sup>survey</sup>

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.  
**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

[Empty box for response to question 9]

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination**  
**Thank you for taking the time to complete and return this response form.**  
**Please keep a copy for future reference.**

## Foreword and additions for the May 2019 representation:

The following report was submitted as part of one or more representations to the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016 during the consultation process in January 2017.

It was written on behalf of the then owners, now mostly residents of, the ground-breaking and major self-build project, known as French Fields, of 18 homes built on brownfield, derelict, industrial land (old coal mine buildings) within the Green Belt.

***The proposed Local Area Plan 2020-2035 and Green Belt Review 2018 have fundamentally and substantially changed, since the publication drafts put forward in January 2017, in particular to the detriment of the land allocations once known collectively as Location 21 or HS03/HA4, but now (with some modification) as HA4 - and are in conflict with the Bold Forest Park AAP (adopted July 2017).***

Therefore, the contents of and arguments in this report are even more relevant and it is re-submitted with maps incorporated as land parcel labels have also changed significantly since the Council's 2016/2017 drafts.

### **For the May 2019 representation it should be noted that:**

1. The National Planning Policy Framework (February 2019) Paragraph 177 states:
 

*"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."*

  - 1.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:
 

***"Likely to generate negative effects" for***

SA1. To protect and enhance biodiversity

SA2. To protect and improve land quality in St Helens
  - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citrinella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.
 

**These species are a material consideration for planning.**
  - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3<sup>rd</sup> edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
  - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.

1.5. Removing HA4 and its mosaic habitat of grade 3 agricultural land and areas of broadleaved woodland from the Green Belt, let alone allowing housing allocation, will remove the protection of these habitats and make the Priority Species more vulnerable. It would also impact plant communities, reptiles and amphibians as well as invertebrates, which are not covered in this document. 02

1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS\_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat. 03  
**This is significant.**

1.7. It is extremely misleading that the maps for HA4 in the LAP appear to show buildings AND the Local Wildlife Site adjacent to HA4 as not being in the Green Belt. This is NOT the case, these buildings and LWS are still in the Green Belt, and planning applications are still being dealt with under that premise. 04

2. The National Planning Policy Framework (February 2019) Paragraph 137 (part) states:

*“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ...”*

2.1. In January 2017, the original report did not put forward arguments to include purpose 5 as part of the representation against removing HA4 from Green Belt, the score was High+ without. However, that now seems to be an oversight due to the following points:

2.2. St Helens has 936 “long term empty” housing units (FOI request January 2019), 2853 “unused” units (Council Tax returns 2018), and very many brownfield sites (St Helens’ brownfield register 2017).

2.3. On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use. 05

2.4. There is no substantive evidence to suggest that there is a need to remove such a large site as HA4 from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised.

2.5. It could be argued that the regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

3. The National Planning Policy Framework sets out obligations when considering flood risk and the effects of climate change. Concerns on these issues are highlighted in the original report, but the effects will be far worse under the new proposals;

3.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:

***“Likely to promote positive effects ”***

SA5. To mitigate and adapt to the impacts of climate change.

SA6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.

*reasoning that: “Site overlaps with Bold Forest Park (0m) and the site presents opportunities for enhancement of GI network.”*

It also scores SA5 using similar designations at several other land parcels for similar reasons.



PO0820

PF1350

# BOLD & CLOCK FACE VILLAGE ACTION GROUP PART B REPRESENTATION

① - LPA01

② - LPA02

③ - Gen. J. Belt Review

④ - LPA04

⑤ - LPA05

⑥ - LPA05.1

⑦ - IDA

⑧ - LPA07

⑨ - LPA09

⑩ - LPC05

⑪ - LPC06

⑫ - LPC07

⑬ - LPC08

⑭ - LPC09

This Representation is submitted on behalf of Bold and Clock Face Village Action Group in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.

The representation is supported by **427 signed Part A forms** in support and agreement of the representation made.

The representation 14 Part B forms as listed in the table of contents below.

1. Legally Compliant.....	3 Pages
2. Policy LPA01: Sustainable Development.....	3 Pages
3. Policy LPA02: Spatial Strategy.....	12 Pages
4. Policy LPA04: A Strong and Sustainable Economy.....	4 Pages
5. Policy LPA05: Meeting Housing Needs.....	3 Pages
6. Policy LPA05.1: Strategic Housing Sites.....	3 Pages
7. Policy LPA07: Transport and Travel.....	7 Pages
8. Policy LPA08 Infrastructure Delivery Funding.....	3 Pages
9. Policy LPA09: Green Infrastructure.....	6 Pages
10. Policy LPC05: Open Space.....	3 Pages
11. Policy LPC06: Biodiversity and Geological Conservation.....	6 Pages
12. Policy LPC07: Greenways.....	3 Pages
13. Policy LPC08: Ecological Network.....	4 Pages
14. Policy PLC09: Landscape Protection and Enhancement.....	2 Pages
15. Appendix	
a. Local Development Scheme 2018-2021	
b. Bold Forest Park Area Action Plan, Adopted 2017	
c. Bold Forest Park Area Action Plan Supporting Technical Document	
d. Bold Forest Park Ecological Network Development	
e. Burtonwood Development	
f. Partial Phase 1 Habitat Survey and 3 Bat Transects	
g. Assessment of the Local Plan and Green Belt Review	

**The Group trust this document will be submitted, in its entirety as part of the public consultation.**

**Bold and Clock Face Village Action Group.**

12 MAY 2019



St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

<b>1. Your Details</b>	<b>2. Your Agent's Details (if applicable) (we will correspond via your agent)</b>
Title: MRS	Title:
First Name: SARAH	First name:
Last Name: HUGHES	Last Name:
Organisation/company: Bold & Clock Face Village Action Group	Organisation/company:
Address: 3 Frenchfields Cr St Helens	Address:
Postcode: WA9 4FZ	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

<b>Signature:</b> [REDACTED]	<b>Date:</b> <input type="text" value="13.05.19"/>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	X	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No X
Sound?	Yes <input type="checkbox"/>	No X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

**Please see attached representation made on behalf of Bold and Clock Face Village Action Group with regards to Policy LPA02: Spatial Strategy.**

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Please see attached representation made on behalf of Bold and Clock Face Village Action Group.**

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	<b>No</b> , I do not wish to participate at the oral examination	<b>X</b>	<b>Yes</b> , I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**The community of Bold feel like they have been excluded from the St Helens Local Plan process and have not had a voice. The community need an opportunity to have their voice heard and concerns raised.**

**The area of Bold has a unique offering within the Borough of the Bold Forest Park and the associated Action Plan, which has been largely ignored.**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**This representation is submitted on behalf of Bold and Clock Face Village Action Group in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.**

Bold and Clock Face Village Action Group have formed in response to what it perceives as the exclusion of the community from the Local Plan process. The Bold & Clock Face Village Action Group (the Group) recognise the efforts of St Helens Local Council in the desire to develop a workable Local Plan for the area. It is hoped that a Local Plan is adopted to ensure Green Belt land is protected and development is steered towards the most suitable areas. However, the Group consider the proposed plans in some areas are not legally compliant and fail to meet the test of soundness, as set out in Paragraph 35 of the National Planning Policy Framework (Feb 2019), for the reasons which have been set out below and therefore requires modification specifically in relation to proposed development within the Bold Forest Park boundary. The Group have aimed to address each of the Policy concerns in turn and have submitted a representation for each.

**I trust this document will be submitted, in its entirety as part of the public consultation.**

#### **Policy LPA02: Spatial Strategy**

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPA02 and sites 4HA and 5HA within the Bold Forest Park and is not consistent with national policy. The Bold Forest Park Area Action Plan, as adopted by St Helens Council July 2017, and listed in the Local Development Scheme 2018-2021<sup>1</sup> as an adopted development plan document should play a key role in guiding decisions.

The Submission Draft St Helens Local Plan 2020 – 2035, proposes significant developments at 4HA and 5HA which are all contained within the Bold Forest Park boundary. Across the three sites there are 3,557 dwellings planned, with the most significant being at 4HA in Clock Face Village, 2,988 dwellings. The development plans propose the removal of 154.53ha Green Belt land, for housing, from the Forest Park area, which constitutes over 55% of the planned housing development within the local plan. Together with the land currently planned for Employment development, this will see an overall reduction of 12% of the Greenbelt Land within the Bold Forest Park area. *'The environmental quality of the area is of fundamental importance to the success of the Forest Park.'*<sup>2</sup> Erosion of the Green Belt land to such an extent within the Forest park boundary, far more than other areas within the borough, will threaten the environmental quality of the area and will potentially lead to the failure of the aims and objectives of the forest park.

The Green Belt Review 2018 used to assess the land for development allocation, is fundamentally flawed in its assessment of site 4HA (known as GBP\_074\_A, GBP\_074\_B,

<sup>1</sup> St Helens Council Local Development Scheme 2018-2021, Section 2.1

<sup>2</sup> Bold Forest Area Action Plan, Adopted 2017, Page 7, 3.2.9



GBP\_074\_C, GBP\_074\_D). The review was split in to 5 stages with each parcel of land being assessed and rated at each stage and then either being carried forward or discounted.

Stage 1 of the GBR, assessed each parcel of land against the purposes of the Green Belt. Table 2.1 defined the criteria used for defining 'strong' and 'less strong' boundary features against purpose 1.

**Table 2.1: Criteria used to define boundaries of parcels and sub-parcels.<sup>3</sup>**

Strong' boundary features	'Less strong' boundary features
<ul style="list-style-type: none"> <li>• Canals and substantial rivers</li> <li>• Protected woodlands (greater than 20m in width)</li> <li>• Bunds and depressions greater than 5m in height/depth</li> <li>• Permanent roads</li> <li>• Railway lines</li> <li>• Buildings with strong established lines (excluding buildings that are not appropriate in the Green Belt such as agricultural buildings and, some facilities for outdoor recreation)</li> <li>• Policy designations or planning commitments that are likely to lead to a firm boundary being created.</li> </ul>	<ul style="list-style-type: none"> <li>• Hedgerows, lines of trees</li> <li>• Farmers' fields</li> <li>• Ditches and drains not readily visible from ground level</li> <li>• Fences and low walls</li> <li>• Tracks and temporary roads</li> <li>• Buildings with weak intermittent lines</li> </ul>

In all four sub-parcels, Farmers fields, Hedgerows and lines of trees have been described as 'substantial' or 'strong' boundaries. This is a direct error when assessed against the criteria as detailed in the GBR. Assessed correctly using the criteria laid out in table 2.1 the sub-parcels become High.

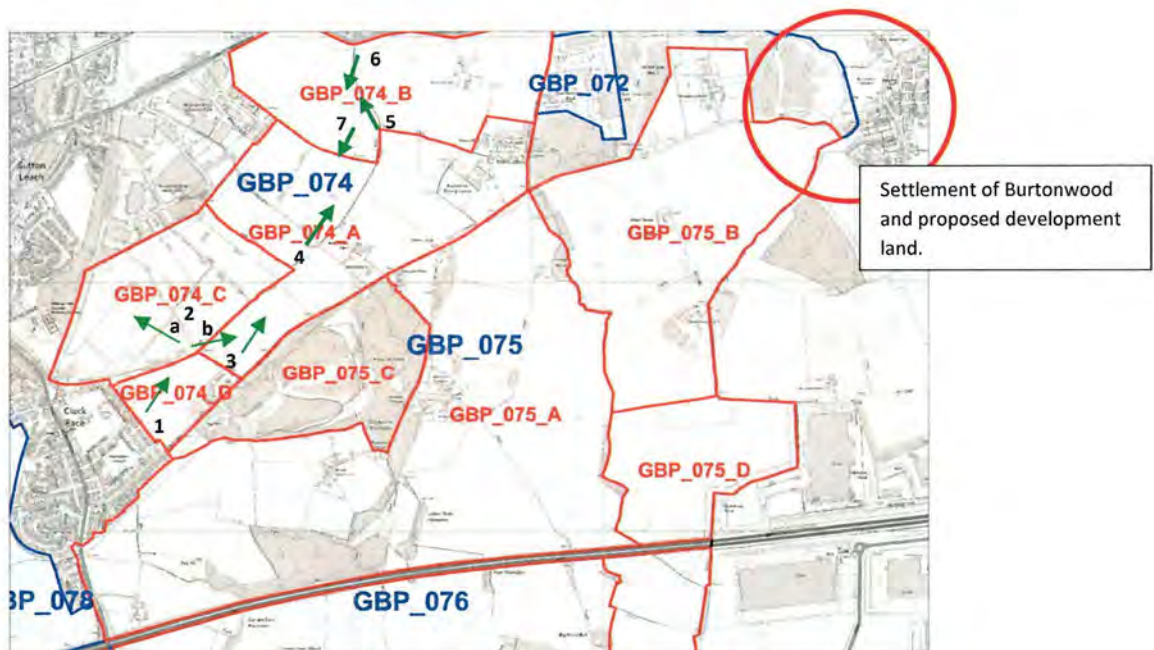
In respect of purpose 2, the GBR did not consider the settlement of Burtonwood in Warrington Borough on the east aspect of 4HA. Whilst not a 'town' as referred to in the NPPF, it is a smaller settlement of the same scale and character as Rainhill, Rainford, Billinge and Garswood that have been considered in the review. It is a community with its own identity, *character and range of community facilities*.<sup>4</sup> The Group argue this exclusion is a fundamental error in the assessment of 4HA against purpose 2. Including Burtonwood in the assessment would re-score each parcel within 4HA as High, being on the urban edge within a 'strategic gap' i.e an essential gap that needs to be kept open and kept clear of new development to ensure that adjacent

<sup>3</sup> Green Belt Review December 2018, Page 13-14

<sup>4</sup> GBR 2018 Page 18

settlements do not merge.<sup>5</sup> This is given even more significance when considered against strategic land and development projects planned for Burtonwood, which will also encroach in to the gap. Please see attached.

The Group argue the findings against purpose 3 are also inaccurate. Again, the review refers to 'strong' boundaries at sub-parcels GBP\_074\_C and GBP\_074\_D, which have been shown to be listed as weak under the GBR categories. The recognised strong boundaries that are present within the sub-parcels serve to prevent urban sprawl. GBP\_074\_A references urban development on its western boundary. The western boundary borders GBP\_074\_C and GBP\_074\_D, farm fields, not urban development. The review has listed each parcel as having limited open views. This is incorrect. Please see below photographs taken from points on Public Rights of Way for each sub-parcel and corresponding reference on the map. These clearly show the open views and inaccuracies in the assessments.



1. Boundary GBP\_074\_D



2a. Boundary GBP\_074\_D and GBP\_074\_C

<sup>5</sup> GBR 2018 Page 19



2b. Boundary GBP\_074\_C and GBP\_074\_A



3. Boundary GBP\_074\_D and GBP\_074\_A



4. GBP\_074\_C and GBP\_074\_A towards GBP\_074\_B



5. Boundary GBP\_074\_A and GBP\_074\_B



6. Boundary GBP\_074\_B



7. From GBP\_074\_B towards GBP\_074\_A

Taking the three purposes together and correcting the inaccuracies, sub-parcels GBP\_074\_A, GBP\_074\_B, GBP\_074\_C and GBP\_074\_D are scored as High+ and as such should be excluded for consideration at stage 1.

If the inaccuracies at stage 1 are ignored and the sub-parcels are carried through to stage 2A, The Group argue they are subject to a 'prohibitive' constraint which would result in them being discounted for the next stage. Table 2.6: List of 'prohibitive' constraints applied to

parcels/sub-parcels in Stage 2A<sup>6</sup>, listed the constraints that should be considered for exclusion. Constraint 4 is described as:

*'More than 2/3rds of the parcel/sub-parcel is covered by an area of public open space, sporting or recreational provision in an area of deficit for facilities of the type which would be lost, and there is no identified scope for suitable replacement provision.'*<sup>7</sup>

Areas GBP\_074 collectively, all fall within the Bold Forest Park boundary. The area is criss-crossed by heavily used Public Rights of Way and a recognised bridleway. It has also been identified for further development of the bridleway network. This issue is discussed further under Policy LPC05, where The Group have identified the area as being an open space of public value, used for recreational purposes and forms part of the Forest Park. Area GBR\_074 collectively should have been discounted at this stage.

If this was again ignored and the parcels were put forward for assessment at Stage 2B, the Bold Forest Park Area Action Plan should have been a key consideration and data source when considering the characteristics of each parcel/sub-parcel against the constraints listed within the Stage 2b development assessment proforma, please see attached. This applies to both sites GBR\_074 and GBR\_080. This is not the case. The Action Plan has not been listed as a data source against any constraint type. This is a fundamental error in the GBR 2018.

As a result, the recommendations of the GBR 2018 must be discounted in relation to sites GBR\_074 and GBR\_080, therefore the Council have failed to demonstrate the exceptional circumstances required to remove parcels GBR\_074 collectively (4HA) and GBR\_080 (5HA) from the Green Belt.

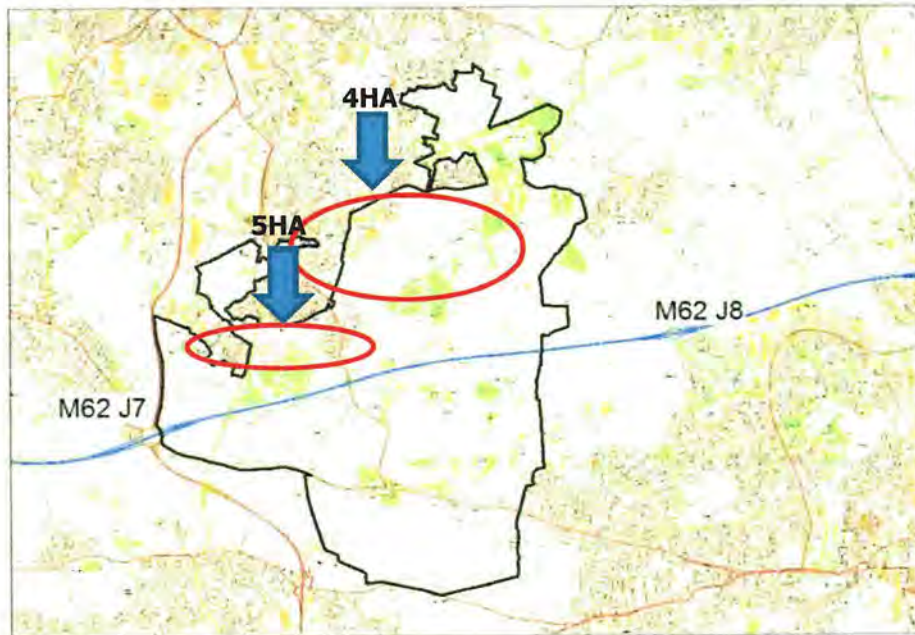
Much of the Green Belt land within the Forest Park that has been allocated within the plan is in the North of the Forest Park and therefore currently the most accessible to many people within the Bold area and neighbouring wards. Removal of the land at 4HA and 5HA will mean a significant percentage of the remaining Greenbelt land is in the South of the Forest Park, an area that is the least accessible to a large majority of residents and visitors to the Park. The area is segregated by the M62, making access difficult other than by car and is privately owned, restricting the access rights of the general public. The NPPF expects the local authority to positively plan to enhance the beneficial use of the land in the Green Belt. This includes looking for opportunities to provide access to Green Belt; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity.<sup>8</sup> The plan therefore is in direct conflict with the Bold Forest Park Area Action Plan and the vision, aims and objectives of the plan.

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<sup>6</sup> St Helens Borough Local Plan 2020-2035 Green Belt Review 2018, Page 22

<sup>7</sup> St Helens Borough Local Plan 2020-2035 Green Belt Review 2018, Page 22

<sup>8</sup> Bold Forest Area Action Plan, Adopted 2017, Policy Context, Page 2, 2.1.6

Figure 1. Bold Forest Park boundary.<sup>9</sup>

The BFPAAP identified the potential to 'accommodate some small-scale development'<sup>10</sup>, providing a 'framework for the development of the Forest Park.'<sup>11</sup> The BFPAAP, further identified areas that should be protected from any development. St Helens Council have failed to take a balanced approach to the allocation of development land within the borough. The Green Belt Review 2018 and subsequent recommendations, should be read in conjunction with already adopted development plans. Site 4HA is covered entirely by a recommended no development area. A Landscape Character Assessment for St Helens by Land Use Consultants considered development within the character area should be avoided to maintain an open rural landscape character.<sup>12</sup>

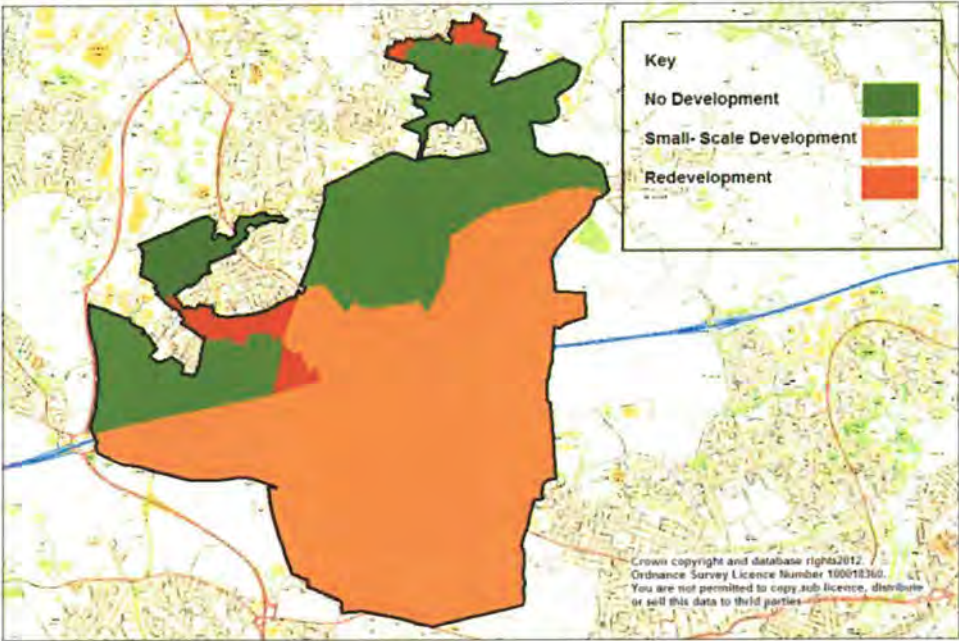
<sup>9</sup> Bold Forest Park Area Action Plan Supporting Technical Document, Page 5

<sup>10</sup> Bold Forest Area Action Plan, Adopted 2017, Research and Consultation Background, Page 15, 6.4.4

<sup>11</sup> Bold Forest Area Action Plan, Adopted 2017, Introduction, Page 1, 1.2

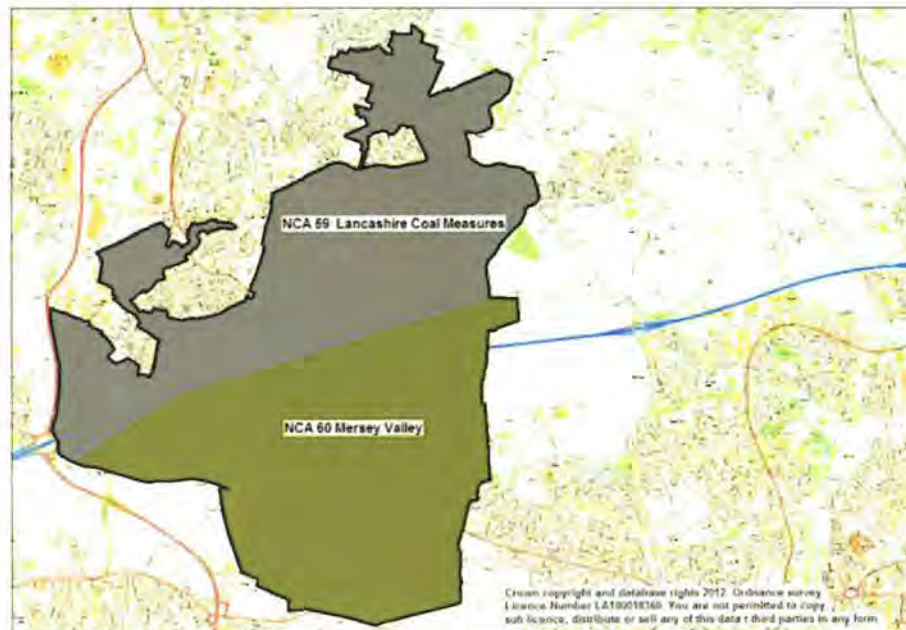
<sup>12</sup> A Landscape Character Assessment for St Helens, Land Use Consultants, January 2006, Page 135

Figure 2: Potential For Development Map<sup>13</sup>



'A high quality environment is an essential ingredient of a successful outdoor leisure attraction. This includes a strong sense of place and local character.' Part of the landscape character of Bold Forest Park can be described as, 'urban fringe farming'. This was further supported by Natural England's National Character Area Advice for the Lancashire Coal Measures (NCA 59), which, 'identifies mining and agriculture as major influences on landscape character.' The BFPAAP accepted and listed as a key issue the recommended advice for 'supporting the agricultural landscape by expanding the habitat networks of grassland, woodland, ponds and hedges.' Site 4HA and 5HA are located entirely within the NCA 59 Lancashire Coal Measures area.

<sup>13</sup> Bold Forest Park Area Action Plan Supporting Technical Document, Page 15

Figure 3. National Landscape Character Areas<sup>14</sup>

In 2004 Groundwork St Helens conducted a feasibility study to investigate the desire for the development of a bridleway network throughout the Forest Park. Over 99% of respondents supported a bridleway development over the open spaces within the Forest Park. The largest development of which was recommended across the open space covered by site 4HA.<sup>15</sup> The British Horse Society (BHS) has put forward its aspirations to develop a three day “Mersey Circular” route with adjacent stabling, suggesting the existing equestrian businesses within St Helens are particularly well placed. The route is mostly within St Helens Borough, in particular, Bold Forest Park. The Mersey branch of the BHS estimates there being 9,085 horses in Liverpool City Region and an annual expenditure of £33m<sup>16</sup>. The study by Groundwork suggested horse riding was as much an anchor activity in the Forest Park as walking, cycling and running and the aspirations of BHS demonstrate the success of the equestrian sector should be seen as crucial to the success of the Forest Park and fundamental to its regeneration. The **Local Plan LPA02: Spatial strategy** states that development would be prevented, ‘that would adversely impact upon or jeopardise the delivery of regeneration proposals.’ The BFPAAP states that any development should, ‘fully contributes to the Parks aims and objectives’.<sup>17</sup>

The removal of 4HA from the Green Belt and allocation for development would result in the closure of the largest equestrian business within the Forest Park at Tunstalls Farm and impact

<sup>14</sup> Bold Forest Park Area Action Plan Supporting Technical Document, Page 10

<sup>15</sup> Bold Forest Park Area Action Plan, Adopted 2017, Page 18, 6.5.2

<sup>16</sup> Bold Forest Park Area Action Plan, Adopted 2017, Page 12, 6.1.7

<sup>17</sup> Bold Forest Park Area Action Plan, Adopted 2017, Page 14, 6.2.2

on a second equestrian business at Northfield Farm that will be completely enclosed by development. It will remove any open space earmarked for the development of an off-road bridleway and halt any aspirations by BHS by not only removing the option of adjacent stabling, but available land to develop a 3day route. This will adversely impact on or jeopardise the delivery of regeneration proposals and the Parks aims and Objectives.

St Helens Council Brownfield register, produced in 2018, suggests current availability for 6028 houses. Following a freedom of information request in January 2019, it is recognised there are currently 936 long term empty homes and 2,853 unused units (council Tax Returns 2018) in the borough of St Helens. Even when using St Helens Councils own figures and excluding the long term empty and unused dwellings, this leaves a shortfall of only 1,500 houses at best. Across the combined sites of 4HA and 5HA, provision is being made for over 3,500 dwellings. This far exceeds the shortfall for the borough as a whole. Sefton Council also submitted comments to St Helens Council in 2016 stating the amount of land being considered for removal from Green Belt was excessive and not in keeping with advice from the Local Plans Expert Group.

The plan proposes the development of approximately 5,000 new homes across the two wards of Bold and Sutton in the St Helens borough. It does not take in to account the number of houses that have already been built in these wards recently and those that are currently under construction. It also excludes any development of less than 250 properties. Taking all these areas in to account, initial estimates of 2,000 properties in addition to those included in the local plan. The impact of 7,000 new homes within a short time scale and restricted area will have a devastating impact and cause irreparable damage to the natural environment, destroy biodiversity, increase rather than minimise pollution and does not make effective use of the land.

Further to the 2,800+ homes long term empty, as stated above, and the over provision of housing within the immediate area, there are also substantial areas of Brownfield land that once regenerated and brought back in to public use would have a significant positive contribution on those communities that are blighted by these areas. One of the key principals of designated Green Belt land is to encourage the redevelopment and regeneration of otherwise unusable Brownfield land. The release of large swathes of Green Belt land for development, fundamentally removes this incentive, burdening communities with land that in some instances could be considered dangerous with no real plan financial or otherwise for repairing and reusing the land. The Group believes the Council have failed in their duty to fully take in to account these reasonable alternatives and is therefore not an appropriate strategy.

It is commendable that St Helens council have created a Brownfield Register and have identified 108 sites and a *minimum* 6028 dwellings that could be built over the next 15 years (2018 Brownfield Register). Furthermore 74 of these sites have planning permission for 3710 homes. Taking the adopted number of dwelling required per year (486), 3710 dwellings equates to over 7 years of housing and 6028 equates to 12 years of development as a minimum. This is an excellent way to regenerate land and communities within the town that are currently purposeless. It is in line with the NPPF (2019, Section 13) approach of urban regeneration, recycling derelict and other urban land and protecting Green Belt.



Research carried out by CPRE (2018)<sup>18</sup> on the state of brownfield land nationally revealed councils had identified suitable land for 23% more housing since they were required to submit information on previously developed land to the National Land Use Database from 2010 to 2012. Analysis of the 2017 and 2018 brownfield registers<sup>19</sup> shows that within St Helens there was an increase of 10 sites and 210 dwellings (10% and 4% increases) within 1 year alone. There is also the potential of currently used sites or unsuitable/contaminated sites becoming available for development within the 15 year period. CPRE have released a Brownfield Toolkit<sup>20</sup> to enabling communities to highlighting brownfield sites in their local area, supporting the work of Council planning departments.

Whilst the consideration of brownfield sites within St Helens only on the Brownfield Register is in line with Government guidelines, it does exclude a wealth of sites that may be released within the next 15 years. A FOI request has shown that there is a significant amount of contaminated land that also has the potential to site considerable number of dwellings (Table 1. Attached St Helens contaminated Land Sites 2015). Although not immediately available, the least contaminated land (Group C), arguably is not financially prohibitive to consider and could reasonably be remediated within the 15 year plan. Table 4.6 of the St Helens Local Plan 7245 dwellings are required between 1<sup>st</sup> April 2020 and 31<sup>st</sup> March 2035. Assuming 6028 would be delivered from the Brownfield register, the residual number of homes (1217) would require 60.85 hectares of land (using Regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 ), which represents only 2% of Group C contaminated land; an amount of land that could feasibly be remediated.

Decontaminating land and regenerating comes at a cost, and whilst ground conditions can be uncertain and unexpectantly costly in previously untouched areas, it is this cost that is considered prohibitive to developers. There are incentives to attract developers to build on currently contaminated sites, such as land remediation tax relief of 150%, the £1 billion Housing Delivery Fund<sup>21</sup>, £1.3 billion Land Assembly fund and Small Sites Fund<sup>22</sup>. These all stem from the Government's desire for innovation in delivery of housing and would aid development on brownfield and contaminated land.

Taking all these factors into consideration, the sustainable approach that is in line with NPPF would be to review the need to release Green Belt on a 5 year basis, releasing it only when brownfield is exhausted. To release Green Belt within the next 15 years would reduce or

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<sup>18</sup> Campaign to Protect Rural England (CPRE), 2018. State of Brownfield 2018, An analysis demonstrating the potential of brownfield land for housing, available at <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4769-state-of-brownfield-2018> accessed on 12/5/19

<sup>19</sup> St Helens website – Research, Evidence and Monitoring – Brownfield Land Register available at <https://www.sthelens.gov.uk/planning-building-control/planning-policy/research-evidence-and-monitoring/> accessed on 12/5/19

<sup>20</sup> CPRE Lancashire Brownfield Land Register Toolkit <http://www.cprelancashire.org.uk/resources/housing-and-planning/item/2483-cpre-lancashire-brownfield-land-register-toolkit> accessed on 12/5/19

<sup>21</sup> Government News Story (2018) £1 billion housing delivery fund launched by Brokenshire in partnership with Barclays available at <https://www.gov.uk/government/news/1-billion-housing-delivery-fund-launched-by-brokenshire-in-partnership-with-barclays> accessed on 12/5/19

<sup>22</sup> Government Press Release (2018) – Government investment to overcome barriers to building available at <https://www.gov.uk/government/news/government-investment-to-overcome-barriers-to-building> accessed on 12/5/19

even remove incentive to regenerate brownfield first. Should the unlikely need arise to release Green Belt there should be a staged approach to its release, which is proportional to what is required on a 5 year basis. In doing so this would reduce the effects of urban sprawl, where there are already hard boundaries by existing housing, industry and roads, in line with NPPF 2019 paragraph 134.

Furthermore, dealing with contamination can improve the water environment, provide homes for wildlife, help tackle climate change, regenerate communities and protect food supplies by preserving Green Belt and reusing land already within the town. All these points are supported with Chartered Institution of Water and Environmental Management (CIWEM) 's brownfield development position statement.<sup>23</sup>

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<sup>23</sup> CIWEM's Policy Position Statement on Brownfield Development available at <https://www.ciwem.org/assets/pdf/Policy/Policy%20Position%20Statement/Brownfield-Development.pdf> accessed on 12/5/19

St Helens Contaminated Land (CL) Sites 2015

Potential CL area (km <sup>2</sup> ) = total 9105 no. sites in the Borough		Percentage of CL in Borough (% of total - 135.9 km <sup>2</sup> )	Part2A		Planning
			(a) Sufficient information to establish SPOSH or not SPOSH	(b) Determined under Part2A	
Site Category	Total area (km <sup>2</sup> )	Site No.	Site No.	Site No.	Site No.
Group A	47.9	35.2 %	3006 sites – a=b+c (sites hold numerous individual sites)	6 sites (Tickle - 34 ind. Property & Jackson 38 ind. Property determinations) <sup>1</sup>	3000 (on average 200 sites from 2001 – 2015 via Planning)
Group B	15.4	11.3 %			
Group C	31.7	23.3 %			
Within Group A, B & C (top 40 highest prioritised sites)	4.3	3.2 %	36 sites	3 sites <sup>2</sup>	33 (collation of data in progress)
<b>Potential CL = total 9105 no. sites – total 3006 no. sites hold sufficient information = 6099 no. sites</b>					

<sup>1</sup> Tickle Avenue Estate, Sutton Sankey Brook, Recreation Street Allotments and Jackson Street Estate—other sites that have been investigated and not determined include Wood Street (not SPOSH), Merton Bank (Management Plan).

