



**ST HELENS**  
BOROUGH COUNCIL

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

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

**PLAN ORDER**

**PO3501 – PO3600**

**SEPTEMBER 2020**

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PO3501



Senior Planning Officer (Policy)  
Development Plans  
Development & Growth  
Place Services  
St. Helens Council

**W:** [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Date: 16/04/2019 11:41  
Subject: Fw: Warrington Response to St Helens Local Plan NTLs

Development Plans Manager.  
St Helens Council,  
Town Hall Annexe  
Corporation Street ,  
St Helens  
WA10 1HF

From: "Bell, Michael" [REDACTED]  
To: [REDACTED]  
Date: 16/04/2019 11:25  
Subject: FW: Warrington Response to St Helens Local Plan NTLs

I understand you wanted me to send our comments again.

Michael

**From:** Bell, Michael

**Sent:** 13 March 2019 11:37

**To:** [REDACTED]  
[REDACTED]

**Subject:** Warrington Response to St Helens Local Plan NTLS

[REDACTED]

I have attached our response in the form of a letter. It identifies the site allocations we are providing comments on and includes some suggested wording to ensure the plan is sound.

In order to get lead Member sign off I have had to prepare a letter rather than use your on-line form.

Can you confirm this is an acceptable format for our response.

regards

**Michael Bell**

Planning Policy and Programmes Manager

Planning Policy and Programmes

Growth Directorate

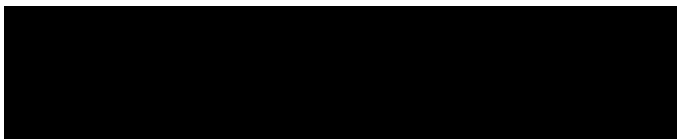
Warrington Borough Council

New Town House

Buttermarket Street

Warrington

WA1 2NH



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- Warrington Response to St Helens Local Plan Draft Submission Version .pdf

① - LPA04

④ - LPA06

② - LPA05

⑤ - APPENDIX 5

③ - DEC

⑥ - APPENDIX 7

⑦ - LPA10

**WARRINGTON****Borough Council**

⑧ - LPA04

- 8EA

Andy Farrall

Executive Director

Economic Regeneration, Growth and Environment

St Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP

Town Hall  
Sankey Street  
Warrington  
WA1 1UH

13 March 2019

Dear [REDACTED]

**RE: St. Helens Local Plan 2020-2035 Submission Draft**Scale of housing and employment growth

Warrington is supportive of St. Helens' overall growth ambitions and its commitment to meet its own housing and employment needs. ] ① ②

Warrington and St Helens, together with Halton, form the mid-Mersey Housing Market Area. All three Councils have worked closely around housing need and supply issues as part of our respective 'duty to cooperate' obligations. ] ③

Site 1EA - Omega South Western Extension

Warrington agrees that the site will form an expansion to the existing Omega South strategic employment location and therefore has a direct relationship with Warrington, although it will continue to provide employment opportunities to the residents of St Helens and other areas in the same manner that Omega already does. ] ④

As stated in Warrington Borough Council's response to the Preferred Development Option consultation, Warrington does therefore agree to Site 1EA1: Omega South Western Extension forming part of Warrington Borough Council's employment land supply. This will be confirmed in the forthcoming Proposed Submission Version of the Warrington Local Plan. ] ⑤

It is noted that the intention is for the extension to use the existing access arrangements for the wider Omega site. It should also be noted that working closely with Omega Warrington Limited, the Council has developed a detailed programme of improvements to the local and strategic highways networks and public transport network to facilitate the sustainable growth of Omega as a strategic employment and housing location. This work has highlighted that both the local and strategic road ] ⑥



#### Site 8EA - Parkside West

There are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from Parkside uses Warrington's local road network to access the motorway network. The Council will therefore seek to ensure that the increase in traffic using Warrington's local road network is minimised and the Council will require a comprehensive mitigation package to be delivered to offset any negative impacts on Warrington.

Warrington is committed to working constructively with St Helens as the proposals and mitigation measures for Parkside are worked up in detail.

The Council requests the following addition to the site requirements in Appendix 5 to ensure that the Local Plan is sound:

- *the amount of development achievable will be determined following a comprehensive transport assessment to be produced in liaison with Warrington Borough Council and Highways England.*

#### Site EA9 - Parkside East EA9

There are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from Parkside uses Warrington's local road network to access the motorway network. The Council will therefore seek to ensure that the increase in traffic using Warrington's local road network is minimised and the Council will require a comprehensive mitigation package to be delivered to offset any negative impacts on Warrington.

Warrington is committed to working constructively with St Helens as the proposals and mitigation measures for Parkside are worked up in detail.

The Council requested the following additions to Policy LPA10 to ensure that the Local Plan is sound:

- *the amount of development achievable will be determined following a comprehensive transport assessment to be produced in liaison with Warrington Borough Council and Highways England*

and the following addition to paragraph 4.36.8 of the Reasoned Justification:

- *Part of the proposed link-road runs through the administrative area of Warrington Borough Council.*

#### Site – LHA4 Bold Forest Garden Suburb

There are potentially significant highways and environmental impacts for Warrington residents, arising from this development if traffic from the proposed Garden Suburb uses Warrington's local road network through the village of Burtonwood to access

PO3502

**Representor Details**

Web Reference Number	WF0098
Type of Submission	Web submission
Full Name	Mrs Linda Horn
Organisation	
Address	Cop Holt Cottage Newton Road Winwick Warrington WA2 8SF
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 LPA 10
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 completely agree with and support the comments made in the

Parkside Action Group

PAG Response to St Helens Local Plan

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

I completely agree with and support the comments made in the

Parkside Action Group

PAG Response to St Helens Local Plan

**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:**

As a member of the local community, who will be affected by any development of Parkside East and West, I would like to attend and hear the representations.

Response Date	3/13/2019 12:03:45 PM
---------------	-----------------------

PO3503



St Helens Local Plan Submission Draft Network Rail comments  
TownPlanning LNW  
to:  
planningpolicy@sthelens.gov.uk  
07/03/2019 09:57



1 Attachment



St Helens Local Plan Submission Draft Network Rail ltr 07032019.pdf

FAO Planning Policy Team

Please find attached Network Rail's comments on the Local Plan Submission Draft.

From

**Diane Clarke**  
**Town Planning Technician LNW**  
**Network Rail**



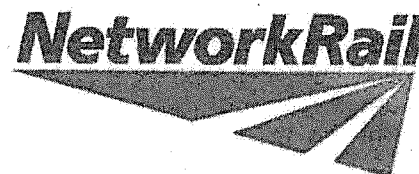
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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

\*\*\*\*\*



To:  
FAO  
Planning Policy Team  
St Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP

From: Town Planning Team LNW  
Network Rail  
1<sup>st</sup> Floor  
Square One  
4 Travis Street  
Manchester  
M1 2NY

Date: 7<sup>th</sup> March 2019

① - LPA10  
② - LPA07  
③ - LPA00

### St Helens Local Plan – Draft Submission

Thank you for consulting Network Rail on the St Helens Plan. We have the following comments to make.

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).

(1)

"Policy LPA10: Parkside East

e) achieve direct rail access to and from the Liverpool / Manchester ('Chat Moss') and the West Coast Main Lines (unless agreed otherwise by the Council);"

Feasibility work would be required to determine the potential of such a development, and to understand the availability of space to run freight in this already heavily congested area of the network.

(2)

The council states in their Transport and Travel Policy (LPA07) section (f) that they are looking to 'Protect former railway lines and corridors from development that could hinder their future re-use for sustainable modes of transport'.

Network Rail has submitted a pre-application notification with the Council for residential or residential led development at Parr Street in St Helens. It is located directly to the east of St Helens Central Railway Station (plans attached to covering email – sale area in blue). Network Rail has met with the council and there have been several meetings on the proposals.

Network Rail undertook a full industry consultation on the disposal of the site; it was determined that there were no firm plans from stakeholders to use any of the development site for future railway/transport proposals.

Following consultation, the Council felt that the development could be used for car parking however, Network Rail highlighted that parking could be located on the western side of the track closer to the station entrance and existing car park.

The Council also felt that some of the site could be used for a new rail link through the site including a new platform. However, there was no supporting evidence, no funding, no scheme or a firmed-up timeline to deliver this. The council's aspiration was based on planning policy dating back to the early 1990's. In light of this, the Office of Road and Rail (ORR) agreed with Network Rail's approach and provided formal consent to dispose. Therefore, we would request that you reflect this the local plan.

(3)

The Local Plan identifies a total of 7706 dwellings supply over the plan period.

Consideration should be given in Transport Assessments (TA) to the potential for increased footfall at Railway Stations

as a result of proposals for residential development / employment areas within the council local plan area. Location of the proposal, accessibility and density of the development, trip generation data should be considered in relation to the station. Where proposals are likely to increase footfall and the need for car parking at Railway Stations, the council should include developer contributions (either via CIL, S106) to provide funding for enhancements as part of planning decisions.

Yours faithfully

  
**Diane Clarke AssocRTPI**  
Town Planning Technician LNW  
Network Rail



PO3504



## St Helens Local Plan - Submission Draft Representations

[Redacted]

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:42

[Redacted]

### 2 Attachments



St Helens Local Plan Submission Reps 130319\_Final.pdf Representation Form\_CBRE.pdf

Good Afternoon,

Please find attached representations to the St Helens Local Plan Submission Draft Consultation by CBRE Ltd on behalf of iSec.

The following documents have been submitted:

- Local Plan Representation Form
- Letter with detailed response to Policy LPA10

I can confirm that CBRE wish to participate in the Examination in Public.

I would be grateful if you could confirm receipt of this email and attached representations.

Kind regards

Grace

Grace Allen MRTPI | Senior Planner  
Planning & Development  
CBRE Ltd  
55 Temple Row | Birmingham | B2 5LS

[Redacted]

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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;

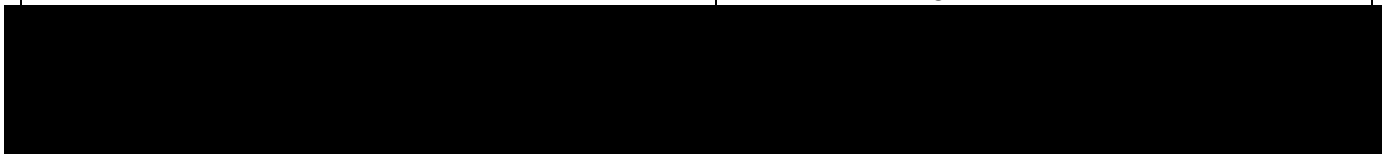
**Part A** – Personal Details

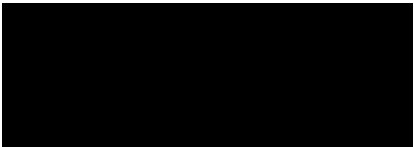
**Part B** – Your Representation(s).

**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: Mr
First Name: C/O Agent	First name: Richard
Last Name:	Last Name: Brown
Organisation/company: iSec	Organisation/company: CBRE Ltd
Address:	Address: 55 Temple Row Birmingham
Postcode:	Postcode: B2 5LS



<b>Signature:</b>		<b>Date:</b>	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.

**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	LPA10	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"/> X	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/> X	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"/> X
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/> 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 our client generally supports the policy and considers that it is sound, a minor modification is suggested which will ensure the policy is fully justified and consistent with national policy. Please see enclosed letter detailing our response.

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 enclosed letter detailing our proposed modification and justification.

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"/>	<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:

To ensure that policy LPA10 is the most appropriate and flexible for rail-served, and other, employment related development. Land at Parkside East is recognised as being critically important to the growth of St Helens and the wider Liverpool City Region and therefore is essential that the policy is clear and enables development of the whole site within the plan period.

**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.**

Development Plans  
St Helens Council  
Town Hall Annexe  
Victoria Square  
St Helens  
Merseyside  
WA10 1HP

13<sup>th</sup> March 2019

Dear Sir/Madam,

**ST HELENS BOROUGH LOCAL PLAN (2020-2035): SUBMISSION DRAFT  
CONSULTATION RESPONSE ON BEHALF OF iSec**

**INTRODUCTION**

These representations are submitted by CBRE in respect land at Parkside East, specifically draft Policy LPA10. CBRE act on behalf of iSec who have a potential interest in the land at Parkside East.

The main purpose of these representations is to express strong support for the proposed allocation at Parkside East as a unique and deliverable opportunity for a Rail Freight Interchange ("RFI") and strategic new employment development which will be of key importance to the continued growth of St Helens and the wider Liverpool City Region.

**THE NEED FOR PARKSIDE EAST**

By way of context, the following paragraphs provide an overview of various documents, including those forming the main evidence base underpinning the allocation of land at Parkside East. The need for a Rail Freight Interchange ("RFI") at Parkside is consistently identified in several strategic studies and assessments, as is the need to deliver major new employment at Parkside (and elsewhere), which can also take benefit from, and support investment in, an RFI.

The development of Parkside for an RFI (and more generally as a major logistics and manufacturing location) is acknowledged as being a critical component to the economic growth of St Helen's and the wider Liverpool City Region.

The evidence base for Parkside East is extensive and robust and along with draft Policy LPA10 is strongly supported by our client as an important location for growth and enables the policy to generally meet the tests of soundness identified in NPPF Paragraph 35.

**The St Helen's Employment Land Needs Study (October 2015)**

It is noted that major employment facilities, including logistics, require large unconstrained sites which allow for 24-hour operation close to the strategic road network and preferably with strong links to major

port facilities. As a general point, the study notes that St Helen's has an undersupply of employment for its population, represented by the relatively low numbers of existing businesses and a net outflow of commuters.

The logistics market in the area is identified as being strong and that Parkside as a location would be attractive to the market in the absence of an RFI, but that its connectivity to the motorway and rail network make this land ideal as a multi-modal freight interchange. It goes on to identify that the provision of a RFI will broaden further the appeal for space at Parkside.

### The St Helen's Employment Land Needs Study (October 2017, and Addendum January 2019)

The 2019 Addendum was commissioned to update evidence of employment land requirements and market conditions, and to assess the jobs growth potential of the St Helens Local Plan Preferred Options proposed employment allocations. Key conclusions can be summarised as including that:

- The warehousing and logistics market is performing strongly with further demand for growth in the regional market, including within St Helens, focussed particularly on the motorway corridors. The logistics sector, particularly large-scale major projects, will be a key driver of growth but with some growth also expected in manufacturing.
- The large-scale warehousing market has substantial land requirements across the Liverpool City Region, and St Helens could play a significant role in the provision of such land, especially given its proximity to the motorway network and the employment development around the former Parkside colliery (including a Strategic Rail Freight Interchange (SRFI)).
- Notwithstanding the high-level of demand, the development of large logistics space has been constrained over recent years by a shortage of supply in high quality, large, flat sites with excellent access to the motorway network and with planning support. Removal of these land supply constraints has / will generate renewed interest from occupiers for strategic locations in St Helens.

### The Parkside Logistics and Rail Freight Interchange Study (August 2016)

This study provides a significant body of evidence to underpin the allocation of land at Parkside. The key conclusions which support the development of a RFI and Parkside more generally can be summarised as follows:

- There is an improving narrative behind the North West and its regional economy which has served to enhance wider market perceptions of the region. There has been significant speculative development in the North West but (as noted in the employment land study), one of the key advantages to Parkside is that it will help to improve the supply of unconstrained available strategic site supply with strategic transport accessibility.
- The use of rail freight nationally has grown significantly and the ability to deliver a RFI at Parkside could be a real 'game changer'.
- In addition to the benefits of the RFI, the Parkside site's access to both the M6 and M62 is highly advantageous, meaning that Parkside has the potential to be an 'all points' operation to serve this part of the UK.
- The co-location of employment development on the site and in the immediate area of Parkside (Omega, Haydock, Logistics North for example) will enable the scale of supply and demand to



help to support the development of intermodal train services to be offered from the site to a range of different markets and locations.

## The Liverpool City Region Growth Strategy

Parkside is identified by the Liverpool City Region Local Enterprise Partnership as an intermodal infrastructure project of key importance to the successful delivery of the Liverpool SuperPort, a global freight and logistics hub serving the north of the UK. Development of Parkside can take advantage of regional developments such as the Liverpool 2 initiative and Atlantic Gateway at the Port of Liverpool, as well as opportunities that come from being part of both the Northern Powerhouse and the Liverpool City Region (LCR). As summarised in **Table 1** below, there are several other documents produced by the LCR that support / promote the delivery of Parkside to meet the economic and employment growth objectives of St Helens and of the wider City Region.

**Table 1: Summary of Liverpool City Region ‘Growth Documents’**

Document	Commentary
<b>A Transport Plan for Growth (2015)</b>	<p>This outlines five strategic projects. One of these is the creation of a freight and logistics hub, with the aim to put the City Region in the best place to respond to changes in the UK and international logistics market.</p> <p>The Plan recognises that improving connectivity and capacity for freight on road and rail networks opens up access to the Port from across the UK and is therefore fundamental to supporting economic prosperity of the Region. Parkside is recognised as key to achieving the SuperPort Hub.</p>
<b>Liverpool SuperPort Market Analysis Land &amp; Property Report (2014)</b>	<p>This provides an evaluation of demand and supply for land for logistics in the City Region over the next 20 years. The Report includes Parkside as a key site capable of accommodating part of an overall need for logistics facilities in the LCR and is therefore a crucial project to ensuring the successful delivery of SuperPort.</p>
<b>Liverpool City Region Long Term Rail Strategy (2014)</b>	<p>This sets out a vision for the role that an expanded rail offer can play in facilitating economic growth of the LCR. The strategy identifies how improving rail connections and logistic sites has particular benefit for the LCR as its peripherality for national distribution means that it is only by utilising lower-cost forms of transport, including rail and water, that the region can secure additional market share.</p> <p>The Strategy also recognises that there are plans for an increase in the number of strategic rail freight interchanges in the north. Parkside will therefore directly assist in rail capturing a greater market share for northbound goods entering the country via the south-coast ports.</p>
<b>B8 Land-use Forecasts for the Liverpool City Region (2016)</b>	<p>The report forecasts substantial growth in the large-scale warehouse market in the Liverpool City Region in coming years. St Helens, as an area with excellent access to the motorway network and key North-West markets, is well positioned to take a significant share of this market.</p>

## The Transport for the North (TfN) Freight and Logistics Strategy

TfN produced a Freight and Logistics Strategy in 2016 to consider opportunities to reduce the cost of freight transport and create new facilities to expand market share in the logistics sector and attract inward private sector investment to the Northern PowerHouse. One of the central recommendations is the

development of 50 hectares of rail and/ or water connected Multimodal Distribution Parks (MDPs) per year, to be located at the edge of urban centres.

Further to this Strategy, a Freight and Logistics Enhanced Analysis Report was issued by TfN in 2018. This Report forecasts significant growth in the amount of freight moved in the North of England between 2016 and 2050 (by 33% based on tonnes lifted or by 60% based on tonne kilometres). The action plan within the report outlines how one of the barriers to modal shift is the lack of multimodal terminals allowing the switch between road and rail/water.

### The National Policy Statement for National Networks (“NPS”) (2015)

Beyond the local and LCR evidence base documents discussed above, there is also a national imperative to deliver improvements to rail infrastructure as a driver for the country’s economic growth.

The NPS sets out Government policies for nationally significant rail and road infrastructure projects for England. It recognises that railways are a vital part of the UK’s transport infrastructure as a driver of economic growth and social development. The NPS strongly supports the need for an expanded network of RFIs in the UK. It highlights the importance of Rail Freight Interchanges in meeting the changing needs of the logistics sector and facilitating rail freight growth; supporting the UK economy through providing national and local benefits in terms of jobs and growth; and providing environmental benefits in terms of removing goods from the road network.

## THE UNIQUENESS OF THE PARKSIDE EAST OPPORTUNITY

As has already been identified, the provision of a RFI provides for something unique for the area. Unlike other land within St Helen’s, land at Parkside East (and West) can accommodate major new manufacturing and logistics development with the potential to have a direct connection to the rail network through its location adjacent to a RFI. Whilst the RFI will be able to service other locations in the area, the overall opportunity presented by Parkside cannot be replicated at other sites in St Helens, including at non-Green Belt sites, where there is no ability to create a significant rail facility to which major employment could be directly linked.

In terms of the RFI at Parkside, it is also better than most of the other possible rail-connected sites outside of St Helen’s potentially able to service the LCR because it has connections to two rail lines – north-south via the West Coast Main Line and east-west via the Chat Moss Line.

Alongside its proximity to the motorway network (Parkside is located at Junction 22 of the M6), the RFI will help to establish Parkside as an ‘all points operation’ with road and rail access across the LCR, including connectivity to the SuperPort in Liverpool and also to other parts of the UK. This will support the ambitions of the LCR (and St Helen’s Council) to bring significant investment and employment opportunities to the region.

The focus for growth in the M6 corridor area is for major logistics and land at Parkside, with or without a RFI, would be attractive to the market for the reasons previously explained. In this regard, it is noteworthy that major improvements to road accessibility to and around Parkside is being delivered which will further enhance its attractiveness. For example:

- Highways England has recently instructed a contractor to design and build a smart motorway on an 11 mile stretch between junctions 21a and 26. This is expected to be complete in Spring 2021.

One of the aims of the smart motorway is to support the economy and facilitate economic growth in the region; and

- Delivery of the Parkside Link Road in 2020/21 to fully open-up the development opportunity at Parkside (also see later sections of this letter).

The provision of an RFI will help to stimulate new demand in the logistics sector. Such a facility could however also encourage the growth of new sectors at Parkside, such as in major manufacturing and innovation hubs which can also take advantage of connectivity to major road and rail infrastructure. Such an approach would mirror the work iSec are currently undertaking at Thames Enterprise Park in Thurrock (further details are provided below).

## DELIVERABILITY

There are several important factors which support the deliverability of land at Parkside East for an RFI and major logistics and manufacturing development. These, inter alia, include the following:

### Involvement of a Proven Delivery Partner

iSec is keen to work with St Helens Council as a potential partner to bring forward the development of Parkside East. iSec is part of the Marcol Group, a privately owned and funded property company, operating in the industrial, residential, office, retail, hotel and healthcare sectors. iSec specialises in industrial development and asset management, with total assets under management valued at £2.5bn. Current pipeline includes:

- 665,000sqm of logistics development;
- 320ha of strategic land;
- 6,000 residential units; and
- 4 major strategic sites in the UK.

In addition to the above, iSec, along with their JV partner Greenergy, recently submitted a planning application for 167ha of brownfield land in the Thames Estuary for circa 480,000sqm of predominantly B2/B8 with an Energy Park, Food Park and Sustainable Industries Park, and land set aside for a rail freight terminal. Work on the remediation of this site as already started, and the first phase should be ready for development from 2020.

Other developments on site include the redevelopment of the former Rolls Royce East Works site at Filton, a 65 hectare site known as Horizon 38. Permission was granted in 2015 for up to 111,500sqm, with around 53,885sqm being developed speculatively for B2/B8 and the remainder for mixed use leisure, commercial and car dealerships. A global technical centre (10,590sqm) has recently been developed for GKN, as the overall site nears completion.

Remediation work is currently ongoing on the former Coalite chemicals and coking works site in Derbyshire, a 60ha site with outline permission for B2/B8. iSec have worked over a number of years with the Local Enterprise Partnership and Councils to secure funding to overcome some complex remediation and viability issues, as well as with HS2 to ensure that the masterplan is deliverable in light of recent safeguarding. The first phase of this development is expected to start on site later this year.

The above demonstrates a strong track record in not only securing planning permission on complex sites, but also the delivery of these sites, often overcoming issues of remediation and wider connectivity to deliver development to the market and create clusters of specialist sectors within the wider B2/B8 use classes.

### Market Demand

As emphasised elsewhere in these comments, it is widely accepted that land at Parkside will be highly attractive to major occupiers seeking a strategically located and highly accessible location in the M6 corridor.

Evidence suggests that the Parkside site would be attractive to the market for major logistics (and manufacturing) development in the absence of an RFI but that its connectivity to the motorway and rail network make this land ideal as a multimodal freight interchange. Along with the SuperPort, the RFI is recognised as being a driver for growth, having the potential to increase demand for employment land in the region, including within St Helen's, particularly for B8 and B2 uses.

There is a recognised need for a RFI to support the growth of the LCR and Parkside East offers an excellent location for this as well as for major commercial employment development. RFI's require large areas of land and generate substantial activity throughout the day and night, 7 days a week. Such facilities therefore suit out of urban areas locations (e.g. well-connected countryside locations which are not directly next to urban residential areas), and are typically large, flat types. Parkside East is very well suited in this regard. It also outperforms other potential RFI locations that could serve the City Region, including in terms of the degree of rail connectivity it can provide. The development of Parkside West (which has been planned to be able to provide for future connection to a RFI at Parkside East in the future), along with employment at Parkside East itself, will further support the rationale and delivery of the RFI, along with the various other major existing and proposed major commercial developments in the area.

In summary, the location and scale of the site, together with the opportunity for major new employment growth to be served by rail with the development of an RFI, makes Parkside East a unique opportunity for the area and an important component of the overall growth strategy for St Helen's and the wider City Region area.

### Parkside Link Road

As noted previously, Parkside East is strategically positioned at Junction 22 of the M6 motorway. Additionally, it is important to highlight that delivery of the Parkside Link Road ("PLR"), which is expected by 2021, will fully open up the development of Parkside, including Parkside East. Major infrastructure funding towards the delivery of the PLR was secured in October 2018 through the Liverpool City Region Single Investment Fund. Detailed planning permission for the road is expected in 2019 and it is understood that the Council is working collaboratively with Highways England to facilitate delivery of the scheme and the major development at Parkside that this will support.

### DRAFT POLICY LPA10

Our Client iSec wishes to express strong support for the proposed allocation at Parkside East. This includes the principle of an RFI and the potential to deliver 'other forms of B2 and B8 employment'. The provision of an RFI in this location is recognised as an important element to overall delivery of land at Parkside East,

which should be complemented by the ability to develop major new manufacturing and logistics space to take advantage of the site's excellent connectivity.

To maximise the deliverability of Parkside East, we recommend a minor modification to the wording of the existing draft policy which currently requires a minimum of 60 hectares of Parkside East to be a SRFI. This minimum size appears to be based on the NSIP threshold as set out in the Planning Act 2008, rather than other evidence base information which does not generally specify the size of the RFI at Parkside.

Paragraph 4.36.16 of the Submission Plan explains that the Council reserves 60ha of land at Parkside East to provide related rail and road infrastructure and landscaping. If this is the intent of the Policy, and the 60 hectares is not also intended to include rail-served warehousing and manufacturing (as would normally be included as part of a SRFI), then setting aside this amount of land specifically for rail and road infrastructure may be excessive. For example, the East Midlands Rail Freight Terminal, whilst covering a total of 283ha of land, incorporates a Rail Freight Interchange (including rail sidings, infrastructure and associated container storage and HGV parking) of 20ha, considerably smaller than the 60ha referenced in the Submission Plan.

Similarly to the East Midland Rail Freight Terminal, iPort Doncaster is a rail-served employment development covering 136ha, of which 14ha comprises the Rail Freight Terminal (including rail sidings, infrastructure and associated container storage and HGV parking). This site was also formerly Green Belt site, as is Parkside East, and has let to major occupiers such as Amazon and Lidl.

Should the rail freight interchange infrastructure at the site require a smaller land area than identified in the policy, this should not fetter the opportunity to deliver additional B2 and B8 employment development at the site in its place, particularly if this includes rail served warehousing and manufacturing. This approach would better ensure that the Policy does not restrict flexibility and deliverability in line with NPPF paragraphs 81 and 82.

We therefore suggest that the minor amends to the wording of Part 2 of Policy LPA10 so that it reads as follows (text to be deleted is shown as ~~striketrough~~) and is therefore fully justified and consistent with national policy:

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2. The site is also considered suitable in principle for other forms of B2 and B8 employment use provided that they would:

- a) bring significant inward investment, local employment and training benefits for the local community; and
  - b) (i) be rail served (i.e., requiring on-site access to a railway); or  
(ii) be of a layout and scale that would not prejudice the ability to develop an effectively laid out SRFI or other rail served employment development (including any necessary rail and road infrastructure, buildings and landscaping),  
~~on at least 60 hectares of the site, at any time in the future.~~
- 

Paragraph 4.36.16 of the Submission Plan should also be amended to reflect the above comments.

## SUMMARY

It is clear from the evidence base which helps to inform the local plan that land at Parkside makes an important contribution to the supply of deliverable and strategically accessible employment land in the M6 motorway corridor, particularly for / in support of the logistics (and manufacturing) sectors. Our client

supports the key findings of the evidence base, which is considered to provide a robust basis for the emerging policy which flows from this.

There is a need to boost the supply of deliverable employment opportunities to cater for major investors who require large, unconstrained and highly accessible land opportunities. The ability for Parkside to deliver a RFI, alongside major manufacturing and logistics development, will be a 'game changer' and is a highly important part to the delivery of the overall growth strategy for St Helen's and the City Region.

Parkside East is a unique and deliverable opportunity and our Client strongly supports its allocation through draft Policy LPA10. The body of evidence, and the recognised substantial economic benefits Parkside East would bring help to justify the exceptional circumstances for the release of land from the Green Belt.

In order to maximise flexibility and deliverability, whilst not diluting the purpose and aims of this policy, a minor amendment to its wording is recommended, and is therefore considered to fully meet the NPPF tests of soundness.

I trust that the above responses are of assistance in informing the next stages of the St Helens Local Plan. Should you have any queries or require further details, please do not hesitate to contact me on [REDACTED]

Yours faithfully,

[REDACTED]  
RICHARD BROWN  
DIRECTOR

FOR AND ON BEHALF OF CBRE LTD.

PO3505

**Representor Details**

Web Reference Number	WF0399
Type of Submission	Web submission
Full Name	Mrs Melanie Boulton
Organisation	
Address	93 Winwick Road WA12 8DB
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	Justification of removing Site 7EA from Greenbelt at Parkside East and West, Newton-le-Willows
Paragraph / diagram / table	4.36.14 and 4.36.15
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.**

The plan is unsound being contrary to strong public objection to the site being removed from Green Belt, inappropriate development in respect of adjacent residential areas, and the likelihood of significant increased traffic impacts and associated health impacts caused by depreciated air quality. Site traffic is also likely to further depreciate air quality in Air Quality Management Areas in vicinity of the site caused by increased traffic levels. The previous Prologis application which included development on both Parkside East and Parkside West anticipated introducing 17,000 extra vehicles/day to our local road network.

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

A much smaller development would be appropriate sited on the former footprint of the colliery. This would significantly reduce the anticipated increase in traffic levels and depreciation of air quality for residents. It would also mitigate the harm to wildlife.

**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	3/1/2019 9:55:39 AM
---------------	---------------------

PO3506

E60095



local plan  
D HULL  
to:  
planningpolicy  
12/03/2019 14:20



SHU 8111

① - LPA05

② - LPD01

③ - LPA11

In response to the St Helens Council Local Plan 2020-2035.

This statement relates to site 8HA in Rainford.

This site is an area of grade one agricultural land being used by a local farmer for crop cultivation and supplying local supermarkets.

It lies within the green belt surrounding the village.

National policy guidelines relating to green belt land state that this land should be released for development only in EXCEPTIONAL circumstances.

There are no EXCEPTIONAL circumstances in this case.

St Helens has a falling population and house prices within the area are below the national and local average. There are also a significant number of empty properties within the borough.

There are a number of brownfield sites within the borough. Enough to achieve the Council's targets for house supply now and well into the future.

Choosing this greenbelt land 8HA for development negates 4 out of 7 of the Council's initial aims and objectives.

\* It does NOT ensure strong, sustainable economy.

\* It will NOT enhance quality of life for local residents.

\* No extra resources or infrastructure will be allocated to the village to cope with the increase in population.

\* It does not promote sustainable transport.

LPD01 states that any development should avoid causing harm to amenities of the local area and surrounding residential and other land users and occupiers.


LPA11 states that any development should maximise levels of accessibility between homes, educational establishments, jobs, public transport services, health and other services. There should be no negative effects on air quality and no increase in pollution.

This development fails to deliver the stated criteria in all these areas. It should not be passed.

Margaret Hull.