<sup>2</sup> Tickle Avenue Estate, Sutton Sankey Brook and Jackson/McCulloch Estate

Reference	Street/Address	GeoX	GeoY	Height	Current/Status	Deliverable	Plan/Status	Permission/Date	Min/Max/Height	Development/Description	Height/Development	Notes	Final/Date	Final/Date	
BR001	Land rear of 14 to 20 Weymouth Avenue, Parr, WA9 3QY	353199	393424	0.36	owned by a public authority	Yes	not permitted					This is a cleared former housing site and has previously benefited from planning permission for residential development. This site is currently being prepared for planning permission for residential development. There are no policy or known physical constraints that would make the site unsuitable for housing.	19/12/2017	19/12/2017	
BR002	Land between B & 24 Portland Way and 161 & 123 Berry's Lane, Parr, WA9 3QZ	353178	393428	0.32	not owned by a public authority	Yes	not permitted					This is a cleared former housing site and has previously benefited from planning permission for residential development. There are no policy or known physical constraints that would make the site unsuitable for housing.	19/12/2017	19/12/2017	
BR003	Land between Weymouth Avenue & Berry's Lane, Parr, WA9 3QY	353178	393437	0.32	not owned by a public authority	Yes	not permitted					This is a cleared former housing site and has previously benefited from planning permission for residential development. There are no policy or known physical constraints that would make the site unsuitable for housing.	19/12/2017	19/12/2017	
BR004	Land at Park Road, St Helens, WA9 1ER	352633	393781	0.78	mixed ownership	Yes	not permitted					This site is identified as an urban village site in the St Helens Core Strategy.	19/12/2017	19/12/2017	
BR005	Moat Brook Urban Village, Watery Lane, St. Helens, WA9 3BN	353007	393292	26.74	mixed ownership	Yes	permitted	22/09/2017		802 Demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure and engineering works, open space, and erection of new residential and retail development.			19/12/2017	19/12/2017	
BR006	Land at junction of Sandbury Street and Fir Street, Thurston Heath, WA10 3RL	354988	393665	0.82	not owned by a public authority	Yes	not permitted					This cleared former housing site has an expired planning permission on the northern parcel. There are no policy or known physical constraints that would make the site unsuitable for housing.	19/12/2017	19/12/2017	
BR007	Land rear of Carnegie Crescent and Goodham Street, Parr, WA9 3LX	353598	393768	0.26	not owned by a public authority	Yes	not permitted					This cleared former housing site has an expired planning permission on the northern parcel. There are no policy or known physical constraints that would make the site unsuitable for housing.	19/12/2017	19/12/2017	
BR008	Land at Somerby Street and Sasser Grove, Parr, WA9 1QN	352525	394908	2.21	not owned by a public authority	Yes	not permitted					This cleared site is subject to some issues with land ownership but this is being addressed with the land registry.	19/12/2017	19/12/2017	
BR009	Land at corner of Fairclough Street and Watery Lane, Parr, WA9 3QU	357834	393237	0.41	mixed ownership	Yes	not permitted					There are no known legal or ownership issues and the site is considered to be available immediately.	19/12/2017	19/12/2017	
BR010	Liverpool Arms and Former Sacred Heart RC Church and School, Borough Road, St. Helens, WA10 3LQ	352559	393504	0.89	mixed ownership	Yes	not permitted					This is a part cleared and develop site with an expired planning permission for apartments.	19/12/2017	19/12/2017	
BR011	Former Station Farm Pl, Eubank Lane, Thurston Heath, WA9 5NH	352684	393982	0.35	not owned by a public authority	Yes	not permitted					Former Public House that was demolished following a fire, previously benefited from planning permission.	19/12/2017	19/12/2017	
BR012	Land & Premises at Crows Field, Rainford, St. Helens, WA11 8NH	342728	401466	2.01	not owned by a public authority	Yes	not permitted					Partly vacant employment site with current developer interest in site. No other economically viable employment use with a planning application for housing on a larger site incorporating greenfield and in the process of being prepared.	19/12/2017	19/12/2017	
BR013	Land north of Eblon Head Road, Thurston Heath, WA9 5GN	350724	392946	7.31	mixed ownership	Yes	not permitted					This site is a cleared former residential site which has previously benefited from planning permission for residential development.	19/12/2017	19/12/2017	
BR014	Former Central Works, Church Road, Haydock, WA11 0GT	352993	396576	1.81	not owned by a public authority	Yes	not permitted					This is a cleared former housing site with prominent frontage along busy route into town centre.	19/12/2017	19/12/2017	
BR015	Site of former 50-52, Eccleston Street, St. Helens Town Centre, WA10 2ZN	352620	395239	0.33	owned by a public authority	Yes	not permitted					There is a mixed use masterplan being prepared for this site and the wider area surrounding the site.	19/12/2017	19/12/2017	
BR016	Site of former 50-52, Eccleston Street, St. Helens Town Centre, WA10 2ZN	352620	395239	0.33	owned by a public authority	Yes	not permitted					This is a mixed use masterplan being prepared for this site and the wider area surrounding the site.	19/12/2017	19/12/2017	
BR017	Site of former 50-52, Eccleston Street, St. Helens Town Centre, WA10 2ZN	352620	395239	0.33	owned by a public authority	Yes	not permitted					This is a mixed use masterplan being prepared for this site and the wider area surrounding the site.	19/12/2017	19/12/2017	
BR018	Former Pumping Station, Station Road, St. Helens Town Centre, WA9 3YU	352111	393482	0.27	not owned by a public authority	Yes	not permitted	22/09/2017		20 Demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure and engineering works, open space, and erection of new residential and retail development (part of Phase 3).			19/12/2017	19/12/2017	
BR019	Site of former Parr Community High School, New Lane/Grimms Avenue, Parr, WA9 1ST	352329	395151	1.57	owned by a public authority	Yes	not permitted					Stripped site after redevelopment of school site.	19/12/2017	19/12/2017	
BR020	Site of former St. Mark's primary school, Willow Tree Avenue, Station, WA9 4LZ	352669	393807	0.3	owned by a public authority	Yes	not permitted					This site is in active use as a children's merchants, cessation of existing use required prior to potential redevelopment for housing.	19/12/2017	19/12/2017	
BR021	Site of former 119-133 Crow Lane West, Eccleston, WA12 9YN	357210	395973	0.3	mixed ownership	Yes	not permitted					The site is in active use as a medical centre in portables within the grounds of the disused parish hall.	19/12/2017	19/12/2017	
BR022	Church Church Parish Hall, Chapel Lane, Eccleston, WA10 5DA	348598	395952	0.38	mixed ownership	Yes	not permitted					This site is cleared former industrial land which a central, urban location. Site would be suitable for high density residential development.	19/12/2017	19/12/2017	
BR023	Former 21, Hebble Grove, Adams Street/Corporation Street, St. Helens Town Centre, WA10 1GF	353935	395834	2.37	not owned by a public authority	Yes	not permitted					Part of cleared former industrial land which has been redeveloped on adjacent parcel, now vacant site.	19/12/2017	19/12/2017	
BR024	Former 21, Hebble Grove, Adams Street/Corporation Street, St. Helens Town Centre, WA10 1GF	353935	395834	2.37	not owned by a public authority	Yes	not permitted					This site is active use as a car repair garage, cessation of existing use required prior to potential residential development.	19/12/2017	19/12/2017	
BR025	Auto Sales Centre, Fitzroy Road, Blackbrook, WA11 0LH	354433	397944	0.31	not owned by a public authority	Yes	not permitted					This is a cleared former housing site that is in active use as a car park. There is potential that the site could be redeveloped for residential development.	19/12/2017	19/12/2017	
BR026	Site of former 125-124 Orchard Street and 107-125 Brompton Street, (now known as Clifton Street) Carr 1, St Helens, WA9 3YU	351425	395979	0.26	not owned by a public authority	Yes	not permitted					Partly vacant employment site with a masterplan for a mix of housing and employment use being prepared on a larger site incorporating greenfield and.	19/12/2017	19/12/2017	
BR027	Land at Cowley Street and Albert Street, Moss Bank, WA10 1TY	351425	395958	0.26	not owned by a public authority	Yes	not permitted					Partly vacant employment site with a masterplan for a mix of housing and employment use being prepared on a larger site incorporating greenfield and.	19/12/2017	19/12/2017	
BR028	Land to the rear of Juddfield Street, Blackbrook, WA11 0AZ	354226	397989	1.14	mixed ownership	Yes	not permitted					Former FCT Headquarters no longer in use.	19/12/2017	19/12/2017	
BR029	Hilton and St Helens PCT HQ, Cowley Hill, Whittle, WA10 2UE	352704	396790	1.17	not owned by a public authority	Yes	not permitted					Former landfill site suitable for housing, however a flood risk assessment would be required.	19/12/2017	19/12/2017	
BR030	Former site of 268 Gerrards Lane, St. Helens, WA9 3BD	351939	391290	1.93	not owned by a public authority	Yes	not permitted					Site is considered suitable for housing however a flood risk assessment would be required.	19/12/2017	19/12/2017	
BR031	Land adjacent to St. Helens Hospital, Marshalls Cross Road, St. Helens Town Centre, WA9 3BY	352787	394146	1.63	not owned by a public authority	Yes	not permitted					Site could potentially be forward for residential development through the One Public Estate Government Programme.	19/12/2017	19/12/2017	
BR032	College Street Northern Gateway, St. Helens Town Centre, WA10 1HT	351817	393798	2.88	owned by a public authority	Yes	not permitted					The site is considered suitable for high density housing.	19/12/2017	19/12/2017	
BR033	Land south of Knowsley Road, West Park, St. Helens, WA10 0PL	349775	393318	0.42	not owned by a public authority	Yes	not permitted					Sustainable site suitable for housing.	19/12/2017	19/12/2017	
BR034	Land south of Cuck Street, St. Helens Town Centre, WA10 2HN	352613	395810	0.48	Urban ownership	Yes	not permitted								
BR035	The Berridge, 268 Gerrards Lane, St. Helens, WA9 3BD	351939	391290	1.93	not owned by a public authority	Yes	not permitted								
BR036	Land and site of Bowling Green in and former Berridge Inn, Watery Lane, Parr, St. Helens, WA9 3BH	352950	394127	0.22	not owned by a public authority	Yes	not permitted								
BR037	The Globe, 142 Handshaw Street, St. Helens, WA10 1JT	351427	395855	0.08	not owned by a public authority	Yes	not permitted	15/12/2009		6 Conversion of former Globe Hotel to create 6 new self contained flats and the retention of existing flat and office space. Total 7 flats (4) 6					
BR038	74 Cooper Lane, Haydock, WA11 0JH	355179	396811	0.09	not owned by a public authority	Yes	not permitted	12/08/2011		6 Retained matters application pursuant to outline permission F/2010/0968 for the erection of a two storey apartment block comprising of two apartments.					
BR039	Land site of and to rear of former 251 to 255 New Street, Station, St Helens	352729	392763	0.2	not owned by a public authority	Yes	not permitted	15/02/2017		8 Erection of two dwellings along with landscaping and associated works.					
BR040	131 Bryn Street, Town Centre, St Helens, Merseyside, WA10 1HZ	351848	395898	0.05	not owned by a public authority	Yes	not permitted	17/02/2016		9 Re-submission of F/2012/0854 for the demolition of the single storey office building and erection of 2.5 - 3 storey residential units in two blocks with associated on site.					
BR041	The Old Cottage Hospital, 386 Clapham Lane, Haydock, WA11 0ST	353483	396837	0.12	not owned by a public authority	Yes	not permitted	20/11/2013		12 Re-submission of F/2013/0013 for the conversion of the former Cottage Hospital to create 11 flats.					
BR042	Former 240 Quarry Lane, Parr, WA9	353034	395153	0.21	not owned by a public authority	Yes	not permitted	18/12/2013		25 Erection of 25 no. apartments with associated car parking and landscaping works.					
BR043	Land at 135 Hill Street, St Helens, WA10 1EP	351712	393713	0.13	not owned by a public authority	Yes	not permitted	05/01/2017		11 Re-submission of F/2010/0134 for the construction of 12 no increased dwellings in 2 blocks plus associated parking.					
BR044	Land at Cannon Street, Cuck Lane, Bold, St. Helens, WA9 4XU	352078	393181	0.21	not owned by a public authority	Yes	not permitted	07/05/2015		10 Erection of 10 no dwelling houses, parking and associated works.					
BR045	Land at and including 24 Brewery Street, Thurston Heath, St. Helens, WA10 3EG	349644	394068	0.18	not owned by a public authority	Yes	not permitted	26/11/2015		16 Demolition of existing buildings and erection of a part two storey / part three storey building to provide 16 no. flats with associated access, car parking and landscaping.					
BR046	Land site of former Fights Inn, 293 Watson Road, Parr, St. Helens	354651	393215	0.18	not owned by a public authority	Yes	not permitted	21/01/2015		10 Erection of 10 no dwellings with associated parking and additional works.					
BR047	8-12 Ormbyk Street, Town Centre, St Helens, WA10 181	351118	393542	0.03	not owned by a public authority	Yes	not permitted	11/12/2015		9 Change of use of first, second and third floors of licensed premises to three residential apartments.					
BR048	92 St James Road, Rainhill, St. Helens, L35 0PG	349424	393051	0.13	not owned by a public authority	Yes	not permitted	25/05/2016		8 Demolition of existing residential building with garage and erection of 3 storey building comprising of two apartments with associated landscaping and parking.					
BR049	23A Handshaw Street, Town Centre, St Helens, WA10 1RT	351234	393408	0.02	not owned by a public authority	Yes	not permitted	26/04/2017		5 Prior notification under Schedule 2, Part 3 of Town and Country Planning (General Permitted Development) Order 2015 for application for conversion of existing office building to 5 no 1. The site benefits from planning consent.					
BR050	Rainhill Club and Sports Lounge, Whitburn New, Rainhill, St Helens, L35 4LP	349070	393188	0.24	not owned by a public authority	Yes	not permitted	17/11/2016		10 Reserved matters application pursuant to F/2016/0273 for 10 no dwellings with regard to appearance, landscaping, layout and scale.					
BR051	Bullring Two Millfields Court, Tazon Way, Eccleston, St Helens	349015	393930	0.21	not owned by a public authority	Yes	not permitted	24/09/2016		8 Erection of a two storey building comprising of 14 and/or 14 no. units on the ground floor and 8 no. apartments at first floor along with car parking landscaping and associated works.					
BR052	Land at 1st Alder Street, Newton La Willows, St Helens, WA12 8HP	358704	393053	0.15	not owned by a public authority	Yes	not permitted	31/09/2016		5 Erection of five dwellings along with associated works, landscaping and car parking.					
BR053	Land at Legh Street, Newton La Willows, St Helens	357387	393274	0.08	not owned by a public authority	Yes	not permitted	18/11/2016		10 Development of a two storey building comprising 5 ground floor commercial units (two class A1) and 12 no residential apartments to upper floors and lift with associated landscaping/terraces and service.					
BR054	Handshaw House, Tower Street, St Helens, Merseyside, WA10 1BW	351457	393587	0.24	not owned by a public authority	Yes	not permitted	05/02/2017		26 Change of use of existing building into 26 no flats with associated parking.					
BR055	Haydock Health and Medical Centre, 152 Station Road, Haydock, St Helens, WA11 0UN	352555	396731	0.23	not owned by a public authority	Yes	not permitted	09/02/2017		16 Outline application for the demolition of the existing building and erection of two apartment blocks providing 16 apartments including access and car parking (appearance, landscaping and scale reserved). This site benefits from planning consent.					
BR056	Len Beaman Limited, Eccleston Street, Town Centre, St Helens, WA10 2HG	352622	393225	0.09	not owned by a public authority	Yes	not permitted	14/11/2016		5 Sub-division of the ground floor into 5 no. A1 units including 3 no. new shopfronts, first floor side extension and conversion of first floor into 5 no. flats (two two bedroom and three three bedroom) plus 3.					
BR057	Travery Farm, Travery Farm, Bold, St Helens, WA9 4TF	354446	392887	0.13	not owned by a public authority	Yes	not permitted	24/01/2017		8 Demolition of existing storage building and erection of 8 supportive care units with associated parking and landscaping.					
BR058	2 Greenwood Drive, Newton La Willows, St Helens, WA12 9BA	358623	394615	0.23	not owned by a public authority	Yes	not permitted	23/01/2017		6 Demolition of existing building and erection of two dwellings along with associated works.					



Pivot table for Planning Status and minimum number of dwellings

<b>Row Labels</b>	<b>Sum of MinNetDwellings</b>
not permitted	2396
pending decision	85
permitted	3337
<b>Grand Total</b>	<b>5818</b>

Pivot table for Planning Status and number of sites

<b>Row Labels</b>	<b>Count of PlanningStatus</b>
not permitted	35
pending decision	3
permitted	60
<b>Grand Total</b>	<b>98</b>





Sustainable site suitable for housing, planning application pending (Ref: P/2018/0021/PAU)

Ref	Address	Ownership	Decision	Permitted	Date	Description	Notes	Ref	Date
BR004 BR007	Land north of Cuck Street, St Helens T1 3JQJZ, 395810 HO1 (apartments) (former AC Complex 5 331718 395647	0.48 not owned by a public authority 1.38 not owned by a public authority	Yes Yes	pending decision permitted	2/21/2006	61. Erection of an over 55+ facility incorporating 61 apartments split into 3 storey building and a 4 storey building with associated car parking and landscaping. 64. Development of 260 new and two bed apartments in three blocks with associated landscaping, access and parking.	3 blocks to be built, 2 demolished, leaving 24 units remaining. There are no known legal or ownership issues and the site is considered to be available immediately.	19/12/2017 19/12/2017	19/12/2017 19/12/2017
BR008 BR006 BR009 BR007 BR010 BR007 BR007	Land at Smeaton Street and former V 342743 394908 Phase 1 J148 281, land site of former V 348483 394104 Land at Mountview Lane, Sutton, Wirral 331314 393129 Polar Road, City Road, Wirral, St. Helens 330759 397211 Land at Bank Lane, Wirral, St. Helens 331314 393129 Land at Bank Lane, Wirral, St. Helens 331314 393129 Fibwick Industrial Estate, Bowers L4 52536 393543	2.1 not owned by a public authority 2.54 not owned by a public authority 2.03 not owned by a public authority 2.72 not owned by a public authority 2.03 not owned by a public authority 2.37 not owned by a public authority 2.83 not owned by a public authority	Yes Yes Yes Yes Yes Yes Yes	not permitted not permitted permitted permitted permitted permitted permitted	05/09/2012 05/02/2013 07/02/2013 02/11/2013 02/11/2013 15/11/2016	74. Reserved matters application for the access, appearance, landscaping, layout and scale for part of phase 2 to include a retail unit and residential development (64 houses and 31 work/live units). 80. Outline application for residential development (all matters except for access reserved for future consideration). 81. Outline application for residential development (all matters except for access reserved for future consideration). 84. Erection of flats, dwellings including 9 flats, associated garages and parking, infrastructure, new access and closure of Wicks Street. 85. Reserved matters application pursuant to P/2009/0239 consisting of 282 No. dwellings including landscape spine and associated works. 93. Demolition of existing buildings and construction of 93 dwellings.	Work has yet to commence on the site. The site is currently under construction. The site is currently under construction. The site is currently under construction. The site is currently under construction.	19/12/2017 19/12/2017 19/12/2017 19/12/2017 19/12/2017 19/12/2017	19/12/2017 19/12/2017 19/12/2017 19/12/2017 19/12/2017
BR003	Land adjacent to A166, Road and Car Wash, Moss Dale, W4L1 1YG	3.31 mixed ownership	Yes	not permitted	31/3/201 397410	99	The site has been the subject of a development brief which includes the provision of a new rail station. Site could potentially come forward for residential development through the One Public Estate Government Programme.	19/12/2017	19/12/2017
BR012 BR016 BR004 BR081	College Street Northern Gateway, St. 131187 397738 Land at Lea Green Colliery and (lower) 310800 392069 Land of (lower) Lane, Throth North, 310416 392410 Phase 4, land site of former Vulcan Works 310416 392410	2.88 owned by a public authority 5.28 not owned by a public authority 3.64 not owned by a public authority 3.18 not owned by a public authority	Yes Yes Yes Yes	not permitted permitted permitted permitted	20/12/2013 07/02/2017	103. Residential units are set to be constructed. The site was granted outline permission in 2006, and was Phase 4 of that overall masterplan and lies on a former colliery and brickworks site. A masterplan is being prepared for a mix of housing and employment uses on a larger site incorporating greenfield land. This site is cleared former industrial land within a central urban location. Site would be suitable for high density development. A planning application has now been received for part of the site (plot 7/201/0534/710) for a high density development.	19/12/2017 19/12/2017 19/12/2017 19/12/2017	19/12/2017 19/12/2017 19/12/2017 19/12/2017	
BR051	Alexander Park - Former Pilkington NC 149166 394584	9.24 not owned by a public authority	Yes	not permitted		128	The southern section of the site does not benefit from planning consent. There is a mixed use masterplan being prepared for this site and the wider area surrounding the train station as part of the One Public Estate programme. No longer economically viable employment site with a planning application for housing on a larger site incorporating greenfield land in the process of being prepared.	19/12/2017	19/12/2017
BR023 BR016	Former St. Helens Glass, Acta Street (C) 333315 395634 Land north and south of Corporation's 331764 395574	2.37 not owned by a public authority 2.32 mixed ownership	Yes Yes	permitted not permitted	09/11/2017	149. Erection of a 5 storey building comprising of 130 extra care apartments, with associated highway works, parking and landscaping. 150		19/12/2017 19/12/2017	19/12/2017 19/12/2017
BR013	Land north of Eton Road, Throth 302714 392946	7.31 mixed ownership	Yes	not permitted		219	Hybrid planning application proposed.	19/12/2017	19/12/2017
BR005 BR008	Wicks, Colliery Lane, Bldg 65, Wirral 331669 394937 Dunham Road, Wirral, St. Helens 332117 395059 Preston Industrial Estate Land At Eton 333315 392960	8.52 not owned by a public authority 9 not owned by a public authority 10.29 not owned by a public authority	Yes Yes Yes	permitted permitted permitted	24/05/2016 17/07/2015 14/7/2015	240. (U) Outline Permission for residential development (all matters other than access reserved). 324. Reserved matters application for residential development comprising the construction of 124 dwellings (demanded proposal), creation of public open space and associated works. 358. Hybrid Application - Full planning permission for demolition of existing metal recycling facility and construction of the site. Outline planning permission for residential development.	The final stage of the development is re-profiling the levels on the site, cutting and backfill, following the setting and leveling. The site benefits from a number of planning consents, the latest being a reserved matters for 224 dwellings. Parts of the site are currently under construction. Site is identified as an urban village site in the St. Helens Core Strategy.	19/12/2017 19/12/2017 19/12/2017	19/12/2017 19/12/2017 19/12/2017
BR005 BR027	Moss Wood Urban Village, Werny Lane 351007 394292 Land at Cowley Street and Albert Street 351416 396538	26.74 mixed ownership 32.08 not owned by a public authority	Yes Yes	permitted not permitted	22/05/2017	802. Demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure and engineering works, open space, and erection of new residential and retail development. 811	Partly vacant employment site with a masterplan for a mix of housing and employment uses being prepared on a larger site incorporating greenfield land.	19/12/2017 19/12/2017	19/12/2017 19/12/2017

Pivot table for Planning Status and minimum number of dwellings

Planning Status	2018 numbers
Row Labels	Sum of MinNetDwellings
not permitted	2162
pending decision	156
permitted	3710
<b>Grand Total</b>	<b>6028</b>

2017 MinNetDwelling	5818
2018 - 2017 numbers	210
% change	4%

Adopted number of dwellings a year to be built 486

Number of years worth of housing development on brownfield with planning permission 7.63

Number of years worth of housing development on brownfield total 12.40

Residual requirement over Local Plan period from 1 April 202 7245

Residual required above brownfield 1217

Total hectares on brownfield register 202.51

0.25hectares for 5 dwellings

Shortfall of land for 1217 homes 60.85

Hectares of Group C contaminated land 3170

Percentage of land to be remediated 2%

Pivot table for Planning Status and number of sites

Planning Status	2018 number of sites
Row Labels	Count of PlanningStatus
not permissioned	29
pending decision	5
permissioned	74
<b>Grand Total</b>	<b>108</b>
2017 count of sites	98
2018 - 2017 number	10
% change	10.20%

Row Labels	Sum of Hectares
not permitted	76.81
pending decision	3.6
permitted	122.1
<b>Grand Total</b>	<b>202.51</b>

## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	X	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No X
Sound?	Yes <input type="checkbox"/>	No X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

**Please see attached representation made on behalf of Bold and Clock Face Village Action Group with regards to Policy LPA08: Infrastructure Delivery Funding.**

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Please see attached representation made on behalf of Bold and Clock Face Village Action Group.**

Please continue on a separate sheet if necessary

***Please note*** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

***After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.***

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	<b>No, I do not wish to participate at the oral examination</b>	<input checked="" type="checkbox"/>	<b>Yes, I wish to participate at the oral examination</b>
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**The community of Bold feel like they have been excluded from the St Helens Local Plan process and have not had a voice. The community need an opportunity to have their voice heard and concerns raised.**

**The area of Bold has a unique offering within the Borough of the Bold Forest Park and the associated Action Plan, which has been largely ignored.**

***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

## Policy LPA08: Infrastructure Delivery and Funding

**This representation is submitted on behalf of Bold and Clock Face Village Action Group in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.**

Bold and Clock Face Village Action Group have formed in response to what it perceives as the exclusion of the community from the Local Plan process. The Bold & Clock Face Village Action Group (the Group) recognise the efforts of St Helens Local Council in the desire to develop a workable Local Plan for the area. It is hoped that a Local Plan is adopted to ensure Green Belt land is protected and development is steered towards the most suitable areas. However, the Group consider the proposed plans in some areas are not legally compliant and fail to meet the test of soundness, as set out in Paragraph 35 of the National Planning Policy Framework (Feb 2019), for the reasons which have been set out below and therefore requires modification specifically in relation to proposed development within the Bold Forest Park boundary. The Group have aimed to address each of the Policy concerns in turn and have submitted a representation for each.

**I trust this document will be submitted, in its entirety as part of the public consultation.**

### Policy LPA08: Infrastructure Delivery and Funding

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPA08 and sites 4HA and 5HA within the Bold Forest Park and is not consistent with national policy. The Bold Forest Park Area Action Plan, as adopted by St Helens Council July 2017, and listed in the Local Development Scheme 2018-2021<sup>1</sup> as an adopted development plan document should play a key role in guiding decisions.

The Infrastructure Delivery Plan (IDP), as a supporting document to the LPSD, concentrates more readily on the current situation rather than a clear indication of how the LPSD will impact on the infrastructure. This is crucial to ensuring NPPF Paragraphs 108 and 109 are adhered to and the BFPAAP is not compromised. It also fails to explain the impact of the LPSD on critical services such as Health and Education and how this will be funded and managed going forwards.

The IDP recognises the pressure on Primary schools in some areas and 'work is already being undertaken to identify suitable schools in Rainhill and Eccleston/Windle for expansion to deal with the emerging demand.' Sites 3HA, 4HA and 5HA will bring an extra 3,984 homes to the area of Bold. However, there is no mention of work being undertaken to identify schools within this area. The high numbers of pupils in the primary schools over recent years are now beginning to filter through to the secondary schools. The IDP highlights there is already an increasing pressure on secondary schools within the borough that they are aiming to address. The number of houses planned in specific areas will increase this pressure ten-fold. The IDP states, 'The Council continues to assess the impact of the developments proposed in the Local Plan on school provision. However, it should be noted that current Government policy does

<sup>1</sup> St Helens Council Local Development Scheme 2018-2021, Section 2.1

not allow for schools in 'special measures' or 'requiring improvements' to be expended, aesthetically improved, or be given additional funding, thereby adding to the already difficult process of trying to plan ahead as this status could apply at various junctures to the schools in the Borough.<sup>2</sup> Of the two local secondary schools that service the area of Bold. Sutton Academy on the previous three full OFSTED inspections (March 2013, January 2015 and February 2017) has been rated as 'Requires Improvement'. St Cuthbert's Catholic High has seen a mixed rating of the four previous full inspections, including 'inadequate', 'requires improvement' to 'Good' in September 2016. A recent report by the Liverpool Echo has rated St Cuthbert's with a 1 star rating out of 5.<sup>3</sup> This suggests the school may receive an unfavourable rating at the next OFSTED inspection which is now due. The LPSD or IDP fails to clarify how it will address this problem in terms addressing adequate school provision for the development sites. The problem is immediate with all of sites 3HA, 4HA and 5HA being allocated for development from 2020. Bold has been identified as having some of the most deprived areas of the country with low educational attainment. Development without a clear plan or funding will hit these people the hardest and will have a further negative, not positive impact on their health and wellbeing.

As with education, the IDP gives an overview of the Whiston and St Helens services, but does not clarify how the LPSD proposals will impact on demand and how this demand will be catered and funded for over the lifetime of the plan and beyond. The IDP notes, that there is a registered NHS GP population of 193,627 and 64 practices. Paragraph 4.29 notes that there are 52 GP's per 100,000 people or 1,923 people per GP. It also adds that a quarter of GP's are due for retirement. The National average is 1,538 people per GP. Staffing within the health service is already a known problem, particularly in St Helens, with a difficulty in attracting staff. At a recent British Medical Council (BMA) Local Medical Committee (LMC) meeting, November 2018, GP leaders proposed to limit GP patients to 1,500 and 25 consultations per day. They also wanted to set an unsafe number of 2,100 patients per GP. At 1,923 patients per GP St Helens is approaching the unsafe limit. Further development without an identified provision and funding will hit the most vulnerable members of our society the hardest. Bold has been identified as having some of the most deprived areas of the country with poor health. These will be the people most affected by this development to the further detriment of their health. The IDP fails to meet the NPPF paragraph 8 b) for the social objective in Achieving Sustainable development.

**The Bold Forest Park Area Action Plan Policy BFP SN1: Meeting the development needs of the borough in a manner appropriate to the forest park**, states development must, 'Not result in the loss of critical infrastructure elements of the forest park or prevent their implementation'

<sup>2</sup> Infrastructure Delivery Plan, December 2018, Page 37, 4.23

<sup>3</sup> <https://www.liverpoolecho.co.uk/news/local-news/st-cuthberts-catholic-high-school-7539916>



'The critical infrastructure elements referred to in Policy BFP SN1 are the recreation hubs and strategic linking routes (the key walking routes, cycle way network, existing bridleways and proposed bridleway).'

'Development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused.'

Site 4HA is criss-crossed by a number of PRow (incorporating Bold Loop a Mersey Forest Trail), Bridleways and proposed Bridleways. Care needs to be taken to ensure the Ecological Network Development does not compromise these vital access routes and likewise the routes do not compromise the Ecological Network. As a result, greater land area and buffer zones are essential to accommodating both routes and network. As a result, the deliverable area within site 4HA would be significantly reduced. This was not considered as part of the GBR 2018. Therefore, the results of the review are flawed and unreliable and cannot be used to justify the removal of the sites from Green Belt.

PO0821

PLO042

Sinc 8HA ①-LPA05

②-LPA02.

55 Rookery Lane  
RAINFORD  
WA11 8BL

726

01744 882558

9 March 2019

13 MAR 2019

Dear Sir/Madam

St Helens MBC Local Plan 2018/19 – 8HA – Land South of Higher Lane and East of Rookery Lane Rainford

I write as a resident of Rainford and one who would be particularly effected by the proposed building on the field adjacent to Higher Lane/ Rookery Lane. I wish to give my reasons why I think that the St Helens Local Plan, as it affects Rainford, is unsound.

**Points against the Plan**

1) The Plan states that up to 259 dwellings could be built on the land. Many families now have two cars (at least) and two wage earners, so there could be in excess of 400 cars exiting the "new estate" in a morning (Monday – Friday) on to "B" roads (Higher Lane/ Rookery Lane) which are already congested on school days taking pupils to the High School. Exiting from Rookery Lane onto Church Rd and then on to the bypass would create long 'tailbacks'. The result of this would be more traffic chaos in and around Rainford. The increase in traffic would impact seriously on the new road system at Windle. ] ①

2) There will be more children living in the new houses. Perhaps not in sufficient numbers to warrant a new primary school but there would need to be extensions to the existing ones. All three primary schools in Rainford do not have the space in their grounds for such extensions. Rainford High School is already a large school (pupil numbers) in a relatively new building and therefore an expansion of pupil numbers would not be feasible. ] ①

3) The additional number of houses would increase the population by potentially 750/800 necessitating more health facilities (doctor/dentist) – where would these be accommodated? ] ①

4) Amongst the aims of the Local Plan are that it wishes to promote industry and create jobs. The site in question is in constant use by a local farmer and the loss of such land for food production may well effect employment in the farming industry and may very well cost jobs. This would be contrary to the ] ①

13 MAR 2019

aims of the Plan and would therefore be counterproductive.

5) The Green Belt Land in question is, like the vast majority of Green Belt farming land in Rainford, Grade 1 agricultural land. The farmer grows vegetables for Supermarkets. We are constantly being told that post Brexit we will have to grow more of our "own" produce. Taking this land (or any farming land in Rainford) for building will mean that we will be growing less. Once removed you cannot 'regrow' Grade 1 agricultural land. This is yet another reason why this Plan is unsound. (1)

6) St Helens Council has a policy of "Brown field first" when it comes to building expansion. While it is acknowledged that there will be many dwellings built on "Brown Fields sites" there are still many such sites which are not being taken up. (2)

7) The "new dwellings" figure for St Helens seems to be unrealistic when looked at against population projections and estimates, there are already circa 900 empty homes in the Borough and more homes being built. The question that needs to be asked is why we need to build yet more when the population has remained fairly static over the past few years. I say that we do not; there is no reason or need to re designate any Green Belt Land within the Borough for development. (2)

8) Rainford is a thriving rural village with a large Farming Industry and community. To take away any of this would, I believe, damage the whole area. ✓

### Points for the Plan

Give what I have said above I do not see any points in favour of the Plan. ✓

Yours faithfully

[Redacted Signature]

K H wesley

Also sent by e-mail on 10.3.19 at 14.28.

PO0822



**FIRE & RESCUE SERVICE**

15 FEB 2019

~~PL0051~~ PL0051

① - LPD02

② - LPC12

③ - LPA05

[Redacted]

Chief Executive  
St Helens Council  
Town Hall  
Corporation Street  
St Helens  
Merseyside WA10 1HP

Phil Garrigan  
Chief Fire Officer  
Merseyside Fire & Rescue Service  
Fire & Rescue Service Headquarters  
Bridle Road  
Bootle  
Merseyside  
L30 4YD

[Redacted]

Your ref:

Our ref: PG/CFO/SW

Date: 15<sup>th</sup> February 2019

Dear [Redacted]

Response to St Helens Local Plan 2020-2035 consultation

Having read the Council's Local Plan 2020-2025, I note that you state that by 2035, "St Helens Borough will provide, through the balanced regeneration and sustainable growth of its built-up areas, a range of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest."

The Fire and Rescue Service supports that aspiration, but I would like to raise a few points for your consideration relating to ensuring that we work together to help keep residents and visitors safe from fire now and in the future.

In relation to the following:

1. Strategic Aims 2 – Ensuring Quality Development and 5 - Ensuring a Strong and Sustainable Economy
2. Development Principles 4 - Contribute to inclusive communities, 5 - Contribute to a high quality built and natural environment and 7- Promote healthy communities
3. Policies LPA11: Health and Wellbeing, LPC01: Housing Mix, LPC03: Gypsies, Travellers and Travelling Show People, LPD02: Design and Layout of New Housing

I would like to request that the Council continues to work closely with the Fire and Rescue Authority to ensure that fire safety is considered as a priority as domestic and commercial property development applications progress through the life of the plan. For example, the Council using its influence to encourage developers to adopt the highest levels of fire safety within their buildings rather than simple compliance with legislation would be particularly useful to improve the safety of people in St Helens in the long term although we recognise that this is not something that can be specified within the Local Plan.

①

In relation to Policy LPC12: Flood Risk and Water Management – it is encouraging to see that the policy seeks to ensure that appropriate adaptation and mitigation measures are put in place to ensure that the development is safe without increasing flood risk.

②

As you may already be aware, we have a ten minute response standard for life risk calls that we aim to meet on at least 90% of occasions. Some of the areas identified for future development will fall outside the area that our fire appliances can usually reach within ten minutes which is unfortunately the case for some existing areas given the rural nature of the Borough. Our plan to replace the fire stations at Eccleston and Parr Stocks Road with a single new station at Watson Street is progressing and this will improve average attendance times in St Helens, but some of the areas where you propose new development may still fall outside our ten minute attendance.

③

We work to address this type of issue by providing increased levels of community safety intervention in these areas to prevent emergencies occurring, and will continue to do so, but it is important that developers are encouraged to adopt high levels of engineered fire safety solutions e.g. sprinkler systems, particularly in the light on ongoing budget cuts to the fire and rescue service.

③

It is of course, always our priority to work with you and other partner organisations to keep your communities as safe as possible and if you would like to discuss any of the matters I have raised please do not hesitate to contact me.