PO3507

ELO211


 RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2

1 Attachment


 41575\_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,  
Melissa
**Melissa Wilson**  
**Senior Planner**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

 ① LPA01  
 ② LPA02  
 ③ LPA03  
 ④ LPA04  
 ⑤ LPA05  
 ⑥ LPA05  
 ⑦ LPA05  
 ⑧ LPA05.1  
 ⑨ LPA06

⑩ LPA07

⑪ LPA08

⑫ LPA09

⑬ LPA11

⑭ GBR

⑮ EVA

⑯ LPC01/2

⑰ LPC02

⑱ LPC13

⑲ LPD01

⑳ LPC01/3

㉑ LPC05

㉒ LPD01

㉓ LPD02

㉔ LPC01/5

㉕ LPC10

㉖ LPD01

㉗ LPD03

㉘ LPC01/6

㉙ LPC12

㉚ LPD01

㉛ LPD07

㉜ SHMA

Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseYorPfo>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

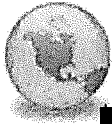
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

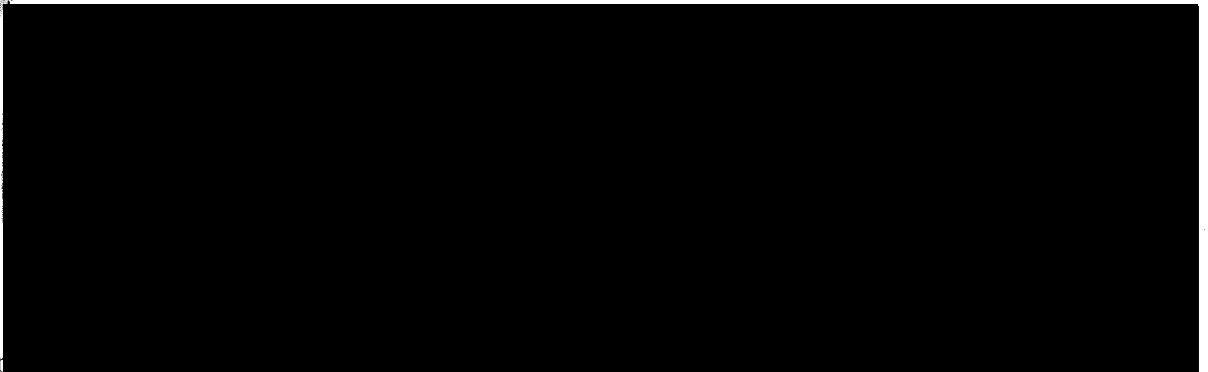
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Think of the environment. Please avoid printing this email unnecessarily.



Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2  
[NLP-DMS.FID606600]  
Brian O'Connor



1 Attachment



SPLIT 41874\_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19\_Part\_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseY9rPfO>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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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: Mr
First Name: Kate	First name: Brian
Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood	Address: Ship Canal House 98 King Street Manchester
Postcode: WA3 6GR	Postcode: M2 4WU
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

<b>Signature:</b> [REDACTED]	<b>Date:</b> 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.



**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	
See cover letter		See cover letter		See cover letter					
Other documents (please name document and relevant part/section)				See supporting Representations and Appendices					

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?	<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 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 supporting Representations and Appendices

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 supporting Representations and Appendices**

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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)

			<b>Yes, I wish to participate at the oral examination</b>
--	--	--	---

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

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

EL0211

## **St Helens Local Plan Soundness Representations**

Taylor Wimpey UK Limited

13 March 2019

**LICHFIELDS**

41874/03/SPM/MWI  
17081285v8  
17081285v8

## 12.0 **Policy LPA11: Health and Wellbeing**

### **Introduction**

- 12.1 Policy LPA11 seeks to ensure new development promotes the health and wellbeing of the local community in St Helens. ✓

### **Consideration of Policy**

- 12.2 As a responsible developer, TW acknowledges the need to ensure that new developments have a positive impact on the health and well-being of the surrounding environs. TW supports the requirement in Part 1 to encourage access to a choice of homes and jobs; and note the Council should increase the supply and delivery of both homes and jobs to meet local need and reduce affordability issues. Notwithstanding this, it is important that any policy requirements relating to amenity, design and layout of new development is in accordance with national guidance and building regulations and it does not affect development viability. (13)
- 12.3 TW considers the requirement of Part 6 to encourage measures to achieve "affordable warmth" to be onerous and suggest this is further explained in the explanatory text. The Local Plan does not define what is meant by 'affordable warmth' and as such no consideration of its impact on development viability can be determined. }

### **Tests of Soundness**

- 12.4 TW considered Policy LPA11 to be sound "affordable warmth" is deleted. ✓

### **Recommended Change**

- 12.5 TW considers that no further change to the policy is required, other than to delete "affordable warmth" from the policy. ✓

PO3508





St. Helens  
Council

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

Ref: LPSD

01 MAR 2019  
(For official use only)

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[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

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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

(we will correspond via your agent)

Title: Mrs

First Name: Shirley Manley

Last Name: Manley

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

Address: 34 smock Lane

Garswood

Postcode: WN4 0SN

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

Mobile: \_\_\_\_\_

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

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

Title: \_\_\_\_\_

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

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

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

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

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

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

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

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

Signature: \_\_\_\_\_

Date: 28/2/19

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

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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)

or by email to:

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

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Telephone: **01744 676190**

## NEXT STEPS

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## 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?

HA- HS

Policy LP08 LP09 LP11 LP12 LP04	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 checked="" 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 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.

no infrastructure for ex-council house / no schools  
 doctors / dentist to support / use Ashkan as the  
 doctors could never give appointments 2 weeks  
 there are 500 more gangs to help  
 cost of child to go to Wigan School as none in Area  
 5K + 5K policy not to build any more (500 jobs  
 child & more)  
 Junction 23 cant support 1 travel to Manchester  
 it would cause extra hour a hour to an the other  
 long drive / which also increase pollution & health  
 and mental health issues it will cause this  
 Junction has taken the biggest hit at all and Haydon  
 and it will continue to decline if more buildings  
 is done  
 Brexit require 5 grow own, so grade 2 fields  
 are needed to supply food - figures don't support  
 can't. figures

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.

- Infrastructure in place for existing houses
- schools to be built + floodings to be rectified - provisions for increase of pollution on health of community!
- Train station to be upgraded to acomoder Prangs / Disabled /
- Brown field sites to be exhausted. Still a lot available which are not being used.
- Mental Health provisions as decrease in Greenbelt will cause depression.

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 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.**

PO3509



270

PF 0249

Ref: LPSD

01 MAR 2019  
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# 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)**

## 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>MISS</u>	Title: .....
First Name: <u>LEAH</u>	First name: .....
Last Name: <u>GLYNNE-MANLEY</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>34 Smack Lane</u> <u>Garswood St</u>	Address: .....
Postcode: <u>WN4 0SN</u>	Postcode: .....
Tel No: .....	Tel No: .....
Mobile: [REDACTED]	Mobile No: .....
Email: .....	mail: .....

Signature: [REDACTED]	Date: <u>28-2-19</u>
-----------------------	----------------------

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

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Town Hall  
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St Helens  
WA10 1HP**

or by hand delivery to:

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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?

1HA 1H5

Policy LPA12 LPA11 LPA07 LPA08 LPA04	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?

☒ Yes

☐ No

Sound?

☒ Yes

☐ No

Complies with the Duty to Cooperate

☒ Yes

☐ 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?

☐

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.

Brexit requires us to be more self-sufficient so loss of grade 2 fields - No schools to support high increase in pollution so increase in health problems no budget / health to support increase St Helens population has declined and is continue to so no need to build these houses as OAN doesn't support this number - Traffic junction 23 is already under strain with this plus Franda farm it would be a major standstill - Mental health will decline due to the amount of greenbelt already taken in this area - Cost of sending child to Wigan is 5K so doesn't make cost effective for St Helens

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.

- Provision to be made for secondary & primary schools + flood risk area.
- Health service that exist - not a baby clinic.
- Transport - regular trainings taken and regular maintenance facilities in station required.
- Shop was stopped due to high traffic in area.
- There is 500 plus cows going to affect area if one shop is stopped?
- Better provision required of farmland. Required to support this.

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
-------------------------------------	--	--------------------------	--

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PO3510





St Helens  
Council

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01 MAR 2019

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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

(we will correspond via your agent)

Title: Mr R Glyn Hanley

First Name: Reece

Last Name: Glyn Hanley

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

Address: 34 Smock Lane

Garswood

Postcode: WN4 0SN

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

Mobile: \_\_\_\_\_

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

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

Title: \_\_\_\_\_

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

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

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

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

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

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

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

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

Signature: \_\_\_\_\_

Date: 28/2/19

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

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or by hand delivery to:

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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? <b>1+1A / 1+1S</b>							
Policy <b>LPA01</b> <b>LPA11</b> <b>LPA08</b>	<b>1</b> <b>2</b> <b>3</b>	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 checked="" 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 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.

no schools or secondary schools being built.  
Junction 23. Extra 500 plus cars on a already  
dangerous junction to many houses being built  
around Garwood / Haydock for this  
junction to support major accidents happen  
regularly - 20min journey times. I have  
for transport support Disabled / Trans / Station  
inadequate / already taken a lot of Green belt  
from area. It can be a town car construction which  
will affect pollution + Traffic to high levels  
A sign will increase  
No powers to support increase as decline  
in area - No mention of new schools

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.

Step Building in Haydock Barwood -  
 it is over used now cannot support  
 Junction 23 - high levels - Health risk.  
 Improve infrastructure of Barwood houses  
 now - Flooding / Grade 2 farmland needed -  
 Build Secondary School as none  
 to support / we use Wigan Council now  
 costing £500k a year <sup>per head</sup> which can't  
 justify use - or money council spend

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
-------------------------------------	--	--------------------------	--

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

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

PO3511



Policy Response - St Helens  
Ben Fox  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 16:31



1 Attachment



Response to Policy LPA11.docx

Dear Sir/Madam,

Please find attached our response to draft policy LPA11.

Can you please confirm receipt?

Kind Regards

*Benjamin Fox MPLAN (Hons) MRTPI*  
Planware Ltd





**Planware Ltd on behalf of McDonald's Restaurants Ltd**

① = LPA11

**Objection Response to St Helen's Local Plan Publication Draft 2019**

**Policy LPA11 – Health and Wellbeing**

**1 Introduction**

- 1.1 We have considered proposed Policy LPA11 – Health and Wellbeing – with regard to the principles set out within the Framework. This response follows Planware's response to the scoping document for the local plan in January 2016. We fully support the policy's aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy's objective. ①
- 1.2 Within these broad points we have the following policy objections to draft Policy LPA11:
- A. The policy is inconsistent, discriminatory and disproportionate.
  - B. Examination of other plans have found similar policy approaches to be unsound.
  - C. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework. ①
- 1.3 In summary, Planware Ltd consider there is no sound justification for a policy such as Policy LPA11, Point 4, even though it makes an effort to encompass other use classes, it singles out Hot food takeaways. Restaurants, cafes and other uses do not usually have an SPD written in detail to control their location and how they are run.
- 1.4 As stated in the opening paragraph, Planware Ltd supports the aim of promoting healthier living and tackling the obesity crisis. We acknowledge that planning can have a role in furthering these objectives. We would therefore welcome and support any studies between obesity and their relationship with development proposals, including examination of how new development can best support healthier lifestyles and tackling the obesity crisis. When a cogent evidence base has been assembled, this can then inform an any appropriate policy response. This has still not emerged. ①
- 1.5 Given the lack of any clear agreement between experts on the indices of obesity or poor health, analysing the evidence is a necessary part of this objection by way of background. This will all be highlighted in the below text. ①
- 1.6 This response is detailed on proposed Policy LPA11 being read in conjunction with the Hot Food Takeaway SPD. ①

## 2 Contribution of McDonald's UK to the United Kingdom

- 2.1 This section of the objection sets out some background context relating to McDonald's own business, its contribution to United Kingdom, and information on the nutritional value and healthy options of the food that it offers in its restaurants. This evidence is relevant to understanding the adverse and unjustified impacts of the blanket ban approach proposed under draft Policy LPA11 in conjunction with the SPD.

### ***Economic and Environmental Benefits***

- 2.2 The first store in the United Kingdom was first opened in 1974 in Woolwich, London. The store is still opened and was interestingly the 3,000<sup>th</sup> store across the world.
- 2.3 With over 36,000 McDonald's worldwide, it operates in over 100 countries and territories. Approximately 120,000 people are employed by McDonald's UK, compared to just over 1 million employees worldwide.
- 2.4 McDonald's and its franchisees have become important members of communities in the United Kingdom: investing in skills and developing our people, supporting local causes and getting kids into football.
- 2.5 Nationally, the company operates from over 1,300 restaurants in the UK. Over 80% of restaurants are operated as local businesses by franchisees, that's around 1,100 franchised restaurants.
- 2.6 McDonald's is one of few global businesses that continues to anchor itself in high streets and town centres across the United Kingdom. Not just serving the general public but creating jobs and seeking to improve the communities around them.
- 2.7 All McDonald's restaurants conduct litter picks covering an area of at least 100 metres around the site, at least three times a day, picking up all litter, not just McDonald's packaging.
- 2.8 McDonald's is a founding member of the anti-littering campaign, Love Where You Live. As part of this, our restaurants regularly organise local community litter picks. The campaign has grown and in 2017, 430 events took place across the UK with around 10,000 volunteers involved. Since the campaign started, 2,600 events have taken place with around 80,000 volunteers involved.
- 2.9 McDonald's restaurants are operated sustainably. For example, their non-franchised restaurants use 100% renewable energy, combining wind and solar and use 100% LED lighting which means we use 50% less energy than fluorescent lighting. All of their used cooking oil is converted into biodiesel for use by delivery lorries. Their entire fleet of lorries runs on biodiesel, 40% of which comes from McDonald's cooking oil. This creates over 7,500 tonnes fewer CO2 emissions than ultra-low sulphur diesel.
- 2.10 All new McDonald's restaurants in the United Kingdom are fully accessible and we are working toward delivering this same standard for all existing restaurants.
- 2.11 McDonald's restaurants provide a safe, warm and brightly lit space for people, especially those who may feel vulnerable or threatened waiting for a taxi or outside.



- 2.12 Many of their toilets are open to all members of the public. They are one of few night time premises that offer this service and given the fact restaurants are located in some of the busiest parts of the country, McDonald's are helping to keep the United Kingdom cleaner.

### ***Nutritional Value of Food and Healthy Options***

- 2.13 McDonald's offers a wide range of different food at its restaurants.
- 2.14 Nutritional information is easy to access and made available online, and at the point of sale on advertising boards, as well as in tray inserts. Information is given on calorie content and key nutritional aspects such as salt, fat and sugar content. This enables an individual is able to identify and purchase food items and combinations that fit in with their individualised calorie or nutritional requirements.
- 2.15 The menu offer includes a range of lower calorie options, some of which are set out in the on the next page.
- 2.16 The restaurants now suggest meal bundles to assist customers in making informed, healthier choices. McDonald's have suggested "favourites" meal bundles, across the breakfast and main menu that enable the choice of low-calorie options to be made even more easily. These 3-piece meal combinations will all be under 400kcal on the breakfast menu, and all under 600kcal on the main menu (with many options under 400kcal on the main menu also), and all individual items on these menu bundles will be either green (low) or amber (medium) on the Food Standards Agency traffic light system for food labelling.
- 2.17 Examples of low calorie (less than 400kcal) breakfast options (where no single item is red for FSA) include any combination of the following:
- Egg & Cheese McMuffin / Egg & cheese snack wrap / bagel with Philadelphia / porridge; with fruit bag; and a medium black coffee, or espresso or regular tea or water.
- 2.18 Examples of low calorie (less than 600kcal) main menu options (where no single item is red for FSA) are included in the table below. Some 90% of our standard menu is under 500 calories.

N/A



Main	Side Options	Drinks Options	Total Calories *varies depending on side & drink choice
The Garlic Mayo Chicken One – grilled wrap	Fruit Bag – Pineapple Stick  Carrot Sticks  Side Salad with Fajita Dressing	Diet Drink  Water  Medium Black Coffee  Regular Tea	Between  379-390kcal
The Sweet Chilli Chicken One – grilled wrap	Fruit Bag – Pineapple Stick  Carrot Sticks  Side Salad with Fajita Dressing	Diet Drink  Water  Regular Tea  Medium Black Coffee	Between  374-383kcal
Grilled Chicken & Bacon Salad with Fajita Dressing	Fruit Bag – Pineapple Stick  Carrot Sticks	Diet Drink  Water  Regular Tea  Medium Black Coffee	Between  238-247kcal

- 2.19 Those specifically wanting a meal low in either fat, salt, or sugar, can tailor their choices accordingly. Any combination of menu items sold at McDonald's can be eaten as part of a calorie controlled nutritionally balanced diet. Customers alternatively eat anything from the menu allowing for this within their overall daily, or weekly nutritional requirements.

#### ***Quality of Ingredients and Cooking Methods***

- 2.20 McDonald's are always transparent about both their ingredients and their processes and strive to achieve quality. Their chicken nuggets are made from 100% chicken breast meat, burgers are made from whole cuts of British and Irish beef. Coffee is fair trade and their milk is organic. McDonald's want their customers to be assured about what they are consuming. The 'Good to Know' section on our website - <https://www.mcdonalds.com/gb/en-gb/good-to-know/about-our-food.html> - provides a range of information about their processes and where produce is sourced from.