✓



Chief Fire Officer

PO0823



**Representor Details**

Web Reference Number	WF0003
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey Warrington WA5 3RH
Agent Details	Colin Morgan

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	Table 4.1: Allocations for Employment Development, Area 1EA, proposed Omega West Extension
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Publication of the 'Warrington Draft Local Plan – Proposed Submission Version' in April 2019, coupled with the extension to the comment period for this St Helens Borough Local Plan, allows a further representation to be made concerning opposition to the proposal to extend the extensive Warrington-based Omega development area across the secure and well-screened Borough and County boundary into St Helens onto productive Green Belt farm land (Area designed 1EA, 30 hectares). Justification for removal of land from the Green Belt is acknowledged in the St Helens and Warrington reports as requiring 'exceptional circumstances' and it is stated in the Warrington draft report that such exceptional circumstances do exist in their need for additional employment land over the period of the Plan to support this proposal. (St Helens Borough Council are considering this proposed change under their duty to cooperate with Warrington, which I understand is subject to the same controls and level of justification as proposals from the St Helens Council itself.) However, I disagree that the assessment provides the required justification and do not think there are sufficient grounds to justify the proposed development of this parcel of land because of the amount of harm that will result to this Bold Forest Park locality when weighed against the anticipated

allocation from the vast Fiddler's Ferry power station site. Set against this is the loss of a strong, sound and effective Green Belt boundary, loss of good farmland, loss of a buffer to established woodland, and the blighting with warehousing of a landscape picked out for special environmental consideration and recreational potential. Therefore, I feel that the case for 'exceptional circumstances', as required by the NFPA for the change to go ahead, appears not to have been made and, on the basis of the losses that would be incurred, the proposal to remove these 30 hectares from Green Belt does not seem justified.

05

**7. Please set out modification(s) you consider are necessary**

Necessary amendments to the report and appendices to remove reference to the proposed removal of parcel 1EA (Omega West Extension) from the Green Belt from the report.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

I am prepared to respond, if required, to any questions the Inspector may have regarding my submission on the Plan.

Response Date	5/13/2019 4:04:11 PM
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PO0824

WF0007  
 SITE 4HA  
 ① LPA02  
 ② LPA05

**Representor Details**

Web Reference Number	WF0007
Type of Submission	Web submission
Full Name	Miss Allison Dyas
Organisation	
Address	55 Bold Road Sutton St Helens WA9 4JG
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**  
 Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA 02, 03, 05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**  
 Positively prepared, Justified, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I wish to give my support for the statement made to you by the Bold and Clock Face Action Group in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorse Lane/Crawford Street, Bold (Bold Forest Garden Suburb).

In addition, I would like to raise my concern regarding the loss of agricultural land in the face of the UKs imminent exit from the European Union. We have no idea how the UKs exit from the EU is going to impact trade. Now is not the time to be giving away prime agricultural land in favour of development when we don't know how our trade with other countries is going to change.

Bold Road (B5204) is already a busy road in a highly industrial area. We are backed by a number of industrial units and faced by Reginald Road Industrial estate which has expanded across the fields opposite over a number of years. The addition of such large scale housing and employment development will put an already busy road under extreme pressure. An increase in industrial units to the area would effectively mean that the residents of Bold Road will be hemmed in by industrial units both front and back, having more of a detrimental impact on public amenity than we already suffer. The noise and traffic will increase and air quality will deteriorate. Alumasc is one of the units situated behind us on Bold Road and the number of lorries that visit the site on a daily basis can on

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②

occasion make Bold Road look like a lorry park and cause road blocks. We already suffer from inconsiderate lorry drivers sitting with engines ticking over kicking our diesel fumes and music playing in the early hours while they wait for Alumasc's gates to open. In addition to that there are the large number of vans and lorries visiting the Reginald Road and Abbotsfield Road Industrial sites. There has to be some relief in living in such an industrial area and the fields and paths through the land referred to as 4HA in the local plan do provide an amount of respite that is not to be underestimated.

②

Please can the local plan focus on encouraging developers to deal with the multitude of brownfield sites that blight communities across St Helens rather than discourage their improvement by actively offering up prime agricultural land and greenbelt. It is time developers worked for the needs of the people rather than focussed on profit. It is time to encourage developers to work for and with communities. There are plenty of brownfield sites land banked by developers across St Helens, where is the push to get these sites improved for their communities? The local plan should focus on improving education for our children and providing highly skilled jobs for them to aspire to rather than low paid work.

①

①

**7. Please set out modification(s) you consider are necessary**

Please can the local plan focus on encouraging developers to deal with the multitude of brownfield sites that blight communities across St Helens rather than discourage their improvement by actively offering up prime agricultural land and greenbelt. It is time developers worked for the needs of the people rather than focussed on profit. It is time to encourage developers to work for and with communities. There are plenty of brownfield sites land banked by developers across St Helens, where is the push to get these sites improved for their communities? The local plan should focus on improving education for our children and providing highly skilled jobs for them to aspire to rather than low paid work.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	5/12/2019 11:35:58 PM
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PO0825

**Representor Details**

Web Reference Number	WF0011
Type of Submission	Web submission
Full Name	Mrs Lorraine Atherton
Organisation	
Address	40 Junction Road Rainford St Helens WA11 8SJ Wa11 8SJ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Rainford local plan
Paragraph / diagram / table	.
Policies Map	.
Sustainability Appraisal / Strategic Environmental Assessment	.
Habitats Regulation Assessment	.
Other documents	.

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Dear all,

The consultation on the Local Plan - extended because of a council error - finally closes on Monday 13th May 2019. If you haven't commented yet, please do so. There is still plenty of time to have your say.

Here are some points we recommend making on the plan overall:

- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is not as high as set out in the Local Plan
- There are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target housing figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure

- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground. 01

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Rainford Specific points (8HA Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1
  - This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 . 02
  - The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
  - There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- 

**7. Please set out modification(s) you consider are necessary**

Please note above my point.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	5/9/2019 11:56:42 AM
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PO0826

**Representor Details**

Web Reference Number	WF0031
Type of Submission	Web submission
Full Name	Mrs Margaret Spensley
Organisation	n/a
Address	3 Spring Vale Reeds Brow Rainford St Helens Merseyside WA11 8PB WA11 8PB
Agent Details	n/a

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	plan for large scale housing developments on Grade 1 agricultural / Greenbelt land
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I strongly object to all parts of the St Helens Local Plan which involves building on Grade 1 Agricultural Land and Greenbelt Land, in Rainford where I live, and across the borough. Building on Greenbelt land should be allowed only in 'exceptional circumstances'. However, there are no 'exceptional circumstances' to justify it in St Helens.

Building on Grade 1 agricultural land when in England only 2.7% of land is of this 'excellent quality' is not in the local or national interest. As an island nation we need to protect this most fertile and productive land to provide food for our families, both now and in the future. Farmers cannot farm without it and we look to planners and politicians in both national and local government to safeguard it on our behalf. Future generations will not thank us for creating ever bigger towns and cities and destroying the countryside which feeds and sustains us and our wildlife. We already rely heavily on food imports, the availability of which we can never be certain; it would be foolhardy to

destroy piecemeal and without thinking the very soil which enables us to grow at least some of the foodstuffs we need for ourselves.

But there has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land!

My further objections are as follows:

The calculations on which this supposed housing need is based are unsound, based on overestimates of St Helens population growth, housing needs and supposed economic benefits. 01

Other alternatives have not been adequately investigated, including use of previously developed land and brownfield sites, conversion of unused buildings etc for housing - all of which would minimise the need for new infrastructure and new land, and allow the best farming land in the country to be kept for farming.

The council has failed to co-operate adequately with other councils and have not published statements of common ground.

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In particular I wish to object strongly to development of site HA8 (Rookery Lane, Rainford) for the following reasons:

St Helens BC itself has assessed that HA8 is the least appropriate Green belt site allocated for housing in Phase 1, as only 4 sites score 4 negatives (red) on the Sustainability Appraisal and the other 3 have already been discarded.

It is Grade 1 Agricultural land, being actively farmed, providing crops and employment.

(see above)

It is next to an industrial area with the risks associated with industrial activity, including pollution and explosions. Other sites have been excluded during the site assessment phase owing to their being close to similarly used industrial land, for example see SHLAA 2016 site assessment ref 16m & 142. 02

Whether we live in the centre of town or the suburbs, we all need to be able to enjoy the sights and sounds of the countryside. Let's not destroy what we've got on our doorstep in the name of supposed 'development', 'progress' or 'need'.

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**7. Please set out modification(s) you consider are necessary**

I believe that the Local Plan should be amended so that housing and employment targets are reduced, more previously used land and brownfield sites are used for housing needs, and that the Grade 1 Agricultural Land and Greenbelt Land in the borough be withdrawn from the Local Plan and protected from housing and industrial development for the future.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/13/2019 4:48:01 PM
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PO0827

- ① LPA01
- ④ LPA04
- ⑦ LPA05.1
- ② LPA02
- ⑤ LPA04.1
- ⑧ LPA06
- ③ LPA03
- ⑥ LPA05
- ⑨ LPA07

**Representor Details**

Web Reference Number	WF0037
Type of Submission	Web submission
Full Name	mr mark railton
Organisation	
Address	The old poultry farm, 29 Rookery Lane, Rainford, St helens WA11 8EF
Agent Details	

⑩ PARA  
1.7.2 DHC

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

There are no exceptional circumstances to justify not using the standard method to calculate housing need

The economic analysis is flawed and based on over-optimistic assumptions

②

The level of land needed for housing and employment is therefore not as high as set out in the Plan

There are therefore no exceptional circumstances to change Green belt boundaries  
Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

1.7 Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth.

### 7. Please set out modification(s) you consider are necessary

There are no exceptional circumstances to justify not using the standard method to calculate housing need

The economic analysis is flawed and based on over-optimistic assumptions

The level of land needed for housing and employment is therefore not as high as set out in the Plan  
There are therefore no exceptional circumstances to change Green belt boundaries  
Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

The Council has identified a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. These figures are in addition to any new dwellings needed to replace demolition losses.

The brownfield land register 2017 identifies enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield, at an average build out rate of 40 per hectare this equates to 35 hectares should be required.

In the Local Plan Preferred Options (LPP0) consultation in 2016/17, the Council proposed to release 51 sites (totalling about 1,187 hectares in area) from the Green Belt to meet future needs for housing and employment development. The current proposals (set out in the LPSD 2019) would result in 27 fewer sites and around 492 hectares less land being released from the Green Belt to meet development needs. I am at a loss as to why 695 hectares is been allocated to housing and employment when only 35 hectares would be required to meet the forecasted housing demand? I can see that a contingency of 20% has been included in the capacity of land removed from the Green Belt as an allowance for the fact that some sites may not be developed as quickly as expected. This seems excessively high, would a more realistic and sensible approach be to allocate 5%, to encourage brown field land to be delivered before greenbelt land is released.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

#### Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "as far as practicable" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

#### Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy.

The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

#### Policy LPA04 Strategic Employment Sites

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PO0828



① LPA01

④ LPA04

⑦ LPA05.1

⑩ LPA07

② LPA02

⑤ LPA04.1

⑧ S.A.

⑪ PAR 1.7.2

③ LPA03

⑥ LPA05

⑨ LPA06

DEC.

**Representor Details**

Web Reference Number	WF0068
Type of Submission	Web submission
Full Name	Mr Mark Railton
Organisation	
Address	29 Rookery lane Rainford, St helens WA11 8EF
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.
- e) There are no exceptional circumstances to justify not using the standard method to calculate housing need
- f) The economic analysis is flawed and based on over-optimistic assumptions
- g) The level of land needed for housing and employment is therefore not as high as set out in the Plan
- h) There are therefore no exceptional circumstances to change Green belt boundaries

②

J) Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

K) The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

L) Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth.

### 7. Please set out modification(s) you consider are necessary

#### LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

#### Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "as far as practicable" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes. I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

#### Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

#### Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St. Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly.

Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly. What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida

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14

PO0829

**Representor Details**

Web Reference Number	WF0070
Type of Submission	Web submission
Full Name	mr Ben Skingle
Organisation	
Address	
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Building on Green Belt and Agricultural Land
Paragraph / diagram / table	HA8
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

**7. Please set out modification(s) you consider are necessary**

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

Rainford Specific points (HA8 Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been

02

02

excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .

- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

02

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**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/13/2019 1:46:43 PM
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PO0830

**Representor Details**

Web Reference Number	WF0108
Type of Submission	Web submission
Full Name	MR DEREK NEVIN
Organisation	
Address	64 CROXTETH DRIVE RAINFORD SAINT HELENS WA118LA WA118LA
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	St helens Borough local plan 2020-2035
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:****6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

There are no exceptional circumstances to justify not using the standard method to calculate housing need

- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
- Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- These alternatives will have less impact on the environment and lead to less need for new infrastructure
- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

Rainford Specific points (HA8 Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been



excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .

- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

02

**7. Please set out modification(s) you consider are necessary**

There is no need to build on grade one arable land when the projected figures for the population of the Borough are on the decline. The housing you plan to build will not help first time buyers as they are far too expensive in the Rainford area, You have many brown field sites and disused properties in St Helens that should be considered first. The infrastructure roads, med centres, schools can not sustain the extra populous it is struggling as it is. there is also the problem with flooding in the area you ear marked to have houses surely concreting more fields and drainage would cause another of the road that took the council 2 years to repair you need to think about your seriously flawed plan and confine it to the file B1n where it belongs

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/13/2019 10:09:26 AM
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PO0831

**Representor Details**

Web Reference Number	WF0128
Type of Submission	Web submission
Full Name	mrs julie ireland
Organisation	
Address	105 longton lane rainhill l35 8nu
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

1. St Helens has a reducing population where is the additional population coming from to justify additional housing.
2. St Helens own brownfield register suggests land availability for 5808 houses 01
3. The councils plan means another 57 hectors land over the Brownfield land to build 1437 houses not the 288 hectors in table 4.5
4. 3HS has a declining industrial base, meaning its population rely s for their employment outside St Helen's boundary. 02
5. The road infrastructure around 3HS isn't capable to cope with existing levels of traffic, increases in traffic will divert more cars into the small roads of the existing estates. namely Longton lane, Two Butt lane, Holt Lane, Mill Lane, View rd, Stoney lane, Blundells lane. 03
6. Warrington Rd and Rainhill Rd junction at Skewed Bridge is at capacity with the councils own figures, similarly the junction at Portico lane and Prescot Rd at capacity. 03
7. Increased traffic increases risk to pedestrians and increases air pollution.
8. The release of greenbelt will cause significant harm to the reason having green belt 01
9. 3HS infrastructure can't sustain increases with dentist, doctor, school places
10. 3HS is a designated flood zone, to loose the land draining leaves existing properties at risk. 04
11. Sport England objected stage 1 plan, this objection hasn't been answered.
12. 3HS incudes more than 13 flora and fauna species protected

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13. There is no statement of common ground with neighboring authorities

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05

**7. Please set out modification(s) you consider are necessary**

The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)  
The council should not consider removing this land from green belt to place in safeguarded

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 9:43:01 PM
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PO0832

**Representor Details**

Web Reference Number	WF0137
Type of Submission	Web submission
Full Name	Mr John Hunt
Organisation	
Address	83 Rookery Lane Rainford St Helens WA118BL
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

*01 special strategic  
02 housing need  
03 safeguarded land*

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA02, LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Issues relate to the entire plan but with particular reference to policies LPA02, LPA05 and LPA06 regarding the need for housing and the circumstances surrounding the justification for release of Green Belt Land.

Official government and council policy states that Green Belt land should only be released in exceptional circumstances - this remains a central part of planning law in this country. St Helens is a borough with a falling population with house prices both below the national and regional average. Evidence shows that housing in St Helens is comparatively cheap and in low demand. The council want to build 486 houses per year, however, the figures from the Office of National Statistics show St Helens only needs 383 houses a year. Taking this into account, the economic analysis used to create the plan is flawed and based on over-optimistic assumptions that the need for housing is far greater than is actually required. Therefore, there are no exceptional circumstances to justify not using the standard method to calculate housing need in St Helens. If the council took these into consideration and created the plan appropriately with reasonable housing numbers, there would be no need to release any Green Belt land at all.

A secondary concern is the lack of consideration given to exploring more reasonable alternate options that would be more beneficial to developing St Helens effectively. The council's own register

*02*

*501*

shows there's enough brown field land in St Helens for 5, 818 houses. That would support the council's housing supply - even on its inflated figures - for 12 years. Why is this not being utilised? If the council were to lower target figures to the level that is genuinely required and ensured development is placed on previously used or Brown Field sites it would help to expand the town and effectively 'clean up' the areas that actually need to be developed. These alternatives would have less impact on the environment and lead to less need for new infrastructure - infrastructure that could require the release of further land. To add, the council have failed to co-operate with other councils and have failed to publish any statement of common ground.

Relating comments specifically to plot HA8 (Higher Lane/Rookery Lane, Rainford) I believe the repercussions of development on this land would be catastrophic. A concern is the reasoning behind the release of this piece of land - reasoning that is flawed. The site is next to an industrial area and subject to risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - see SHLAA 2016 site assessment ref 16m and 142. Why is this land still be considered when almost identical plots have been classified as inappropriate? Only 4 sites score 4 negatives on the Sustainability Appraisal. The other 3 have been discarded, however, the council's assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

Most worryingly is that the majority of these Green Belt sites (in particular HA8) are Grade 1 Agricultural Land which is actively used and regularly farmed. HA8 is arguably one of the most fertile lands in the region. This land provides not only food but employment in the agricultural sector which is threatened by the proposed removal of this site from Green Belt protection. The local plan is intended to promote employment and economical growth yet this will have the opposite effect. Surely, when Britain is facing uncertain financial and economic times (which is the prospect of a no-deal Brexit) we should be striving to maintain thriving local business and employment, particularly those areas that provide food supply. To implement a plan that could potentially damage this is very concerning. Surely we should be pushing to preserve farming land in order to be self-sufficient rather than reducing these means leading to a potentially devastating effect.

The new Local Plan allocated 259 homes to be build on HA8. The original plan allocated just 174 homes for this land. The council have offered no reasoning for such a significant increase in housing or how this would logistically fit. The plot is on a rural road which is struggling to carry the weight of traffic it holds at present. Accident figures (with particular reference to the junction at Higher Lane/Mill Lane neighbouring the plot) support the danger that the road currently possesses. However, the influx of such a large estate has the capacity to bring 1000+ extra vehicles to these lanes. It would cause higher levels of carbon emissions and toxicity putting health care at risk. This, alongside the issues regarding the potential for an increase in traffic accidents, would deem the area unsafe and put residents in significant danger.

As it stands, if the plan is not significantly modified it will not be legally sound and should, therefore, not be allowed to go ahead. The evidence does not support the current plan and certainly does not support the need for loss of Green Belt land. The council should be reducing the housing and employment targets and allocating more previously developed land. If they were to do this, these precious Green Belt areas could remain protected.

This representation is sent on behalf of my household to include the views of the following: Mrs Elaine Hunt, Mr John Hunt, Mr Thomas Hunt, Mr Ethan Hunt and Mr Owen Hunt

#### **7. Please set out modification(s) you consider are necessary**

Points raised in previous section 6.

#### **8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

PO0833



**Representor Details**

Web Reference Number	WF0142
Type of Submission	Web submission
Full Name	Mrs Jane Makin
Organisation	On behalf of my household
Address	2 Moss Nook Lane Rainford St Helens WA11 8AF
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA02
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

In respect of the overall figures in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

01

02

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

02

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**7. Please set out modification(s) you consider are necessary**

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 8:24:53 PM
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PO0834

①-LPA08 ②-LPA02 ③-Para 1.7.2 DTC

**Representor Details**

Web Reference Number	WF0164
Type of Submission	Web submission
Full Name	Mr Dylan Riley
Organisation	
Address	35 Kiln Lane WA10 6AD
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

These plans will lead to significant additional traffic congestion on a network that is already at breaking point and continually log-jammed across the town.

This will be made even worse by the need for additional and/or expanded schools.

St Helens Council has a long history of failing to deliver infrastructure.

It will have a detrimental effect on highway safety for both pedestrians, cyclists and drivers.

Schools and nurseries are already over-subscribed and this Plan will only lead to even more pressure.

Social infrastructure will not be able to cope; doctors, dentists and the hospitals.

Increased traffic will exacerbate health problems across the town due to increased pollution and isolated developments increasing car dependency and therefore potentially obesity.

There will be a significant loss of recreational areas for walking and escaping urban areas and additional sports facilities such as a golf course if Green Belt development is allowed.

There is a huge amount of Brownfield land available to develop in St Helens but it seems the easier option is Green Belt.

The council are pandering to demands of landowners and developers seeking to make huge profits at the expense of GB.

Neighbouring areas such as Knowsley also has extensive Brownfield sites and a Duty to Co-operate could find a common strategy – none appears to have been carried out.

①

②

③

There are no exceptional grounds to alter GB boundaries and by doing so would leave the town continuing to be blighted by brownfield and contaminated sites, whilst developers profit and the council take the increased taxes to be wasted.

2

**7. Please set out modification(s) you consider are necessary**

No green belt should be released as no exceptional circumstances.  
The growth projections should be revised to something more realistic

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 7:35:43 PM
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PO0835

**Representor Details**

Web Reference Number	WF0175
Type of Submission	Web submission
Full Name	mr steven ireland
Organisation	
Address	105 longton lane rainhill l35 8nu
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	lpa6
Paragraph / diagram / table	3hs
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	yes
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

1. There's a declining population. There's no evidence presented supporting the need for additional housing, without any details where the additional home occupiers will come from. 01
2. Brown field will supply land for 5808, houses. there's no argument to justify removing greenbelt.
3. Declining industries in St Helens involves a lot of the existing population traveling outside the borough boundaries for employment. 02
4. Anyone moving into St Helens looking to purchase a property will need a salaried employment. inevitability that puts additional cars in the area 3HS where roads are cant cope with current level of traffic.
5. The 2 major roads supporting Rainhill, is A57 Warrington Rd and Rainhill Rd. These Roads are congested already. Any more traffic will put pressure on residential roads , which have seen increases significantly, to name but a few: Mill lane, Holt lane, Longton lane. 03
6. Any improvement works for Warrington rd, will need to overcome the Skewed Bridge. There's little scope to improve there.
7. Any traffic rises will lead to additional air pollution, increasing risks to health and pedestrian accidents.
8. 3HS area has got the infrastructure to support increase housing, Doctors, Dentists, school places these services will be accessed elsewhere, committing people to travel. 04

9. Any development in 3HS increase risk to existing properties, by not allowing the flood plain draining the land via the brook.
10. St Helens council hasn't provided Sport England a decision on their previous objection which should be rejected or upheld.
11. 3HS supports 13 species of protected flora and fauna
- 

OK

**7. Please set out modification(s) you consider are necessary**

The council should withdraw this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not remove this land from green belt to place it as safeguarded

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 5:18:52 PM
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PO0836

**Representor Details**

Web Reference Number	WF0177
Type of Submission	Web submission
Full Name	Mrs Diane O'Donovan
Organisation	
Address	The Cottage Higher Lane Rainford St Helens WA11 8NG
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	All policies
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

There are brownfield sites available - why, then, is Grade 1 Agricultural land, at present under cultivation, being considered?

**7. Please set out modification(s) you consider are necessary**

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 5:05:12 PM
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PO0837

①-LPA02    ②-LPA04    ③-LPA07    ④-LPA06  
 ⑤-LPA08    ⑥-LPC12    ⑦-LPD07

**Representor Details**

Web Reference Number	WF0183
Type of Submission	Web submission
Full Name	Mrs Clare McDermott
Organisation	N/A
Address	8 Mallard Gardens St Helens WA9 5BL
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06
Paragraph / diagram / table	7HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	x
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The population has been declining and without knowing the impact of Brexit is it unclear why there is a requirement for additional housing on this land. 01

St Helens Council suggests availability for 84 units.

Declining business including industry has declined since the middle of the 1980s and the area proposed relies on employment outside of the area to be able to afford the houses. 02

This obviously has an impact on the traffic throughout the area and the current infrastructure is insufficient to cope with that and the additional pollution.

There have been houses built on the old Sutton site, further down the road nearer to Sutton on Elton Head Road plus the new Waterside development with additional housing suggested there. Elton Head Road is heavily used at present including a through route for the ambulance service which means the traffic noise is already high and the number of cars, vans, buses and wagons also contribute to the pollution. 03

The area of Rainhill only has one A road which services this area in addition to the by pass so it is heavily used and Elton Head Road is used as a cut through.

Add another 160 cars plus would add to congestion, pollution and noise levels.

This will also impact pedestrian safety to have increased traffic and again pollution levels.

I have breathing problems and over the past few years I have reviewed the pollution levels and surrounding areas and between 2013 and 2015 there were on average 51.9 deaths per 100,000 from

respiratory diseases in the under 75s compared to 44.3 for the North West and 33.1 for the rest of England with Thatto Heath rated as the second highest effected in the Borough. 03

Therefore this area of Elton Head Road would be affected by the increase not only of cars but the additional pollution linked to homes and gardens.

The area designated in 7HS is a natural green band of land which acts as a buffer between the industrial buildings built on the link way and the new housing estate further down Elton Head Road. There are foxes and rabbits, bats, squirrels and the occasional heron who inhabit the area and there are numerous wild birds in the area.

If this area were to disappear and removed from the green belt area and place into safe guarding and then subsequently development it would be one large housing estate from Rainhill through to St Helens forming a huge urban development and lack of green space. 04

If areas of natural land are removed from the green belt areas then this would cause significant harm to the purpose of having the green belt.

Additional housing would add to the problems of school places and availability of seeing the doctor in the local surgeries. It could also impact hospital and A&E facilities, doctors and dentists. If the new houses were occupied and they could not gain access to local facilities then they would have to travel and again this adds to the amount of cars on the road. 05

If you add approximately 160 cars (some families will have more than 2 cars) and the number of journeys per day then we would find it hard to exit our close which is hard at the moment between the hours of 7 and 9 and then 3 and 5 and 6 and 8 due to the rush hour and school times. 03

There is also flooding every year on the road and the three closes opposite the proposed site were built on 3 ponds and this is obvious in times of bad weather.

At moment at least the water is near the farm land and does not always spread across the road.

If there was significant building then the utilities and facilities would need to be thoroughly excavated and proper drainage and management implemented. 06

The area has confirmed flood zones and a high water table to lose the space available to help with the drainage could put our houses at risk of flooding.

We also have shortages every now and then and broadband can drop in and out and if you add further volumes then this could impact these services again if volumes increased. 07

#### 7. Please set out modification(s) you consider are necessary

The council should not consider removing this land from green belt or open spaces to place in safe guarding.

I have been advised that this could be reviewed every five years so although it states it is safeguarded until 2035 I am registering my representation for my future safety and wellbeing.

#### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

#### 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 3:02:20 PM
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PO0838

**Representor Details**

Web Reference Number	WF0214
Type of Submission	Web submission
Full Name	Mr Sean Hollowed
Organisation	
Address	6 The Fairways Ashton-in-Makerfield Wigan Lancs WN4 0YX
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**  
No

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA04 - sites 2EA, 5EA & 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale. 01

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. 02

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt. 03

The Department of Communities and Local Government has stated that, "Local Authorities may only alter Greenbelt boundaries in exception circumstances." I do not believe that the Council has proved in its Plan that the circumstances are exceptional. 04

The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North. 05

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. 06

High volumes of predicted traffic will add to the already over capacity on the roads in the vicinity. 07

There is no statement of common ground with neighbouring authorities.

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the Greenbelt.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/11/2019 7:13:49 PM
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PO0839

**Representor Details**

Web Reference Number	WF0215
Type of Submission	Web submission
Full Name	Miss Jane Wilcock
Organisation	
Address	6 The Fairways Ashton-in-Makerfield Wigan Lancs WN4 0YX
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA04 - sites 2EA, 5EA & 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale. 01

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. 02

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt. 03

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High volumes of predicted traffic will add to the already over capacity on the roads in the vicinity. 07

There is no statement of common ground with neighbouring authorities. 07

**7. Please set out modification(s) you consider are necessary**

Delete this land from the proposed removal from the Greenbelt.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/11/2019 7:04:41 PM
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PO0840

**Representor Details**

Web Reference Number	WF0220
Type of Submission	Web submission
Full Name	Mr William Johnston
Organisation	
Address	
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA02
Paragraph / diagram / table	?
Policies Map	Rainford Sites?
Sustainability Appraisal / Strategic Environmental Assessment	?
Habitats Regulation Assessment	?
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

02

### 7. Please set out modification(s) you consider are necessary

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
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- these alternatives will have less impact on the environment and lead to less need for new infrastructure
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For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

PO0841

**Representor Details**

Web Reference Number	WF0221
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey WA5 3RH
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Policy LPA04.1, Strategic Employment Sites
Paragraph / diagram / table	Section 4.13
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Bold Forest Park Area Action Plan, Adopted July 2017

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

From consulting the National Planning Policy Framework (NPPF, last updated 19th February 2019, especially paragraphs 133 -147) I read that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also explicitly states that once established Green Belt boundaries should only be altered in 'exceptional circumstances' and that these "Very special circumstances" will not exist unless any potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." The Draft Local Plan (St Helens Borough Local Plan 2020-2035: Proposed Submission Draft, December 2018) includes a proposal to allow the extension of the Omega industrial site west into the eastern side of Bold Forest Park (in the report, designated as Area 1EA, comprising 31 hectares), which is currently part of the St Helens Green Belt. I consider that the proposed change is unsound because of a lack of justification for the required 'exceptional circumstances' needed to allow conversion of Green Belt land – in this case farmland - to industrial use. This change to a secure, well-established, Borough, County, and mature tree-lined Green Belt boundary is being proposed to meet projected future employment requirements for Warrington, adjacent to St Helens. Warrington currently has a net 14,000 commuters coming into the borough each day so is not generally short of employment opportunities for its population, and is presently using up the vast potential of the Omega South employment area land with both warehouses and housing, suggesting that their



priority is not to create significant additional employment within the Borough. In the future, this proposed change could make a small contribution to Warrington's employment numbers, but it is insignificant compared with all the many and various opportunities proposed within Warrington itself, with an available land area consisting of hundreds of hectares in total. In addition, Warrington is having to compete with other areas in the north west of England such as Haydock, Heywood, Middlewich and Knowsley for warehouse business. It is, therefore, unclear how an argument of 'exceptional circumstances' might be made for this proposed change from farmland to warehousing at this location. 01

The proposed area 1EA is within Bold Forest Park. Removal of this land from Green Belt goes against the stated aims of the Bold Forest Park Area Action Plan that was signed by St Helens Council in 2017 after significant work to look at all aspects of environmental value and protection and enhancement of the area. (In the AAP Technical Report, the land 1EA is shown as Medium/High sensitivity [Section 2.3.7] – the highest category given, and also as 'Conserve/Enhance' in Figure 9. The designated nature conservation site of Booth's Wood would be right on the edge of the proposed area 1EA, removing the protecting buffer such that the industrial site would run right up against the TPO'd trees and the boundary of the original mediaeval deer park.) 02

Since the numbers quoted in the Draft Local Plan apparently demonstrate that this area of farmland is not needed to meet St Helens employment requirements, it would appear that the anticipated benefit that could arise from this proposed industrial extension would be in the form of a relatively small amount of additional Council revenue (70% of which would go to St Helens, 30% to Warrington). Set against this is the damage done to the agricultural land of Bold Forest Park and the rest of the Park countryside by having the intended warehouses on its eastern side. In addition, even more traffic and air pollution will be generated in the west Warrington area from the increased diesel lorry traffic. Local Warrington residents will be affected by the increased pollution, noise and congestion. 03

In the documentation for this proposal to remove area 1EA from the Green Belt, there is a general statement, as made for other areas under consideration, that there are people living within 1km of the area who are in the bottom 20% of the economic scale. If this statement is considered to have any particular significance, it should perhaps be noted that the population on and around this southeast side of the Bold Forest Park countryside area is of very low density apart from the extensive Warrington-based Lingley Green and Whittle Hall areas of Great Sankey, which comprise mostly of new modern three- and four- and five- bedroom detached houses. If, the report is suggesting as a justification that there may be a potential employment opportunity for any nearby population in St Helens, it should be noted that, in practice, the M62 cuts these populations off such that they are at least 8km away by road and about 1.5 hours away by existing public transport from this area (using information from Google maps in March 2019). 04

In the event that such a development is allowed to proceed, the documentation does not contain any information e.g. under 'Requirements' that might help mitigate the environmental damage done to Bold Forest Park. This seems to have been considered for certain other sensitive areas, but was this considered here? Many of the trees and woods in the Bold Forest Park area probably date from the first half of the 18th century when the new Bold Hall was built, when they lined the original driveway – and many are now protected by TPOs. There is a variety of wildlife and under the St Helens AAP there is the intention to increase tree cover by 10% in this area. However, the generally open aspect of the farmland means that once the current strong treelined boundary is breached, the whole area across to the St Helens conurbation from the Warrington boundary would be visible to the development. The development at Omega South is currently well screened from the St Helens Green Belt area by mature trees along the County and Borough boundary. 05

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 06

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 07

pollution, noise and air pollution. The effect would be a reversal of the intent so recently shown by St Helens Council in the recent AAP of 2017. 07

With respect to pollution from diesel lorries and other additional traffic generated in the Great Sankey area: One of the current occupants of a warehouse on Omega South – Amazon – operates three times as many lorries to and from their warehouse as was expected by the developers of Omega for the area of the development. If this were repeated for any of the warehouses proposed for the Bold Forest Park extension, it would add even more than expected amounts of pollution, noise and congestion to the roads and surrounding area. 08

I have three young grandchildren growing up in the Whittle Hall – one of whom has spent time in hospital with asthma-related breathing difficulties on more than one occasion. For this additional reason, I oppose an extension of the Omega South development across the border into St Helens and would ask if a case of 'exceptional circumstances' has been made? 09

**7. Please set out modification(s) you consider are necessary**

In line with the above comments, to make the report sound, it is proposed the Draft Local Report would have the references to the development of the area designated 1EA removed, such that this area remains part of the current Green Belt. (Minor changes may be required to various supporting documentation where this proposal has been mentioned.)

If, following the review, the argument for proceeding with removal of the area 1EA from Green Belt for the stated purpose is considered justified, in the light of the above and any other arguments presented, then a statement of intent in the documentation to minimise the environment impact on the Bold Forest Park area, and facilitate enhancements where possible, would seem appropriate.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/11/2019 4:27:16 PM
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PO0842

**Representor Details**

Web Reference Number	WF0222
Type of Submission	Web submission
Full Name	Mrs Gill Holmes
Organisation	
Address	13 Villiers Crescent Eccleston St. Helens WA10 5HP
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Please see comments
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

1: St Helens council have stated a principle of brownfield site first and greenfield only in extreme circumstances, however they have not demonstrated diligence in identifying suitable brownfield sites for housing or monies to support decontamination of these sites. Other councils have demonstrated a commitment to regeneration of town centres through housing development - a strategy that is desperately needed in St Helens. There has been little demonstration of imagination in solving this issue and the decision to build on greenfield sites is an easy option which leads to further dereliction and decay of the town centre. Eccleston's inclusion is the green belt which is to be safe guarded for development, this is grade 1 or 2 agricultural land, a very necessary resource at this time, therefore the plan is not justified ore sustainable. 01

2: Employment growth. The figures supplied are based on unreasonable assumptions and will lead to an oversupply of housing. the main source of employment will be warehousing which will not provide the high earning jobs suggested, also it is anticipated that warehousing industry will increasingly make use of robot technology which will reduce the predicted employment figures. These factors will affected the numbers and type of housing development and is not reflected in the plan making it unjustifiable and unsustainable. The employment figures quoted should be replaced by ONS (2018) which uses more current data. 02

3: Infrastructure: the Infrastructure Delivery Plan is weak to the point of non-existence. The areas to be developed already have the problems of oversubscribed schools and major transport problems. The 8HS is beside the A580 a major route between Manchester and Liverpool, already undergoing major work to improve traffic flow. Further disgorgement of thousands more cars onto this road will make this expensive upgrading pointless. Bleakhill Road is already a bottle-neck morning and night without further cars from a new development adding to the problem. There is also the issue of road safety there is the school on this road and access to this will become more difficult together with the danger of air pollution from idling cars - a very pertinent problem currently. It is proposed that Houghton's Lane development will exit directly onto the A580 in an area that is an know black spot - 3 people lost there lives at this point just before Christmas. For Windle and Eccleston 8HS acts as a lone greenspace and a buffer for the road pollution from the A580. It is the only accessible area of greenbelt criss-crossed by footpaths which are regularly used by residents. The Plan is not effective or justified. 03

4: Duty to cooperate: there is little evidence of discussion with other authorities or services e.g NHS. Neighbouring authorities have major development plans for both employment and housing and there is little evidence of discussion between authorities as to how realistic these plans are. It appears that it is a race to develop land and the first to build will win, such a policy will cause over prediction of employment and housing need which could be disastrous for the region. There appears to have been little negotiation with the NHS and the services that can be provided. The area already has a recruitment problem both for GPs and hospital staff, Brexit will make this worse and there has been little discussion as to how this development will affect services already stretched and whether it is possible for the NHS to respond to the extra demand. Therefore the plan is not sustainable. 04

The Plan does not comply with NPPF (2018) and it does not consider the more accurate and true housing and employment information in ONS (2018) figures therefore due to all the factors listed (and more) this could lead to an unsustainable oversupply of housing in the North West together with the loss of valuable agricultural land. 05

### 7. Please set out modification(s) you consider are necessary

Suggestion:

The ONS (2018) needs to be adopted, more accurate and realistic housing need statistics should be developed/sourced;

funding to decontaminate brownfield sites should be sourced;

redevelopment of town centre sites to enhance regeneration of this area is a priority;

remove all Green Belt areas from the plan; protect agricultural land.