**Menu Improvement and Reformulation**

- 2.21 McDonald's is actively and continuously engaged in menu reformulation to give customers a range of healthier options. Louise Hickmott, Head of Nutrition, at McDonald's UK, has provided a letter giving examples of the steps that have been taken in recent years. The information is summarised below.
- 2.22 In recent years McDonald's has made great efforts to reduce fat, salt and sugar content across their menu.
- 89% of their core food and drink menu now contains less than 500 kcals.
  - Supersize options were removed from their menu in 2004;
  - 72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government's nutrient profile model;
  - Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z);
  - Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot sticks, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk;
  - Customers can swap fries for fruit bags, carrot sticks or shake salad on the main menu, or the hashbrown for a fruit bag or carrot sticks on the breakfast menu, at no additional cost;
  - In 2014, McDonald's introduced "Free Fruit Fridays" resulting in 3.7 million portions of fruit being handed out. Since then, discounted fruit is now available with every Happy Meal.

**Fat**

- 2.23 A recent meta-analysis and systematic review of 72 studies (45 cohort studies and 27 controlled trials) demonstrated that with the exception of Trans Fatty Acids (TFA), which are associated with increased coronary disease risk, there was no evidence to suggest that saturated fat increases the risk of coronary disease, or that polyunsaturated fats have a cardio-protective effect, which is in contrast to current dietary recommendations (Chowdrey et al, 2014).
- 2.24 However, UK guidelines currently remain unchanged; men should consume no more than 30g of saturated fat per day, and women no more than 20g per day (NHS Choices, 2013). It should be remembered that all fats are calorie dense (9kcal/g) and that eating too much of it will increase the likelihood of weight gain and therefore obesity, indirectly increasing the risk of coronary heart disease, among other co-morbidities.
- 2.25 What have McDonald's done?
- Reduced the saturated fat content of the cooking oil by 83%;
  - Signed up to the Trans Fats pledge as part of the Government's "Responsibility Deal";
  - The cooking oil has been formulated to form a blend of rapeseed and sunflower oils to reduce levels of TFA to the lowest level possible;
  - They have completely removed hydrogenated fats from the vegetable oils;
  - Reduced the total fat in the milkshakes by 32% per serving since 2010;
  - Organic semi-skimmed milk is used in tea/coffee beverages and in Happy Meal milk bottles, with lower saturated fat levels compared with full fat variants.



**Sugar**

- 2.26 Dietary carbohydrates include sugars, starches and fibre, and each has approximately 4kcal/g.
- 2.27 The Scientific Advisory Commission on Nutrition (SACN) currently recommends that approximately 50% of total dietary energy intake should be from carbohydrates (SACN Report, 2015). In 2015 SACN recommended that the dietary reference value for fibre intake in adults be increased to 30g/day (proportionally lower in children) and that the average intake of "free sugars" (what used to be referred to as non-milk extrinsic sugars) should not exceed 5% of total dietary energy, which was in keeping with the World Health Organisation (WHO) recommendations.
- 2.28 Current average intake of free sugars far exceeds current recommendations, and excess intake is associated with dental issues and excess calorie intake which can lead to weight gain and obesity.
- 2.29 Over the last 10 years our reformulation work has resulted in 787 tonnes less sugar across our menu in 2017 versus 2007. What have McDonald's done?
- Reducing the sugar in our promotional buns, this removed 0.6 tonnes of sugar
  - Their Sweet Chilli Sauce has been reformulated to reduce sugar by 14% this equates to 155 tonnes of sugar removed
  - Their Festive Dip has removed 4 tonnes of sugar
  - Their famous McChicken Sandwich Sauce has reduced in sugar 45%
  - Their Tomato Ketchup has reduced in sugar by 20% which equates to 544 tonnes of sugar removed from the system
  - Their Chucky Salsa has reduced in sugar by 28%
  - Since 2016 they have reduced the sugar content of Fanta by 54%
  - The Toffee Syrup in their Toffee Latte has been reformulated to remove 20% of the sugar
  - McDonald's have also reformulated their Frozen Strawberry Lemonade this has led to 8% sugar reduction per drink
- n/a

**Salt**

- 2.30 A number of health-related conditions are caused by, or exacerbated by, a high salt diet. The strongest evidence links high salt intake to hypertension, stroke and heart disease, although it is also linked with kidney disease, obesity and stomach cancer (Action on Salt website).
- 2.31 Salt is often added to food for either taste or as a preservative, and in small quantities it can be useful. Adults in the UK are advised not to exceed 6g of salt per day, but the average intake at a population level is consistently higher than this.
- 2.32 Salt does not directly lead to obesity; however, it does lead to increased thirst, and not everyone drinks water or calorie-free "diet" beverages. If our thirst increases and leads to increased consumption of calories from extra fluid intake, then this may lead to increased weight and obesity. 31% of fluid drunk by 4-18-year-old children is sugary soft drinks (He FJ et al, 2008), which has been shown to be related to childhood obesity (Ludwig DS et al, 2001).

2.33 What have McDonald's done?

- The salt content across the UK menu has been reduced by nearly 35% since 2005;
- Customers can ask for their fries to be unsalted;
- The salt added to a medium portion of fries has been reduced by 17% since 2003;
- The average Happy Meal now contains 19% less salt than in 2006
- Chicken McNuggets contain 52% less salt than in 2003.

2.34 The process continues. McDonald's have recently made the following changes to further improve their menu

- Making water the default drink in the Happy Meals;
- Making it easier for people to understand the existence of a wide range of under 400 and 600 calorie meal options that are available.

**Third Party Opinions of McDonald's**

2.35 McDonald's regularly receive supportive comments from independent third parties.

2.36 Professor Chris Elliott, of the Department for Environment, Food & Rural Affairs' independent Elliott Review into the integrity and assurance of food supply networks: interim report, December 2013:

*"Each supply chain is unique, showing that there is no single approach to assuring supply chain integrity. The review has seen many examples of good industry practice that give cause for optimism. There is not space within this final report to reference all the good industry practices but those that have stood out include McDonald's and Morrisons."*

2.37 Jamie Oliver, the TV chef, food writer and campaigner speaking in January 2016 at the Andre Simon Food & Drink Book Awards to the Press Association:

*"Everyone always liked to poke at McDonald's. McDonald's has been doing more than most mid and small-sized businesses for the last 10 years. Fact. But no one wants to talk about it. And I don't work for them. I'm just saying they've been doing it - 100% organic milk, free range eggs, looking at their British and Irish beef."*

2.38 Raymond Blanc, the TV chef and food writer, speaking in 2014, after having presented McDonald's UK with the Sustainable Restaurant Association's Sustainability Hero award:

*"I was amazed. All their eggs are free-range; all their pork is free-range; all their beef is free-range."*

*"[They show that] the fast-food business could change for the better. They're supporting thousands of British farms and saving energy and waste by doing so."*

*"I was as excited as if you had told me there were 20 new three-star Michelin restaurants in London or Manchester."*

2.39 Marco Pierre White, TV chef and food writer, speaking in 2007:

*"McDonald's offers better food than most restaurants and the general criticism of the company is very unfair."*

N/A



*"Their eggs are free range and the beef is from Ireland, but you never hear about that. You have to look at whether restaurants offer value for money, and they offer excellent value."*

These comments below represent independent opinions

***Supporting Active and Healthy Lifestyles among Employees and Local Communities***

- 2.40 McDonald's is focused on its people and is proud to have been recognised for being a great employer. For example:

Great Place to Work 2017 'Best Workplaces' – McDonald's are ranked 4th on the Great Place to Work 2017 'Best Workplaces' list (large organisation). This is our 11th year on the list.

- The Sunday Times Best Company to Work for List 2017 - we have made The Sunday Times 30 Best Big Companies to Work for list for the seventh consecutive year, achieving 6th position.
- Workingmums.co.uk Employer Awards 2017- Innovation in Flexible Working - in November 2017, we were awarded the Top Employer for Innovation in Flexible Working by workingmums.co.uk. The judges specifically recognised our approach to Guaranteed Hours contracts.
- The Times Top 100 Graduate Employers - the Times Top 100 Graduate Employers is the definitive annual guide to Britain's most sought after employers of graduates.
- Investors in People Gold - Investors in People accreditation means we join a community of over 15,000 organisations across 75 countries worldwide and it is recognised as the sign of a great employer.
- School leavers Top 100 Employees - McDonald's UK has been certified as one of Britain's most popular employers for school leavers in 2017, for the third consecutive year. An award voted for by 15-18 year olds in the UK.

- 2.41 In April 2017, McDonald's began to offer employees the choice between flexible or fixed contracts with minimum guaranteed hours. This followed trials in 23 restaurants across the country in a combination of company owned and franchised restaurants. All of their employees have been offered this choice and around 80% have selected to stay on flexible contracts.
- 2.42 Over the past 15 years, McDonald's has been proud partners with the four UK football associations: The English Football Association; The Scottish Football Association; The Football Association of Wales; and The Irish Football Association.
- 2.43 This partnership has seen them support over one million players and volunteers. In London since 2014, more than 1,000 people have attended their Community Football Days and have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald's restaurants within the M25, approximately 88 are twinned and actively supporting a local football club. This serves as an example of the company's willingness to confront the obesity crisis by a multitude of different approaches.
- 2.44 McDonald's do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport.

- 2.45 Their Community Football programme helps to increase participation at all levels. McDonald's remain absolutely committed to it and are in the final stages of planning a new programme for future years.

**Marketing**

- 2.46 As a business, McDonald's are committed to ensuring their marketing will continue to be responsible and will be used as a positive influence to help our customers make more informed choices.
- 2.47 McDonald's recognise that marketing has a part to play in influencing customers' choices. They comply, and go beyond, the UK's stringent regulations on marketing to children and use their marketing to help families understand more about the range of food options they have to offer.
- 2.48 McDonald's never market products classified as high in fat, salt or sugar to children in any media channel, at any time of the day. They are committed to ensuring that marketing is always responsible as well as informative, and that it reinforces positive food messages.
- 2.49 In addition, they go beyond the regulations in a lot of cases. For example, when advertising a Happy Meal, they only ever do so with items such as carrot sticks, a fruit bag, milk or water to ensure McDonald's are not marketing HFSS food to children. This has been done voluntarily since 2007.

**Summary**

- 2.50 In the light of the above it is clear that McDonald's restaurants offer the district considerable and substantial economic benefits, are supportive of active and healthy lifestyles. They also enable customers to make informed, healthy decisions from the wide-ranging menu options available. It is important that this is acknowledged, given the assumption in proposed Policy LPA11, that Hot Food Takeaways may have negative health impacts. Given the policy aim – which McDonald's supports – of promoting healthier lifestyles and tackling obesity, other alternatives would be more effective, which in turn will have negative land use consequences.
- 2.51 We turn now to the main points of the objection.



### 3 The 400m Exclusion Zone is Inconsistent with National Policy

#### **Introduction**

- 3.1 This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is also discussed in the next section.
- 3.2 National policy contains no support for a policy approach containing a blanket ban or exclusion zone for A5 (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development.
- 3.3 Planware Ltd feel that guiding the location of hot food takeaways is in direct conflict with the framework as the approach is not positive, justified, effective or consistent. These points are further explained in this objection. Whilst the 400m is guidance in the SPD, there is no justification to contain a restriction within Policy LPA11.

#### **Practical Impacts**

- 3.4 The practical impacts of guiding the location of hot food takeaways would have unacceptable negative land use consequences.
- 3.7 The Framework does not support the use of planning as a tool to limit people's dietary choices.

#### **Conflict with National Policy**

- 3.8 The local policy team do not appear to have fully assessed the potential impact of the policy. It essentially creates a moratorium against A5 uses leaving limited reasonable space for them to locate.
- 3.10 The policy would apply an over-generic approach to restrict A5 development with little sound planning reasoning or planning justification. This is contrary to paragraph 11 of the Framework that advises authorities to positively seek opportunities to meet development needs of their area.
- 3.11 Thus, is consistent with paragraph 80-81 of the Framework.
- 3.12 Para 80 states:

*"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."*

- 3.13 Para 81 states:

*Planning policies should:*

*"a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*

*b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*

*c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*

*d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."*

- 3.14 As explained in this objection, there is a lack of evidence to demonstrate the link between fast food, school proximity, negative health and obesity. The need for evidence is emphasised in paragraph 31 of the Framework that states that each local plan should be based on adequate, up-to-date and relevant evidence. Neither the policy nor the supporting text address this point. Policy needs to be based on evidence and the lack of evidence should highlight a red flag concerning the draft policy.
- 3.16 The policy is likely to be damaging to the district's economy due to the fact that it is restricting Health and Wellbeing to an unprecedented level without regard to the local area or the economy.
- 3.17 The Framework cannot be interpreted to provide generic restrictions on a particular use class. There is no basis for such a blanket ban approach in the Framework or Planning Practice Guidance. In fact, the Planning Practice Guidance emphasises that planning authorities should look at the specifics of a particular proposal and seek to promote opportunity rather than impose blanket restrictions on particular kinds of development. In the section on "Health and Wellbeing":
- 3.18 Paragraph: 002 (Reference ID: 53-002-20140306) states that in making plans local planning authorities should ensure that:
- "opportunities for healthy lifestyles have been considered (eg. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);"*
- 3.19 Paragraph: 006 (Reference ID: 53-006-20170728) says that a range of criteria should be considered, including not just proximity to schools but also wider impacts. It does not support a blanket exclusion zone. Importantly, the criteria listed are introduced by the earlier text which states:
- "Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices."*
- 3.19 The above guidance serves to emphasise why it is important to look at particular proposals as a whole, rather than adopting a blunt approach that treats all proposals that include an A5 use as being identical.



#### 4 The Policy is Inconsistent, Discriminatory and Disproportionate

- 4.1 The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of A5 use. Yet A1 retail outlets and A3 food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from an A3 unit can be delivered to a wide range of locations, including schools. This means that the policy takes an inconsistent approach towards new development that sells food and discriminates against operations with an A5 use. It also means that the policy has a disproportionate effect on operations with an A5 use.
- 4.2 The test of soundness requires that the policy approach is "justified", which in turn means that it should be the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence (paragraph 35 of the Framework).
- 4.3 Given the objectives of the policy, it ought to apply equally to all relevant food retailers. It is unclear how the policy would be implemented and work in a real life scenario.
- 4.4 The table below shows the kind of high calorie, low nutritional value food that can be purchased from a typical A1 high street retailer at relatively low cost. It is contrasted with the kind of purchase that could be made at a McDonald's. The evidence provided at **Appendix 1** confirms that 70% of purchases by students in the school fringe are purchased in non-A5 shop.<sup>1</sup>

<sup>1</sup> The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University.

Company	Snack or meal	Salt (g)	Fat (g)	Calories (kcal)	Price (£)
McDonald's	Apple and Grape fruit bag	0.0	0.1	46	49p
McDonald's	Garlic Mayo chicken wrap	1.3	11.0	345	2.99
Greggs	Sausage roll	1.6	22.0	317	90p
Greggs	Cheese and Onion bake	1.6	30.0	436	1.35
Costa Coffee	Nutty flapjack	0.1	23.2	425	1.70
Costa Coffee	Ham and Cheese panini	2.5	13.5	427	3.95

- 4.5 If the policy is to be based on Use Classes, then the proposed policy should place restrictions on other use classes in addition to class A5. In fact, by restricting A5 uses only, the policy would encourage food purchases at other locations and allows for the overarching objectives to be compromised.
- 4.6 Finally, it is important that for the majority of days in the year (weekends and school holidays combined) schools are not open at all. Research by Professor Peter Dolton of Royal Holloway College states that "At least 50% of the days in a year kids don't go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school."<sup>2</sup>
- 4.7 For the minority of the year when schools are open, it is important to recognise that many schools have rules preventing children from leaving the school grounds during the school day, and in any event proximity to schools has no conceivable relevance outside of the particular times when children are travelling to or from school in circumstances where their route takes them past the development proposal.
- 4.8 The policy's blanket approach (in conjunction with the SPD) fails to acknowledge that the opportunity for children to access A5 development, as part of a school day, is extremely limited. The complete ban is wholly disproportionate to the circumstances when the concern underlying the policy might become a more prominent matter. Only limited purchases of food are made at A5 restaurants on journeys to and from school. Further details are set out in **Appendix 2**.