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

### 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 2:19:27 PM
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PO0843

**Representor Details**

Web Reference Number	WF0241
Type of Submission	Web submission
Full Name	Miss Anna Geier
Organisation	On behalf of Rainhill Civic Society (Registered Charity)
Address	Flat 4 Victoria Court, 571 Warrington Road, Rainhill L35 4LS
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA02, 05, 06
Paragraph / diagram / table	Tables 4.5, 4.6 — ③
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Appendix 7

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Rainhill Civic Society Response to St Helens Borough Local Plan 2020-2035 Submission Draft  
Rainhill Civic Society is a local amenity society founded over 50 years ago in Rainhill. One of its aims is the preservation and enhancement of the township of Rainhill. The society has approximately 300 members and works with the local community, the Parish Council and other groups to make Rainhill an enjoyable place to live. This response has been collated by the Society's Planning Sub-committee and has been approved and minuted by the full Committee of the Society.

① Policy LPA02

The Society objects to the releasing of land from the Green Belt after 2035, also known as 'safeguarding'. The Society agrees that any form of new development on Green Belt land is inappropriate and should only be considered in exceptional circumstances, in accordance with Section 13: Protecting Green Belt Land of the National Planning Policy Framework (NPPF, 2019). The 3HS site lies within Flood Zone 2 and Flood Zone 3 and the removal of this green space is likely to increase the risk of flooding in the area due to existing surface water drainage issues and flooding from the brook. The 'safeguarding' of 3HS and potential future development will have adverse impacts on biodiversity. The 3HS site is home to several species of flora and fauna, including up to 13 protected species, which are likely to be threatened by future development.

② Policy LPA05 & Appendix 7 — ③

The Society objects to Policy LPA05 and Appendix 7, which outline the Council's aim for 486 dwellings per annum across the Borough and 956 units for the safeguarded 3HS site. Housing

requirements outlined in Table 4.5 and Table 4.6 lack consistency. Table 4.6 illustrates a requirement for 7,245 houses which equates to an additional 1,437 houses and approximately 57 hectares of land as opposed to the 288 hectares as outlined in Table 4.5. Furthermore, the Local Plan does not acknowledge the availability of brownfield land to accommodate for 5,808 houses, as outlined on St Helens Council brownfield register. There has been a decline in the Borough's local population since 1981, and so the need for additional housing in the area is unjustified. The decline of industries in St Helens since the mid-1980s suggests that income-based salaries to purchase property come from outside of 3HS and the Borough.

New housing development has the potential to further increase the strain on local resources such as schools, hospitals, doctors and dental surgeries which are currently struggling with demand. With the assumption of two cars per household, housing development will have detrimental impacts on public health due to increased air pollution from personal and commercial road vehicles. As outlined in section 8.27, air pollution in St Helens Borough is higher than the national average with high numbers of cardiovascular and respiratory disease in adults and children. Between 2013-2015, approximately 51.9 deaths per 1,000 occurred in St. Helens from respiratory diseases under the age of 75, compared with the national average of 33.1. To the east of 3HS, Thatto Heath is the second highest area affected in St Helens. These numbers are likely to increase as a result of new development.

The introduction of increased road traffic will add further strain and congestion on local communication routes such as Warrington Road (A57), the only A-road through Rainhill, Rainhill Road (B5413) including Skew Bridge, Portico Lane (B5201) / Prescott Road junction which are currently at capacity according to St Helens Council. Increased traffic will also impact small resident estates and minor B and C roads including Two Butt Lane, Kendal Drive Estate (Rainhill), Royal Oak Estate (Whiston), Mill Lane, View Road, Stoney Lane, Blundells Lane, Longton Lane and Holt Lane. As a statutory body, Sports England objected to the Stage 1 Local Plan due to the change of use of Eccleston Park Golf Club (3HS). The Council has an obligation to address such objections from statutory bodies either as being resolved or upheld. St Helens Council should provide compelling evidence for over subscription of the golf creational facilities in the local area which is still awaited.

4

Policy LPA06

NPPF outlines the importance of Green Belt and its protection to prevent urban sprawl and the merging of neighbouring towns (NPPF, 134). The Society acknowledges the importance of all Green Belt sites, including Eccleston Park Golf Club (3HS) and therefore objects to its 'safeguarding' for the future. The potential for re-development at 3HS after 2035 will remove the only Green Belt / Open Green space remaining between the areas of Rainhill, Eccleston Park, Whiston, Nut Grove and Thatto Heath. The loss of 3HS will ultimately have adverse environmental, social and economic impacts on Rainhill, the wider borough and its residents. In the case of the Local Plan, no Statement of Common Ground (SoCG) has been issued with neighbouring authorities.  
Planning Sub-committee on behalf of Rainhill Civic Society

**7. Please set out modification(s) you consider are necessary**

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/10/2019 7:00:51 PM
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PO0844

**Representor Details**

Web Reference Number	WF0246
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	---
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	--- --- --- ---

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA05 - 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. 01

The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from. 02

Cross referencing this with the Council's employment policy of seemingly putting all its eggs in the basket marked 'warehousing', such jobs with its notoriously low pay, will not attract workers to move into the Borough to purchase the new build housing. 03

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

Examples of brownfield sites that could be developed for housing and aren't put forward in the Local Plan are:

1 Land off Parr Street in St Helens Town Centre, to the rear of St Helens Central Station. This site was formerly the Council owned abattoir which was demolished many years ago and has been derelict ever since. In close proximity to the station and the Town Centre this site would appear to be ripe for development and would clear up an unsightly mess. OK

2 Land off Bellerophon Way, Haydock, to the rear of the Tesco Haydock. This land is currently being marketed as housing land but again it isn't allocated in the Local Plan.

These are just two examples and there are many other areas of brownfield sites throughout the Borough that could be developed but the Council would appear to favour release of Greenbelt rather than insisting that developers remediate brownfield sites to clean up the many eyesore areas. The Council states that it has a 'brownfield first' policy but this seems to be mere lip service and is not put into practice or made manifestly clear from the Local Plan.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt in that is closing the Green spaces between the settlements of Haydock, Garswood and Blackbrook.

This site, Florida Farm South, is some 23 hectares or approximately 57 acres. On the opposite side of the A580 East Lancashire Road the Council granted planning permission for warehouse development at Florida Farm North, some 36.37 hectares of Greenbelt Land..

Its proposals are that a further 28 hectares to the north of that site should also be allocated for warehousing, giving a total of almost 65 hectares or 160 acres to be covered in concrete, tar macadam and huge sheds.

Those sites, together with Florida Farm South will amount to approximately 217 acres of Greenbelt for development, a huge proportion of the Greenbelt in this vicinity.

..  
Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. Building housing developments on the fringes of the Borough encourages the use of motor cars because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe because of the proximity to the newly re-configured junction of Haydock Lane and the A580 which lies to the East of the proposed junction.

This junction was constructed with money received from the Liverpool City Region rather than being provided by the developer in what is said to be a £150 million development. This is now a 4-way junction with Toucan crossing facilities meaning that traffic in the morning and evening peak periods is queuing for longer and the drivers are then moving away from the signals and rapidly accelerating. These vehicles will be confronted by vehicles leaving the proposed housing development. 05

The proposal for a roundabout junction at Liverpool Road & Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

A development of this size at this location is likely to generate over 2000 additional vehicle movements per day. Anyone leaving the development to travel in the direction of Manchester can only do so by leaving at this junction and then accessing the A580 via the A58/A580 junction or by travelling through Haydock via the A599 and accessing the A580 via the Haydock Lane junction referred to above.

The Council has proposals to upgrade the A58/A580 junction but it isn't known whether the works have anticipated the additional traffic that will be generated by the proposal. Other than the construction of the roundabout referred to at the junction of Liverpool Road and Vicarage Road there don't appear to be any additional highways infrastructure proposals. This roundabout is merely to provide access to the development, it doesn't mitigate the problems that will be created by the development.

Air pollution is already a major problem in St Helens with the statistics for deaths from pulmonary disease being higher than average. The recent BBC website article about polluted areas of the UK, list Merseyside and Manchester as two of the worst polluted areas. The A580 links these two areas and already carries a heavy burden of traffic. 05

The developers of the site at Florida Farm North stated in their planning application that the development would generate an estimated 6,700 additional vehicle movements per day through the A580/Haydock Lane junction. The additional air pollution caused by these vehicles was described as negligible in the report to the Planning Committee. There must come a time, however, when all the negligible amounts add up to substantial. 06

There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into Clipsley Brook which floods at the junction of West End Road and Stanley Bank Way (A58). The problem isn't made any easier because the Council for the Florida Farm North development has relaxed its requirements for flood prevention from a one in 100 year storm plus 40% for climate change to one in a 100 year plus 10% for climate change, without giving any adequate reasons why. The Employment Land proposals at LPA04 Sites 5EA and 6EA will do nothing to ease the burden on the amount of water in Clipsley Brook. 05

The loss of approximately 217 acres of farmland in this small area could prove to be crucial to the ability of the Country to grow its own food crops.

The Council doesn't appear to have provided a statement of common ground with neighbouring authorities. 07

**7. Please set out modification(s) you consider are necessary**

The site at LPA05 - 2HA should be deleted from the list of land to be deleted from the Greenbelt.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

I wish to speak on behalf of residents in the vicinity of this proposed development who have already had their lives blighted by the granting of planning permission for the warehouse development at Florida Farm North.

Response Date	3/10/2019 6:08:16 PM
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PO0845

**Representor Details**

Web Reference Number	WF0248
Type of Submission	Web submission
Full Name	Mrs Catherine Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02

- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03

- effective land use by concentrating on Green Space development over town centre development with higher densities. 04

- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06

- Adequate regional and cross border collaboration has not been undertaken. 07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. 08

- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.

- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05

- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09

- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10

- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/10/2019 6:03:27 PM
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PO0846



**Representor Details**

Web Reference Number	WF0249
Type of Submission	Web submission
Full Name	Mr Brendan Houlihan
Organisation	
Address	68 Ecclesfield Rd Eccleston St Helens WA10 5NB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 0

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02

- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03

- effective land use by concentrating on Green Space development over town centre development with higher densities. 04

- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06

- Adequate regional and cross border collaboration has not been undertaken. 07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09
- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/10/2019 5:58:24 PM
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PO0847

**Representor Details**

Web Reference Number	WF0250
Type of Submission	Web submission
Full Name	Mr Richard Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.

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- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05

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- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09

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- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10

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- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/10/2019 5:51:50 PM
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PO0848

**Representor Details**

Web Reference Number	WF0313
Type of Submission	Web submission
Full Name	Mrs Ann-Marie Barrow
Organisation	
Address	11 Lynton Way Windle St. Helens WA10 6EQ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

This version of the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council

are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
  - The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
  - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- 
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
  - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
  - The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
  - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

08

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#### 7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

#### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

#### 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 12:03:49 PM
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PO0849

**Representor Details**

Web Reference Number	WF0346
Type of Submission	Web submission
Full Name	Mrs Elizabeth Graner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA10 4EY
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06

---

- Adequate regional and cross border collaboration has not been undertaken. 07

---

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

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- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05

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- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09

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- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10

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- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/5/2019 6:20:22 PM
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PO0850

**Representor Details**

Web Reference Number	WF0347
Type of Submission	Web submission
Full Name	Mr Alan Garner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA104EY
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

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- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
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**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
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- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
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- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
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- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/5/2019 6:18:13 PM
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PO0851

- ①-LPA01 ②-LPA02 ③-LPA04 ④-LPA02  
 ⑤-Green Belt Review 2018 ⑥-LPA04 ⑦-Para 1.7.2 DTC  
 ⑧-LPA05 ⑨-LPA08 ⑩-LPA07 ⑪-LPA08

**Representor Details**

Web Reference Number	WF0394
Type of Submission	Web submission
Full Name	Mr Michael McLoughlin
Organisation	
Address	3b Sadlers Lane Rainford St. Helens WA11 7HT
Agent Details	Mr Michael McLoughlin

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

this version does not satisfy:

- the requirement for Sustainable development 01
  - the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
  - sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
  - effective land use by concentrating on Green Space development over town centre development with higher densities. 04
  - food security by ignoring Agricultural Land Quality. 05
- In addition, the following fundamental elements of the Plan remain questionable -
- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
  - Adequate regional and cross border collaboration has not been undertaken. 07
  - The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
  - The latest estimate produced by the ONS (2016) predicts that 383 houses



per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

---

• The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

---

• The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

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• The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

---

• The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

---

**7. Please set out modification(s) you consider are necessary**

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/2/2019 1:35:59 PM
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PO0852

**Representor Details**

Web Reference Number	WF0436
Type of Submission	Web submission
Full Name	Ms Sarah Byrne
Organisation	N/A
Address	9 Amanda Road, Rainhill L35 8PN
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

① ② ③ ④ ⑤

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA01, LPA02, LPA05, LPA06, LDP01
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I am unable to comment if the Local Plan is legally compliant as I am not legally trained. I would have selected 'Don't Know' if that was available. However, I do believe that the plan is contradictory throughout - please see below.

① — LPA01 and LPA02: — ②

Points 2 and 4 of this Policy refer to the development providing necessary infrastructure and services, and that the development will be sustainable or made to be sustainable. Infrastructure and services such as doctor and dentist surgeries, schools, hospitals and roads (particularly Warrington Road) are already oversubscribed – I do not see how the development will be sustainable or be made to be sustainable if this is the case given austerity cuts, particularly to the NHS. Additionally, the ageing population of Rainhill does not correlate with the proposed need for more housing to be built; care homes and local authority are services are already at maximum capacity, hence the rise in council tax to accommodate this.

Point 8 of this Policy refers to the quality of life, health and well-being for residents. I disagree with this point. As stated above, doctor and dentist surgeries, schools, hospitals and roads (particularly Warrington Road) are already oversubscribed – I do not see how the development will be sustainable or be made to be sustainable if this is the case given austerity cuts, particularly to the NHS. I believe the development will add to an already strained NHS, and in the long term will impact the physical and mental health of residents, in addition to the staff having to provide these services.

PO0853

**Representor Details**

Web Reference Number	WF0445
Type of Submission	Web submission
Full Name	Mr Paul McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	Areas 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

01

02

03

04

05

06

07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. 08
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/24/2019 3:12:06 PM
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PO0854

**Representor Details**

Web Reference Number	WF0446
Type of Submission	Web submission
Full Name	Mrs Helen McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	Area s 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	yes
Habitats Regulation Assessment	yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

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The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07



- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
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- 
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
  - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
  - The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
  - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/24/2019 3:06:37 PM
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PO0855



CPRE Lancashire response  
jackie.copley  
to:  
planningpolicy  
13/03/2019 09:20



1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

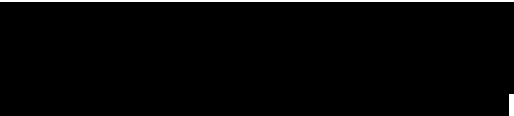
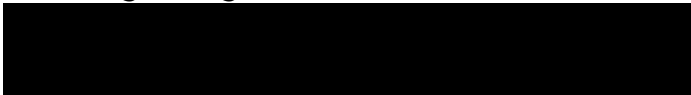
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

**Jackie Copley MRTPI MA BA(Hons) PgCert**  
Planning Manager



**Campaign to Protect Rural England**

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU  
CPRE Lancashire is a Company Limited By Guarantee registered in England, No. 5291461  
Registered Charity Number: 1107376

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St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

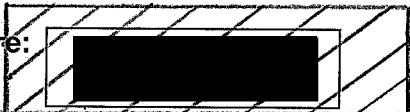
Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

**RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

**FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

**NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

**DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

**Policy LPA02: Spatial Strategy**

We are pleased to read the re-use of previously developed land in Key Settlements will remain a key Priority in local plan Policy LPA02: Spatial Strategy, as we too strongly advocate a brownfield preference approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. We acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." However, observe that the use of the phrase "as far as practicable" will make LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future. Therefore we strongly urge for this phrase to be deleted, or LPA02 will remain ineffective, if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

04

CPRE Lancashire strongly opposes Green Belt release. We consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

05

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer has an interest in low value farmland being consented for residential use and having responded to the call for sites. Many developers chase land value rises from farmland being allowed for residential use, and they aren't in the least bit bothered about issues such as sustainability, ecology, rural economic sectors. If the developer's land is in a 'sustainable' location and it would constitute 'sustainable development' this would be mutually beneficial to both developer and wider society, but if the land is in a place that is 'unsustainable' then it would be at a cost to society and it should not be allowed.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. Understandably, the loss of Green Belt stirs up strong emotions and CPRE tenaciously defends it. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

CPRE Lancashire supports the policy intention that says: "The quality of life, health and wellbeing of St Helens Borough's residents, workers and visitors and the quality of the natural environment will be supported by:" and we applaud the text in the five supporting bullet points.

**Policy LPA03: Development Principles**

CPRE Lancashire also generally supports Policy LPA03: Development Principles, as we agree places should be inclusive and that deprivation should be alleviated in the future. Similar to our comments to LPA01 and LPA02 we are greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

06

**Policy LPA04 Strategic Employment Sites**

CPRE Lancashire is strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St Helens, which we regard as unjustly excessive. We believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of

07  
8  
08

PO0856





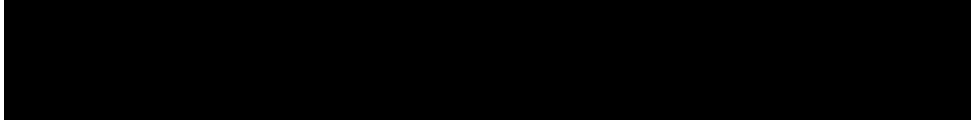
St Helens LP 2020-2035 (Submission Draft)

Tony McAteer

to:

planningpolicy

13/03/2019 08:46



2 Attachments



Local Plan Reprs Form.pdf Local Plan Reprs.pdf

Dear Sirs

Please see attached representations to the above draft LP on behalf of Eccleston Homes Ltd. We would be grateful if you could acknowledge receipt.

Regards

**Tony McAteer**  
**McAteer Associates Ltd**



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Mark	First name: Tony
Last Name: Fillingham	Last Name: McAteer
Organisation/company: EcclestonHomes Ltd	Organisation/company: McAteer Associates Ltd
Address: Suite114 Newton House Bichwood House Warrington	Address: 4 St Johns Wood Lostock Bolton
Postcode: WA3 6FW	Postcode: BL6 4FA

Signature: 

Date:

12 March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

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## **RETURN DETAILS**

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post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

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[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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## **NEXT STEPS**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete **PART B** of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LPA02 LPA03 LPA05 LPA06 LPA01		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)				See Attached representations						

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**See Attached Representations**

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<p><b>No</b>, I do not wish to participate at the oral examination</p>	<p>X</p>	<p><b>Yes</b>, I wish to participate at the oral examination</p>
--	----------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

**To ensure the representations are fully understood by the Inspector.**

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination***

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

**McAteer**  
**associates**<sup>ltd</sup>  
PROVIDING PLANNING SOLUTIONS

**St. HELENS BOROUGH LOCAL PLAN 2020-2035**

**Representations to the Submission Draft**

**January 2019**

**On behalf of**

**Eccleston Homes Ltd**

**McAteer Associates Ltd**  
**4 St Johns Wood**  
**Lostock**  
**Bolton**  
**BL6 4FA**

## 2 Policy LPA02

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2.1 Eccleston Homes support the Council's proposal to distribute future development across the Borough to sustainable locations and that the Council recognise Haydock as being a Key Settlement. 01

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2.2 They support the Council's conclusions that in order to meet the housing needs of the Borough it is necessary to remove land from the Green Belt and allocate it for housing now. However, Eccleston Homes have joined with other landowners/developers in objecting to the extent of the land proposed to be released from the Green Belt. The submissions made by Nexus Planning, on behalf of the consortium, clearly demonstrates there is a requirement to release more Green Belt land to meet the housing needs of the borough, especially if, as recognised by the Council, more choice is to be provided in terms of location and housing size. 02

---

2.3 They also support the removal of land from Green Belt to be allocated as Safeguarded Land, but for the same reasons consider the extent of the Safeguarded Land is insufficient to meet the future needs of the Borough. Eccleston Homes also object to the fact that the policy states such land is removed to meet housing needs for the 15 years after the end of this Plan period i.e. from 2035/36 to 2048/49. 03

---

2.4 Eccleston Homes consider that the wording of the policy should be amended to allow Safeguarded Land to come forward within the current Plan period if it can be demonstrated that the housing needs of the Borough cannot be met through the housing allocations being put forward in the Plan.

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2.5 Eccleston Homes also consider the Green Belt Assessment used to determine whether sites should be allocated for housing or Safeguarded Land cannot be the sole determining factor. As will be demonstrated elsewhere they hold an interest in the land south of Station Road, Haydock. Given that the land is capable of delivery within the next two years, Eccleston Homes do not consider the Green Belt Assessment properly reflects deliverability or their advancement in comparison to allocated housing sites, and this land should be allocated for housing. 04

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2.6 Eccleston Homes consider that it would be more appropriate to rank sites based on their impact on the Green Belt. This has been an approach adopted elsewhere in the North West and could easily be linked to the spatial distribution set out in the policy.

---

04

PO0857



St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

Dear Sir / Madam,

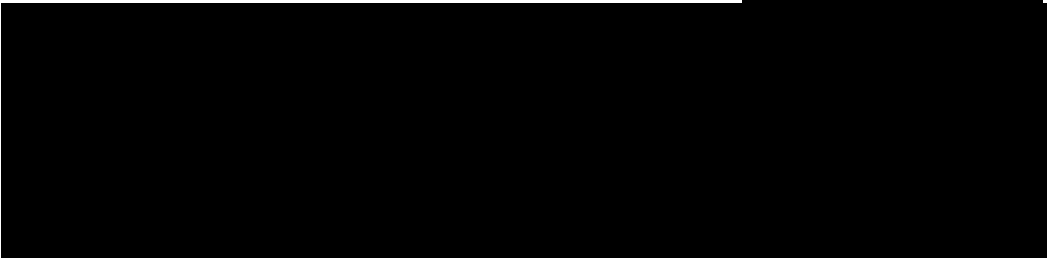
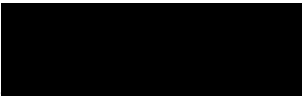
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**

Planning Associate



**Representor Details**

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Please see accompanying representations

**7. Please set out modification(s) you consider are necessary**

Please see accompanying representations

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Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Please see accompanying representations

---

### 3. STRATEGIC POLICIES

---

3.1 The Council has outlined a number of strategic policies within the Submission Draft Local Plan. Our Client supports the need for significant housing and employment growth, and the pragmatic approach by the Council to bring forward development which at a minimum meets the future residential and employment needs within St Helens and identifies additional land provision to provide flexibility and supply. Moreover, and as mentioned previously, we consider that the Local Plan should aim to provide sufficient growth to support the wider aspirations of the LCR to help drive forward economic growth and seek to reverse current trends of decline in deprivation and affordability within the borough.

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3.2 With regard to the above, we have a number of concerns with the Policies as drafted and set out these comments below:

#### **Policy LPA01 – Presumption in favour of sustainable development**

3.3 Our Client supports the inclusion of Policy LPA01 and the approach taken by the Council in relation to the presumption in favour of sustainable development which is generally reflective of the approach set out within the 2018 NPPF. We consider it is essential for this policy to be included within the emerging Local Plan, and its inclusion demonstrates compliance with Paragraph 11 of the NPPF.

11

3.4 Notwithstanding the above, Policy LPA01 seeks only to address the presumption in favour of sustainable development insofar as it relates to decision making, rather than Plan-making. We consider that the Local Plan would benefit from clarification that it has been prepared with the intention of being compatible with the presumption where it relates to plan making; this will be particularly important as the plan evolves through future reviews. Indeed, key to the Local Plan remaining sound will be its commitment to being sufficiently flexible to adapt to rapid change as set out within the opening paragraphs of paragraph 11 of the NPPF.

12

#### **Policy LPA02 – Spatial Strategy**

3.5 Our Client supports the Council's approach in identifying a number of Key Settlements, which includes Newton-le-Willows. We support the need for development to be

13

focussed on these Key Settlements as the most sustainable locations to accommodate the levels of development required to meet needs and deliver economic growth. 13

However, we consider that this policy wording should specify that that development will necessitate development 'in and around' those Key Settlements. It is acknowledged throughout the Plan that development cannot all be located within existing settlement boundaries. 14

3.6 In addition, we consider that the test "as far as practicable, having regard to the availability of suitable sites" should be removed from the policy working at Part 1 of Policy LPA02. It is for the Local Plan, and accompanying Sustainability Assessment (supported by a robust evidence base) to determine the appropriate level of development for the borough and to deliver a 'sound' Local Plan. It is not clear where or how the Council will seek to apply a test of practicability to the allocation of development. 15

3.7 Part 3 of LPA02 seeks to encourage the redevelopment of previously developed land (PDL) within Key Settlements through the lowering of developer contributions. We support the encouragement of PDL but do not consider that it is necessary to limit that encouragement to sites found within settlement boundaries of the Key Settlements; indeed, national planning policy does not require such a test to be applied. We would suggest that redevelopment of all sustainably located PDL should be encouraged to meet the development needs of the borough. Moreover, we consider that the Local Plan should seek to remove, as far as possible, barrier so the redevelopment of brownfield land, not just concentrating on developer contributions. 16

3.8 Part 4 of the above policy sets out that Green Belt release will be required to meet the development needs of the borough over the plan period and other Green Belt land is required to be safeguarded to meet the needs of the borough beyond the plan period. We support the release of Green Belt land within the Local Plan and the need for safeguarded land. As set out later within these representations, we consider that there is a case for further release of Green Belt land within the borough to meet development needs and we consider that our Client's Site is a suitable Site to be released for development from the Green Belt; both as a sustainable location for development and by virtue of the Site's failure to contribute meaningfully to the function and purpose of the Green Belt. 17  
18

PO0858



St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



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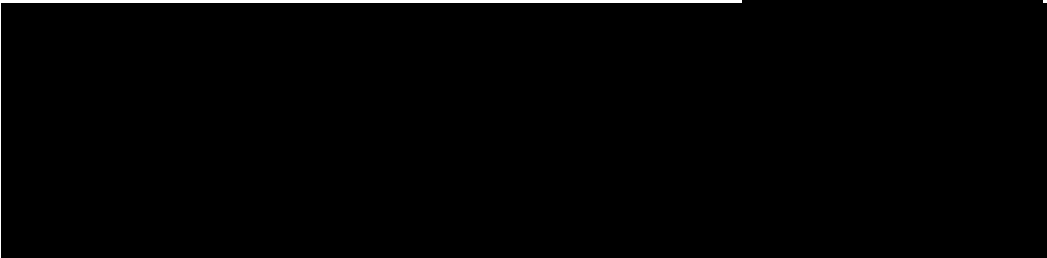
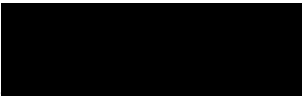
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Kind regards

**Ian Gilbert**

Planning Associate





**Representor Details**

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Type of Submission	Web submission
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**3. To which part of the Local Plan does this representation relate?**

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Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
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Other documents	Please see accompanying representations

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Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

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Please see accompanying representations

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Yes, I wish to participate at the oral examination

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18

PO0859



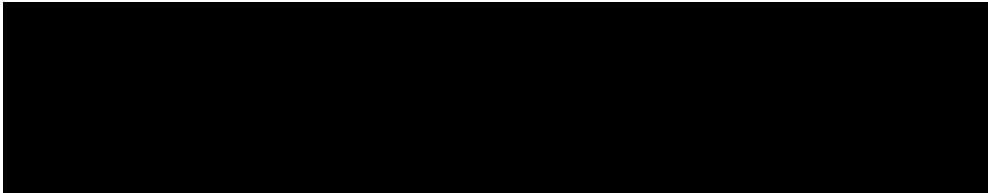
St Helens Local Plan 2020 - 2035, Submission Draft - Representations

Dan Ingram

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:20



2 Attachments



27020.A3.DI.SG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

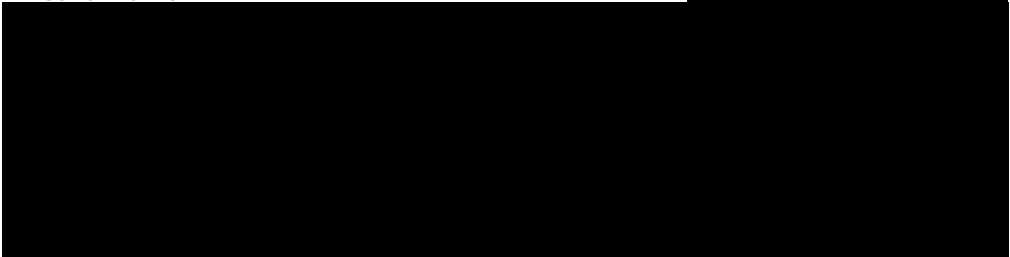
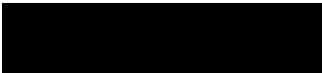
I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.

**Dan Ingram**

Senior Planner





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMORSE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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**No**, I do not wish to participate at the oral examination



**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO  
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER  
SITES .



**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019

### 3.0 THE ROLE OF RAINFORD AS A KEY SETTLEMENT

- 3.1 The New Local Plan contains a list of Key Settlements and Spatial Areas at paragraph 4.6.3, stating that the areas listed are the largest settlements within the Borough, and provide a range of key facilities and services to meet day-to-day household requirements. The New Local Plan does not define this list as a hierarchy; however, it is clear upon reading the list that it has been written as such.
- 3.2 Rainford lies fourth on this list in recognition of its importance within the Borough. The list of Key Settlements and Spatial Areas identifies them as being of varying scales and roles. In the case of Rainford, the New Local Plan outlines the following:

***"The largest village in the north of the Borough, this Key Settlement contains a local shopping centre and also acts as a service centre for the for the distinct settlement of Rainford Junction to the north (where there is a train station with links to Wigan and Liverpool)".***

- 3.3 Our Client welcomes and supports the continued recognition of Rainford as a Key Settlement in the New Local Plan, but also the acknowledgement that it is the largest village within the north of the Borough upon which other settlements, including Rainford Junction, are reliant. Our Client considers that the role of Rainford within the north of the Borough should not be underplayed by the Council; accordingly, the New Local Plan must ensure that sufficient provision is made to support and facilitate its growth and to accommodate the needs of existing and future residents (particularly those in the north of the Borough).

- 3.4 The Key Diagram at Figure 4.2 clearly highlights how the Borough is effectively divided by the A580 and that, as a result of this divide, Rainford forms the largest settlement within the northern half of the Borough. The Key Diagram also illustrates how much of the northern half of the Borough is constrained by Green Belt land and how Rainford as a settlement is contained by Green Belt on all sides.
- 3.5 Our Client considers that whilst the New Local Plan identifies Rainford as a Key Settlement, and the largest in the north of the Borough, this importance does not appear to have been fully recognised and followed through in the proposed allocation of housing and employment land in the town. It is evident that there is an imbalance in the New

35

PO0860



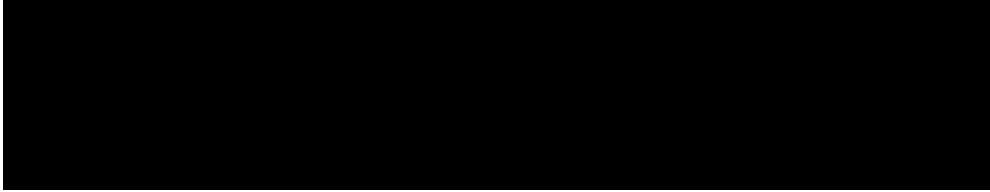
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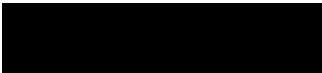
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Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

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Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
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Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

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Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO  
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER  
SITES .

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# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019

## 9.0 OTHER POLICY CONSIDERATIONS

9.1 This Section will provide our Client's comments on other policies contained within the New Local Plan.

### **Policy LPA01: Presumption in Favour of Sustainable Development**

9.2 Policy LPA01 of the New Local Plan sets out the Council's approach to sustainable development during the Plan period. The Plan outlines at paragraph 4.3.2 that the operation of this Policy will be guided by paragraph 11 of the NPPF.

---

9.3 Whilst the Policy follows the broad thrust of the NPPF it introduces additional wording and tests which are not present within paragraph 11 of the NPPF. For example, point 2 of the Policy outlines that planning applications which accord with the Local Plan will be approved without delay unless material considerations indicate otherwise. The material considerations test is no longer included within paragraph 11 of the NPPF and in this regard the policy is inconsistent with the NPPF. 17

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9.4 Furthermore, the Policy does not allow for a balance to be struck between benefits and harm; this is outlined within paragraph 11 of the NPPF and again Policy LPA01 is inconsistent with national planning policy in this regard. 18

---

9.5 Our Client is concerned that the principles of sustainability advocated by Policy LPA01 do not accord with those outlined within the NPPF, and therefore object to this Policy on these grounds. Our Client considers that the Policy should be compliant with the provisions for sustainable development as outlined within the NPPF but considers that should this be the case, the Policy would not need to be included within the Plan as it would simply be repeating the contents of the NPPF. On this basis, it is recommended that Policy LPA01 be removed from the Plan altogether.

### **Policy LPA02: Spatial Strategy**

9.6 This Policy sets the Council's overall strategy for new development in St Helens over the New Local Plan period. Key aims of the Plan are: to support the continued regeneration of St Helens and other key settlements; ensure that the scale, nature and location of development is appropriate and sustainable; encourages the use of brownfield land; identifies land for release from the Green Belt (and safeguarded) to ensure that identified development needs (and future development needs) can be delivered in full; focus strategic employment in accessible locations; support the function and role of St Helens

Town Centre, and other local centres; support the wellbeing and health of residents, workers and visitors; and protect and develop existing transport infrastructure.

---

9.7 Our Client has a number of concerns with this Policy. Firstly, Point 1 of the Policy identifies that regeneration and growth will be focussed on the key settlements. However, on review of the proposed allocations identified on the Key Diagram, it is clear that a number of these allocations are isolated, away from settlements and in some cases, located on the boundary of the Authority. It is considered that some of the allocations within the Plan do not accord with this point and fail from the outset to meet the sustainability aspirations otherwise advocated by the Council throughout the Plan. This also runs contrary to Point 2 of the Policy which seeks to direct development towards sustainable locations. 19

---

9.8 Furthermore, Point 1 makes reference to St Helens Core Area, although this is not defined. Whilst it is outlined on the Key Diagram it does not provide satisfactory detail in order to ascertain where the boundary lies, giving rise to misunderstanding and misinterpretation. Our Client considers that a detailed map outlining the St Helens Core Area should be contained within the Plan. 20

---

9.9 Our Client also has concerns over the provisions of Point 3 of Policy LPA02 which details that lower thresholds for developer contributions will be sought for developments on previously developed land. Our Client considers that this goes against the fundamental aim of developer contributions, which should be used as a tool to make development acceptable in planning terms. It should not be used as a tool to make developments more viable as advocated by Point 3. Our Client considers that developer contributions should only be used in line with national planning policy, and that the provisions of Point 3 as currently written within the New Local Plan should be removed. 21

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9.10 Our Client is overall supportive of the positive move by the Council to review and identify land within the Green Belt for housing and employment uses, including the identification of land as safeguarded to meet future needs. However, the Council should ensure that adequate land is allocated for housing in order to accommodate the population growth that will result from the provision of additional employment land which is promoted by Point 5. As per our earlier comment within this representation, our Client is concerned that insufficient land is being allocated to meet the Borough's needs, current and future. 22  
23

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### **Policy LPA03: Development Principles**

9.11 Policy LPA 03 moves on from the spatial approach and sustainable approach established through Policies LPA01 and LPA02 of the New Local Plan respectively. The Policy requires

PO0861



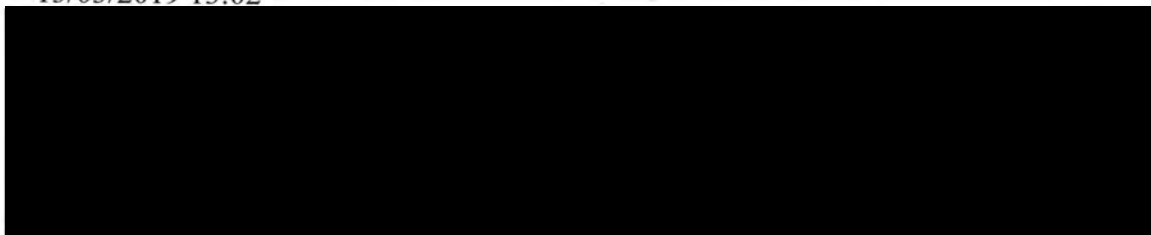
St Helens Submission Draft Local Plan: Representations on behalf of Bericote Properties Ltd [NLP-DMS.FID586504]

Katie Howarth

to:

planningpolicy@sthelens.gov.uk

13/03/2019 13:02



2 Attachments



41575\_09 Bericote St Helens Soundness Reps 13.03.2019.PDF



41575\_09 Ipsd-representation-form Bericote 7.03.2019.pdf

Dear Sir/Madam

On behalf of our client, Bericote Properties Ltd, pleased find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form is also attached.

It would be much appreciated if you could confirm receipt of this response by return.

Regards

**Katie Howarth**

**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU



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St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

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Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

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This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mrs
First Name: Simon	First name: Caroline
Last Name: Spencer	Last Name: Musker
Organisation/company: Bericote Properties Limited	Organisation/company: Lichfields
Address: 8 Hamilton Terrace Leamington Spa	Address: Ship Canal House 98 King Street Manchester
Postcode: CV32 4LY	Postcode: M2 4WU
Tel No:	[REDACTED]
Mobile No:	
Email:	

Signature: [REDACTED]

Date:

7/3/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.



**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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St.Helens Council  
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Merseyside  
WA10 1HP**

**or** by hand delivery to:

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Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
See cover letter	See cover letter	See cover letter		
Other documents (please name document and relevant part/section)		See cover letter		

**4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**  
*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

**5. If you consider the Local Plan is unsound, is it because it is not:**  
*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See cover letter

Please continue on a separate sheet if necessary

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			Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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- a Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
  - i The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
  - ii Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

This letter demonstrates that a number of policies within the Local Plan that require amendments in the context of the tests of soundness established by the Framework.

## St Helens Local Plan

### Policy LPA02: Spatial Strategy

Policy LPA02 sets out the spatial strategy for St Helens over the plan period and identifies locations for sustainable growth. LPA02 (5) specifies that substantial new employment development will take place on large sites that are capable of accommodating large employment buildings (over 9,000 sq. m).

#### *Consideration of Policy*

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Bericote generally supports the strategy for sustainable growth as set out in Policy LPA02 and the Council's acknowledgement of the need for development to be delivered in sustainable locations (Part 1 and 2). 01

---

Bericote strongly supports the release of Green Belt land to meet employment and housing needs over the Plan Period (LPA02 (4)) in line with the Framework [§136]. The Local Plan period being pursued by the Council runs to 2035 which is the minimum necessary to meet national policy<sup>1</sup>. However, planning to 2035 allows no margin for delays in the adoption process and Bericote would advocate an elongated plan period to ensure the Plan can meet the requirements of national policy when it comes to being adopted.

Bericote objects to LPA02 (5) which specifies that substantial new employment development will take place on large sites that are capable of accommodating large employment buildings (over 9,000 sq. m) as it conflicts with the ability for Bericote to fully utilise the M6Major.com Site and this is contrary to the Framework<sup>2</sup> which requires planning polices to promote effective use of land. Given that the site is proposed to be removed from the Green Belt in the Plan and has planning permission for 135,000 sq. m of employment floorspace there is no justification for restricting the scale of non-strategic logistics buildings on the remainder of the M6Major.com Site. 02

#### *Tests of Soundness*

- 1 **It is not effective:** Policy LPA02(5) fails to facilitate the effective use of land where an extant planning permission already exists.
- 2 **Consistent with national policy:** In the event of any delay in the plan preparation process through to adoption, the local plan timeframe is too short. In addition, the Framework requires planning policies

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<sup>1</sup> The Framework 2019 - §22

<sup>2</sup> The Framework 2019 - §117

PO0862



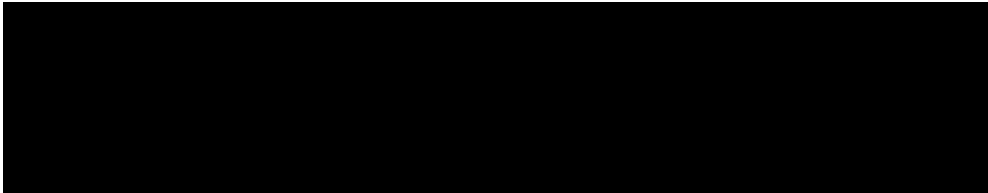
St Helens Local Plan 2020 - 2035, Submission Draft - Representations

Dan Ingram

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:20



2 Attachments



27020.A3.DI.SG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

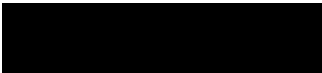
I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.

**Dan Ingram**

Senior Planner





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMORSE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

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**Yes**, I wish to participate at the oral examination

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# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019

### 3.0 THE ROLE OF RAINFORD AS A KEY SETTLEMENT

- 3.1 The New Local Plan contains a list of Key Settlements and Spatial Areas at paragraph 4.6.3, stating that the areas listed are the largest settlements within the Borough, and provide a range of key facilities and services to meet day-to-day household requirements. The New Local Plan does not define this list as a hierarchy; however, it is clear upon reading the list that it has been written as such.
- 3.2 Rainford lies fourth on this list in recognition of its importance within the Borough. The list of Key Settlements and Spatial Areas identifies them as being of varying scales and roles. In the case of Rainford, the New Local Plan outlines the following:

***"The largest village in the north of the Borough, this Key Settlement contains a local shopping centre and also acts as a service centre for the for the distinct settlement of Rainford Junction to the north (where there is a train station with links to Wigan and Liverpool)".***

- 3.3 Our Client welcomes and supports the continued recognition of Rainford as a Key Settlement in the New Local Plan, but also the acknowledgement that it is the largest village within the north of the Borough upon which other settlements, including Rainford Junction, are reliant. Our Client considers that the role of Rainford within the north of the Borough should not be underplayed by the Council; accordingly, the New Local Plan must ensure that sufficient provision is made to support and facilitate its growth and to accommodate the needs of existing and future residents (particularly those in the north of the Borough).

- 3.4 The Key Diagram at Figure 4.2 clearly highlights how the Borough is effectively divided by the A580 and that, as a result of this divide, Rainford forms the largest settlement within the northern half of the Borough. The Key Diagram also illustrates how much of the northern half of the Borough is constrained by Green Belt land and how Rainford as a settlement is contained by Green Belt on all sides.
- 3.5 Our Client considers that whilst the New Local Plan identifies Rainford as a Key Settlement, and the largest in the north of the Borough, this importance does not appear to have been fully recognised and followed through in the proposed allocation of housing and employment land in the town. It is evident that there is an imbalance in the New

35

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Local Plan, with the vast majority of housing growth now directed towards the south of the Borough (compared to the previous Local Plan Preferred Options document).

---

- 3.6 As a Key Settlement, the New Local Plan should be ambitious and provide for balanced housing growth in Rainford in line with the Plan's Vision and Objectives. Presently, our Client considers that this is not the case for the north of the Borough (Rainford included) and that additional housing growth needs to be directed towards Rainford (during and beyond the Plan period) in order to address this imbalance.
- 

06

PO0863





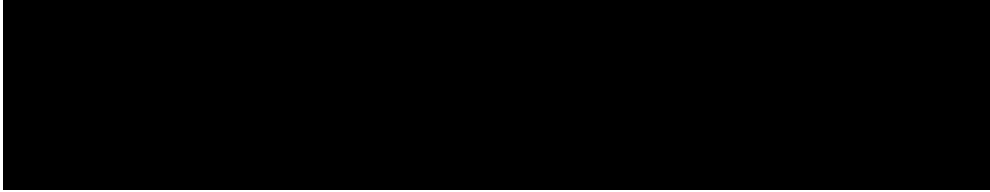
St Helens Local Plan 2020 - 2035, Submission Draft - Representations

Dan Ingram

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:20



2 Attachments



27020.A3.DI.SG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

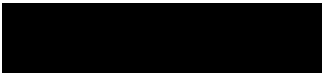
I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.

**Dan Ingram**

Senior Planner





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMOORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO  
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER  
SITES .

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019

## 9.0 OTHER POLICY CONSIDERATIONS

9.1 This Section will provide our Client's comments on other policies contained within the New Local Plan.

### **Policy LPA01: Presumption in Favour of Sustainable Development**

9.2 Policy LPA01 of the New Local Plan sets out the Council's approach to sustainable development during the Plan period. The Plan outlines at paragraph 4.3.2 that the operation of this Policy will be guided by paragraph 11 of the NPPF.

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9.3 Whilst the Policy follows the broad thrust of the NPPF it introduces additional wording and tests which are not present within paragraph 11 of the NPPF. For example, point 2 of the Policy outlines that planning applications which accord with the Local Plan will be approved without delay unless material considerations indicate otherwise. The material considerations test is no longer included within paragraph 11 of the NPPF and in this regard the policy is inconsistent with the NPPF. 17

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9.4 Furthermore, the Policy does not allow for a balance to be struck between benefits and harm; this is outlined within paragraph 11 of the NPPF and again Policy LPA01 is inconsistent with national planning policy in this regard. 18

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9.5 Our Client is concerned that the principles of sustainability advocated by Policy LPA01 do not accord with those outlined within the NPPF, and therefore object to this Policy on these grounds. Our Client considers that the Policy should be compliant with the provisions for sustainable development as outlined within the NPPF but considers that should this be the case, the Policy would not need to be included within the Plan as it would simply be repeating the contents of the NPPF. On this basis, it is recommended that Policy LPA01 be removed from the Plan altogether.

### **Policy LPA02: Spatial Strategy**

9.6 This Policy sets the Council's overall strategy for new development in St Helens over the New Local Plan period. Key aims of the Plan are: to support the continued regeneration of St Helens and other key settlements; ensure that the scale, nature and location of development is appropriate and sustainable; encourages the use of brownfield land; identifies land for release from the Green Belt (and safeguarded) to ensure that identified development needs (and future development needs) can be delivered in full; focus strategic employment in accessible locations; support the function and role of St Helens



Town Centre, and other local centres; support the wellbeing and health of residents, workers and visitors; and protect and develop existing transport infrastructure.

---

9.7 Our Client has a number of concerns with this Policy. Firstly, Point 1 of the Policy identifies that regeneration and growth will be focussed on the key settlements. However, on review of the proposed allocations identified on the Key Diagram, it is clear that a number of these allocations are isolated, away from settlements and in some cases, located on the boundary of the Authority. It is considered that some of the allocations within the Plan do not accord with this point and fail from the outset to meet the sustainability aspirations otherwise advocated by the Council throughout the Plan. This also runs contrary to Point 2 of the Policy which seeks to direct development towards sustainable locations. 19

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9.8 Furthermore, Point 1 makes reference to St Helens Core Area, although this is not defined. Whilst it is outlined on the Key Diagram it does not provide satisfactory detail in order to ascertain where the boundary lies, giving rise to misunderstanding and misinterpretation. Our Client considers that a detailed map outlining the St Helens Core Area should be contained within the Plan. 20

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9.9 Our Client also has concerns over the provisions of Point 3 of Policy LPA02 which details that lower thresholds for developer contributions will be sought for developments on previously developed land. Our Client considers that this goes against the fundamental aim of developer contributions, which should be used as a tool to make development acceptable in planning terms. It should not be used as a tool to make developments more viable as advocated by Point 3. Our Client considers that developer contributions should only be used in line with national planning policy, and that the provisions of Point 3 as currently written within the New Local Plan should be removed. 21

---

9.10 Our Client is overall supportive of the positive move by the Council to review and identify land within the Green Belt for housing and employment uses, including the identification of land as safeguarded to meet future needs. However, the Council should ensure that adequate land is allocated for housing in order to accommodate the population growth that will result from the provision of additional employment land which is promoted by Point 5. As per our earlier comment within this representation, our Client is concerned that insufficient land is being allocated to meet the Borough's needs, current and future. 22  
23

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### **Policy LPA03: Development Principles**

9.11 Policy LPA 03 moves on from the spatial approach and sustainable approach established through Policies LPA01 and LPA02 of the New Local Plan respectively. The Policy requires

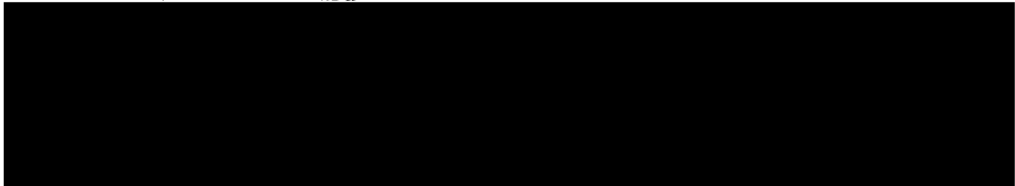
PO0864



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:02

Cc:  
Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner



# indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

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This form has two parts; Part A – Personal Details Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Table with 2 columns: 1. Your Details, 2. Your Agent's Details (if applicable). Rows include Title, Name, Organisation, Address, Postcode, and Contact Information.

Signature and Date fields. Signature is redacted, Date is 13/03/2019.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) Yes [X] (Via Email) No [ ]

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

**RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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**Telephone:** 01744 676190

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**Now please complete PART B of this form, setting out your representation/comment.**

# Please use a separate copy of Part B for each separate comment/representation.

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	✓	Paragraph / diagram / table	✓	Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	✓
Justified?	✓
Effective?	✓
Consistent with National Policy?	✓

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
---	-------------------------------------	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination**

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

# St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

**indigo.**



## 4. Specific Policies

### Policy LPA02: Spatial Strategy

- 4.1. We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Garswood (*"a village in the north of the Borough...large enough to form a Key Settlement"*), recognises that Garswood has potential for and can support new development. The spatial distribution effectively addresses the existing housing and employment issues within the borough and development in these regions will lead to sustainable development across the borough. 05
- 4.2. Every update of the St. Helens Strategic Housing Land Availability Assessment since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. We consider that the policy addresses the housing delivery issues in the borough through a revised spatial distribution, including proposing development at Garswood, and releasing of Green Belt land for housing. We therefore support the identification of Garswood for new development.
- 4.3. The policy highlights that *"the re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites"*. This needs re-wording to avoid ambiguity. The use of brownfield land is understandably a priority in terms of regeneration and sound planning, but brownfield sites should not be prioritised over allocated greenfield sites in terms of phasing. 06
- 4.4. At LPA02(4) the policy highlights that *"such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan"*. We object to this on the basis that there is no clarity on when a full review of the local plan will be triggered. Further clarity should be provided on this point, including with reference to the Housing Delivery Test and / or Five Year Supply. Additionally, we advocate that safeguarded land should come forward for development within the plan period, should housing allocations become stalled or not deliver housing within the timescales identified. 07
- 4.5. The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included; the issues are covered in Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. 08
- 4.6. At paragraph 4.6.2 'Sub-regional context', it confirms St Helens Council has cooperated extensively with nearby districts including the Greater Manchester City Regions. We support the need which has been identified within the Liverpool City Region to accommodate the growth of the logistics and warehousing sector, in order to support underlying economic trends and the growth of the port of Liverpool. 09
- 4.7. We also support the Plan's aims to address the issue of insufficient employment land to meet the needs of modern businesses. We support mixed use development and smaller employment uses interspersed with residential development as this will encourage St Helens Borough's residents to work closer to home, reduce the number of people who commute to other locations or move away to secure work. 10

### Policy LPA03: Development Principles

- 4.8. On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined because some will not be relevant to a particular proposal. 11

PO0865

**Representor Details**

Web Reference Number	WF0248
Type of Submission	Web submission
Full Name	Mrs Catherine Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02

- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03

- effective land use by concentrating on Green Space development over town centre development with higher densities. 04

- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06

- Adequate regional and cross border collaboration has not been undertaken. 07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08

- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.

- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05

- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09

- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10

- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/10/2019 6:03:27 PM
---------------	----------------------

PO0866

**Representor Details**

Web Reference Number	WF0249
Type of Submission	Web submission
Full Name	Mr Brendan Houlihan
Organisation	
Address	68 Ecclesfield Rd Eccleston St Helens WA10 5NB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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- Adequate regional and cross border collaboration has not been undertaken. 07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

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- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.

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- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05

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- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09

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- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10

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- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/10/2019 5:58:24 PM
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PO0867



**Representor Details**

Web Reference Number	WF0250
Type of Submission	Web submission
Full Name	Mr Richard Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contanimated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.

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- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05

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- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09

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- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10

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- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/10/2019 5:51:50 PM
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PO0868

**Representor Details**

Web Reference Number	WF0313
Type of Submission	Web submission
Full Name	Mrs Ann-Marie Barrow
Organisation	
Address	11 Lynton Way Windle St. Helens WA10 6EQ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

This version of the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council

are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
  - The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
  - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- 
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
  - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
  - The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
  - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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#### 7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

#### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

#### 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 12:03:49 PM
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PO0869

**Representor Details**

Web Reference Number	WF0346
Type of Submission	Web submission
Full Name	Mrs Elizabeth Graner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA10 4EY
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06

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- Adequate regional and cross border collaboration has not been undertaken. 07

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- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

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- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05

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- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09

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- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10

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- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/5/2019 6:20:22 PM
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PO0870

**Representor Details**

Web Reference Number	WF0347
Type of Submission	Web submission
Full Name	Mr Alan Garner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA104EY
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. 08
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/5/2019 6:18:13 PM
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PO0871

- ①-LPA01 ②-LPA02 ③-LPA04 ④-LPA02  
 ⑤-Green Belt Review 2018 ⑥-LPA04 ⑦-Para 1.7.2 DTC  
 ⑧-LPA05 ⑨-LPA08 ⑩-LPA07 ⑪-LPA08

**Representor Details**

Web Reference Number	WF0394
Type of Submission	Web submission
Full Name	Mr Michael McLoughlin
Organisation	
Address	3b Sadlers Lane Rainford St. Helens WA11 7HT
Agent Details	Mr Michael McLoughlin

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:****6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

this version does not satisfy:

- the requirement for Sustainable development 01
  - the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
  - sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
  - effective land use by concentrating on Green Space development over town centre development with higher densities. 04
  - food security by ignoring Agricultural Land Quality. 05
- In addition, the following fundamental elements of the Plan remain questionable -
- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
  - Adequate regional and cross border collaboration has not been undertaken. 07
  - The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
  - The latest estimate produced by the ONS (2016) predicts that 383 houses

per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

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• The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

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• The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

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• The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

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• The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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**7. Please set out modification(s) you consider are necessary**

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/2/2019 1:35:59 PM
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PO0872

**Representor Details**

Web Reference Number	WF0445
Type of Submission	Web submission
Full Name	Mr Paul McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	Areas 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

01

02

03

04

05

06

07



- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. 08
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/24/2019 3:12:06 PM
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PO0873

**Representor Details**

Web Reference Number	WF0446
Type of Submission	Web submission
Full Name	Mrs Helen McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	Area s 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	yes
Habitats Regulation Assessment	yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
  - The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
  - The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
  - The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
  - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- 
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
  - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
  - The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
  - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/24/2019 3:06:37 PM
---------------	----------------------

PO0874

ELO258







Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens  
Graham Lamb

SITE GBP-092-A

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:01



4 Attachments

-  L004- Land at St Helens Road - Repts to Submission Local Plan.pdf  Appendix 3- Agricultural Land Report.pdf
  -  Appendix 4- Comprehensive Repts to Submission Local Plan.pdf
  -  Appendix 4a- Interim Housing Needs Assessment.pdf
- ① LPA05      ⑥ S.O.5.1  
 ② LPA02      ⑦ LPA02 - PARA 3  
 ③ GBP      ⑧ LPA02 - PARA 4  
 ④ S.A.      ⑨ LPA03  
 ⑤ S.O.4.1      ⑩ LPA04

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

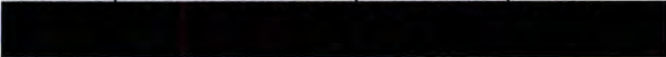
Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**  
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Suite 4b | 113 Portland Street | Manchester | M1 6DW



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- ⑪ LPA05 - PARA 3      ⑯ LPC02
- ⑫ LPA05 - PARA 4      ⑰ LPC04
- ⑬ APPENDIX 4      ⑱ LPA07 - PARA 3, 4
- ⑭ TABLE 4.6      ⑲ LPA07, PARA 9
- ⑮ LPA05.1      ⑳ LPC10 - PARA 6
- ㉑ LPA06      ㉓ LPC13 - PARA 4
- ㉒ LPC01      ㉔ LPD07
- ㉕ LPD02
- ㉖ LPD03

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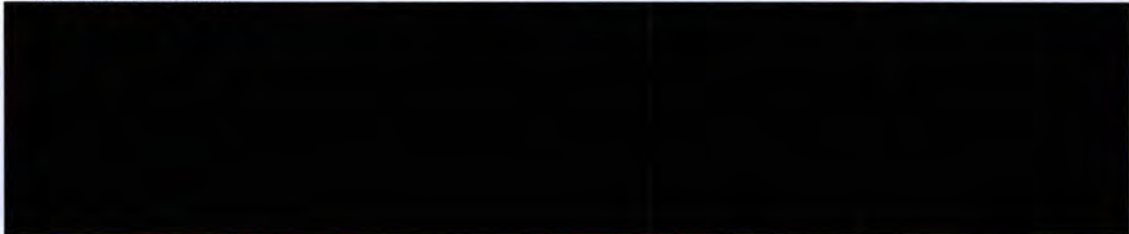
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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)  
Graham Lamb  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:03



1 Attachment



Appendix 1- Delivery Statement.pdf

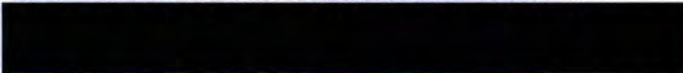
**Email 2**

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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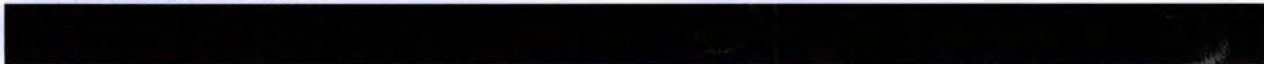
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**From:** Graham Lamb

**Sent:** 13 March 2019 17:01



**Subject:** Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,



**Graham Lamb**  
Associate Planner

**Pegasus Group**

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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)  
Graham Lamb  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:04



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

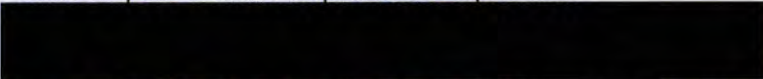
**Email 3**

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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**From:** Graham Lamb  
**Sent:** 13 March 2019 17:01  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Subject:** Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens. ✓

Submissions will come in 2 emails due to file size.

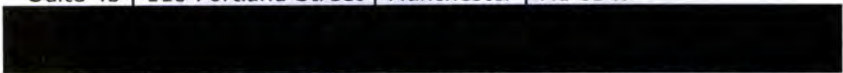
I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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 <https://i.imgur.com/05aES4f.jpg>

KW/GL/P17-0098/L004

13 March 2019

Planning Policy Team  
Development Plans Section  
St Helens Council  
Place Services  
Town Hall Annexe  
Victoria Square  
St Helens  
Merseyside  
WA10 1HP

**Sent via email to:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Dear Sir/Madam,

**Land North of St Helens Road, Eccleston Park, St Helens  
St Helens Local Plan Submission Draft (January-March 2019 Consultation)**

We are instructed on behalf of the client, I Birchall & D Birchall (c/o P Wilson & Company LLP Chartered Surveyors), to submit representations to the Local Plan Submission Consultation of the emerging St Helens Local Plan. The client are the landowners of a parcel of land referred to as land north of St Helens Road, Eccleston Park.

A Delivery Statement has been prepared for the site, which is contained at **Appendix 1**. As demonstrated in the document, the site has capacity to deliver up to 625 homes in a highly sustainable location. This document demonstrates how the site is entirely suitable, deliverable and viable for housing development, as well as being an entirely appropriate Green Belt release site.

Further technical studies have also been prepared to further demonstrate the suitability of St Helens Road site for housing development, as set out below and attached:

- Accessibility Statement (**Appendix 2**)
- Agricultural Land Report (**Appendix 3**)

**The need to allocate additional sites**

Pegasus Group has prepared comprehensive representations and an Interim Housing Report to the St Helens Local Plan on behalf of another client, Redrow, who have separate land interests within Eccleston (both reports are contained at **Appendix 4**).

So whilst not directly related to this site, these reports (particularly sections 4-9 of the main representation) outline a compelling case as to why the Council need to allocate more sites in order for the plan to be found sound and to meet emerging housing requirements, as summarised below:

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- There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned.
- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites.
- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan.

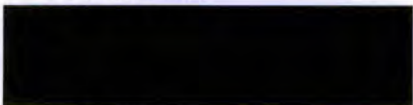
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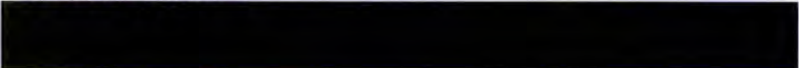
To conclude, we politely suggest that the Council need to allocate more sites in order for the plan to be found sound. As demonstrated in the appended documents, the St Helens Road, Eccleston site is available and suitable for development and should therefore be considered for housing allocation.

I trust the enclosed is clear, however should you have any queries on these representations please do not hesitate to contact me on the details provided below.

Yours sincerely,



Graham Lamb  
Associate Planner



Encs.



**ST HELENS BOROUGH LOCAL PLAN 2020-2035:  
SUBMISSION DRAFT**

**REPRESENTATION BY  
REDROW HOMES NORTH WEST**

Date: 13<sup>th</sup> March 2019

Pegasus Reference: GL/KW/P17-0098/R005v4

**Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW

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**4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)**

4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

**Spatial Vision & Strategic Objectives**

4.2 Redrow support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*. ✓

4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a 'sufficient' number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be 'positively prepared' with the objective of 'significantly boosting the supply of housing'. As such, the Council should be seeking to surpass their needs so we recommend that the wording be updated to reflect this. 5

4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to need to meet local employment needs; however, boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to acknowledge this. 6

**Policy LPA02 (Part 3) - Previously Developed Land**

4.5 We agree that previously developed land will make a significant contribution to supply and support the Council in seeking to encourage brownfield re-development through the lowering of developer contributions. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide the range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another. 7

4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment.

**Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

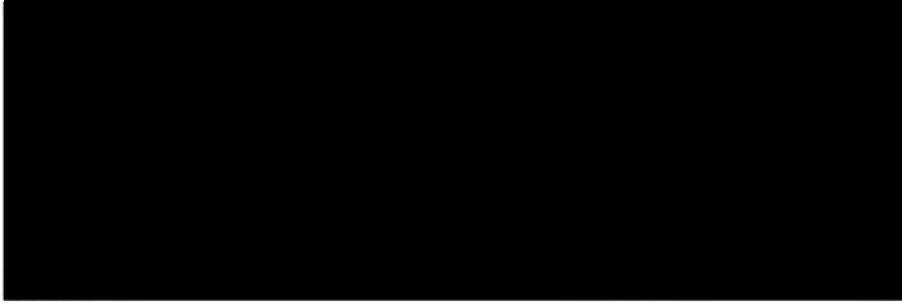
4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is ✓

PO0875



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West  
Email 1 of 4  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:05

- ① - LPA05
- ② - LPA02
- ③ - GBR
- ④ - S.A.



- ⑤ - S.O. 4.1
- ⑥ - S.O. 5.1

4 Attachments

- Appendix 1-Site Location Plan-Redrow.pdf
- Appendix 2 Part 1-Delivery Statement-Redrow.pdf
- Representation Form-Redrow-May 19.pdf R005v6 - Repts to Submission Local Plan-Redrow.pdf

- ⑦ - LPA02 - PARA 3
- ⑧ - LPA02 - PARA 4
- ⑨ - LPA03
- ⑩ - LPA04

Dear Sir/Madam,

We are instructed on behalf of our client, Redrow Homes North West, to submit the attached form and representation (R005) to the Local Plan Submission Draft Consultation. Redrow have land interests in relation to the Burrows Lane, Ecclestone site, which is discussed in detail in the attached representation.

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Site Location Plan (attached to this email)
- Appendix 2 - Delivery Statement (Part 1 attached to this email)
- Appendix 3 - Accessibility Statement
- Appendix 4 - Phase 1 Ecology Survey
- Appendix 5 - Agricultural Land Assessment
- Appendix 6 - Detailed Site Pro Formas
- Appendix 7 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 8 - Council's Housing Trajectory
- Appendix 9 - Pegasus Housing Trajectory
- Appendix 10 - Spatial Distribution of Sites

- ⑪ - LPA05 - PARA 3
- ⑫ - LPA05 - PARA 4
- ⑬ - APPENDIX 4
- ⑭ - TABLE 4.6
- ⑮ - LPA05.1
- ⑯ - LPA06
- ⑰ - LPC01

We will follow up this submission by sending a CD in the post which contains the entirety of Redrow's submission to the Local Plan consultation.

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Many thanks and kind regards,

**Rebecca Dennis**  
Principal Planner

**Pegasus Group**  
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Suite 4b | 113 Portland Street | Manchester | M1 6DW

- ⑲ - LPC13 - PARA 4
- ⑳ - LPD07
- ㉑ - LPD02
- ㉒ - LPD03

- ⑱ - LPC02
- ⑲ - LPC04
- ㉑ - LPA07 - PARA 3d
- ㉒ - LPA07 - PARA 9
- ㉓ - LPC10

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 2 of 4  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:06



3 Attachments



Appendix 2 Part 2-Delivery Statement-Redrow.pdf Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 3 of 4  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:07



7 Attachments



Appendix 5-Agricultural Land Classification-Redrow.pdf Appendix 6-Detailed Site Pro Forma-Redrow.pdf



Appendix 8-Council's Housing Trajectory-Redrow.pdf



Appendix 9a-Pegasus Trajectory Best Case Scenario-Redrow.pdf



Appendix 9b-Pegasus Trajectory Worst Case Scenario 9b-Redrow.pdf



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



Appendix 7-Review of Employment-Led Local Plan Housing Requirement-Redrow.pdf

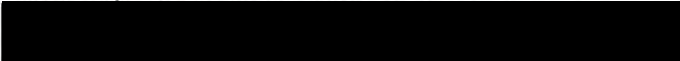
Email 3 of 4 of Redrow representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 4 of 4  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:07



1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

**Rebecca Dennis**  
Principal Planner

**Pegasus Group**

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Suite 4b | 113 Portland Street | Manchester | M1 6DW

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St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Graham
Last Name:	Last Name: Lamb
Organisation/company: Redrow Homes North West	Organisation/company: Pegasus Group
Address:	Address: Suite 4b, 113 Portland Street, Manchester,
Postcode:	Postcode: M1 6DW



Signature:	Date: <input type="text" value="13/05/19"/>
------------	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>



**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA02	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	<b>No x</b>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	x
Justified?	X
Effective?	X
Consistent with National Policy?	x

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

WHILST WE ARE SUPPORTIVE OF THE GENERAL WORDING OF THE SPATIAL STRATEGY, WE OBJECT TO THE CURRENT SPATIAL DISTRIBUTION OF SITES IN THE SUBMISISON VERSION OF THE PLAN. THE PLAN FAILS TO DISTRIBUTE DEVELOPMENT TO A NUMBER OF HIGHLY SUSTAINABLE AREAS, INCLUDING ECCLESTON. THE CURRENTLY SUGGESTED SPATIAL DISTRIBUTION THEREFORE FAILS TO ACHIEVE THE SPATIAL STRATEGY SET OUT IN THIS POLICY.



PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

THE SPATIAL DISTRIBUTION OF ALLOCATED SITES NEEDS TO BE RE-LOOKED AT, TO BE MORE DISPERSED IN NATURE, IN ORDER FOR THE PLAN TO BE SOUND.

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**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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**ST HELENS BOROUGH LOCAL PLAN 2020-2035:  
SUBMISSION DRAFT**

**REPRESENTATION BY  
REDROW HOMES NORTH WEST**

Date: 13<sup>th</sup> May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

**Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW



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#### 4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)

- 4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

##### **Spatial Vision & Strategic Objectives**

- 4.2 Redrow support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*.

- 4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a *'sufficient'* number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be *'positively prepared'* with the objective of *'significantly boosting the supply of housing'*. As such, the Council should be seeking to surpass their needs so we recommend that the wording be updated to reflect this. (5)

- 4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to need to meet local employment needs; however, boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to acknowledge this. (6)

##### **Policy LPA02 (Part 3) - Previously Developed Land**

- 4.5 We agree that previously developed land will make a significant contribution to supply and support the Council in seeking to encourage brownfield re-development through the lowering of developer contributions. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide the range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another. (7)

- 4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment.

##### **Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

- 4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is

PO0876

Sinc: Former LPA0 HS23 ELO290

ELO290B.1.pdf



Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:13



① LPA05

② LPA02

③ GBR

④ SA

⑤ S.O.4.1

⑥ S.O.5.1

⑦ LPA02-PARA 3

3 Attachments



Representation Form-Wallace-May 19.pdf R001v7- Reps to Submission Local Plan-Wallace.pdf

⑧ LPA02- PARA 4

⑨ LPA03



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑩ LPA04

Dear Sir/Madam,

⑪ LPA05 - PARA 3

We are instructed on behalf of our client, Wallace Land Investments, to submit the attached form and representation (R001) to the Local Plan Submission Draft Consultation. Wallace have land interests in relation to the Mill Lane, Rainhill site, which is discussed in detail in the attached representation.

⑫ LPA05 - PARA 4

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Illustrative Masterplan (attached to this email)
- Appendix 2 - Previously Submitted Documents and Technical Information
- Appendix 3 - Additional Technical Documents (May 2019)
- Appendix 4 - Detailed Site Pro Formas
- Appendix 5 - Council's Stage 3 Green Belt Assessment of Mill Lane Site
- Appendix 6 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 7 - Council's Housing Trajectory
- Appendix 8 - Pegasus Housing Trajectory
- Appendix 9 - Spatial Distribution of Sites

⑬ APPENDIX 4

⑭ LPA05 - TABLE 4.6

⑮ LPA05.1

⑯ LPA06

⑰ LPC01

We will follow up this submission by sending a CD in the post which contains the entirety of Wallace's submission to the Local Plan consultation.