<sup>2</sup> Peter Dolton, Royal Holloway College, University of London & Centre for Economic Performance, London School of Economics, Childhood Obesity in the UK: Is Fast Food a Factor? [http://www.made.org.uk/images/uploads/2\\_Prof\\_P\\_Dolton\\_presentation.ppt](http://www.made.org.uk/images/uploads/2_Prof_P_Dolton_presentation.ppt)



## 5 The Policy is not Justified because of a Lack of an Evidence Base

- 5.1 The test of soundness requires policy to be evidence based. There is no evidence that hot food takeaways have negative health impacts and that there is a link between proximity to schools and obesity. Also, with no basis to indicate over-concentrated areas gives rise to obesity or poor health outcomes, justification is evidently incomplete. In fact, the studies that have considered whether such a causal connection exists [between proximity of a hot food takeaway and poor health outcomes], have found none.
- 5.2 Public Health England (PHE), which is part of the Department of Health and Social Care, expressly accept that the argument for the value of restricting the growth in fast food outlets is only "theoretical" based on the "unavoidable lack of evidence that can demonstrate a causal link between actions and outcomes."<sup>3</sup>
- 5.3 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation 'did not find strong evidence at this time to justify policies related to regulating the food environments around schools.' It instead highlighted the need to 'develop a higher quality evidence base'.<sup>4</sup>
- 5.4 The range of US and UK studies used to support many beliefs about obesity, including the belief that the availability of fast food outlets increased obesity, was comprehensively reviewed in papers co-written by 19 leading scientists in the field of nutrition, public health, obesity and medicine. Their paper "Weighing the Evidence of Common Beliefs in Obesity Research" (published in the Critical Review of Food, Science and Nutrition (Crit Rev Food Sci Nutr. 2015 December 6; 55(14) 2014-2053) found that the current scientific evidence did not support the contention that the lack of fresh food outlets or the increased number of takeaway outlets caused increase obesity (see pp16-17 of the report).
- 5.5 There appears to have been no critical assessment of whether the underlying evidence supports the proposed policy approach.
- 5.6 In this context, it is important to consider the evidence from the Borough of Waltham Forest, which introduced a school proximity policy in 2008 – about a decade ago. Over that period, the Public Health England data for the borough shows that there has been no discernible impact on childhood obesity rates – with these worsening in recent years. The borough's Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games.
- 5.7 While it is accepted that the causes of obesity are complex, it is clear that the school exclusion zone policy had no discernible effect in Waltham Forest. More research and investigation is needed before such a policy approach can be justified by evidence.

<sup>3</sup> Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013

<sup>4</sup> J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.

## 6 Similar Policies Have Been Found Unsound When Promoted in Other Plans

- 6.1 The lack of evidence between proximity of takeaways to local schools and its impact on obesity has been confirmed in a number of planning decisions.
- 6.2 In South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating 'the evidence base does not adequately justify the need for such a policy', and due to the lack of information, it is impossible to 'assess their likely impact on the town, district or local centres'.<sup>5</sup>
- 6.3 Similarly, research by Brighton & Hove concluded that 'the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day'.<sup>6</sup>
- 6.4 The recent Inspectors response to the London Borough of Croydon (January 2018) regarding a similar prohibition on A5 uses, (where a similar campaign to persuade takeaway proprietors to adopt healthy food options existed) confirmed that the councils own 'healthy' plans would be stymied by the proposed policy, as would purveyors of less healthy food. The policy failed to distinguish between healthy and unhealthy takeaway food, and "confounds its own efforts to improve healthiness of the food provided by takeaway outlets" and failed to "address the demand for the provision of convenience food". The Inspector concluded that because the reasons for the policy do not withstand scrutiny, they must be regarded as unsound.
- 6.5 The proposed policy LPA11 is a policy that we cannot agree to. The proposed approach is in direct conflict with the Framework. As mentioned in the above text, there is enough reputable information to demonstrate a current evidence base that fails to demonstrate the link between fast food and school proximity.

<sup>5</sup> Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate.

<sup>6</sup> Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 30, September 2011

## 7 Alternative Approaches

- 7.1 Planware Ltd considers there is no sound justification for point 4 of the proposed Policy LPA11 Points 4 should therefore be removed to provide consistency and to abide by the Framework.
- 7.2 Planware Ltd would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached.
- 7.3 It is considered until such a time has been reached, point 4 should be removed.



## 8 Conclusion

- 8.1 McDonald's supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the proposed Policy LPA11 is a sound way of achieving those objectives. The underlying assumption in the policy is that all A5 uses (and any restaurants with an element of A5 use) are inherently harmful to health. McDonald's own business is an example of a restaurant operation which includes A5 use but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy life styles through the support given to its staff and support given to football in the communities which the restaurants serve.
- 8.2 In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald's own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities and training are substantial, and important given that improved economic circumstances can support improved health.
- 8.3 The policy to some extent acknowledges that food choices which are high in calories and low in nutritional value are made at premises other than hot food takeaways, drinking establishments, cafes and other uses, however due to the Hot Food Takeaways SPD, none of these uses mentioned will be guided in the same extensive way due to there being no detailed guidelines on how to manage the other uses.
- 8.4 For the reasons given in this objection the proposed policy is very clearly inconsistent with government policy on positive planning, on supporting economic development and the needs of businesses. There is no justification in national policy for such restrictions to be applied to A5 uses. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald's from major commercial and tourist areas.
- 8.5 For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had a similar policy, concerning a school exclusion zone, for around a decade (LB Waltham Forest). It has had no discernible effect on obesity levels, which have in fact increased since its introduction.
- 8.6 Given the overall objective of improving lifestyles and lowering obesity levels, restrictive policy regarding A5 development is a narrow-sighted approach. There is no mention of other possible reasons behind the national high levels of obesity. To discriminate against Health and Wellbeing alone is worrying and using the planning system to influence people's daily lifestyle choices is not acceptable.

## Appendix 1 – Food in the School Fringe Tends to be Purchased in Non-A5 Properties

1. Research by Professor Jack Winkler (London Metropolitan University) into the 'school fringe' – found just 3/10 purchases by students in a 400m school fringe were made in A5 properties.<sup>7</sup>
2. 70% of purchases in the school fringe were made in non-fast food outlets, and the same research concluded 'the most popular shop near Urban was the supermarket, with more visits than all takeaways put together'.
3. Professor Winkler's findings are not an isolated case. A report by Public Health England and the LGA states that fast food school proximity restrictions do 'not address sweets and other high-calorie food that children can buy in shops near schools.'<sup>8</sup>
4. Research by Brighton and Hove found that 'Newsagents were the most popular premises [in the school fringe], with more pupils visiting newsagents than any A5 premises'.<sup>9</sup>
5. Likewise, research for the Food Standards Agency on purchasing habits in Scotland found that 'Supermarkets were the place that children reported they most frequently bought food or drinks from at lunchtime'.<sup>10</sup>
6. Indeed, there are several more researchers who have found no evidence to support the hypothesis that less exposure to fast food, or better access to supermarkets are related to higher diet quality or lower BMI in children.<sup>111213</sup>

<sup>7</sup> The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University

<sup>8</sup> Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013

<sup>9</sup> Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 28, September 2011

<sup>10</sup> Jennie Macdiarmid et al. Food Standards Agency. Survey of Diet Among Children in Scotland (2010) - [http://www.esds.ac.uk/doc/7200/mrdoc/pdf/7200\\_final\\_report\\_part\\_2.pdf](http://www.esds.ac.uk/doc/7200/mrdoc/pdf/7200_final_report_part_2.pdf)

<sup>11</sup> Forsyth, A., et al., Do adolescents who live or go to school near fast-food restaurants eat more frequently from fast-food restaurants? Health and Place, 2012. 18(6): p. 1261-9.

<sup>12</sup> An, R. and R. Sturm, School and residential neighborhood food environment and diet among California youth. American Journal of Preventative Medicine, 2012. 42(2): p. 129-35.

<sup>13</sup> Timperio, A.F., et al., Children's takeaway and fast-food intakes: associations with the neighbourhood food environment. Public Health Nutrition, 2009. 12(10): p. 1960-4.



## Appendix 2 – Food Purchases made on School Journeys

**Only a limited number of journeys to and from school involve a purchase at a food outlet.**

1. This has been confirmed in research by the Children's Food Trust, which found that only 8% of all journeys to and from school included a purchasing visit to a food outlet.<sup>14</sup>

**Table 3. Total number of journeys including a food outlet visit**

	n	Number of journeys to school	Number of journeys from school	Total number of journeys	Percentage (%) of all journeys
Journeys including a visit to a food outlet		86	87	173	
Journeys including a purchase from a food outlet		11	6	17	10
		8	6	14	8

2. Of the food purchases made on school journeys, confectionary was the most popular item sold – which McDonald's does not offer on its menu.
3. Likewise, research by Ashelsha Datar concluded that children 'may not purchase significant amounts of junk food in school' – partly due to 'fewer discretionary resources to purchase them'.<sup>15</sup>
4. Indeed, even where purchases were made, 'children may not change their overall consumption of junk food because junk food purchased in school simply substitutes for junk food brought from home.'
5. Similarly, research by Fleischhacker highlighted the need for future school-based studies to 'gather information on whether or not the students attending the studied schools actually eat at the restaurants near their schools'.<sup>16</sup>
6. This was also highlighted in the systematic review by Oxford University, which states 'future work should also incorporate a child's usual mode of travel to and from school into decisions about appropriate buffer distances.' The review added that age should also be taken into consideration, as this can impact on travel time and the availability of pocket change.<sup>17</sup>

<sup>14</sup> Children's Food Trust – November 2011, page 1 [http://www.childrensfoodtrust.org.uk/assets/research-reports/journey\\_to\\_school\\_final\\_findings.pdf](http://www.childrensfoodtrust.org.uk/assets/research-reports/journey_to_school_final_findings.pdf)

<sup>15</sup> Ashelsha Datar & Nancy Nicosia, Junk Food in Schools and Childhood Obesity, page 12, May 2013

<sup>16</sup> S Fleischhacker et al. A systematic review of fast food access studies, page 9, 17th December 2009

<sup>17</sup> J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13-14, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.



PO3512

**Representor Details**

Web Reference Number	WF0009
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

**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	LPA11 (4)
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?	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.****POSITIVELY PREPARED**

Part 4 of the draft policy assumes that the location of food and drink uses can have negative health impacts, but does so without any evidence how many are needed or where. Consequently, the development requirement has not been objectively assessed.

Food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Classes A3-5 or A5 uses is both unhelpful and unfair.

**JUSTIFIED**

There is no evidence for a causal link between the incidence of obesity and the location of food and drink uses and only limited evidence of any correlation at all.

**EFFECTIVE**

01

02

Some hot food takeaways, restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, but not all are, and the planning system is ineffective in distinguishing between those that are and those that are not.

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture.

Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.

---

#### CONSISTENT WITH NATIONAL POLICY

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities.

The PPG suggests, but does not mandate, policies to limit proliferation of certain use classes; however, no such proliferation has been identified in this case. Crucially, these must be supported by an evidence base.

---

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

Delete part 4 of draft policy LPA11.

#### **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:**

Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 7:09:27 PM
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PO3513



**Representor Details**

Web Reference Number	WF0009
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

**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	LPA11 (4)
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?	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.****POSITIVELY PREPARED**

Part 4 of the draft policy assumes that the location of food and drink uses can have negative health impacts, but does so without any evidence how many are needed or where. Consequently, the development requirement has not been objectively assessed.

Food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Classes A3-5 or A5 uses is both unhelpful and unfair.

**JUSTIFIED**

There is no evidence for a causal link between the incidence of obesity and the location of food and drink uses and only limited evidence of any correlation at all.

**EFFECTIVE**

01

02



Some hot food takeaways, restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, but not all are, and the planning system is ineffective in distinguishing between those that are and those that are not.

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. 03

Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.

---

#### CONSISTENT WITH NATIONAL POLICY

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. 04

The PPG suggests, but does not mandate, policies to limit proliferation of certain use classes; however, no such proliferation has been identified in this case. Crucially, these must be supported by an evidence base.

---

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

Delete part 4 of draft policy LPA11.

#### **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:**

Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 7:09:27 PM
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PO3514

**Representor Details**

Web Reference Number	WF0038
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking Surrey GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

**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	LPA11(4)
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?	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.****POSITIVELY PREPARED**

The policy is negative in assuming that uses within Classes A3-5 necessarily have negative health impacts. The use of tools such as Healthy Catering Commitments see such uses as an opportunity to utilise increasing levels of eating out of the home to benefit health.

The policy is also incomplete to the extent that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets.

**JUSTIFIED**

The evidence for a link between the incidence of overweight or obesity and the proximity of food and drink uses to other land uses is very limited and often contradictory.

**EFFECTIVE**



By apparently affecting all food and drink uses, the policy would appear to negate incentives to widen the range of healthy options or to reformulate existing ones. 01

**CONSISTENT WITH NATIONAL POLICY**

National policy requires that food and drink uses be located within town centres, on their edges or in other accessible locations, but the policy would otherwise control their location.

In doing so, it would tend to reduce the range of uses (particularly experiential uses) in town centres and to reduce accessibility generally. This will reduce footfall and active travel.

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

Delete Part 4 of Policy LPA11.

**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:**

Because the Inspector may have to question the plan-making authority or objector on the basis for the commitments and policy or alternatives.

Response Date	3/13/2019 4:24:53 PM
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PO3515



**Representor Details**

Web Reference Number	WF0009
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

**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	LPA11 (4)
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?	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.****POSITIVELY PREPARED**

Part 4 of the draft policy assumes that the location of food and drink uses can have negative health impacts, but does so without any evidence how many are needed or where. Consequently, the development requirement has not been objectively assessed.

Food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Classes A3-5 or A5 uses is both unhelpful and unfair.

**JUSTIFIED**

There is no evidence for a causal link between the incidence of obesity and the location of food and drink uses and only limited evidence of any correlation at all.

**EFFECTIVE**

01

02

Some hot food takeaways, restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, but not all are, and the planning system is ineffective in distinguishing between those that are and those that are not.

Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture.

Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.

---

#### CONSISTENT WITH NATIONAL POLICY

The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities.

The PPG suggests, but does not mandate, policies to limit proliferation of certain use classes; however, no such proliferation has been identified in this case. Crucially, these must be supported by an evidence base.

---

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

Delete part 4 of draft policy LPA11.

#### **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:**

Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

Response Date	5/9/2019 7:09:27 PM
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PO3516



**Representor Details**

Web Reference Number	WF0009
Type of Submission	Web submission
Full Name	Mr Paul Stokes
Organisation	Kentucky Fried Chicken (Great Britain) Limited
Address	Orion Gate Guildford Road Woking GU22 7NJ
Agent Details	Mr Steve Simms SSA Planning Limited PO Box 10201 Nottingham, NG9 9FZ

**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	LPA11 (4)
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:**

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Complies with the duty to cooperate?	Yes

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**JUSTIFIED**

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**EFFECTIVE**

01

02



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---

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---

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

Because the Council has not presented evidence to support the proposed policy and it may be necessary to discuss research that exists in this area to explain why it does not support the specific policy proposed and to suggest alternative approaches.

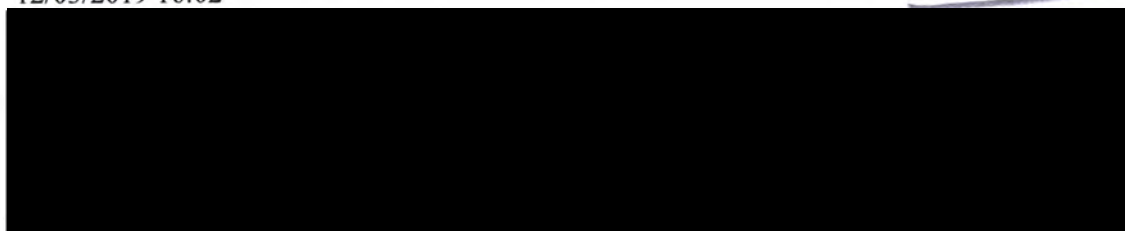
Response Date	5/9/2019 7:09:27 PM
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PO3517



St Helens Local Plan - Representations OBO Network Space Developments Ltd  
William Mulvany  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 16:02

EF0046



## 2 Attachments



lpsd-representation-form Policy LPB01.pdf lpsd-representation-form Policy LPA04 and Appendix 5.pdf

Dear Planning Policy

Please find attached representations to the Local Plan made on behalf of our client Network Space Developments Ltd.

Please acknowledge safe receipt.