⑱ LPC02

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

⑲ LPC04

⑳ LPC03 - PARA 4

Many thanks and kind regards,

㉑ LPA07-PARA 3c) ㉒ LPD07

㉓ LPA07-PARA 9 ㉔ LPD02

Rebecca Dennis

Principal Planner

Pegasus Group

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Suite 4b | 113 Portland Street | Manchester | M1 6DW

㉕ LPC10

㉖ LPD03



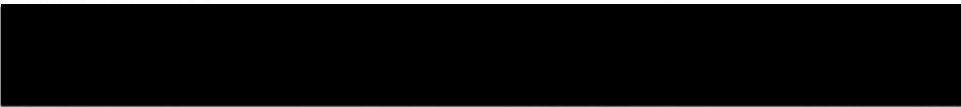
Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8

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4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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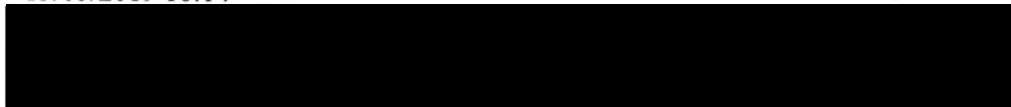
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1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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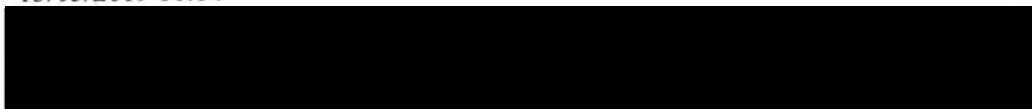
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<https://i.imgur.com/05aES4f.jpg>



Representations to Local Plan Submission Draft Consultation-Wallace-Email 4 of 8  
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planningpolicy@sthelens.gov.uk  
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2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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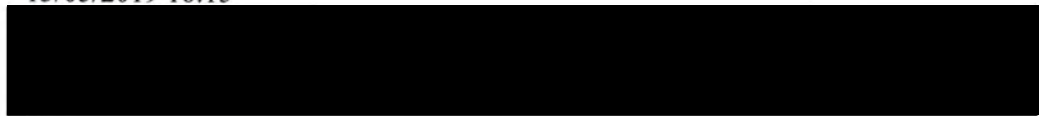
Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8

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1 Attachment



Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

Email 6 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 7 of 8

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7 Attachments



Appendix 4-Detailed Site Pro Formas-Wallace.pdf



Appendix 5-Council's Stage 3 Green Belt Assessment-Wallace.pdf



Appendix 7-Council's Housing Trajectory-Wallace.pdf



Appendix 8b-Pegasus Trajectory Worst Case Scenario-Wallace.pdf



Appendix 8c-Summary Supply Trajectory-Wallace.pdf



Appendix 8a-Pegasus trajectory Best Case Scenario-Wallace.pdf



Appendix 6-Review of Employment-Led Local Plan Housing Requirement-Wallace.pdf

Email 7 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Rebecca Dennis

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1 Attachment



Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

**Rebecca Dennis**  
Principal Planner

**Pegasus Group**  
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Suite 4b | 113 Portland Street | Manchester | M1 6DW



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St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

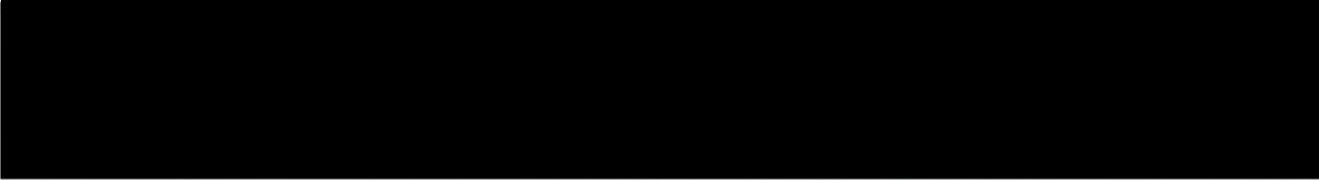
Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**. Any comments received after this deadline **cannot** be accepted.

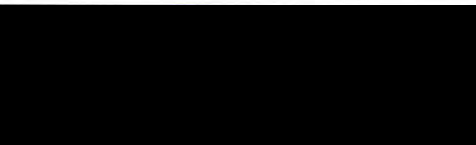
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**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Sebastian
Last Name:	Last Name: Tibenham
Organisation/company: Wallace Land Investments (c/o Agent)	Organisation/company: Pegasus Group
Address:	Address: Suite 4b, 113 Portland Street, Manchester
Postcode:	Postcode: M1 6DW



Signature: 	Date: <input type="text" value="13/05/2019"/>
--	---

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**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)                      No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

**RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

## Now please complete **PART B** of this form, setting out your representation/comment.

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Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	<b>No X</b>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**





**ST HELENS BOROUGH LOCAL PLAN 2020-2035:  
SUBMISSION DRAFT**

**REPRESENTATION BY  
WALLACE LAND INVESTMENTS**

Date: 13<sup>th</sup> May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

**Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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**Live: 45457800 v 3**

**4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)**

4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

**Spatial Vision & Strategic Objectives**

4.2 Wallace support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*.

4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a *'sufficient'* number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be *'positively prepared'* with the objective of *'significantly boosting the supply of housing'*. As such, the Council should be seeking to surpass their needs, so we recommend that the wording be updated to reflect this.

5

4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to meet local employment needs; however boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to make reference to this.

6

**Policy LPA02 (Part 3) - Previously Developed Land**

4.5 We agree that previously developed land can make a significant contribution to supply. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide a range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another.

7

4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment. Developer contributions should be assessed and set taking into account site specifics. A one size fits all generic approach should be avoided.

**Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is

PO0877



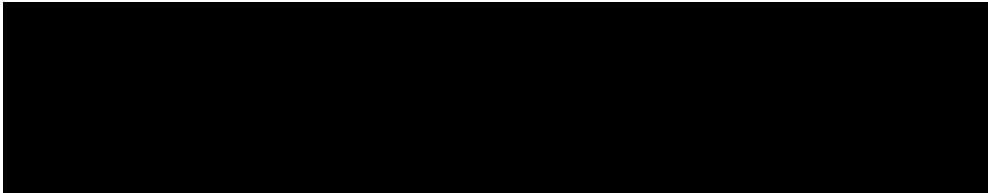
St Helens Local Plan 2020 - 2035, Submission Draft - Representations

Dan Ingram

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:20



2 Attachments



27020.A3.DI.SG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

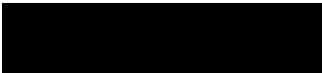
I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.

**Dan Ingram**

Senior Planner





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMORSE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

**No**, I do not wish to participate at the oral examination



**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO  
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER  
SITES .



**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019

## 9.0 OTHER POLICY CONSIDERATIONS

9.1 This Section will provide our Client's comments on other policies contained within the New Local Plan.

### **Policy LPA01: Presumption in Favour of Sustainable Development**

9.2 Policy LPA01 of the New Local Plan sets out the Council's approach to sustainable development during the Plan period. The Plan outlines at paragraph 4.3.2 that the operation of this Policy will be guided by paragraph 11 of the NPPF.

---

9.3 Whilst the Policy follows the broad thrust of the NPPF it introduces additional wording and tests which are not present within paragraph 11 of the NPPF. For example, point 2 of the Policy outlines that planning applications which accord with the Local Plan will be approved without delay unless material considerations indicate otherwise. The material considerations test is no longer included within paragraph 11 of the NPPF and in this regard the policy is inconsistent with the NPPF. 17

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9.4 Furthermore, the Policy does not allow for a balance to be struck between benefits and harm; this is outlined within paragraph 11 of the NPPF and again Policy LPA01 is inconsistent with national planning policy in this regard. 18

---

9.5 Our Client is concerned that the principles of sustainability advocated by Policy LPA01 do not accord with those outlined within the NPPF, and therefore object to this Policy on these grounds. Our Client considers that the Policy should be compliant with the provisions for sustainable development as outlined within the NPPF but considers that should this be the case, the Policy would not need to be included within the Plan as it would simply be repeating the contents of the NPPF. On this basis, it is recommended that Policy LPA01 be removed from the Plan altogether.

### **Policy LPA02: Spatial Strategy**

9.6 This Policy sets the Council's overall strategy for new development in St Helens over the New Local Plan period. Key aims of the Plan are: to support the continued regeneration of St Helens and other key settlements; ensure that the scale, nature and location of development is appropriate and sustainable; encourages the use of brownfield land; identifies land for release from the Green Belt (and safeguarded) to ensure that identified development needs (and future development needs) can be delivered in full; focus strategic employment in accessible locations; support the function and role of St Helens

Town Centre, and other local centres; support the wellbeing and health of residents, workers and visitors; and protect and develop existing transport infrastructure.

---

9.7 Our Client has a number of concerns with this Policy. Firstly, Point 1 of the Policy identifies that regeneration and growth will be focussed on the key settlements. However, on review of the proposed allocations identified on the Key Diagram, it is clear that a number of these allocations are isolated, away from settlements and in some cases, located on the boundary of the Authority. It is considered that some of the allocations within the Plan do not accord with this point and fail from the outset to meet the sustainability aspirations otherwise advocated by the Council throughout the Plan. This also runs contrary to Point 2 of the Policy which seeks to direct development towards sustainable locations. 19

---

9.8 Furthermore, Point 1 makes reference to St Helens Core Area, although this is not defined. Whilst it is outlined on the Key Diagram it does not provide satisfactory detail in order to ascertain where the boundary lies, giving rise to misunderstanding and misinterpretation. Our Client considers that a detailed map outlining the St Helens Core Area should be contained within the Plan. 20

---

9.9 Our Client also has concerns over the provisions of Point 3 of Policy LPA02 which details that lower thresholds for developer contributions will be sought for developments on previously developed land. Our Client considers that this goes against the fundamental aim of developer contributions, which should be used as a tool to make development acceptable in planning terms. It should not be used as a tool to make developments more viable as advocated by Point 3. Our Client considers that developer contributions should only be used in line with national planning policy, and that the provisions of Point 3 as currently written within the New Local Plan should be removed. 21

---

9.10 Our Client is overall supportive of the positive move by the Council to review and identify land within the Green Belt for housing and employment uses, including the identification of land as safeguarded to meet future needs. However, the Council should ensure that adequate land is allocated for housing in order to accommodate the population growth that will result from the provision of additional employment land which is promoted by Point 5. As per our earlier comment within this representation, our Client is concerned that insufficient land is being allocated to meet the Borough's needs, current and future. 22  
23

---

### **Policy LPA03: Development Principles**

9.11 Policy LPA 03 moves on from the spatial approach and sustainable approach established through Policies LPA01 and LPA02 of the New Local Plan respectively. The Policy requires

PO0878

ELO258







Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens  
Graham Lamb

SITE GBP-092-A

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:01



4 Attachments

-  L004- Land at St Helens Road - Repts to Submission Local Plan.pdf  Appendix 3- Agricultural Land Report.pdf
  -  Appendix 4- Comprehensive Repts to Submission Local Plan.pdf
  -  Appendix 4a- Interim Housing Needs Assessment.pdf
- Dear Sir/Madam,
- |           |                  |
|-----------|------------------|
| ① LPA05   | ⑥ S.O.5.1        |
| ② LPA02   | ⑦ LPA02 - PARA 3 |
| ③ GBR     | ⑧ LPA02 - PARA 4 |
| ④ S.A.    | ⑨ LPA03          |
| ⑤ S.O.4.1 | ⑩ LPA04          |

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**  
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- |                  |                     |                     |                  |
|------------------|---------------------|---------------------|------------------|
| ⑪ LPA05 - PARA 3 | ⑬ APPENDIX 4        | ⑮ LPA05.1           | ⑰ LPC02          |
| ⑫ LPA05 - PARA 4 | ⑭ TABLE 4.6         | ⑯ LPA07, PARA 9     | ⑱ LPC04          |
| ⑬ APPENDIX 4     | ⑮ LPA05.1           | ⑰ LPA07 - PARA 9, C | ⑲ LPC10 - PARA 6 |
| ⑭ TABLE 4.6      | ⑯ LPA05.1           | ⑱ LPC10 - PARA 6    | ⑳ LPC13 - PARA 4 |
| ⑮ LPA05.1        | ⑰ LPA07 - PARA 9, C | ⑲ LPC13 - PARA 4    | ㉑ LPD07          |
| ⑰ LPA07, PARA 9  | ⑱ LPC10 - PARA 6    | ㉑ LPD07             | ㉒ LPD02          |
| ⑱ LPC10 - PARA 6 | ㉑ LPD07             | ㉒ LPD02             | ㉓ LPD03          |
| ㉑ LPD07          | ㉒ LPD02             | ㉓ LPD03             |                  |

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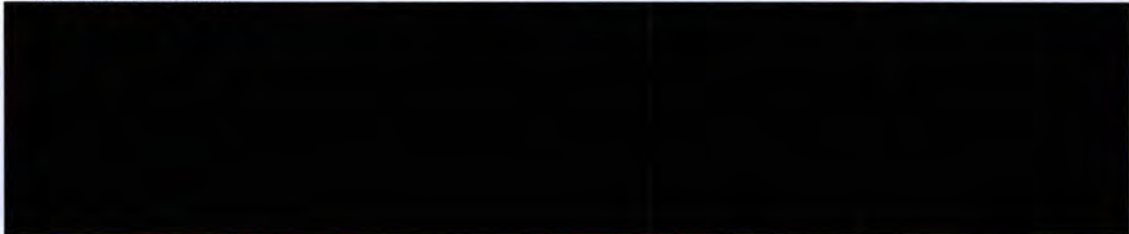
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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)  
Graham Lamb  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:03



1 Attachment



Appendix 1- Delivery Statement.pdf

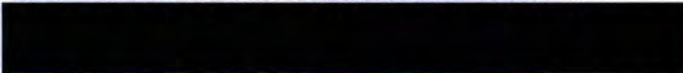
**Email 2**

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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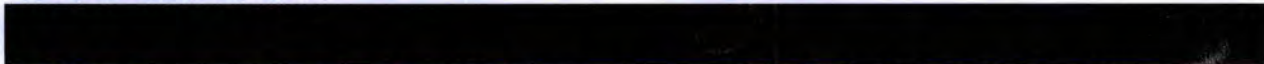
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**From:** Graham Lamb

**Sent:** 13 March 2019 17:01



**Subject:** Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,



**Graham Lamb**  
Associate Planner

**Pegasus Group**

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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)  
Graham Lamb  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:04



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

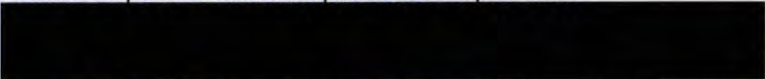
**Email 3**

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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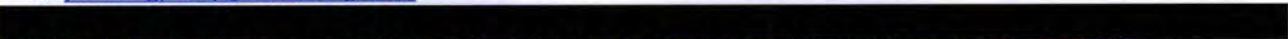
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**From:** Graham Lamb  
**Sent:** 13 March 2019 17:01  
**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)



**Subject:** Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

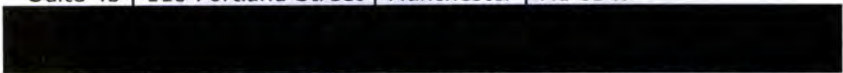
I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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KW/GL/P17-0098/L004

13 March 2019

Planning Policy Team  
Development Plans Section  
St Helens Council  
Place Services  
Town Hall Annexe  
Victoria Square  
St Helens  
Merseyside  
WA10 1HP

**Sent via email to:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Dear Sir/Madam,

**Land North of St Helens Road, Eccleston Park, St Helens  
St Helens Local Plan Submission Draft (January-March 2019 Consultation)**

We are instructed on behalf of the client, I Birchall & D Birchall (c/o P Wilson & Company LLP Chartered Surveyors), to submit representations to the Local Plan Submission Consultation of the emerging St Helens Local Plan. The client are the landowners of a parcel of land referred to as land north of St Helens Road, Eccleston Park.

A Delivery Statement has been prepared for the site, which is contained at **Appendix 1**. As demonstrated in the document, the site has capacity to deliver up to 625 homes in a highly sustainable location. This document demonstrates how the site is entirely suitable, deliverable and viable for housing development, as well as being an entirely appropriate Green Belt release site.

Further technical studies have also been prepared to further demonstrate the suitability of St Helens Road site for housing development, as set out below and attached:

- Accessibility Statement (**Appendix 2**)
- Agricultural Land Report (**Appendix 3**)

**The need to allocate additional sites**

Pegasus Group has prepared comprehensive representations and an Interim Housing Report to the St Helens Local Plan on behalf of another client, Redrow, who have separate land interests within Eccleston (both reports are contained at **Appendix 4**).

So whilst not directly related to this site, these reports (particularly sections 4-9 of the main representation) outline a compelling case as to why the Council need to allocate more sites in order for the plan to be found sound and to meet emerging housing requirements, as summarised below:

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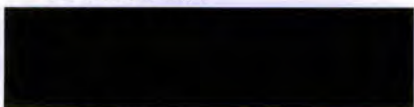
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Registered Office: Pegasus house, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

- There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned. (B)
- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites. ✓
- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan. (2)

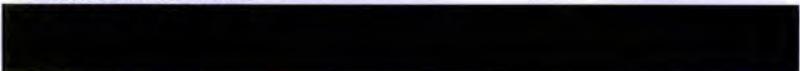
To conclude, we politely suggest that the Council need to allocate more sites in order for the plan to be found sound. As demonstrated in the appended documents, the St Helens Road, Eccleston site is available and suitable for development and should therefore be considered for housing allocation. (B)

I trust the enclosed is clear, however should you have any queries on these representations please do not hesitate to contact me on the details provided below.

Yours sincerely,



Graham Lamb  
**Associate Planner**



Encs.





**ST HELENS BOROUGH LOCAL PLAN 2020-2035:  
SUBMISSION DRAFT**

**REPRESENTATION BY  
REDROW HOMES NORTH WEST**

Date: 13<sup>th</sup> March 2019

Pegasus Reference: GL/KW/P17-0098/R005v4

**Pegasus Group**

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**4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)**

4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

**Spatial Vision & Strategic Objectives**

4.2 Redrow support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*. ✓

4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a 'sufficient' number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be 'positively prepared' with the objective of 'significantly boosting the supply of housing'. As such, the Council should be seeking to surpass their needs so we recommend that the wording be updated to reflect this. 5

4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to need to meet local employment needs; however, boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to acknowledge this. 6

**Policy LPA02 (Part 3) - Previously Developed Land**

4.5 We agree that previously developed land will make a significant contribution to supply and support the Council in seeking to encourage brownfield re-development through the lowering of developer contributions. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide the range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another. 7

4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment.

**Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is ✓

insufficient land within the existing urban area to meet their needs for housing and employment land going forward. ✓

4.8 We fully support this position; however, the policy and text does not fully explain how this generates the 'exceptional circumstances' required to alter Green Belt boundaries, in line with paragraph 136 of the 2019 NPPF; although this is addressed within paragraphs 1.11-1.21 of the Green Belt Review.

4.9 In our view, it is harm that will occur from failing to meet their housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances required for Green Belt release in St Helens, and we would ask that the text is strengthened to reflect this. ✓

4.10 We also support the principle of safeguarded land but do have concerns with the quantum of proposed, which we address within section 7. ✓

**Policy LPA03 – Development Principles**

4.11 Redrow fully support the development principles set out in this policy, as they promote sustainable development in line with the NPPF but with sufficient flexibility to allow for proposals to be considered on a site by site basis, to ensure that they don't restrict or frustrate development. ] 9

**Policy LPA04 – A Strong and Sustainable Economy**

4.12 We are generally supportive of this policy but would reiterate our comments above (in respect of Strategic Objective 5.1) on role that boosting housing supply can play in meeting economic growth aspirations and suggest that the wording in this policy is updated to acknowledge this. ] 10



PO0879

Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 1 of 4  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:05

- ① - LPA05
- ② - LPA02
- ③ - GBR
- ④ - S.A.



- ⑤ - S.O. 4.1
- ⑥ - S.O. 5.1
- ⑦ - LPA02 - PARA 3
- ⑧ - LPA02 - PARA 4
- ⑨ - LPA03
- ⑩ - LPA04

4 Attachments

- Appendix 1-Site Location Plan-Redrow.pdf
- Appendix 2 Part 1-Delivery Statement-Redrow.pdf
- Representation Form-Redrow-May 19.pdf R005v6 - Repts to Submission Local Plan-Redrow.pdf

Dear Sir/Madam,

We are instructed on behalf of our client, Redrow Homes North West, to submit the attached form and representation (R005) to the Local Plan Submission Draft Consultation. Redrow have land interests in relation to the Burrows Lane, Ecclestone site, which is discussed in detail in the attached representation.

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Site Location Plan (attached to this email)
- Appendix 2 - Delivery Statement (Part 1 attached to this email)
- Appendix 3 - Accessibility Statement
- Appendix 4 - Phase 1 Ecology Survey
- Appendix 5 - Agricultural Land Assessment
- Appendix 6 - Detailed Site Pro Formas
- Appendix 7 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 8 - Council's Housing Trajectory
- Appendix 9 - Pegasus Housing Trajectory
- Appendix 10 - Spatial Distribution of Sites

- ⑪ - LPA05 - PARA 3
- ⑫ - LPA05 - PARA 4
- ⑬ - APPENDIX 4
- ⑭ - TABLE 4.6
- ⑮ - LPA05.1
- ⑯ - LPA06

We will follow up this submission by sending a CD in the post which contains the entirety of Redrow's submission to the Local Plan consultation.

⑰ - LPC01

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

⑱ - LPC02

Many thanks and kind regards,

⑲ - LPC03 - PARA 4

⑳ - LPD07

㉑ - LPC04

㉒ - LPD02

㉒ - LPA07 - PARA 3d

㉓ - LPD03

㉓ - LPA07 - PARA 9

㉔ - LPC10

**Rebecca Dennis**  
Principal Planner

**Pegasus Group**  
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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

Email 2 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:06



3 Attachments



Appendix 2 Part 2-Delivery Statement-Redrow.pdf Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 3 of 4  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:07



7 Attachments



Appendix 5-Agricultural Land Classification-Redrow.pdf Appendix 6-Detailed Site Pro Forma-Redrow.pdf



Appendix 8-Council's Housing Trajectory-Redrow.pdf



Appendix 9a-Pegasus Trajectory Best Case Scenario-Redrow.pdf



Appendix 9b-Pegasus Trajectory Worst Case Scenario 9b-Redrow.pdf



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



Appendix 7-Review of Employment-Led Local Plan Housing Requirement-Redrow.pdf

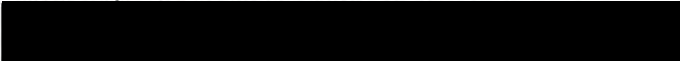
Email 3 of 4 of Redrow representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 4 of 4  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:07



1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

**Rebecca Dennis**  
Principal Planner

**Pegasus Group**

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<https://i.imgur.com/05aES4f.jpg>



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Graham
Last Name:	Last Name: Lamb
Organisation/company: Redrow Homes North West	Organisation/company: Pegasus Group
Address:	Address: Suite 4b, 113 Portland Street, Manchester,
Postcode:	Postcode: M1 6DW



Signature:	Date: <input type="text" value="13/05/19"/>
------------	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us by no later than **5pm on Monday 13<sup>th</sup> May 2019** by:

post to:                               **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:       Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:                       **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

*Please note we are unable to accept faxed copies of this form.*

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**. If you still need assistance, you can contact us via:

**Email:**                               **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**  
**Telephone:**                       **01744 676190**

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA02	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	<b>No x</b>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	x
Justified?	X
Effective?	X
Consistent with National Policy?	x

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

WHILST WE ARE SUPPORTIVE OF THE GENERAL WORDING OF THE SPATIAL STRATEGY, WE OBJECT TO THE CURRENT SPATIAL DISTRIBUTION OF SITES IN THE SUBMISISON VERSION OF THE PLAN. THE PLAN FAILS TO DISTRIBUTE DEVELOPMENT TO A NUMBER OF HIGHLY SUSTAINABLE AREAS, INCLUDING ECCLESTON. THE CURRENTLY SUGGESTED SPATIAL DISTRIBUTION THEREFORE FAILS TO ACHIEVE THE SPATIAL STRATEGY SET OUT IN THIS POLICY.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

THE SPATIAL DISTRIBUTION OF ALLOCATED SITES NEEDS TO BE RE-LOOKED AT, TO BE MORE DISPERSED IN NATURE, IN ORDER FOR THE PLAN TO BE SOUND.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.



**ST HELENS BOROUGH LOCAL PLAN 2020-2035:  
SUBMISSION DRAFT**

**REPRESENTATION BY  
REDROW HOMES NORTH WEST**

Date: 13<sup>th</sup> May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

**Pegasus Group**

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**4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)**

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4.2 Redrow support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*.

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4.5 We agree that previously developed land will make a significant contribution to supply and support the Council in seeking to encourage brownfield re-development through the lowering of developer contributions. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide the range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another.

4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment.

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insufficient land within the existing urban area to meet their needs for housing and employment land going forward.

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- 4.9 In our view, it is harm that will occur from failing to meet their housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances required for Green Belt release in St Helens, and we would ask that the text is strengthened to reflect this.
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- 4.11 Redrow fully support the development principles set out in this policy, as they promote sustainable development in line with the NPPF but with sufficient flexibility to allow for proposals to be considered on a site by site basis, to ensure that they don't restrict or frustrate development.

**Policy LPA04 – A Strong and Sustainable Economy**

- 4.12 We are generally supportive of this policy but would reiterate our comments above (in respect of Strategic Objective 5.1) on role that boosting housing supply can play in meeting economic growth aspirations and suggest that the wording in this policy is updated to acknowledge this.

PO0880

Sinc: Former LPA0 HS23 ELO290

ELO290B.1.pdf



Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:13



① LPA05

② LPA02

③ GBR

④ SA

⑤ S.O.4.1

⑥ S.O.5.1

⑦ LPA02-PARA 3

3 Attachments



Representation Form-Wallace-May 19.pdf R001v7- Reps to Submission Local Plan-Wallace.pdf

⑧ LPA02- PARA 4

⑨ LPA03



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑩ LPA04

Dear Sir/Madam,

⑪ LPA05 - PARA 3

We are instructed on behalf of our client, Wallace Land Investments, to submit the attached form and representation (R001) to the Local Plan Submission Draft Consultation. Wallace have land interests in relation to the Mill Lane, Rainhill site, which is discussed in detail in the attached representation.

⑫ LPA05 - PARA 4

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Illustrative Masterplan (attached to this email)
- Appendix 2 - Previously Submitted Documents and Technical Information
- Appendix 3 - Additional Technical Documents (May 2019)
- Appendix 4 - Detailed Site Pro Formas
- Appendix 5 - Council's Stage 3 Green Belt Assessment of Mill Lane Site
- Appendix 6 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 7 - Council's Housing Trajectory
- Appendix 8 - Pegasus Housing Trajectory
- Appendix 9 - Spatial Distribution of Sites

⑬ APPENDIX 4

⑭ LPA05 - TABLE 4.6

⑮ LPA05.1

⑯ LPA06

⑰ LPC01

We will follow up this submission by sending a CD in the post which contains the entirety of Wallace's submission to the Local Plan consultation.

⑱ LPC02

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

⑲ LPC04

⑳ LPC03 - PARA 4

Many thanks and kind regards,

㉑ LPA07-PARA 3c) ㉒ LPD07

Rebecca Dennis

Principal Planner

㉓ LPA07-PARA 9 ㉔ LPD02

Pegasus Group

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Suite 4b | 113 Portland Street | Manchester | M1 6DW

㉕ LPC10

㉖ LPD03



Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:13



4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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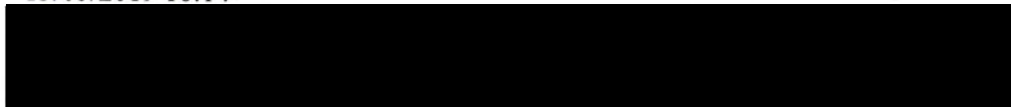
Representations to Local Plan Submission Draft Consultation-Wallace-Email 3 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:14



1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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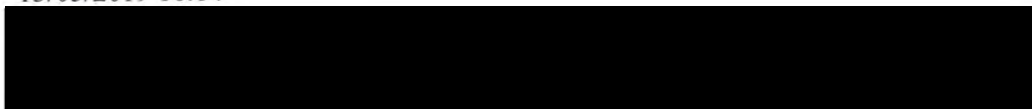
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Representations to Local Plan Submission Draft Consultation-Wallace-Email 4 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:14



2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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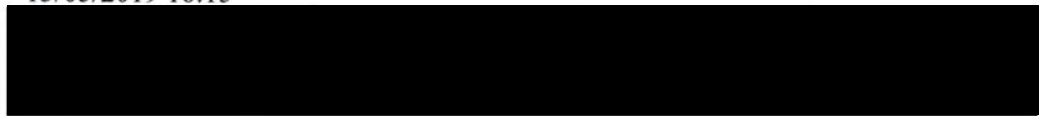
Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:15



1 Attachment



Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 6 of 8

Rebecca Dennis

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1 Attachment



Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

Email 6 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 7 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:16



7 Attachments



Appendix 4-Detailed Site Pro Formas-Wallace.pdf



Appendix 5-Council's Stage 3 Green Belt Assessment-Wallace.pdf



Appendix 7-Council's Housing Trajectory-Wallace.pdf



Appendix 8b-Pegasus Trajectory Worst Case Scenario-Wallace.pdf



Appendix 8c-Summary Supply Trajectory-Wallace.pdf



Appendix 8a-Pegasus trajectory Best Case Scenario-Wallace.pdf



Appendix 6-Review of Employment-Led Local Plan Housing Requirement-Wallace.pdf

Email 7 of 8 of Wallace representations.

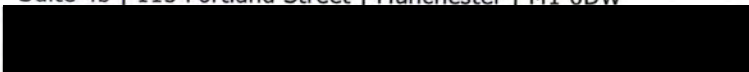
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 8 of 8  
Rebecca Dennis

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planningpolicy@sthelens.gov.uk  
13/05/2019 16:16



1 Attachment



Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

**Rebecca Dennis**  
Principal Planner

**Pegasus Group**  
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St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

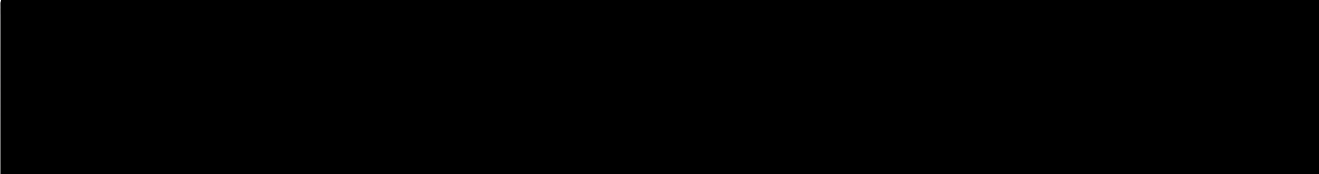
Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Sebastian
Last Name:	Last Name: Tibenham
Organisation/company: Wallace Land Investments (c/o Agent)	Organisation/company: Pegasus Group
Address:	Address: Suite 4b, 113 Portland Street, Manchester
Postcode:	Postcode: M1 6DW



Signature: 	Date: <input type="text" value="13/05/2019"/>
--	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)                      No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

**RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.



## Now please complete **PART B** of this form, setting out your representation/comment.

### Please use a separate copy of Part B for each separate comment/representation.

#### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA02	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	<b>No X</b>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

WHILST WE ARE SUPPORTIVE OF THE GENERAL WORDING OF THE SPATIAL STRATEGY, WE OBJECT TO THE CURRENT SPATIAL DISTRIBUTION OF SITES IN THE SUBMISISON VERSION OF THE PLAN. THE PLAN FAILS TO DISTRIBUTE DEVELOPMENT TO A NUMBER OF HIGH PERFORMING SETTLEMENTS, INCLUDING RAINHILL WHICH IS HIGHLY SUSTAINABLE KEY SERVICE SETTLEMENT. THE CURRENTLY SUGGESTED SPATIAL DISTRIBUTION THEREFORE FAILS TO ACHIEVE THE SPATIAL STRATEGY SET OUT IN THIS POLICY.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

THE SPATIAL DISTRIBUTION OF ALLOCATED SITES NEEDS TO BE RE-LOOKED AT, TO BE MORE DISPERSED IN NATURE, IN ORDER FOR THE PLAN TO BE SOUND.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	-------------------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



**ST HELENS BOROUGH LOCAL PLAN 2020-2035:  
SUBMISSION DRAFT**

**REPRESENTATION BY  
WALLACE LAND INVESTMENTS**

Date: 13<sup>th</sup> May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

**Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW



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**Live: 45457800 v 3**

#### **4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)**

4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

##### **Spatial Vision & Strategic Objectives**

4.2 Wallace support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*.

4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a *'sufficient'* number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be *'positively prepared'* with the objective of *'significantly boosting the supply of housing'*. As such, the Council should be seeking to surpass their needs, so we recommend that the wording be updated to reflect this.

4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to meet local employment needs; however boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to make reference to this.

##### **Policy LPA02 (Part 3) - Previously Developed Land**

4.5 We agree that previously developed land can make a significant contribution to supply. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide a range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another.

4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment. Developer contributions should be assessed and set taking into account site specifics. A one size fits all generic approach should be avoided.

##### **Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is

insufficient land within the existing urban area to meet their needs for housing and employment land going forward.

4.8 We fully agree with the Council's Assessment and conclusions on this point. However, the policy and text does not fully explain how this generates the 'exceptional circumstances' required to alter Green Belt boundaries, in line with paragraph 136 of the 2019 NPPF; although this is addressed within paragraphs 1.11-1.21 of the Green Belt Review.

4.9 In our view, it is harm that will occur from failing to meet their housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances required for Green Belt release in St Helens. We would recommend that this is made clear in the text to properly reflect the basis of releasing land from the Green Belt.

4.10 The principle of safeguarded land is also supported, however the quantum of land proposed for safeguarding is not accepted, and this is addressed in section 7.

**Policy LPA03 – Development Principles**

4.11 Wallace fully support the development principles set out in this policy, as they promote sustainable development in line with the NPPF but with sufficient flexibility to allow for proposals to be considered on a site by site basis, to ensure that they don't restrict or frustrate development.

**Policy LPA04 – A Strong and Sustainable Economy**

4.12 Wallace are generally supportive of this policy but would reiterate our comments above (in respect of Strategic Objective 5.1) on the role that boosting housing supply can play in meeting economic growth aspirations and suggest that the wording in this policy is updated to acknowledge this.

} 9  
} 10

PO0881

**Representor Details**

Web Reference Number	WF0002
Type of Submission	Web submission
Full Name	Mr Francis Williams
Organisation	St Helens Green Party
Address	7 Parkside Avenue Sutton Manor St. Helens WA9 4DT
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Green Party SHLP response

There must be exceptional circumstances for removing land from the Green Belt. The Borough has failed to base its future needs in terms of trends established from previous demand data, instead it has based its needs on an aspirational view of future needs which intends to stimulate development by making land available for building, rather than responding to actual need: the exceptional circumstances are not fully evidenced and justified in accordance with para. 136 National Planning Policy Framework, nor is aspirational assessment of future need objectively assessed as required by para. 11(b) NPPF.

The Borough contains a large proportion of previously-developed land and has suffered much despoliation since the start of the industrial revolution, and whilst the borough has policies for gradual assessment of contaminated and unsuitable sites, it does not have a policy for remediating these sites and making them available for development. In view of the large amount of previously developed land that is not available for development, policy that fails to make such land available, yet consigns large areas of virgin land for development, cannot be viewed as sustainable. It fails to preserve land for future generations, whilst not bringing land currently unavailable through contamination or other current unavailability forward for development. Using Green Belt land will have deleterious effects on food production, wildlife, recreation and the ecosystem.

01

02

03

As there has been such extensive scarring of the local landscape historically by industry, virgin land, whether or not in agricultural production, should be conserved at all costs, and all realistic alternatives should be considered. Land that is taken for development, particularly on the urban fringe, reduces access to the countryside, with its health and recreational benefits.

03

Land used for warehousing has an ever-shrinking capacity for employment as technology introduces more and more labour-saving devices to reduce employment costs. The same is likely to apply with freight transport when driverless vehicles are introduced. A policy sacrificing large tracts of productive agricultural land for a rapidly-diminishing yield in employment is neither a sustainable use of land, nor does it provide sustainable employment. Furthermore, large warehousing has a commensurately large take of land, so under the plan, large tracts of land would be urbanized and taken out of food production at a time when the UK has a growing population.

04

Land has been Safeguarded for future development. St Helens Green Party believes that the SHLPSD does not accord with the principles of sustainability, that is, it earmarks agricultural land that is currently Green Belt land development, not under the new plan but the one following it. We suggest that the land in question should remain in the Green Belt, and periodic reviews of the local plan should consider needs current at the time. Safeguarding large areas does not accord with para. 11(a), which states: "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;". A plan that designates large areas of land as being for future development cannot be deemed flexible. What, for example, if food production becomes a priority in the next few years? The plan has to be reviewed every five years, there is no need to safeguard any land. Decisions can thus be taken nearer the time, with more accurate data available.

05

To accord with the principles of sustainability, new housing development should be close to centres of employment or as close as possible to existing transport hubs. Housing development should be within easy reach of the employment centres or close to transport hubs.

As the borough's policy seems to be to promote warehousing, the bulk of such employment being low-skill with corresponding remuneration, housing development on greenfield sites distant from employment centres is unlikely to be predominantly of a type which is affordable for those on low incomes, nor is it sustainable from a transport perspective, making travel by bus lengthy or motor-transport dependent. The optimal locations for housing development are close to the town centre.

06

**7. Please set out modification(s) you consider are necessary**

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	5/13/2019 4:10:28 PM
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PO0882



Removal of green belt for omega west  
Keith Gleave  
to:  
planningpolicy  
10/05/2019 14:03



1 Attachment



St Helens green belt objection\_may19.docx

Please find my further objections to the removal of green belt land on the border of Warrington

Thanks

Keith

51 Bembridge close

Great Sankey

Warrington

WA5 3RH

10/05/2019

Re: Consultation on removal of St Helens green belt, site 1EA

Further to my previous comments on St Helens council wishing to remove land out the greenbelt at the request of Warrington Borough Council to create Omega West, I have a few further observations.

In requesting to take a further 70 acres out of greenbelt to increase and meet the amount of employment land Warrington requires, I draw your attention to the amount of housing that is currently being built on Omega and Lingley Mere, in the order of 70 acres. There are further plans to place more housing on Omega, indeed more developments that are not employment. I therefore contend that there are no requirements to pillage this area of wood and farmland.

The amount of employment land designated in the southern section of Warrington is also a vast portion of land with the same type of employment designation as that required for Omega west. Again I would contend that this meets the requirements for Warrington.

In the very near future the Fiddlers Ferry generating station in Penketh will be going offline and closing, as it's a fossil fuel burning station. The area of land contained here is again vast. It would be the preferred option of a brown field site ripe for regeneration. Undoubtedly remediation of the site would have to take place but this would not be to the same level as that required by a domestic housing development. So again I would contend there is no requirement to take land out of the greenbelt.

In stating the above there are many other items of guidance provided on the greenbelt, including the following:-

“The urban fringe is the nearest opportunity for outdoor recreation for large numbers of people in

Urban areas, if the land is publicly accessible. Land in these locations will be increasingly

Valuable for food and energy production in future. Such land should not just be kept open, but should be positively managed, through such initiatives as multi-functional community forests." Guidance 2015. Hence Bold Forest Park – and many people use this landscape – proposed development will destroy the view. Currently a strong tree-lined boundary.

"National planning policy makes provision for changes to be made to the Green Belt. Critically, changes to the Green Belt are made through the local plan. In order to make a change to the Green Belt boundary in the local plan there have to be 'exceptional circumstances' (NPPF para 83)."

"The Green Belt policy is not an outright prohibition on development in the Green Belt. Rather it is a prohibition on inappropriate development in the absence of very special circumstances." Hunston High Court Judgement, St Albans

'Local planning authorities should, through their local plans, meet objectively addressed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as whole, or specific policies in the Framework indicate development should be restricted'. The Guidance notes that Green Belt is identified in the NPPF as such a policy.' From Planning Policy Guidance 2014

'In the 6 November 2014 report the Inspector says, 'It therefore seems to me that these are significant flaws in both the process and evidence relating to the release of land from Green Belt, particularly given the recent clarification of national guidance on the significance of the Green Belt'. The comment appears to suggest that with bar raised politically at least, the onus on the Council to explain and justify its position in relation to the Green Belt is that much greater at present.'

'The current arrangements for strategic planning through local plans established by the Duty to Cooperate in the Localism Act 2011 and the soundness tests in the NPPF are relevant to the consideration of Green Belt.' So all the same rules apply under 'duty to co-operate'.

I would like to be kept informed please of any planning inspectorate meetings and or consultations.

Yours Sincerely

Keith Gleave

PO0883



St Helens Local Plan Submission Draft  
McBride, Sean  
to:  
'planningpolicy@sthelens.gov.uk'  
13/03/2019 12:30



5 Attachments



St Helens Local Plan Submission Draft Rep - March 2019.pdf



Vision Document - Land at Weathercock Hill Farm Rev A 13 03 19\_compressed (2).pdf



Weathercock Hill Farm\_Ecological Statement(1.1).pdf



Landscape Feasibility Statement - Land at Weathercock Hill Farm.pdf 2503.TN.pdf

Dear Sir/Madam

Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards  
Sean

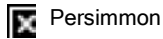
**Sean McBride**  
Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH



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Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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**St. Helens Borough Local Plan  
2020-2035 Submission Draft**

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Representations submitted on behalf of Persimmon Homes North West

**March 2019**



EL0177

ensuring efficient re-use of previously developed; and Strategic Aim 4 which acknowledges the need to identify sufficient land for a sufficient number and range of new homes.

01

2.3 Whilst supportive of SA4, it is considered that its wording to identify *sufficient* land for a *sufficient* range of new homes does not necessarily fully represent Government objectives to '*significantly boost the supply of homes*', as set out within the National Planning Policy Framework [the Framework] (para. 59). It is considered that this strategic objective should be revised to reflect the objectives of the Framework.

02

2.4 The Company also supports Strategic Aim 5 which seeks to maximise the contribution of St Helens to the economy of the Liverpool City Region [City Region] and adjacent areas, by ensuring an adequate supply of employment land and premises to meet local employment needs. It is imperative that the Council aligns its housing requirement to support delivery of such economic growth aspirations. We would also encourage reference to the Northern Powerhouse within Strategic Aim 5, given the significant contribution that the City Region will play in its delivery.

03

04

#### **Policy LPA02: Spatial Strategy**

3.1 The Company broadly supports Policy LPA02 which seeks to focus regeneration and growth in St Helens to the key settlements of St Helens, Blackbrook and Haydock, Newton-le-Willows and Earlestown, Rainford, Billinge, Garswood and Rainhill; and direction of new development to sustainable locations, which will enable movements between homes, jobs and key services and facilities by non-car modes of transport.

05

3.2 The Company supports the development of previously developed land and policy mechanisms which can ensure their delivery. However, it should not be expected that the Local Plan be worded to sequentially prioritise their delivery over other sites allocated for development. Such a position is considered to accord with the Framework, which states that policies should '*promote an effective use of land...in a way that makes as much use as possible of previously developed or brownfield land*' (para. 117).

06

3.3 The Company supports the Council seeking to deliver its full housing and employment needs across the Plan period, including the release of land from the Green Belt where required; the

07

EL0177

Framework stating that Green Belt boundaries should only be altered 'through the preparation or updating of plans' (para 135).

- 
- 3.4 Whilst addressed in more detail later in this representation, the Council's Strategic Housing Land Availability Assessment 2017 [SHLAA] identifies an existing housing land supply of 6,344 homes; significantly short of the emerging Local Plan housing requirement of 9,234 net additional dwellings. The Company considers that exceptional circumstances exist to release land from the Green Belt, as required at para 137 of the Framework. 08

- 
- 3.5 It is necessary that the Council seeks to identify sufficient sites to meet St Helens' full objectively assessed need within its own authority area. Given Warrington and Halton, those neighbouring authorities who form the Mid-Mersey HMA, are also undertaking a Green Belt review to accommodate their future housing needs; it being confirmed that they (along with nearby districts in Liverpool and Greater Manchester City Regions, and West Lancashire) will be unable to accommodate St Helens' unmet needs.

- 
- 3.6 The Company also supports the Council's identification of land for safeguarding to meet the longer term housing and employment needs of St Helens, considering this approach to be in accordance with para. 139 of the Framework. 09

---

**Policy LPA03: Development Principles**

- 4.1 The Company are broadly supporting of the development principles set out within policy LPA03 particularly the creation of sustainable communities and the requirement that new development assists in meeting the challenges of population retention and growth, by providing a mix of homes, including types and tenures to meet needs and aspirations of all existing and future residents. 10

---

**Policy LPA04: A Strong and Sustainable Economy**

- 5.1 The Company generally supports policy LPA04 which seeks to maximise opportunities for economic growth, job creation and skills development. 12

- 
- 5.2 Whilst acknowledging the importance of protecting sites allocated for employment and viable employment sites from being developed for alternative uses, it is considered that paragraphs 4 and 5 of the policy do not fully accord with the Framework.

PO0884

**Representor Details**

Web Reference Number	WF0002
Type of Submission	Web submission
Full Name	Mr Francis Williams
Organisation	St Helens Green Party
Address	7 Parkside Avenue Sutton Manor St. Helens WA9 4DT
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Green Party SHLP response

There must be exceptional circumstances for removing land from the Green Belt. The Borough has failed to base its future needs in terms of trends established from previous demand data, instead it has based its needs on an aspirational view of future needs which intends to stimulate development by making land available for building, rather than responding to actual need: the exceptional circumstances are not fully evidenced and justified in accordance with para. 136 National Planning Policy Framework, nor is aspirational assessment of future need objectively assessed as required by para. 11(b) NPPF.

The Borough contains a large proportion of previously-developed land and has suffered much despoliation since the start of the industrial revolution, and whilst the borough has policies for gradual assessment of contaminated and unsuitable sites, it does not have a policy for remediating these sites and making them available for development. In view of the large amount of previously developed land that is not available for development, policy that fails to make such land available, yet consigns large areas of virgin land for development, cannot be viewed as sustainable. It fails to preserve land for future generations, whilst not bringing land currently unavailable through contamination or other current unavailability forward for development. Using Green Belt land will have deleterious effects on food production, wildlife, recreation and the ecosystem.

01

02

03

As there has been such extensive scarring of the local landscape historically by industry, virgin land, whether or not in agricultural production, should be conserved at all costs, and all realistic alternatives should be considered. Land that is taken for development, particularly on the urban fringe, reduces access to the countryside, with its health and recreational benefits.

03

Land used for warehousing has an ever-shrinking capacity for employment as technology introduces more and more labour-saving devices to reduce employment costs. The same is likely to apply with freight transport when driverless vehicles are introduced. A policy sacrificing large tracts of productive agricultural land for a rapidly-diminishing yield in employment is neither a sustainable use of land, nor does it provide sustainable employment. Furthermore, large warehousing has a commensurately large take of land, so under the plan, large tracts of land would be urbanized and taken out of food production at a time when the UK has a growing population.

04

Land has been Safeguarded for future development. St Helens Green Party believes that the SHLPSD does not accord with the principles of sustainability, that is, it earmarks agricultural land that is currently Green Belt land development, not under the new plan but the one following it. We suggest that the land in question should remain in the Green Belt, and periodic reviews of the local plan should consider needs current at the time. Safeguarding large areas does not accord with para. 11(a), which states: "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;". A plan that designates large areas of land as being for future development cannot be deemed flexible. What, for example, if food production becomes a priority in the next few years? The plan has to be reviewed every five years, there is no need to safeguard any land. Decisions can thus be taken nearer the time, with more accurate data available.

05

To accord with the principles of sustainability, new housing development should be close to centres of employment or as close as possible to existing transport hubs. Housing development should be within easy reach of the employment centres or close to transport hubs.

As the borough's policy seems to be to promote warehousing, the bulk of such employment being low-skill with corresponding remuneration, housing development on greenfield sites distant from employment centres is unlikely to be predominantly of a type which is affordable for those on low incomes, nor is it sustainable from a transport perspective, making travel by bus lengthy or motor-transport dependent. The optimal locations for housing development are close to the town centre.

06

**7. Please set out modification(s) you consider are necessary**

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	5/13/2019 4:10:28 PM
---------------	----------------------

PO0885



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
Hannah Payne  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 16:22



1 Attachment



Representation Form.pdf

Dear Sir/Madam,

Please see attached completed Representation Form and accompanying representations submitted on behalf of Barratt Homes to be taken into consideration as part of the consultation on the St. Helens Local Plan Submission Draft.

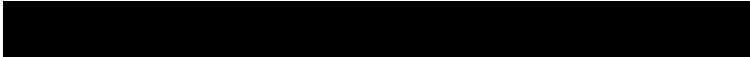
Note that we would like to be informed of future progress on the Local Plan and request the opportunity to attend Examination in Public.

We would be grateful if you could confirm receipt by way of a return email.

Kind regards,

Hannah

**Hannah Payne** | Senior Planner



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;


**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Hannah
Last Name:	Last Name: Payne
Organisation/company: Barratt Homes	Organisation/company: Indigo Planning Ltd
Address:	Address: St James' Tower, 7 Charlotte Street, Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	

Signature: 	Date: <input type="text" value="13/03/2019"/>
--	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input type="checkbox"/> (Via Email)	No <input type="checkbox"/>
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see enclosed representation.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see enclosed representation.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please see enclosed representation.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

# indigo.

Every update of the St. Helens Strategic Housing Land Availability Assessment since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. We consider that the policy addresses the housing delivery issues in the borough through a revised spatial distribution and release of Green Belt land for housing. We support this policy but have concerns over the emphasis placed on the delivery of brownfield sites.

02

However, the priority placed on the re-use of previously development land over other allocated sites is not considered appropriate. We question the rationale for lowering the threshold for developer contributions for developers of brownfield sites given it is incorrect to assume developers on greenfield sites have less constraints. As such, each site should be taken on its own merits with developers' contributions subject to viability considerations.

03

At LPA02(4), further clarity should be provided on when a full review of the Plan will be triggered.

04

The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included in LPA902 as health and wellbeing of St. Helens' residents is covered within Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. This part of the policy should therefore be removed.

05

### **Policy LPA03: Development Principles**

On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined.

06

Nonetheless, the development of the Florida Farm South draft allocation supports the development principles identified within this policy. It will provide circa 600 homes; contributing not only towards the boroughs housing target and a sustainable mix and tenures of quality homes but also through direct and indirect investment in the local area. This in turn will contribute towards the borough's regeneration objectives.

07

### **Policy LPA04: A Strong and Sustainable Economy**

The employment target of a minimum of 215.4ha up to 2035 has been reduced from the minimum of 306ha up to 2033 outlined in the Preferred Options Local Plan.

Although this target appears sufficient to meet anticipated need, this figure does not reflect the Spatial Vision and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general.

08

The allocation of employment sites within the Green Belt particularly those along

09

PO0886



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:02

Cc:  
Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner



# indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts; Part A – Personal Details Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Table with 2 columns: 1. Your Details, 2. Your Agent's Details (if applicable). Rows include Title, Name, Organisation, Address, Postcode, and Contact Information.

Signature and Date fields. Signature is redacted, Date is 13/03/2019.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? Yes [X] (Via Email) No [ ]



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

**RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

# Please use a separate copy of Part B for each separate comment/representation.

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	✓	Paragraph / diagram / table	✓	Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	✓
Justified?	✓
Effective?	✓
Consistent with National Policy?	✓

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments**

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
---	-------------------------------------	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination**

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

# St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

## Leyland Green Farm, Garswood

### Representations on behalf of Murphy Group

**indigo.**

## 4. Specific Policies

### Policy LPA02: Spatial Strategy

- 4.1. We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Garswood (*"a village in the north of the Borough...large enough to form a Key Settlement"*), recognises that Garswood has potential for and can support new development. The spatial distribution effectively addresses the existing housing and employment issues within the borough and development in these regions will lead to sustainable development across the borough. 05
- 4.2. Every update of the St. Helens Strategic Housing Land Availability Assessment since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. We consider that the policy addresses the housing delivery issues in the borough through a revised spatial distribution, including proposing development at Garswood, and releasing of Green Belt land for housing. We therefore support the identification of Garswood for new development.
- 4.3. The policy highlights that *"the re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites"*. This needs re-wording to avoid ambiguity. The use of brownfield land is understandably a priority in terms of regeneration and sound planning, but brownfield sites should not be prioritised over allocated greenfield sites in terms of phasing. 06
- 4.4. At LPA02(4) the policy highlights that *"such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan"*. We object to this on the basis that there is no clarity on when a full review of the local plan will be triggered. Further clarity should be provided on this point, including with reference to the Housing Delivery Test and / or Five Year Supply. Additionally, we advocate that safeguarded land should come forward for development within the plan period, should housing allocations become stalled or not deliver housing within the timescales identified. 07
- 4.5. The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included; the issues are covered in Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. 08
- 4.6. At paragraph 4.6.2 'Sub-regional context', it confirms St Helens Council has cooperated extensively with nearby districts including the Greater Manchester City Regions. We support the need which has been identified within the Liverpool City Region to accommodate the growth of the logistics and warehousing sector, in order to support underlying economic trends and the growth of the port of Liverpool. 09
- 4.7. We also support the Plan's aims to address the issue of insufficient employment land to meet the needs of modern businesses. We support mixed use development and smaller employment uses interspersed with residential development as this will encourage St Helens Borough's residents to work closer to home, reduce the number of people who commute to other locations or move away to secure work. 10

### Policy LPA03: Development Principles

- 4.8. On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined because some will not be relevant to a particular proposal. 11

PO0887

EFO061

SITE  
3HS



St.Helens Borough Local Plan 2020-2035 - Group Representation

Adam Onyett

to:

planningpolicy@sthelens.gov.uk

13/03/2019 10:35



2 Attachments



St Helens Local Plan - Representation Form.pdf Group Representation Signatories.pdf

Good morning

Please find our group representation, with my Lead Name, attached regarding the Local Plan.

Regards

Adam Onyett

- ① - LPA05 - TABLE 4-5
- ② - LPA05 - GEN
- ③ - LPA05 - 6HA
- ④ - LPA06
- ⑤ - LPA02
- ⑥ - LPA06 - 3HS
- ⑦ - TIA
- ⑧ - IDP
- ⑨ - para 1.7.2 - DEC.



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Adam	First name:
Last Name: Onyett	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 37 Wedgewood Gardens St Helens	Address:
Postcode: WA9 5GA	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

<b>Signature:</b> [Redacted]	<b>Date:</b> <input type="text" value="10/03/19"/>
------------------------------	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>



## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

#### 3. To which part of the Local Plan does this representation relate?

Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Unsure	
Sound?		No
Complies with the Duty to Cooperate		No

Please tick as appropriate

#### 5. If you consider the Local Plan is unsound, is it because it is not:

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

#### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Having reviewed the St Helens Brownfield Register, it is apparent that there has been some miscalculation. The Register suggests that there are 5,818 dwellings available, yet the Plan states 7,040 dwellings, of which 4,085 will be built within the Plan period. The figures stated do not align and for this reason the Plan is not sound. The figures must be accurate and aligned for the Plan to be sound.

LPA05 states that 486 dwellings per annum (dpa) are required and there have been various projections within the 'Strategic Housing Market Assessment' (GL Hearn), with the

①

②

recommendation being 482dpa. The 2016 based projections have a proposed figure of 383dpa (see paragraph 8.8 of the GL Hearn report). The Plan does not seem to justify why 486dpa has been determined and for this reason the Plan is not justified. There also appears to be some confusion on the required dpa; item 1. In the table of paragraph 4.16 suggests 486dpa, yet paragraph 4.18.4 suggests the figure is 468dpa. This confusion seems to throw some of the report in to doubt.

2

The site at Cowley Hill (6HA), is understood to have a potential of more than 1,000 dwellings which could be built on this site; well above the 816 suggested in the Plan. The proposed density (35 units per Ha) is potentially lower than the developer would wish for and certainly the 75% net developable area is below what any developer would propose for such a site. The cost of remediation of such a brownfield site would need a greater land usage and density in order to maximise the economic viability for cost of remediation. It also understood that a potential developer would want to complete the entire site within the 15 year period of the proposed Plan, again due to economic viability. So, the Plan is unsound delivering only 516 dwellings at this site over its period as opposed to the probable 1,000+ dwellings which will happen over the Plan period.

3

Under section 3.2.1 of the Plan (Strategic Aims & Objectives), within the table under item 6.2 & 6.3 the protection of the environment and enhancement of green space is promoted. Paragraph 4.24.1 offers no real justification against this Aim rendering the proposal not justified nor sound.

4

Section 4.5 of the Plan states that all strategic aims have been met, however, item 4 of Policy LPA02 releases green belt. This does not meet Strategic Aim item 6 'Safeguarding and Enhancing Quality of Life'.

5

The Plan does not identify specific measures to deal with the Infrastructure Delivery to be incorporated with the use of the 3HS site, nor is anything specific referred to in the Infrastructure Delivery Plan. The area surrounding 3HS suffers significant congestion throughout the day, specifically between 07:30-09:15, 14:30-16:00 and 17:00-18:30 on weekdays. The arterial route of Warrington Road (A57) is always busy being a main route between M62, Whiston hospital (constantly having ambulances traversing through) and Prescott. The junction of Warrington Road (A57) and Rainhill Road (at Skew Bridge) is a significant 'bottleneck' point on this route and, should there be development of 3HS, would serve to increase congestion issues. There is also pressure on Elton Head Road and where this meets the A570 Linkway. The ongoing roadworks are intended to alleviate this however, it is believed that by changing the roundabout to a traffic signalled junction will not significantly improve the situation.

6

Highway  
&  
Warrington

The traffic congestion concerns also lead the local community to concerns regarding our health. Contained within the Plan in paragraph 2.6.1 are the leading causes of death within our Borough. These are cancer and respiratory disease which can both be brought on by poor air quality. By the introduction of 3HS in the Plan, a significant green space, the local residents have genuine fear for our health with the introduction of at least 1,000 cars for any development on 3HS (not accounting for the added pollution throughout the construction phase). Coupled with the risk to health from congestion is the loss of trees from the 3HS site in which helps to offset some of the CO2 emissions.

6

The Transport Impact Assessment 2019 makes no reference to the 3HS site and has taken no account of the potential traffic increase from this site (or any of the other proposed 'safeguarded' sites) so, therefore, proves the Plan is not sound. As described above, the traffic situation is currently at breaking point and without a clear transport strategy considering the impacts of the 3HS site the proposals will have a detrimental effect on the road users within the wider area.

7

3HS  
LHS

Foreman

1498

Contractor in the  
the

supporting Ecological Assessment and for the reasons outlined we do not believe the Plan is justified.

Whilst the SHMBC policy states that the land will be 'safeguarded' for housing after 2035 and we are assured that planning would be refused before then, we hold concerns regarding the use of the land over the next 16 years. We believe that the owners (Mulberry Homes) could potentially allow the land to become a derelict 'dumping ground' forcing a potential rethink of policy and potential change to current proposals. It is not unreasonable to be concerned that a developer may look for ways to expedite plans for the site they currently own.

6

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order for the plan to comply with the National Planning Policy Framework (2019), we believe that the land referred to as 3HS in the Local Plan should remain designated as Greenbelt and not be re-designated as 'safeguarded'. With particular reference to Clauses 136 and 137 of NPPF (2019) which clearly state that Green Belt boundaries should only be altered in exceptional circumstances and bearing in mind the comments made in 6. above, we do not believe that the circumstances to re-designate the land referred as 3HS as 'safeguarded' are 'exceptional' enough to warrant the destruction of Green Belt. The Plan is not consistent with national policy.

Please continue on a separate sheet if necessary

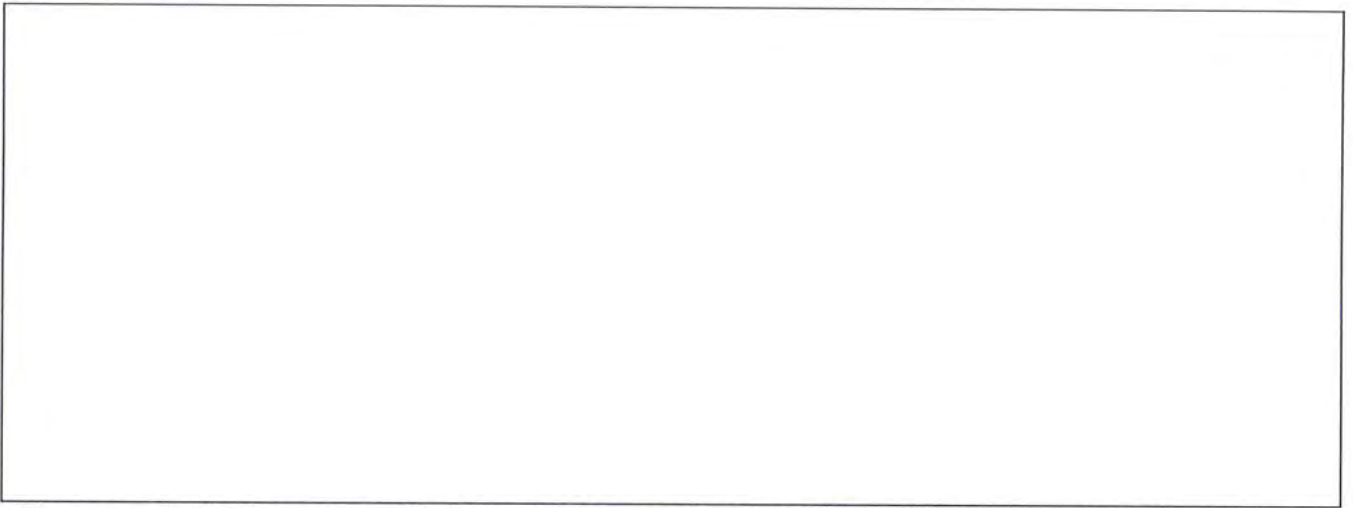
**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:



**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

PO0888



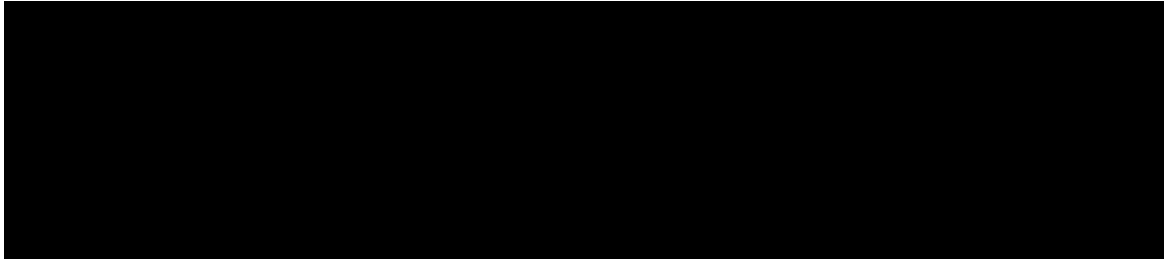
St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

Dear Sir / Madam,

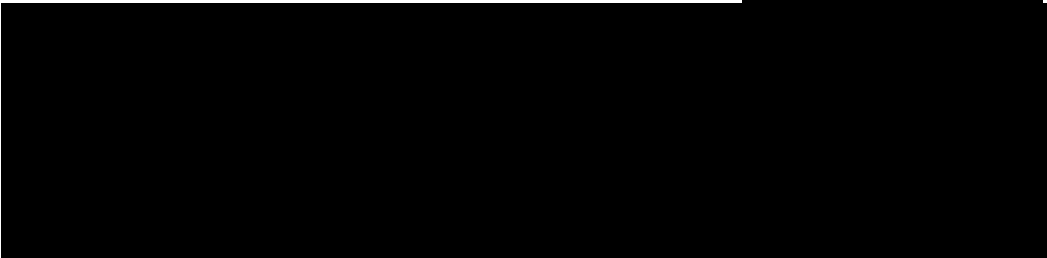
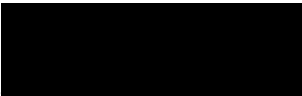
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**

Planning Associate



### Representor Details

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

### 7. Please set out modification(s) you consider are necessary

Please see accompanying representations

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

### 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

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### 3. STRATEGIC POLICIES

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3.1 The Council has outlined a number of strategic policies within the Submission Draft Local Plan. Our Client supports the need for significant housing and employment growth, and the pragmatic approach by the Council to bring forward development which at a minimum meets the future residential and employment needs within St Helens and identifies additional land provision to provide flexibility and supply. Moreover, and as mentioned previously, we consider that the Local Plan should aim to provide sufficient growth to support the wider aspirations of the LCR to help drive forward economic growth and seek to reverse current trends of decline in deprivation and affordability within the borough.

9

10

3.2 With regard to the above, we have a number of concerns with the Policies as drafted and set out these comments below:

#### **Policy LPA01 – Presumption in favour of sustainable development**

3.3 Our Client supports the inclusion of Policy LPA01 and the approach taken by the Council in relation to the presumption in favour of sustainable development which is generally reflective of the approach set out within the 2018 NPPF. We consider it is essential for this policy to be included within the emerging Local Plan, and its inclusion demonstrates compliance with Paragraph 11 of the NPPF.

11

3.4 Notwithstanding the above, Policy LPA01 seeks only to address the presumption in favour of sustainable development insofar as it relates to decision making, rather than Plan-making. We consider that the Local Plan would benefit from clarification that it has been prepared with the intention of being compatible with the presumption where it relates to plan making; this will be particularly important as the plan evolves through future reviews. Indeed, key to the Local Plan remaining sound will be its commitment to being sufficiently flexible to adapt to rapid change as set out within the opening paragraphs of paragraph 11 of the NPPF.

12

#### **Policy LPA02 – Spatial Strategy**

3.5 Our Client supports the Council's approach in identifying a number of Key Settlements, which includes Newton-le-Willows. We support the need for development to be

13



PO0889



St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

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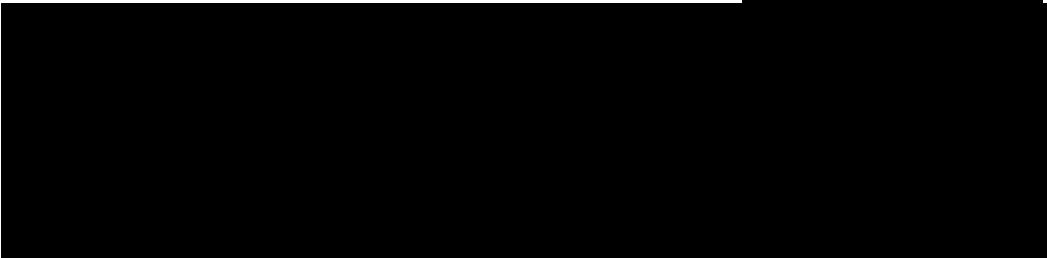
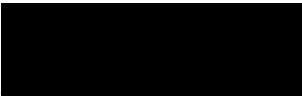
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**

Planning Associate



**Representor Details**

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Please see accompanying representations

**7. Please set out modification(s) you consider are necessary**

Please see accompanying representations

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Please see accompanying representations

---

3.13 We have concerns that the Council's 'Spatial Strategy for meeting development needs' set out at paragraph 4.6.8 of the Local Plan does not indicate how the Council has sought to disaggregate development across the Key Settlements and other areas across the borough. The housing strategy simply seems to be the result of combining currently identified SHLAA Sites and a number of allocations across the borough. The Council has not made clear what its 'strategy' for distributing that growth is. It is not clear, therefore, whether each of the Key Settlements in particular can be assured of being allocated the development that they need as settlements.

21

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3.14 We generally support the need for Green Belt release within the borough as set out within Local Plan and we support the need to identify Green Belt land for release further to a comprehensive review of the Green Belt; indeed we agree with the Council that it should maintain an effective Green Belt. However, without an indication of the levels of development that the Council considers should be met at each of the Key Settlements it is difficult to consider the case for exceptional circumstances for Green Belt release across the borough. In its simplest terms, how has the Council weighed harm to the Green Belt in a specific area against the need for development where it has not defined the need for development in that area.

22

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3.15 As set out later within these representations our Client to our Site being discounted from the Green Belt Assessment in relation to the Site. We agree with the Green Belt Assessment which considers the Site (Site reference GBP\_048) to be of "Low" value to all purposes of including land within the Green Belt; and overall makes a "weak" contribution to the Green Belt. However, the Site has subsequently been discounted from the Green Belt Assessment on the basis that its part designation as a 'Amenity Greenspace' is a prohibitive constraint to development. We disagree with that conclusion and address this later within these representations and within the attached Development Framework Document (DFD). We consider that the Site should be allocated for development and released from the Green Belt.

23

24

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### **Policy LPA03 – Development Principles**

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3.16 We support the Council's aspirations for development to be guided by a number of development principles, and the need for the Council to address the challenges faced through population growth; economic well-being; contribution to inclusive

25

PO0890

①-LPA02    ②-Para 17.2 DTC

③-LPA07    ④-LPA05



RAG Submission

to:  
planningpolicy  
13/03/2019 09:59



1 Attachment



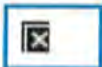
RAG Submission Final.docx

Dear Sirs,

Please find attached the representation from Rainford Action Group re the St Helens Plan 2020-2035 proposed Submission Draft

Kind Regards,

**Ian McFegan**



Virus-free. [www.avast.com](http://www.avast.com)

① - LPA02

② - Para 1.7.2 DTC

③ - LPA07

④ - LPA05

# Rainford Action Group (RAG) Representation; St. Helens Local Plan 2020-2035 Proposed Submission Draft

## March 2018

1. Purpose
2. Introduction
3. Overall Plan
4. Comments on site 8HA (Land South of Higher Lane and East of Rookery Lane, Rainford)
5. Appendix 1

Key	
Abbreviation	Full Title
SHLP	St. Helens Local Plan 2020 -2035 Proposed Submission Draft
SHBC	St Helens Borough Council ("The Council")
RAG	Rainford Action Group



## 1. Purpose

- 1.1 This submission is made on behalf of Rainford Action Group (RAG) in consultation with the concerns raised by the local residents and complements the SHGBA submission by Kirkwells.

## 2. Introduction

- 2.1 RAG was formed in Dec 2016, initially to help Rainford residents to understand what was being proposed by St. Helens Council in the SHLPP, and to help them through the somewhat complicated submission process.
- 2.2 Many residents were deeply concerned by the scale of development in Rainford proposed by that document. A committee was formed to represent the views of the community and encourage participation in the process.
- 2.3 Public meetings were held with over 400 attendees, and a Facebook Group was set up which currently has 1,500 members, as well as a Twitter account with over 1,000 followers.
- 2.4 RAG welcomes the reduction in the number of sites and housing numbers proposed for Rainford in the St.Helens Local Plan 2020-2035 Proposed Submission Draft.
- 2.5 RAG is not against development *per se*, and accepts the need for new housing in the right amount and location and where there is a proven need.
- 2.6 We would also like to see the early adoption of a local Plan. However, we do not believe that this Proposed Submission Draft passes the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF) and there are number of issues we feel need to be addressed which are set out below.