Kind regards

**WILL MULVANY**

Associate: Chartered Town Planner  
BSc (Hons), MA, MRTPI



## LAUNCH OF LEEDS PLANNING PROTOCOL 19TH MARCH 2019

As Chair of Leeds Chamber Housing Forum and also of Spawforths, David Rolinson has been working with Leeds City Council to develop a new planning protocol to guide all future planning applications within Leeds. David will be launching the Planning Protocol jointly with Tim Hill, Chief Planning Officer of Leeds City Council on the 19th March

**PLEASE CLICK HERE TO FIND OUT MORE!**



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Yorkshire Chamber  
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**RTPI**

Chartered Town Planner



**RIBA**

Chartered Practice

**THE ACADEMY  
OF URBANISM**



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PLANNING  
CHAMPION**



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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: Mr
First Name:	First name: Will
Last Name:	Last Name: Mulvany
Organisation/company: Network Space Developments Ltd	Organisation/company: Spawforths
Address: C/O Agent	Address: Junction 41 Business Court, East Ardsley, Leeds
Postcode:	Postcode: WF3 2AB



Signature: 	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 ☐

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	LPB01 ①	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 ✓	No <input type="checkbox"/>
Sound?	Yes ✓	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes ✓	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 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 approach to St Helens Town Centre and the Central Spatial Area.

Network Space is the owner of land adjacent to the Stadium and Tesco, known as Saints Retail Park. They also own land to the south of the Town Centre known as the former LeadMill site.

Our client supports the continued inclusion of their land within the CSA, which is an important and integral part of the wider Town Centre offer. The need to facilitate/ promote linkage within the CSA is supported. The Policy and associated Policies Map is sufficiently flexible to allow for deliverable development opportunities for a range of uses subject to the appropriate justification.

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.

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 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:

Our client is the owner of land in key locations in St Helens and are based within the Borough. They would like the opportunity to discuss their representations where this is appropriate and 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.**



PO3518

ELO117



Representations concerning the St Helens Borough Local Plan 2020-2035

Greg Leyland

to:

planningpolicy

12/03/2019 17:43

Cc:

① GBR

④ LPA04

⑦ LPA09

⑩ LPA09

② LPA06

⑤ LPA05

⑧ LPA01

⑪ S.A.

⑬ Sus. TIA  
Reps.

③ LPA03

⑥ LPA07

⑨ LPA09

⑫ TIA

STC 4HS

1 Attachment



St Helens Local Plan 2019 Review - Greg Leyland - 120319.pdf

Dear Sir

I have a number of comments concerning the Council's proposed 'Local Plan 2020 – 2035'.

I wish to object to the land referred to as Eccleston Park Golf Club (EPGC) having its 'Green Belt' status being changed to 'Safeguarded'.

'Safeguarding' the land will only *potentially* stop housing development for up to 15 years (to 2035), after which time it would likely be developed into a housing estate.

Below, I have cut and pasted various paragraphs from the documentation held on the St Helens Council website (accessible via <https://www.sthelens.gov.uk/localplan>), highlighted in yellow the aspect I wish to comment on, and provided my comments in red italics. I have also attached a pdf version to this email.

I trust you will give my objections consideration and take them into account as you continue to make plans.

Could you please acknowledge this email by return.

Yours faithfully

G Leyland  
6 Central Avenue  
Eccleston Park  
Prescot  
Merseyside  
L34 2QP

## Extracted from: 'Greenbelt Review December 2018'

### THE PURPOSES OF GREEN BELT

1.9 The NPPF establishes that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

*I have lived in or around Eccleston Park all my life and have always considered the fields now referred to as Eccleston Park Golf Club as the buffer and separator between Eccleston Park and Rainhill. I was bemused when the Golf Club was named 'Eccleston Park' since the land had always been considered to be in Rainhill.*

10



and there are no realistic alternatives to the proposed development that would avoid such harm. In such cases, mitigation and / or as a last resort compensatory provision will be required.

5.3.7 The Council's future aspirations to improve the offer of St.Helens Town Centre asset out within the Strategy include the provision of new retail and leisure floorspace, subject to the appropriate policy tests. It is considered that this approach, along with steps to encourage the reuse of vacant floorspace, will address the identified quantitative and qualitative needs of residents in the Borough.

*I am concerned that the Council is proposing to provide new retail and leisure space when there are already 15.8% units vacant, and question whether any new space is actually required. In particular, if the Council is proposing to use Council Tax money in order to do this, I have a major objection. Existing retail and leisure space must be made to work before considering diverting cash badly needed for education, health, roads, environmental cleanliness, police etc.etc.*

*What does the Council mean by 'encourage the reuse of vacant floorspace'? M&S and Tyrers, for example, were important shops for the town centre which are planning to leave, or have already left. The Council has not been encouraging enough for these businesses, so what has it learnt from their loss, and what does it intend to do for future 'encouragement'? Both aspects should be clarified to a level of detail in the plan, rather than simply stating aspirations.*

## Policy LPC09: Landscape Protection and Enhancement

1. Proposals for new development must, as appropriate having regard to their scale and nature:

a) seek to conserve, maintain, enhance and / or restore any landscape features that are important to the character of the local area;

*The area known as Eccleston Park Golf Club provides separation between the communities in Eccleston Park and Rainhill. This separation ensures the two communities are not a single urban sprawl; it allows the two sets of residents to maintain a sense of belonging and 'sense of place'; it also helps to preserve, and is intrinsic to the character of the two settlements.*

b) demonstrably form the best option for meeting the aims of the development whilst minimising impacts on the landscape and appearance of the area and respecting local distinctiveness;

*Should a housing development go ahead at any time in the future on the EPGC land, the impact to both the Rainhill and Eccleston Park residents will be massive. Both areas will lose their local distinctiveness, and the current physical landscape will be lost and unrecognizable.*

2. Where a development would lead to harm to the landscape or visual character of the area, mitigation measures will be sought to reduce the scale of such harm. Where the development would (despite any such measures) cause significant harm but also bring significant benefits, suitable compensation measures may be sought. If significant harm

PO3519



① - LPA09



{In Archive} RE: Have your say on the St.Helens Borough Local Plan 2020-2035

Submission Draft

Tim Bettany-Simmons

to:

planningpolicy@sthelens.gov.uk

04/02/2019 11:09

② - LPB01

③ - LPA11

Dear Sir/Madam

Thank you for your consultation on the St.Helens Borough Local Plan 2020-2035 Submission Draft. We previously commented on the document at Preferred Option stage. Having reviewed the plan we have the following comments:

Page 63 – Para 4.32, Policy LPA09 – Green Infrastructure

We support the thrust of this policy. Although the policy does not specifically mention the canal, it is noted that the supporting policy justification mentions about developing the Sankey canal corridor as a multi-functional green corridor. We support this aim, pending any long term ambitions of the Sankey Canal Partnership to see the canal restored.

①

Page 74 – Para 5.1, Policy LPB01 – St Helen Town Centre,

We support the thrust of this policy and in particular criteria 7 which links in with policy LPA09 – Green Infrastructure.

②

Page 120 – Para 7.21.14 – makes reference to the Sankey Canal Restoration Society and working in partnership with them (along with others). The Trust supports canal restoration as a whole and the ambitions of the Sankey Canal Partnership to see the canal restored.

③

I hope that the above points can be taken into account.

Kind regards

Tim

Area Planner / Cynlluniwr Ardal

Canal & River Trust / Glandwr Cymru,  
Red Bull Wharf, Congleton Road South, Church Lawton, Stoke-on-Trent, Staffordshire, ST7 3AP

From: [Redacted] On Behalf Of [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Sent: 18 January 2019 17:34

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

Subject: Have your say on the St.Helens Borough Local Plan 2020-2035 Submission Draft

Dear Sir or Madam,

**St.Helens Borough Local Plan 2020-2035: Submission Draft**

## Town and Country Planning (Local Planning) (England) Regulations 2012

I am writing to notify you that the St. Helens Borough Local Plan 2020-2035 Submission Draft ("the Local Plan") and supporting documents will be published under Regulation 19 of the above-mentioned Regulations on 17 January 2019. You have received this email because your contact details are held on our Register of Consultees database.

### How can I view the Plan and submit representations?

Copies of the Plan, together with a Sustainability Appraisal, Habitats Regulation Assessment, Green Belt Review and other supporting documents (as well as Frequently Asked Questions and a Statement of the Representations Procedure) are available for inspection on the Council website at <https://www.sthelens.gov.uk/localplan> and (from 8.30 am until 5.15 pm on weekdays) at Ground Floor reception, St. Helens Town Hall, St Helens. Key documents are also available at all St. Helens Council libraries (see <https://www.sthelens.gov.uk/libraries> for details of locations and opening times).

You may submit comments (known as 'representations') on the Local Plan. Representations must be sent:

- by post to **Local Plan, St Helens Council, St Helens Town Hall, Victoria Square, St Helens, WA10 1HP**; or
- by email to [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk); or
- by using our on-line form at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

**All representations must be received by 5.00 pm on Wednesday 13<sup>th</sup> March 2019.** Please note that late representations cannot be accepted.

It is recommended that comments are made by completing the Council's Publication Stage Representation Form using the guidance notes. The forms and guidance notes are available to download from the Council's website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan), and from the Ground Floor Reception, St. Helens Town Hall, St Helens from 8.30am – 5.15pm Monday to Friday and at all local St. Helens libraries. Alternatively, you can contact the Planning Policy Team on 01744 676190.

### Next steps

Previously, the Council consulted on the Local Plan Preferred Options. It has taken representations received at that and earlier stages into account when producing the current 'Submission Draft' of the Plan. Following the current consultation, the Council intends to submit the current version of the Plan, together with any representations received during the consultation, to the Government. We expect to do this in summer 2019. A Government Planning Inspector will then examine the Plan and its supporting evidence. He or she will probably hold public hearings as part of this process. Following the examination, the Inspector will decide whether the Plan is 'sound' and can be adopted by the Council (with or without modifications). The Council expects to adopt the Plan in 2020.

### Data protection

We process your 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).

If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, please let us know either by phone 01744 676190 or email



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

### How can I find out more?

A series of drop in sessions have been arranged at various locations across the Borough at which you will be able to find out more. Please see the Council's website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan) for details of these events or use the contact details at the top of this letter for further details.

Yours sincerely,

Jonathan Clarke

### Development Plans Manager

*(See attached file: Statement of Representation Procedure.pdf)*

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### Keep in touch

Sign up for the Canal & River Trust e-newsletter <https://canalrivertrust.org.uk/newsletter>

Become a fan on <https://www.facebook.com/canalrivertrust>

Follow us on <https://twitter.com/canalrivertrust> and <https://www.instagram.com/canalrivertrust>

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Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

### Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>

Cefnogwch ni ar <https://www.facebook.com/canalrivertrust>

Dilynwch ni ar <https://twitter.com/canalrivertrust> ac <https://www.instagram.com/canalrivertrust>

Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidrwydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

PO3520



EF00009



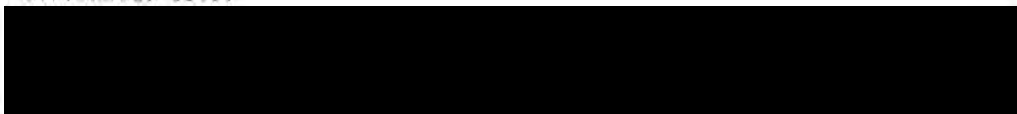
St.Helens Local Plan 2020-35 - Representation / Comment Form - 8HA Rainford

Swift, Susan M

to:

planningpolicy@sthelens.gov.uk

07/03/2019 13:07



1 Attachment



Mrs M MORGAN - Comments form for 8HA - St Helens Local Plan - March19.pdf

Dear sir / madam

please find enclosed by comments form in response to the development proposal for 8HA Rainford

Regards

Marian Morgan

Site 8HA

① - LPA02

② - LPA04

③ - LPA07

④ - LPA01



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: MRS	Title:
First Name: MARIAN	First name:
Last Name: MORGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 101 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

08/03/2019

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 ☐ (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.**



## **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	LPC01	Paragraph / diagram / table	6.1	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	3.5.7 3.3.30 3.3.22 3.3	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 <b>X</b> <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <b>X</b> <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 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?	<b>X</b> <input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<b>X</b> <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**

This Local Plan is not sound or justified as the proposed 8HA development is contrary to the statements within the Strategic Aims & Objectives of the Plan and Policy LPC01.

St.Helens is a borough with a falling population and house prices below the national average, and Rainford already has a large number of affordable family houses on the market for sale.

There is no evidence of a housing shortage in St.Helens & it has been stated that St.helens has a greater home ownership than other parts of the country.

An extra 259 units would have a significant detrimental impact on the existing community facilities and amenities currently used by Rainford residents.

This Local Plan is contrary to the policy objective of avoiding harming the amenities, character & appearance of Rainford, due to the 259 proposed units.

Given the ageing Rainford village population, any development should have a high % of homes for life ie. Bungalows with consideration given to disabled access and new pedestrian routes/ footpath improvements made to allow for disabled motorised scooters to be used to & from village to maintain independent living.

(4)



Local occupancy restrictions should be stated within planning application to ensure local residents move from a family house onto a bungalow.

There is currently a shortage within the Rainford housing market for bungalows, and would assist St. Helens tackle the growing Social Care problem all Council's are facing to support elderly residents to stay in their own homes for as long as possible.

Other planning constraints should ensure the development provides a play area & some open communal space within site, as Rainford currently does not have sufficient play areas for children.

The Local Plan for 8HA consistently fails to meet its strategic aims & objectives and is not justified.

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.**

Reduce the number of proposed housing units within the allocated site 8HA.

Ensure detailed planning conditions are put in place to improve the basic infrastructure facilities of the village to support any new development.

Any new housing should have a local occupancy restriction to ensure that any young Rainford families receive priority over families from out of town

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>X</b>	<b>No, I do not wish to participate at the oral examination</b>		<b>Yes, I wish to participate at the oral examination</b>
----------	---	--	---

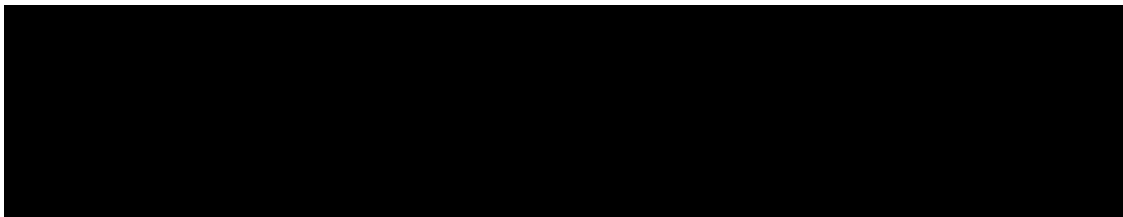
**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

***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***

PO3521



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



**SATPLAN**  
 PLANNING & DEVELOPMENT

LIVERPOOL • LONDON • NEWCASTLE • MANCHESTER

**Shaun Taylor**  
 Managing Director







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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;

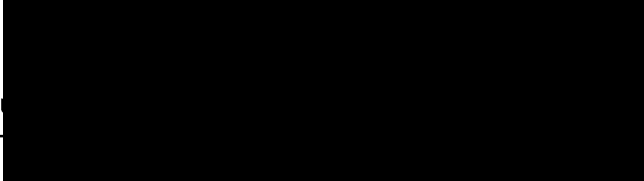
**Part A** – Personal Details

**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: 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		13.3.19
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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 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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**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.

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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	LPC01	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
Sound?	Yes	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	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: <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 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

Whilst we support the main aims and objectives of Policy LPC01, there are insufficient Sites allocated to meet the housing requirement and therefore deliver the wide-ranging mix of housing set out in this policy. Without a suitable quantum and mix of housing Sites the aims and objectives of this policy will not be achieved. Our client's Site at Eccleston Park Golf Course



(Site Ref. 3HS) should be allocated for housing. This site would meet all of the aims and objectives that are set out in Policy LPC01.

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.

Allocate Site Ref. 3HS (Eccleston Park Golf Course) for housing. The site is of a scale that can deliver the mix of housing types set out in Policy LPC01, furthermore the Site is not constrained and is deliverable in the short term.

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

To represent our client's site accurately and provide information as required at EiP.

***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.**



## **Representations**

on behalf of:

**Mulbury (Warrington) Ltd**

**at**

**Eccleston Park Golf Course,**

**Eccleston, St Helens**

**March 2018**



**SATPLAN**  
PLANNING & DEVELOPMENT

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## **6. Benefits of Residential Developments**

- 6.1. It is a long established principle that residential development can deliver far reaching economic and social benefits. The Site has the ability to deliver multiple benefits as set out below.

### **Affordable Housing**

- 6.2. The proposed development seeks to provide 30% affordable housing (which in the case of this site, equates to around 300 dwellings). The level of affordable housing proposed reflects the requirements set out in the emerging Local Plan.
- 6.3. In terms of delivery, there is significant interest from a number of housebuilders and the landowner is currently advancing these discussions. Given the size of the site coupled with the knowledge of the Site from a technical perspective, the site could be easily delivered within the Plan period, with at least 400 dwellings be delivered in years 1-5. The site would make a very significant contribution towards meeting the need for market affordable homes in St Helens.

### **Extra Care Housing**

- 5.1 The Site would also be capable of delivering much needed mainstream care and/or extra care housing and independent living options. Increasing this type of provision is a clear aim of policy LPC01.

### **Other Benefits**

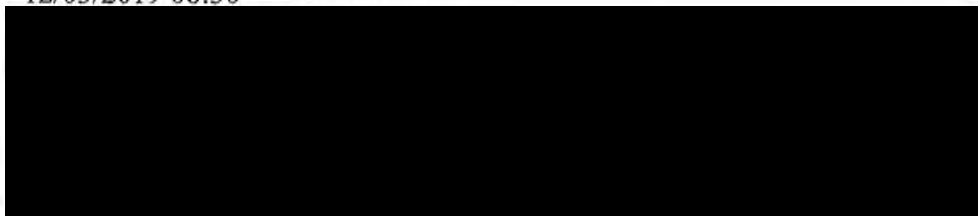
- 5.2 In addition to the benefit of providing a housing scheme there are also numerous other benefits that would arise from the residential development.
- Capital Investment and Expenditure Benefits: this relates to the value of capital investment and expenditure generated by the industry on new land for housing development;
  - Construction Benefits: this relates to the impacts of this capital investment on construction employment and associated income generation and economic output during the construction of housing;



PO3522



St Helens Local Plan Submission Draft - Representations on behalf of Harworth Estates Ltd  
Kirsty Czernucha  
to:  
'planningpolicy@sthelens.gov.uk'  
12/03/2019 08:30



#### 6 Attachments



HARM3013 Representations to the SHBC Local Plan Submission Draft- Harworth Estates Final.pdf



HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPA05.pdf



HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPC01.pdf



HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPC02.pdf



HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPC13.pdf



HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPD07.pdf

Good morning

On behalf of our client, Harworth Estates Ltd, please find enclosed a copy of the representations and relevant comment forms to the St Helens Borough Local Plan 2020 – 2035 (Submission Draft).

I would be grateful if you could please confirm receipt of this email and the representations enclosed.

Kind regards  
Alice Fitton



**Turley**

1 New York Street  
Manchester M1 4HD



- ① - LPD07
- ② - LPC13
- ③ - LPC02
- ④ - LPC01
- ⑤ - LPA05
- ⑥ - LPA02
- ⑦ - LPA05.1
- ⑧ - S-A
- ⑨ - LPA05 - Criterion 3

Linkedin

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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: C/O Agent	Title: Miss
First Name: C/O Agent	First name: Alice
Last Name: C/O Agent	Last Name: Fitton
Organisation/company: Harworth Estates Ltd	Organisation/company: Turley
Address: C/O Agent	Address: 1 New York Street, Manchester
Postcode:	Postcode: M1 4HD

Signature:

[Redacted Signature]

Date:

11/03/2019

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

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Policy	LPC01	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 X
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?	<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 supporting Representations Report



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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<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:

To explain further the rationale behind the representations and be given the opportunity to respond to any changes the Council proposes to make and any further evidence that is presented.

**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 Council Local Plan -  
Submission Draft**

Moss Nook Urban Village, Watery Lane, Moss  
Nook

Representations on behalf of Harworth Estates Ltd

March 2019

**Turley**



positive effects to the land quality and as such should score 'Green'<sup>2</sup> in the SA (as opposed to 'Grey'<sup>3</sup>).

- Harworth agrees with the SA Scores for SA Objectives SA5, SA7a, SA9a, SA12a, SA12b, SA13b, SA14, SA16 and SA20 which all conclude development of the site is likely to promote positive effects on mitigating against climate change, landscape sensitivity, access to open space and green spaces, access to GPs, access to leisure, access to secondary schools, access to employment opportunities, access to housing, and access to services.
- Harworth agrees with the SA Scores for SA Objectives SA4, SA6, SA7b, SA9b, SA13a, SA15, and SA19 which all conclude that development of the site is unlikely to have any effects on sustainably managed water resources, minimising the risk of flooding, distance to a prominent ridgeline, public rights of way, access to primary schools, supporting the local economy, and reducing the need to travel.
- Harworth agrees with the SA Scores for SA Objective SA3 and SA8 which acknowledges that any negative effects on air quality and cultural heritage can be mitigated.

3.14 To summarise, the recent technical studies confirm that there are no environmental, physical or social constraints that would restrict future development on the site. As in accordance with the principle of development that has been approved for the site, the SA demonstrates how development of the site will promote many positive effects on the environment and social wellbeing.

3.15 The allocation of this land will therefore further support the delivery of a sustainable brownfield site, significantly contributing towards the housing needs of the borough.

#### Development Management Considerations

3.16 Harworth supports the principle of having policies to manage the housing mix and the provision of affordable housing within new developments. However, emerging Policies **LPC01 'Housing Mix'** and **LPC02 'Affordable Housing'** should be amended so that they are flexible enough to acknowledge that the different scale, characteristics and density of each development site will vary from site to site.

3.17 As such, Harworth recommends that the policies are more positively prepared, to acknowledge that the provision of a suitable housing mix and affordable housing will be determined by a viability case, to ensure the development sites can be delivered on an individual basis.

3.18 Harworth supports the principle of emerging Policy **LPC13 'Renewable and Low Carbon Energy Development'** which seeks to reduce carbon emissions within the borough. However, this should not be a mandatory requirement for all future developments within the borough and it should be considered suitable when it is viable to do so.

<sup>2</sup> Green: Likely to promote positive effects

<sup>3</sup> Grey: Unlikely to have significant effects

PO3523



St Helens Local Plan - Presubmission consultation  
John Fleming  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 10:13



2 Attachments



St Helens Local Plan - consultation form.pdf St Helens - Local Plan presubmission - GDL representations.pdf

**St Helens Local Plan - Presubmission consultation**

Please find attached the response of Gladman Developments to the above consultation.

I would be grateful if you could confirm receipt of this email and its contents.

Yours faithfully,

John Fleming





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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**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: John	First name:
Last Name: Fleming	Last Name:
Organisation/company: Gladman Developments	Organisation/company:
Address: Gladman House, Alexandria Way, Congleton	Address:
Postcode: CW12 1LB	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]

Date:

13<sup>th</sup> 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.

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Yes ☐ (Via Email)No ☐

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Merseyside  
WA10 1HP**

**or** by hand delivery to:

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

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

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/> x
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> x
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> 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?	<input type="checkbox"/> x
Justified?	<input type="checkbox"/> x
Effective?	<input type="checkbox"/> x
Consistent with National Policy?	<input type="checkbox"/> 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 representations.



Please continue on a separate sheet if necessary

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**Please see attached representations**

Please continue on a separate sheet if necessary

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



**Please see attached representations**

***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 Helen's Local Plan  
Pre- Submission Version  
Gladman Representations



March 2019

4.5.9 Given the amount of existing commitments in the Council's housing land supply it is therefore apparent that clear evidence is required to demonstrate that the sites selected are deliverable and can commence in the next five years. Gladman reserve the right to comment upon this issue if further evidence is made available during the Examination in Public. 09

---

## 4.6 Policy LPC01: Housing Mix

4.6.1 This policy requires new housing on greenfield sites which as a whole would deliver 25 or more new homes, to provide the following:

- a) At least 20% of new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2); and
- b) At least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwelling standard set out in Part M4(3).

4.6.2 In principle, Gladman recognise the importance of delivering housing to assist in meeting the needs for older people and those with mobility issues. However, the Framework is clear that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing only if this would address an identified need for such policies and where these standards can be justified. 10

4.6.3 Gladman refer to the PPG which provides guidance on the use of the optional technical standards. Before pursuing any such policy requirement, the Council will need to ensure through its evidence base is in line with the guidance and that the justification and specific detail of the policy take account of the various factors which the PPG refers to:

**"Based on their housing needs assessment and other available datasets it will be for the local planning authority to set out how they intend to approach the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:**

- **The likely future need for older and disabled people (including wheelchair user dwellings);**

- **Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes, or care homes);**
- **The accessibility and adaptability of existing stock;**
- **How needs vary across different tenures; and**
- **The overall impact of viability.”<sup>5</sup>**

4.6.4 Gladman note that these technical standards have deliberately been set as optional standards which, if to be included as a policy in the Local Plan, would need to be justified by robust evidence. Gladman do not consider that sufficient evidence has been made available to support the requirements. Although it is accepted that evidence suggests an ageing population in the borough, this alone does not justify the use of optional building regulations as this is consistent with the national trend. 10

4.6.5 When considering this policy, the Council need to be aware of the impact that these requirements can have on scheme viability and the knock-on effects that this could have on the delivery of much needed housing. Flexibility within the policy wording should be included which provides ‘support’ for provision of M4(2) and M4(3) homes and not set a policy requirement which could impact development viability.

---

## **4.7 Policy LPD01: Ensuring quality development**

4.7.1 The above policy requires development proposals to include or contribute to the provision of public art where the development would be of a substantial size and/or in a prominent gateway or town centre location.

4.7.2 Gladman draw the Council's attention to paragraph 54 of the NPPF which clearly states planning obligations should only be used where it is not possible to address unacceptable impacts through a planning application. The lack of public art is plainly not an unacceptable impact. The principle also predates CIL and the associated regulations, as well as the new focus in NPPF2019 on improved design standards. The Council should not be seeking to introduce a policy requirement which has no planning basis and 11

---

<sup>5</sup> PPG ID: 56-007-20150327



PO3524



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.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

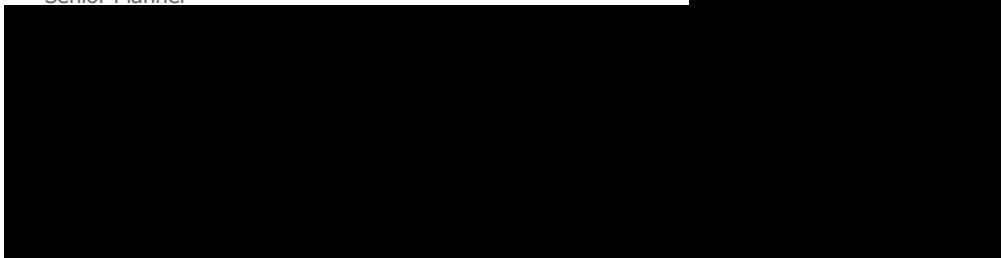
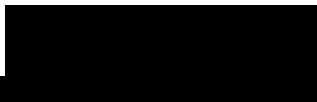
To whom it may concern,

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 WILLMORIS
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)

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

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



- 9.23 Our Client also considers that mechanisms should be put in place throughout the Plan to ensure that sites can continue to be delivered in the event that there is a shortfall in the Council's supply of new housing.

#### **Policy LPA09: Green Infrastructure**

- 9.24 This Policy outlines what the Green Infrastructure network is and why it is of value to the Borough. The Policy details how the Council will work with other organisations to improve and enhance the Green Infrastructure network noting that development proposals on strategic housing and employment sites incorporate holistic Green Infrastructure Plans. The Policy also outlines that developers will be required to provide long-term management arrangements for new and existing green infrastructure within development sites. Furthermore, the Policy states that development that would contribute to, or enhance the function of the Green Infrastructure network will be encouraged.

- 9.25 Our Client is supportive of this Policy and notes the encouragement given to development proposals which will enhance the Green Infrastructure network.

29

#### **Policy LPC01: Housing Mix**

- 9.26 This Policy outlines that both new market and affordable dwellings will be expected to cater for a range of types tenures and sizes of homes as informed by the SHMA. The Policy indicates that proposals for new housing of 25 dwellings or more on greenfield sites will require at least 20% are accessible and adaptable and at least 5% area designed for wheelchair uses, in line with the Building Regulations 2010. The Policy also requires 5% of new homes on greenfield developments of 25 dwellings or more to be bungalows.
- 9.27 The Policy also provides for exceptions to these requirements should a viability assessment demonstrate that meeting such requirements would render the development un-viable.

- 9.28 Our Client does have some concerns around the requirement for 5% of new homes on greenfield sites being bungalows and considers that there is little justification as to why this should be the case. The Policy does not consider factors such as the character of the area or impact upon densities. Our Client is unable to endorse this aspect of the Policy and considers that the Council should provide further evidence in order to justify its position.

30

- 9.29 Notwithstanding the above, our Client is generally supportive of this Policy, recognising the need to provide for a range of dwellings catering for the needs of the whole

community, including the need to provide aspirational dwellings and to drive economic growth. It is important however that this Policy is not overly prescriptive in its requirements which could ultimately stall the delivery of sites. The Policy should be flexible and allow for a site-by-site analysis in order to ensure that an appropriate mix of housing is secured.

31

### **Policy LPC02: Affordable Housing**

9.30 This Policy outlines that proposals for new open market housing of developments of 11 units or more will be required to provide at least 30% affordable housing in Housing Zones 2 and 3, and with at least 10% of the affordable provision being available for affordable home ownership. Figure 6.1 of the Plan indicates our Client's land interest as being within Housing Zone 3 and as such the above requirements would apply.

9.31 Point 4 of the Policy indicates that the provision of affordable housing may vary on a site by site basis taking into account evidence on local need and economic viability subject to extensive justification.

9.32 Our Client broadly supports this Policy; the provision of affordable housing to meet the needs of the whole community clearly accords with the aims and objectives of the Council as well as the thrust of national policy. Our Client also welcomes the flexibility afforded by point 4, recognising that future market conditions may not allow for such provision to take place, although this would ultimately be determined as part of the planning application process. It is important to ensure that the requirement for affordable housing does not render a development unviable, particularly when considering density requirements afforded by Policy LPA05.

32

9.33 Notwithstanding the above, our Client does question why the Policy differentiates between Zone 2 and 3 at all especially when the Policy's approach to affordable housing delivery within these areas is the same. Zone 2 and 3 should be merged to create a single area, allowing for the Policy to be simplified.

33

9.34 Finally, our Client considers that adequate monitoring must take place across the Borough to ensure that the need for affordable housing is met.

### **Policy LPC09: Landscape Protection and Enhancement**

9.35 This Policy outlines that new development proposals must conserve, maintain or enhance any landscape features that are important to the local area. It requires development proposals to demonstrate that the best option for the landscape has taken forward and

PO3525



E0258



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

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:01

Site GBP-092-A

## 4 Attachments

L004- Land at St Helens Road - Reps to Submission Local Plan.pdf Appendix 3- Agricultural Land Report.pdf

Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

Appendix 4a- Interim Housing Needs Assessment.pdf

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**  
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

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<https://i.imgur.com/iHE788g.jpg>

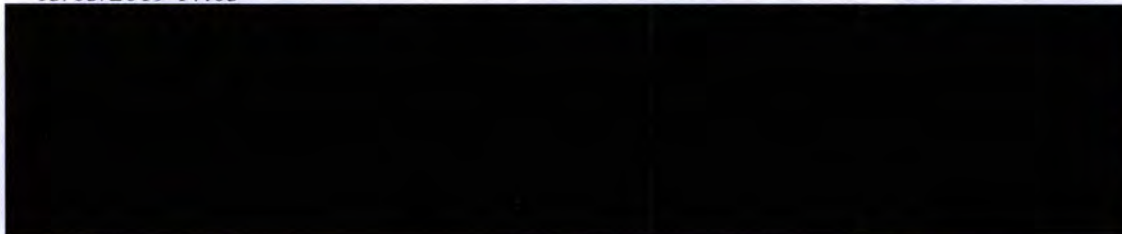
- |                  |                  |
|------------------|------------------|
| ① LPA05          | ⑥ S.O.5.1        |
| ② LPA02          | ⑦ LPA02 - PARA 3 |
| ③ GBR            | ⑧ LPA02 - PARA 4 |
| ④ S.A.           | ⑨ LPA03          |
| ⑤ S.O.4.1        | ⑩ LPA04          |
| ⑪ LPA05 - PARA 3 | ⑬ APPENDIX 4     |
| ⑫ LPA05 - PARA 4 | ⑭ TABLE 4.6      |
| ⑮ LPA05.1        | ⑯ LPA07, PARA 9  |
| ⑰ LPC02          | ⑲ LPC10 - PARA 6 |
| ⑱ LPC04          | ⑳ LPC13 - PARA 4 |
| ㉑ LPA06          | ㉒ LPD07          |
| ㉓ LPC01          | ㉔ LPD02          |
|                  | ㉕ LPD03          |



 <https://i.imgur.com/05aES4f.jpg>



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

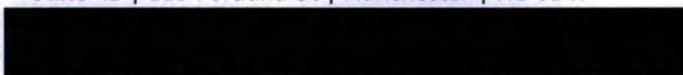
## Email 2

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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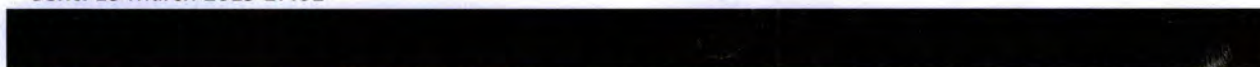
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**From:** Graham Lamb

**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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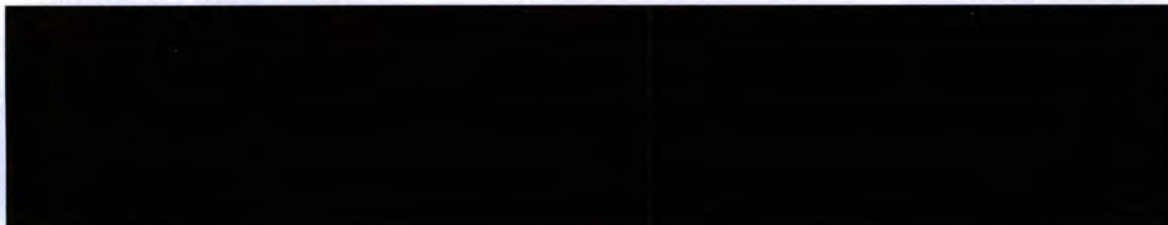
 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>





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

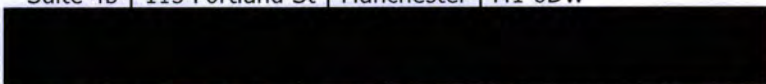
### Email 3

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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 Please consider the environment before printing this email message.