### 3. Overall Plan

In summary our issues with the overall plan are;

- 
- 3.1 There are no exceptional circumstances to justify not using the standard method to calculate housing need
  - 3.2 The economic analysis is flawed and based on over-optimistic assumptions
  - 3.3 The level of land needed for housing and employment is therefore not as high as set out in the Plan 01
  - 3.4 There are therefore no exceptional circumstances to change Green belt boundaries
  - 3.5 Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

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3.6 The Council have failed to co-operate with other councils and have not published any statement(s) of common ground. 02

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3.7 Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth. 03

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*[Note: Points 3.1 to 3.6 are covered in detail in the Kirkwell's submission on behalf of St Helens Green Belt Association, and by Dr Athey's submission.]*

### 4. Comments on Site 8HA

(Land South of Higher Lane and East of Rookery Lane, Rainford)

- 
- 4.1 Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1. It is therefore logical that this should be the first site Green Belt site released from development if the housing need is reduced. We are arguing (3.1 above) that the Council should use the Standard method of 468 rather than the uplifted 486, which over 19 years equates to 342 fewer houses. This comfortably exceeds the 259 houses planned for site 8HA 04



PO0891



St Helens Local Plan Submission Draft

McBride, Sean

to:

'planningpolicy@sthelens.gov.uk'

13/03/2019 12:30



5 Attachments



St Helens Local Plan Submission Draft Rep - March 2019.pdf



Vision Document - Land at Weathercock Hill Farm Rev A 13 03 19\_compressed (2).pdf



Weathercock Hill Farm\_Ecological Statement(1.1).pdf



Landscape Feasibility Statement - Land at Weathercock Hill Farm.pdf 2503.TN.pdf

Dear Sir/Madam

Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards

Sean

**Sean McBride**

Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH



We are proud to be an official partner of Team GB.



As part of our partnership with Team GB, we're **Building Futures**, giving away £1 million to the next generation of stars. [Find out more....](#)

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**St. Helens Borough Local Plan  
2020-2035 Submission Draft**

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Representations submitted on behalf of Persimmon Homes North West

**March 2019**



EL0177

ensuring efficient re-use of previously developed; and Strategic Aim 4 which acknowledges the need to identify sufficient land for a sufficient number and range of new homes.

01

2.3 Whilst supportive of SA4, it is considered that its wording to identify *sufficient* land for a *sufficient* range of new homes does not necessarily fully represent Government objectives to '*significantly boost the supply of homes*', as set out within the National Planning Policy Framework [the Framework] (para. 59). It is considered that this strategic objective should be revised to reflect the objectives of the Framework.

02

2.4 The Company also supports Strategic Aim 5 which seeks to maximise the contribution of St Helens to the economy of the Liverpool City Region [City Region] and adjacent areas, by ensuring an adequate supply of employment land and premises to meet local employment needs. It is imperative that the Council aligns its housing requirement to support delivery of such economic growth aspirations. We would also encourage reference to the Northern Powerhouse within Strategic Aim 5, given the significant contribution that the City Region will play in its delivery.

03

04

#### **Policy LPA02: Spatial Strategy**

3.1 The Company broadly supports Policy LPA02 which seeks to focus regeneration and growth in St Helens to the key settlements of St Helens, Blackbrook and Haydock, Newton-le-Willows and Earlestown, Rainford, Billinge, Garswood and Rainhill; and direction of new development to sustainable locations, which will enable movements between homes, jobs and key services and facilities by non-car modes of transport.

05

3.2 The Company supports the development of previously developed land and policy mechanisms which can ensure their delivery. However, it should not be expected that the Local Plan be worded to sequentially prioritise their delivery over other sites allocated for development. Such a position is considered to accord with the Framework, which states that policies should '*promote an effective use of land...in a way that makes as much use as possible of previously developed or brownfield land*' (para. 117).

06

3.3 The Company supports the Council seeking to deliver its full housing and employment needs across the Plan period, including the release of land from the Green Belt where required; the

07

EL0177

Framework stating that Green Belt boundaries should only be altered 'through the preparation or updating of plans' (para 135).

---

3.4 Whilst addressed in more detail later in this representation, the Council's Strategic Housing Land Availability Assessment 2017 [SHLAA] identifies an existing housing land supply of 6,344 homes; significantly short of the emerging Local Plan housing requirement of 9,234 net additional dwellings. The Company considers that exceptional circumstances exist to release land from the Green Belt, as required at para 137 of the Framework. 08

---

3.5 It is necessary that the Council seeks to identify sufficient sites to meet St Helens' full objectively assessed need within its own authority area. Given Warrington and Halton, those neighbouring authorities who form the Mid-Mersey HMA, are also undertaking a Green Belt review to accommodate their future housing needs; it being confirmed that they (along with nearby districts in Liverpool and Greater Manchester City Regions, and West Lancashire) will be unable to accommodate St Helens' unmet needs.

---

3.6 The Company also supports the Council's identification of land for safeguarding to meet the longer term housing and employment needs of St Helens, considering this approach to be in accordance with para. 139 of the Framework. 09

---

#### **Policy LPA03: Development Principles**

4.1 The Company are broadly supporting of the development principles set out within policy LPA03 particularly the creation of sustainable communities and the requirement that new development assists in meeting the challenges of population retention and growth, by providing a mix of homes, including types and tenures to meet needs and aspirations of all existing and future residents. 10

---

#### **Policy LPA04: A Strong and Sustainable Economy**

5.1 The Company generally supports policy LPA04 which seeks to maximise opportunities for economic growth, job creation and skills development. 12

---

5.2 Whilst acknowledging the importance of protecting sites allocated for employment and viable employment sites from being developed for alternative uses, it is considered that paragraphs 4 and 5 of the policy do not fully accord with the Framework.

PO0892





St Helens Local Plan Submission Draft  
McBride, Sean  
to:  
'planningpolicy@sthelens.gov.uk'  
13/03/2019 12:30



5 Attachments



St Helens Local Plan Submission Draft Rep - March 2019.pdf



Vision Document - Land at Weathercock Hill Farm Rev A 13 03 19\_compressed (2).pdf



Weathercock Hill Farm\_Ecological Statement(1.1).pdf



Landscape Feasibility Statement - Land at Weathercock Hill Farm.pdf 2503.TN.pdf

Dear Sir/Madam

Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards  
Sean

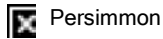
**Sean McBride**  
Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH



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**St. Helens Borough Local Plan  
2020-2035 Submission Draft**

---

Representations submitted on behalf of Persimmon Homes North West

**March 2019**



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2.4 The Company also supports Strategic Aim 5 which seeks to maximise the contribution of St Helens to the economy of the Liverpool City Region [City Region] and adjacent areas, by ensuring an adequate supply of employment land and premises to meet local employment needs. It is imperative that the Council aligns its housing requirement to support delivery of such economic growth aspirations. We would also encourage reference to the Northern Powerhouse within Strategic Aim 5, given the significant contribution that the City Region will play in its delivery.

03

04

#### **Policy LPA02: Spatial Strategy**

3.1 The Company broadly supports Policy LPA02 which seeks to focus regeneration and growth in St Helens to the key settlements of St Helens, Blackbrook and Haydock, Newton-le-Willows and Earlestown, Rainford, Billinge, Garswood and Rainhill; and direction of new development to sustainable locations, which will enable movements between homes, jobs and key services and facilities by non-car modes of transport.

05

3.2 The Company supports the development of previously developed land and policy mechanisms which can ensure their delivery. However, it should not be expected that the Local Plan be worded to sequentially prioritise their delivery over other sites allocated for development. Such a position is considered to accord with the Framework, which states that policies should '*promote an effective use of land...in a way that makes as much use as possible of previously developed or brownfield land*' (para. 117).

06

3.3 The Company supports the Council seeking to deliver its full housing and employment needs across the Plan period, including the release of land from the Green Belt where required; the

07

EL0177

Framework stating that Green Belt boundaries should only be altered 'through the preparation or updating of plans' (para 135).

- 
- 3.4 Whilst addressed in more detail later in this representation, the Council's Strategic Housing Land Availability Assessment 2017 [SHLAA] identifies an existing housing land supply of 6,344 homes; significantly short of the emerging Local Plan housing requirement of 9,234 net additional dwellings. The Company considers that exceptional circumstances exist to release land from the Green Belt, as required at para 137 of the Framework. 08

- 
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- 
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---

**Policy LPA03: Development Principles**

- 4.1 The Company are broadly supporting of the development principles set out within policy LPA03 particularly the creation of sustainable communities and the requirement that new development assists in meeting the challenges of population retention and growth, by providing a mix of homes, including types and tenures to meet needs and aspirations of all existing and future residents. 10

---

**Policy LPA04: A Strong and Sustainable Economy**

- 5.1 The Company generally supports policy LPA04 which seeks to maximise opportunities for economic growth, job creation and skills development. 12

- 
- 5.2 Whilst acknowledging the importance of protecting sites allocated for employment and viable employment sites from being developed for alternative uses, it is considered that paragraphs 4 and 5 of the policy do not fully accord with the Framework.

PO0893



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:02

Cc:  
Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner



# indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts; Part A – Personal Details Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Table with 2 columns: 1. Your Details, 2. Your Agent's Details (if applicable). Rows include Title, Name, Organisation, Address, Postcode, and Contact Information.

Signature and Date fields. Signature is redacted, Date is 13/03/2019.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) Yes [X] (Via Email) No [ ]



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

**RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

**FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

**NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

**DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

# Please use a separate copy of Part B for each separate comment/representation.

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	✓	Paragraph / diagram / table	✓	Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	✓
Justified?	✓
Effective?	✓
Consistent with National Policy?	✓

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
---	-------------------------------------	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination**

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

# St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

## Leyland Green Farm, Garswood

### Representations on behalf of Murphy Group

**indigo.**

## 4. Specific Policies

### Policy LPA02: Spatial Strategy

- 4.1. We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Garswood (*"a village in the north of the Borough...large enough to form a Key Settlement"*), recognises that Garswood has potential for and can support new development. The spatial distribution effectively addresses the existing housing and employment issues within the borough and development in these regions will lead to sustainable development across the borough. 05
- 4.2. Every update of the St. Helens Strategic Housing Land Availability Assessment since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. We consider that the policy addresses the housing delivery issues in the borough through a revised spatial distribution, including proposing development at Garswood, and releasing of Green Belt land for housing. We therefore support the identification of Garswood for new development.
- 4.3. The policy highlights that *"the re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites"*. This needs re-wording to avoid ambiguity. The use of brownfield land is understandably a priority in terms of regeneration and sound planning, but brownfield sites should not be prioritised over allocated greenfield sites in terms of phasing. 06
- 4.4. At LPA02(4) the policy highlights that *"such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan"*. We object to this on the basis that there is no clarity on when a full review of the local plan will be triggered. Further clarity should be provided on this point, including with reference to the Housing Delivery Test and / or Five Year Supply. Additionally, we advocate that safeguarded land should come forward for development within the plan period, should housing allocations become stalled or not deliver housing within the timescales identified. 07
- 4.5. The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included; the issues are covered in Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. 08
- 4.6. At paragraph 4.6.2 'Sub-regional context', it confirms St Helens Council has cooperated extensively with nearby districts including the Greater Manchester City Regions. We support the need which has been identified within the Liverpool City Region to accommodate the growth of the logistics and warehousing sector, in order to support underlying economic trends and the growth of the port of Liverpool. 09
- 4.7. We also support the Plan's aims to address the issue of insufficient employment land to meet the needs of modern businesses. We support mixed use development and smaller employment uses interspersed with residential development as this will encourage St Helens Borough's residents to work closer to home, reduce the number of people who commute to other locations or move away to secure work. 10

### Policy LPA03: Development Principles

- 4.8. On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined because some will not be relevant to a particular proposal. 11

PO0894

**Representor Details**

Web Reference Number	WF0002
Type of Submission	Web submission
Full Name	Mr Francis Williams
Organisation	St Helens Green Party
Address	7 Parkside Avenue Sutton Manor St. Helens WA9 4DT
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Green Party SHLP response

There must be exceptional circumstances for removing land from the Green Belt. The Borough has failed to base its future needs in terms of trends established from previous demand data, instead it has based its needs on an aspirational view of future needs which intends to stimulate development by making land available for building, rather than responding to actual need: the exceptional circumstances are not fully evidenced and justified in accordance with para. 136 National Planning Policy Framework, nor is aspirational assessment of future need objectively assessed as required by para. 11(b) NPPF.

The Borough contains a large proportion of previously-developed land and has suffered much despoliation since the start of the industrial revolution, and whilst the borough has policies for gradual assessment of contaminated and unsuitable sites, it does not have a policy for remediating these sites and making them available for development. In view of the large amount of previously developed land that is not available for development, policy that fails to make such land available, yet consigns large areas of virgin land for development, cannot be viewed as sustainable. It fails to preserve land for future generations, whilst not bringing land currently unavailable through contamination or other current unavailability forward for development. Using Green Belt land will have deleterious effects on food production, wildlife, recreation and the ecosystem.

01

02

03

As there has been such extensive scarring of the local landscape historically by industry, virgin land, whether or not in agricultural production, should be conserved at all costs, and all realistic alternatives should be considered. Land that is taken for development, particularly on the urban fringe, reduces access to the countryside, with its health and recreational benefits.

03

Land used for warehousing has an ever-shrinking capacity for employment as technology introduces more and more labour-saving devices to reduce employment costs. The same is likely to apply with freight transport when driverless vehicles are introduced. A policy sacrificing large tracts of productive agricultural land for a rapidly-diminishing yield in employment is neither a sustainable use of land, nor does it provide sustainable employment. Furthermore, large warehousing has a commensurately large take of land, so under the plan, large tracts of land would be urbanized and taken out of food production at a time when the UK has a growing population.

04

Land has been Safeguarded for future development. St Helens Green Party believes that the SHLPSD does not accord with the principles of sustainability, that is, it earmarks agricultural land that is currently Green Belt land development, not under the new plan but the one following it. We suggest that the land in question should remain in the Green Belt, and periodic reviews of the local plan should consider needs current at the time. Safeguarding large areas does not accord with para. 11(a), which states: "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;". A plan that designates large areas of land as being for future development cannot be deemed flexible. What, for example, if food production becomes a priority in the next few years? The plan has to be reviewed every five years, there is no need to safeguard any land. Decisions can thus be taken nearer the time, with more accurate data available.

05

To accord with the principles of sustainability, new housing development should be close to centres of employment or as close as possible to existing transport hubs. Housing development should be within easy reach of the employment centres or close to transport hubs.

As the borough's policy seems to be to promote warehousing, the bulk of such employment being low-skill with corresponding remuneration, housing development on greenfield sites distant from employment centres is unlikely to be predominantly of a type which is affordable for those on low incomes, nor is it sustainable from a transport perspective, making travel by bus lengthy or motor-transport dependent. The optimal locations for housing development are close to the town centre.

06

**7. Please set out modification(s) you consider are necessary**

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	5/13/2019 4:10:28 PM
---------------	----------------------



PO0895



St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

Dear Sir / Madam,

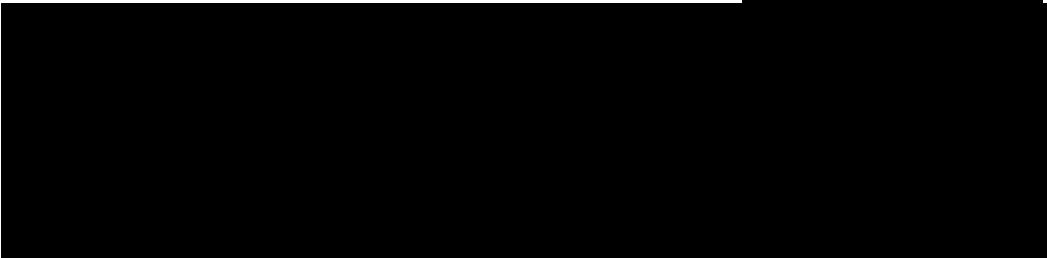
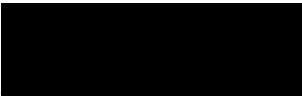
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**

Planning Associate



### Representor Details

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

### 7. Please set out modification(s) you consider are necessary

Please see accompanying representations

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

### 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

---

### 3. STRATEGIC POLICIES

---

3.1 The Council has outlined a number of strategic policies within the Submission Draft Local Plan. Our Client supports the need for significant housing and employment growth, and the pragmatic approach by the Council to bring forward development which at a minimum meets the future residential and employment needs within St Helens and identifies additional land provision to provide flexibility and supply. Moreover, and as mentioned previously, we consider that the Local Plan should aim to provide sufficient growth to support the wider aspirations of the LCR to help drive forward economic growth and seek to reverse current trends of decline in deprivation and affordability within the borough.

9

10

3.2 With regard to the above, we have a number of concerns with the Policies as drafted and set out these comments below:

#### **Policy LPA01 – Presumption in favour of sustainable development**

3.3 Our Client supports the inclusion of Policy LPA01 and the approach taken by the Council in relation to the presumption in favour of sustainable development which is generally reflective of the approach set out within the 2018 NPPF. We consider it is essential for this policy to be included within the emerging Local Plan, and its inclusion demonstrates compliance with Paragraph 11 of the NPPF.

11

3.4 Notwithstanding the above, Policy LPA01 seeks only to address the presumption in favour of sustainable development insofar as it relates to decision making, rather than Plan-making. We consider that the Local Plan would benefit from clarification that it has been prepared with the intention of being compatible with the presumption where it relates to plan making; this will be particularly important as the plan evolves through future reviews. Indeed, key to the Local Plan remaining sound will be its commitment to being sufficiently flexible to adapt to rapid change as set out within the opening paragraphs of paragraph 11 of the NPPF.

12

#### **Policy LPA02 – Spatial Strategy**

3.5 Our Client supports the Council's approach in identifying a number of Key Settlements, which includes Newton-le-Willows. We support the need for development to be

13

PO0896



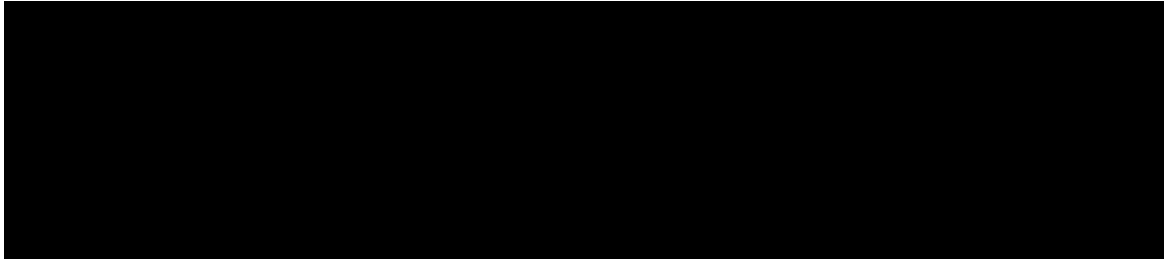
St Helens Local Plan Submission Draft Representations - Torus 62 Limited

Ian Gilbert

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

Dear Sir / Madam,

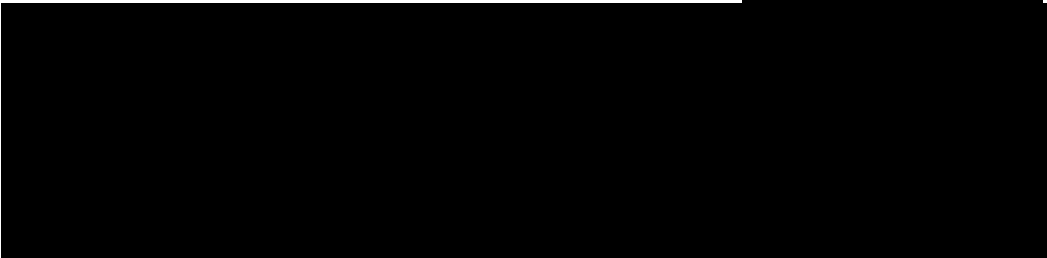
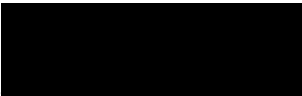
Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**

Planning Associate



### Representor Details

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

### 7. Please set out modification(s) you consider are necessary

Please see accompanying representations

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

### 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

- 
- 3.9 Section 4.6 of the Local Plan sets out the reasoned justification for the approach taken by Policy LPA02 and notes, in essence that there is there has been no identified need for St Helens to meet any unmet need from neighbouring boroughs. Equally, there has been no spare capacity identified within neighbouring boroughs in which to help meet St Helens' development needs. St Helens' neighbouring districts are also all intending to undertake a review of Green Belt boundaries.
- 
- 3.10 Whilst we do not disagree with the above assumption, we are concerned that the trust of the above approach is that, notwithstanding the LCR's aspirations for the City Region to drive forward growth, it appears that individual Councils are not taking a more insular approach to meeting their own development needs. We address the Council's housing requirement (and OAN) in more detail below, but at its most high level, the proposed housing requirement of 486dpa sits significantly below the 860dpa identified by the SHELMA as being required to support a growth scenario across the LCR. 19
- 
- 3.11 We acknowledge that there has been a change in planning policy since the publication of the SHELMA (and Mid-Mersey SHMA) namely in the form of the Standardised Methodology for calculating OAN (SMOAN). However, the SMOAN looks only at the housing needs calculated on a borough-by-borough basis and is not a methodology for calculating the housing needs across a combined authority area; particularly where the aspirations of that area go significantly beyond meeting the baseline housing needs of the area. This is evidenced by the significant drop in housing needs identified from those identified within the SHELMA to those derived from the SMOAN. Our Clients are concerned that if housing growth across the LCR is simply a summation of the SMOAN for each individual authority within the LCR, that the aspirations for growth within the City Region will be missed entirely. 20
- 
- 3.12 It is clear from the supporting text of the Local Plan that St Helens should be pushing for growth as part of the wider City Region. Left to its own market forces the Plan sets out that the borough has experienced development and investment that have been substantially below those achieved in the 1990's notes declining trends. There is clearly a need for a step change within the borough. Paragraph 4.6.7 of the Local Plan notes that there is a substantial need for new housing development linked to demographic needs and the need to provide housing sufficient to support economic growth.



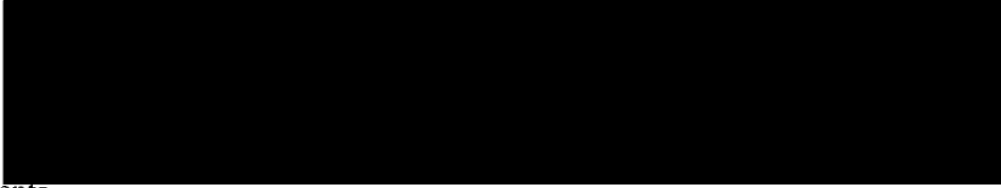
PO0897



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:02

Cc:  
Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner



# indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts; Part A – Personal Details Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Table with 2 columns: 1. Your Details, 2. Your Agent's Details (if applicable). Rows include Title, Name, Organisation, Address, Postcode, and Contact Information.

Signature and Date fields. Signature is redacted, Date is 13/03/2019.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) Yes [X] (Via Email) No [ ]

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

**RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

**FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

**NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

**DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

# Please use a separate copy of Part B for each separate comment/representation.

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	✓	Paragraph / diagram / table	✓	Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	✓
Justified?	✓
Effective?	✓
Consistent with National Policy?	✓

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
---	-------------------------------------	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

# St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

## Leyland Green Farm, Garswood

### Representations on behalf of Murphy Group

**indigo.**

## 4. Specific Policies

### Policy LPA02: Spatial Strategy

- 4.1. We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Garswood (*"a village in the north of the Borough...large enough to form a Key Settlement"*), recognises that Garswood has potential for and can support new development. The spatial distribution effectively addresses the existing housing and employment issues within the borough and development in these regions will lead to sustainable development across the borough. 05
- 4.2. Every update of the St. Helens Strategic Housing Land Availability Assessment since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. We consider that the policy addresses the housing delivery issues in the borough through a revised spatial distribution, including proposing development at Garswood, and releasing of Green Belt land for housing. We therefore support the identification of Garswood for new development.
- 4.3. The policy highlights that *"the re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites"*. This needs re-wording to avoid ambiguity. The use of brownfield land is understandably a priority in terms of regeneration and sound planning, but brownfield sites should not be prioritised over allocated greenfield sites in terms of phasing. 06
- 4.4. At LPA02(4) the policy highlights that *"such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan"*. We object to this on the basis that there is no clarity on when a full review of the local plan will be triggered. Further clarity should be provided on this point, including with reference to the Housing Delivery Test and / or Five Year Supply. Additionally, we advocate that safeguarded land should come forward for development within the plan period, should housing allocations become stalled or not deliver housing within the timescales identified. 07
- 4.5. The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included; the issues are covered in Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. 08
- 4.6. At paragraph 4.6.2 'Sub-regional context', it confirms St Helens Council has cooperated extensively with nearby districts including the Greater Manchester City Regions. We support the need which has been identified within the Liverpool City Region to accommodate the growth of the logistics and warehousing sector, in order to support underlying economic trends and the growth of the port of Liverpool. 09
- 4.7. We also support the Plan's aims to address the issue of insufficient employment land to meet the needs of modern businesses. We support mixed use development and smaller employment uses interspersed with residential development as this will encourage St Helens Borough's residents to work closer to home, reduce the number of people who commute to other locations or move away to secure work. 10

### Policy LPA03: Development Principles

- 4.8. On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined because some will not be relevant to a particular proposal. 11



PO0898

EF0008












St Helens Local Plan - Representations OBO Parkside Regeneration LLP  
William Mulvany  
to:  
planningpolicy@sthelens.gov.uk  
04/03/2019 12:14

- ① - LPA02
- ② - FIGURE 4.1
- ③ - FIGURE 4.2
- ④ - LPA04.1
- ⑤ - LPA10
- ⑥ - APPENDIX 5



9 Attachments

-  [lpsd-representation-form Policy LPA02.pdf](#)  [lpsd-representation-form Policy LPA04.1.pdf](#)
-  [lpsd-representation-form Policy LPA04.pdf](#)  [lpsd-representation-form Policy LPA10.pdf](#)
-  [lpsd-representation-form Appendix 5.pdf](#)  [Parkside Masterplan red.pdf](#)  [Parkside Rail Safeguarding red.pdf](#)
-  [FPC-ARP-XX-XX-FN-RX-00001 red.pdf](#)  [2018-09-14 Arup Feedback on AECOM Rail Technical Note.pdf](#)

Dear Planning Policy

Please find attached representations to the Submission Draft Local Plan that are submitted on behalf of our client Parkside Regeneration LLP.

Please acknowledge safe receipt.

Kind regards  
WILL MULVANY  
Associate: Chartered Town Planner  
BSc (Hons), MA, MRTPI



Junction 41 Business Court, East Ardsley, Leeds, WF3 2AB



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St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

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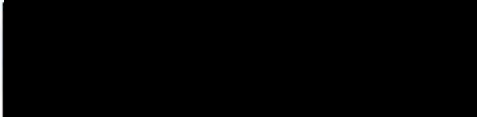
This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Will
Last Name:	Last Name: Mulvany
Organisation/company: Parkside Regeneration LLP	Organisation/company: Spawforths
Address: C/O Agent	Address: Junction 41 Business Court, East Ardsley, Leeds
Postcode:	Postcode: WF3 2AB



Signature: 	Date: <input type="text" value="4 March 2019"/>
--	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA02	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

It is considered that the Local Plan is sound and legally compliant in principle in respect of the Spatial Strategy as set out at Policy LPA02. In particular, our client **supports** development at the former Parkside Colliery as a transformational employment opportunity that will make a major contribution to the economic development of St.Helens Borough, the Liverpool City Region and beyond.

However, our client **conditionally objects** to the supporting Figures 4.1 Key Settlements Plan and 4.2 Key Diagram in respect of the Parkside East site area, specifically the rail safeguarding area on the Parkside West allocation. The alignment is incorrect and needs to reflect the alignment identified in the live planning application for Phase 1 of redevelopment of the former Parkside Colliery.

①  
②  
③

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend the rail safeguarding area for Parkside East on Figures 4.1 and 4.2, alongside the Policies Map to reflect that promoted by the site owners and attached to these representations. ✓

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<b>No</b> , I do not wish to participate at the oral examination	✓	<b>Yes</b> , I wish to participate at the oral examination
--	---	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Our client is the owner of the former Parkside Colliery (Allocation 8EA). It is allocated for employment development in the Local Plan as a key transformational employment site. It is one of the key allocations within the Local Plan and it is important that any considerations in respect of the spatial strategy, particularly where these may impact on delivery of the Parkside scheme, provide an opportunity for discussion and response through the Inspector. ✓

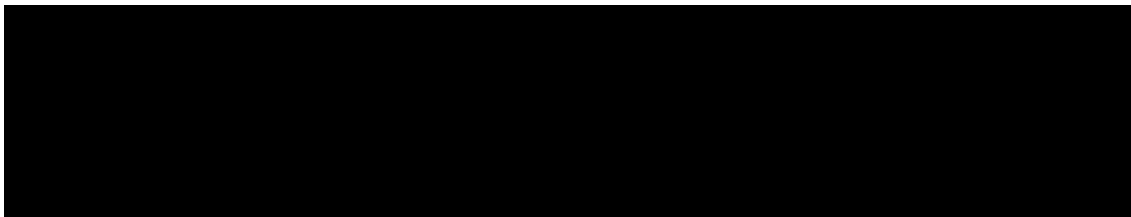
**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

PO0899



St Helens Local Plan: Submission Draft Representations: Mulbury (Warrington) Ltd  
Shaun Taylor  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 14:21



5 Attachments



Rep to Policy LPA02-Spatial Strategy .pdf Rep to Policy LPA05-Meeting Housing need.pdf



Rep to Policy LPA06-Safeguarded Land .pdf Rep to Policy LPC01- Housing Mix.pdf



Reps Report FINAL (with appendices).pdf

Dear Sir

Please find attached representations in relation to the above on behalf of our client, Mulbury (Warrington) Ltd.

We have submitted representations in relation to Policies:

- LPA02
- LPA05
- LPA06
- LPC01

In addition to the Representations Proformas, please also find attached report that should be read alongside these representations and made available to the Inspector in due course.

I would be grateful if you could confirm receipt of this email and its contents.

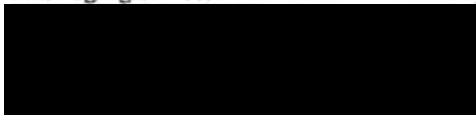
Kind regards  
Shaun



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**Shaun Taylor**  
Managing Director







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**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;


**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Andy	First name: Shaun
Last Name: Brown	Last Name: Taylor
Organisation/company: Mulbury (Warrington) Ltd	Organisation/company: SATPLAN LTD
Address: Great Oak Farm Mag Lane Lymm	Address: The Bridgewater Complex 36 Canal Street Liverpool
Postcode: WA13 0TF	Postcode: L20 8AH
Tel No: N/A	
Mobile No: N/A	
Email: N/A	

Signature		Date:	13.3.19
-----------	---	-------	---------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)No 

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete **PART B** of this form, setting out your representation/comment.

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy	LPA02	Paragraph / diagram / table	Figure 4.1 (Key Settlements Plan) and Figure 4.2 (Key Diagram)	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or <u>fails to comply with the duty to cooperate</u> . <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

#### **Criteria 1 & 2**

Policy LPA02 sets out the Spatial Strategy for the borough. The Policy is clear that growth in St

Helens should be focussed within the Key Settlements. In addition, Figure 4.1 (Key Settlements Plan) and Figure 4.2 (Key Diagram) within the LPSD clearly indicates that Site Ref. 3HS is on the edge of the St Helens Core Area and is therefore a highly sustainable location for future housing development. Paragraph 4.68 further notes that "Land for new development will be identified in sustainable locations, generally within, on the edge of, or close to Key Settlements".

We contend that residential development at Site 3HS is fully in accordance with Policy LPA02 as the site is clearly on the edge of the St Helens Core Area and in a highly sustainable location. The site can deliver a significant element of housing within the plan period (market and affordable homes) and should be allocated within the Local Plan rather than safeguarded – there are no deliverability issues associated with this Site. Whilst it may be reasonable to enable some new housing development to come forward in the outlying areas of the Borough, the Council has taken a disproportionate approach by not allocating the Eccleston Park Golf Course, given its better location and proximity to the urban core and its overall sustainability. For the reasons set out in section 5 of the accompanying representations, the site is sustainable, unconstrained and deliverable and should therefore be allocated to contribute towards the identified housing requirements.

#### **Criteria 4**

*Criteria 4 is concerned with releasing land from the Green Belt and safeguarding it to allow for longer term housing and / or employment needs to be met after 31 March 2035. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan.*

Monitoring the delivery of new homes annually to ensure that there is an adequate supply of new housing in accordance with the Housing Delivery Test and enough supply to provide the relevant 5-year supply plus the appropriate buffer is welcomed. However, should the deliverable housing land supply fall below five years there should be a mechanism by which safeguarded sites can come forward without the need for a full Local Plan Review. Waiting for such a review in the circumstances of there not being a five-year supply would frustrate the delivery of both market and affordable housing and would leave the Council vulnerable in planning appeal situations.

We suggest the policy wording is amended as set out in part 7 of this form. This ensure the policy is positively prepared and flexible.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A new or amended safeguarded land policy is required. We would suggest the following which is a modified version of a similar policy currently in use by West Lancashire Borough Council in their adopted Local Plan:

Safeguarded Sites will be considered for release prior to 2035 if one of the following scenarios applies:

1. Where the Council cannot demonstrate a 5-year deliverable supply of housing (this would apply at any time during the Plan period).
2. If at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from the most sustainably located Safeguarded Sites to make up the extra land supply required to meet the new housing target for the remainder of the plan period.

The Council will need to publish annual Housing Land Monitoring updates and we would advocate these are prepared alongside industry experts perhaps as part of a Housing Market Partnership.

This approach will make the Local Plan sound as it will ensure the Plan is flexible and capable of reacting to a change in circumstances without the need for a review of the Local Plan. This change also better reflects the guidance set out in NPPF and PPG in terms of flexibility, effectiveness and the delivery of housing.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

**No**, I do not wish to participate at the oral examination



**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It will be necessary to verbally explain the strong planning merits in favour of the Eccleston Park Golf Club site to represent our client's site accurately and provide information as required at EiP to the benefit of the Inspector.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

PO0900





Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
Hannah Payne  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 16:22



1 Attachment



Representation Form.pdf

Dear Sir/Madam,

Please see attached completed Representation Form and accompanying representations submitted on behalf of Barratt Homes to be taken into consideration as part of the consultation on the St. Helens Local Plan Submission Draft.

Note that we would like to be informed of future progress on the Local Plan and request the opportunity to attend Examination in Public.

We would be grateful if you could confirm receipt by way of a return email.

Kind regards,

Hannah

**Hannah Payne** | Senior Planner



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;


**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Hannah
Last Name:	Last Name: Payne
Organisation/company: Barratt Homes	Organisation/company: Indigo Planning Ltd
Address:	Address: St James' Tower, 7 Charlotte Street, Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	

Signature: 	Date: <input type="text" value="13/03/2019"/>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input type="checkbox"/> (Via Email)	No <input type="checkbox"/>
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	



## **PART B – YOUR REPRESENTATION**

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Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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Please tick as appropriate

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Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
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Please see enclosed representation.

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Please see enclosed representation.

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Please see enclosed representation.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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Please keep a copy for future reference.**

# indigo.

Every update of the St. Helens Strategic Housing Land Availability Assessment since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. We consider that the policy addresses the housing delivery issues in the borough through a revised spatial distribution and release of Green Belt land for housing. We support this policy but have concerns over the emphasis placed on the delivery of brownfield sites.

02

However, the priority placed on the re-use of previously development land over other allocated sites is not considered appropriate. We question the rationale for lowering the threshold for developer contributions for developers of brownfield sites given it is incorrect to assume developers on greenfield sites have less constraints. As such, each site should be taken on its own merits with developers' contributions subject to viability considerations.

03

At LPA02(4), further clarity should be provided on when a full review of the Plan will be triggered.

04

The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included in LPA902 as health and wellbeing of St. Helens' residents is covered within Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. This part of the policy should therefore be removed.

05

### **Policy LPA03: Development Principles**

On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined.

06

Nonetheless, the development of the Florida Farm South draft allocation supports the development principles identified within this policy. It will provide circa 600 homes; contributing not only towards the boroughs housing target and a sustainable mix and tenures of quality homes but also through direct and indirect investment in the local area. This in turn will contribute towards the borough's regeneration objectives.

07

### **Policy LPA04: A Strong and Sustainable Economy**

The employment target of a minimum of 215.4ha up to 2035 has been reduced from the minimum of 306ha up to 2033 outlined in the Preferred Options Local Plan.

Although this target appears sufficient to meet anticipated need, this figure does not reflect the Spatial Vision and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general.

08

The allocation of employment sites within the Green Belt particularly those along

09