**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/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>

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.

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

**T** 0161 393 3399 | **W** [www.pegasuspg.co.uk](http://www.pegasuspg.co.uk)

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## 8. HOMES AND COMMUNITIES POLICIES (CHAPTER 6)

- 8.1 The policies and supporting text relating to the overall housing requirement and distribution strategy have been largely covered within sections 3 to 5; however, we make more specific comments below on the wording and mechanisms proposed in Chapter 6 'Homes and Communities'.

### Policy LPC01 - Housing Mix

- 8.2 We welcome the flexibility in Part 1 that housing mix should be informed by 'relevant evidence' including (but not limited to) the Borough's latest SHMA, as this acknowledges that there may be more localised and site specific evidence that supports a departure from the district wide mix requirements set out in the SHMA, and that such requirements will change through the course of the plan period. This is hugely important, as clearly any policy on housing mix must ensure that it does not frustrate delivery by being overly prescriptive. (17)
- 8.3 Part 2 of this policy requires greenfield developments of 25 or more new homes to provide optional standards on accessibility, with at least 20% designed to 'accessible and adaptable' standards in line with Part M4(2) and at least 5% designed to 'wheelchair user' standards in line with Part M4(3).
- 8.4 In addition, Part 3 requires greenfield developments of 25 or more to provide at least 5% as bungalows.
- 8.5 Whilst Redrow are fully committed to providing homes that are suitable for the needs of elderly and disabled people, we object to the blanket application of a 5% bungalow rate and 20% accessible home rate imposed by this policy. When this is coupled with a 30% requirement for affordable homes on greenfield sites (which we address in more detail below), this represents a significant proportion of non-standard housing for companies such as Redrow to deliver, given Redrow specialise in family housing. (17)
- 8.6 The NPPG (section 56, paragraphs 005-007) is clear that if a Council wishes to adopt the higher optional technical standards for accessible, adaptable and wheelchair homes it requires clear evidence on the following:
- the likely future need for housing for older and disabled people (including wheelchair user dwellings).
  - size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
  - the accessibility and adaptability of existing housing stock.
  - how needs vary across different housing tenures.
  - the overall impact on viability. (17)

- 8.7 Paragraph 56-008-20160519 also notes that policies should also consider site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for the optional accessibility standards, particularly where step free access cannot be achieved or is not viable.
- 8.8 The 2019 SHMA does reference the NPPG guidance and does include some evidence on future need for older and disabled people at the borough wide level; however, this simply reflects trends that are occurring across the country (i.e. an aging population) whilst there is no consideration of the adaptability of existing stock or any site-specific factors.
- 8.9 Furthermore, the SHMA highlights that it may be prudent to take a different approach to affordable and market housing (on the basis that many RPs already build to higher standards due to households in the affordable sector being more likely to have some form of disability), yet this has not been assessed further within the policy.
- 8.10 As such, it is our view that the optional accessibility requirements set out in Part 2 are not justified and should be removed unless the additional evidence referred to above is provided.
- 8.11 In terms of the 5% bungalow requirement in part 2, the previous SHMA only referred to a general requirement for bungalows (para 10.29), whilst the 2019 SHMA update specifically states how it is difficult to quantify a need/demand for bungalows. Furthermore, this requirement applies to all greenfield sites without differentiation in terms of location, the character of the area or densities, and therefore could generate conflict with other policies within the plan and frustrate delivery.
- 8.12 Therefore, it is our view that this bungalow requirement is unjustified and should be removed.
- 8.13 If the Council have ongoing and genuine concerns that the market will not deliver either specialist housing, bungalows or any other form of housing, we would suggest that the Council considers allocating additional land specifically for this form of development so as to attract specialist developers to the area.

#### **Policy LPC02 – Affordable Housing**

- 8.14 Redrow support the need to deliver affordable housing and fully recognise their obligations as a responsible housebuilder to assist in meeting such needs.
- 8.15 Redrow also support the notion of applying different affordable housing ratios to different parts of the Borough based on an understanding of needs and viability, as this accords with paragraph 34 of the 2019 NPPF which confirms that policies relating to planning contributions should not undermine the deliverability of plans.
- 8.16 This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable on greenfield sites within affordable housing zones 2 and 3, and 10% affordable homes where they are on brownfield sites in affordable housing zone 3.

PO3526





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, Eccleston 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 Forms
- 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 - LPD02

㉒ - LPD03

㉓ - LPC04

㉔ - LPA07 - PARA 3d

㉕ - LPA07 - PARA 9

㉖ - LPC10

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Suite 4b | 113 Portland Street | Manchester | M1 6DW



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 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

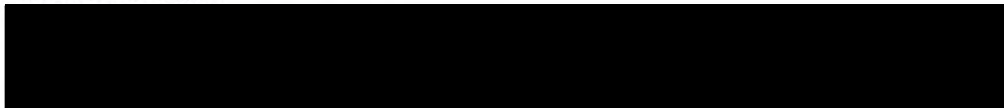
Email 2 of 4

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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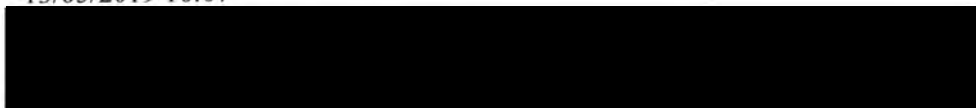
<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHE T88g.jpg>



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

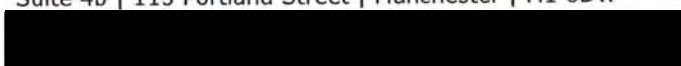
Email 3 of 4 of Redrow representations.

### 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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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).

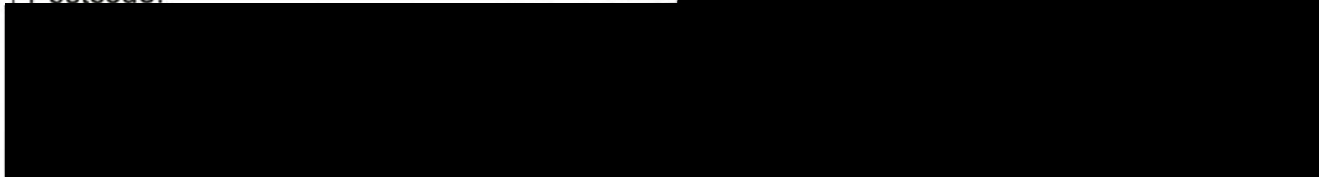
Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

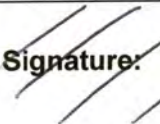
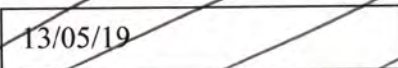
This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**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: 
--	--

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.**



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	LPC01	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 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.
<p>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> <p>REDROW OBJECT TO THE BLANKET APPLICATION OF 5% BUNGALOW RATES AND 20% ACCESSIBLE HOME RATE, WHICH ARE NOT JUSTIFIED BY A ROBUST EVIDENCE BASE.</p> <p>PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.</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.

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.





## **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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## **8. HOMES AND COMMUNITIES POLICIES (CHAPTER 6)**

- 8.1 The policies and supporting text relating to the overall housing requirement and distribution strategy have been largely covered within Sections 3 to 5; however, we make more specific comments below on the wording and mechanisms proposed in Chapter 6 'Homes and Communities'.

### **Policy LPC01 - Housing Mix**

- 8.2 We welcome the flexibility in Part 1 that housing mix should be informed by 'relevant evidence' including (but not limited to) the Borough's latest SHMA, as this acknowledges that there may be more localised and site specific evidence that supports a departure from the district wide mix requirements set out in the SHMA, and that such requirements will change through the course of the plan period. This is hugely important, as clearly any policy on housing mix must ensure that it does not frustrate delivery by being overly prescriptive.
- 8.3 Part 2 of this policy requires greenfield developments of 25 or more new homes to provide optional standards on accessibility, with at least 20% designed to 'accessible and adaptable' standards in line with Part M4(2) and at least 5% designed to 'wheelchair user' standards in line with Part M4(3).
- 8.4 In addition, Part 3 requires greenfield developments of 25 or more to provide at least 5% as bungalows.
- 8.5 Whilst Redrow are fully committed to providing homes that are suitable for the needs of elderly and disabled people, we object to the blanket application of a 5% bungalow rate and 20% accessible home rate imposed by this policy. When this is coupled with a 30% requirement for affordable homes on greenfield sites (which we address in more detail below), this represents a significant proportion of non-standard housing for companies such as Redrow to deliver, given Redrow specialise in family housing.
- 8.6 The NPPG (section 56, paragraphs 005-007) is clear that if a Council wishes to adopt the higher optional technical standards for accessible, adaptable and wheelchair homes it requires clear evidence on the following:
- the likely future need for housing for older and disabled people (including wheelchair user dwellings).
  - size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
  - the accessibility and adaptability of existing housing stock.
  - how needs vary across different housing tenures.
  - the overall impact on viability.



- 8.7 Paragraph 56-008-20160519 also notes that policies should also consider site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for the optional accessibility standards, particularly where step free access cannot be achieved or is not viable.
- 8.8 The 2019 SHMA does reference the NPPG guidance and does include some evidence on future need for older and disabled people at the borough wide level; however, this simply reflects trends that are occurring across the country (i.e. an aging population) whilst there is no consideration of the adaptability of existing stock or any site-specific factors.
- 8.9 Furthermore, the SHMA highlights that it may be prudent to take a different approach to affordable and market housing (on the basis that many Registered Providers already build to higher standards due to households in the affordable sector being more likely to have some form of disability), yet this has not been assessed further within the policy.
- 8.10 As such, it is our view that the optional accessibility requirements set out in Part 2 are not justified and should be removed unless the additional evidence referred to above is provided.
- 8.11 In terms of the 5% bungalow requirement in part 2, the previous SHMA only referred to a general requirement for bungalows (para 10.29), whilst the 2019 SHMA update specifically states how it is difficult to quantify a need/demand for bungalows. Furthermore, this requirement applies to all greenfield sites without differentiation in terms of location, the character of the area or densities, and therefore could generate conflict with other policies within the plan and frustrate delivery.
- 8.12 Therefore, it is our view that this bungalow requirement is unjustified and should be removed.
- 8.13 If the Council have ongoing and genuine concerns that the market will not deliver either specialist housing, bungalows or any other form of housing, we would suggest that the Council considers allocating additional land specifically for this form of development so as to attract specialist developers to the area.

**Policy LPC02 – Affordable Housing**

- 8.14 Redrow support the need to deliver affordable housing and fully recognise their obligations as a responsible housebuilder to assist in meeting such needs.
- 8.15 Redrow also support the notion of applying different affordable housing ratios to different parts of the Borough based on an understanding of needs and viability, as this accords with paragraph 34 of the 2019 NPPF which confirms that policies relating to planning contributions should not undermine the deliverability of plans.
- 8.16 This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable on greenfield sites within affordable housing zones 2 and 3, and 10% affordable homes where they are on brownfield sites in affordable housing zone 3.



PO3527

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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



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑧ LPA02-PARA 4

⑨ LPA03

⑩ LPA04

⑪ LPA05-PARA 3

Dear Sir/Madam,

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

㉑ LPA07-PARA 3c

㉒ LPA07

㉓ LPA07-PARA 9

㉔ LPA02

㉕ LPC10

㉖ LPA03

Many thanks and kind regards,

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

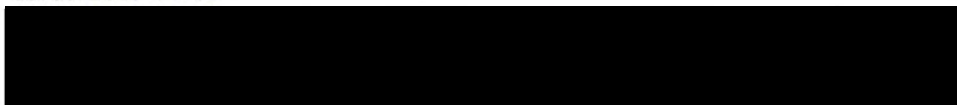
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Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:13



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.

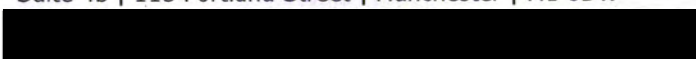
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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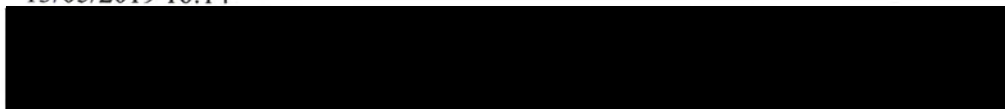
Representations to Local Plan Submission Draft Consultation-Wallace-Email 3 of 8

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.

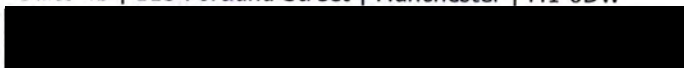
**Rebecca Dennis**

Principal Planner

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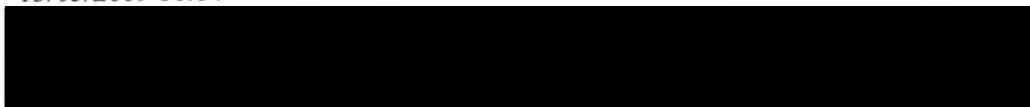
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Representations to Local Plan Submission Draft Consultation-Wallace-Email 4 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:14



2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

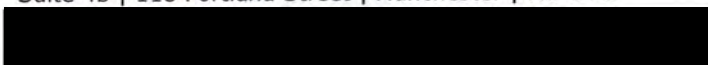
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Suite 4b | 113 Portland Street | Manchester | M1 6DW



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mailto:rebecca.dennis@pegasusgroup.co.uk

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

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<https://i.imgur.com/iHET88g.jpg>



<https://i.imgur.com/05aES4f.jpg>



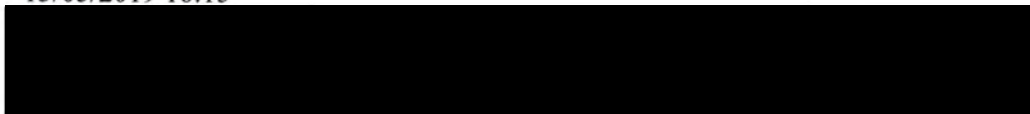
Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8

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.

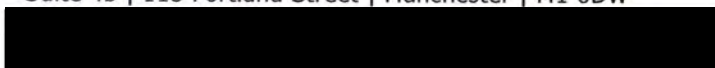
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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<https://i.imgur.com/ZuAcceY.jpg>

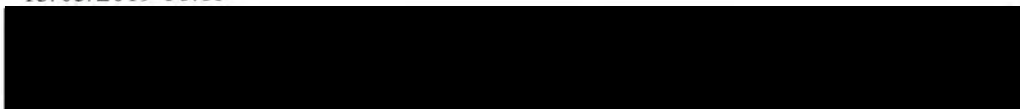


<https://i.imgur.com/iHET88g.jpg>





Representations to Local Plan Submission Draft Consultation-Wallace-Email 6 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:15



1 Attachment



Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

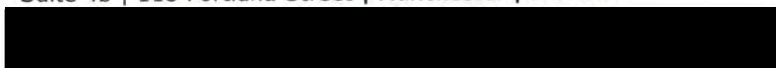
Email 6 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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 <https://i.imgur.com/iHEt88g.jpg>

 <https://i.imgur.com/05aES4f.jpg>



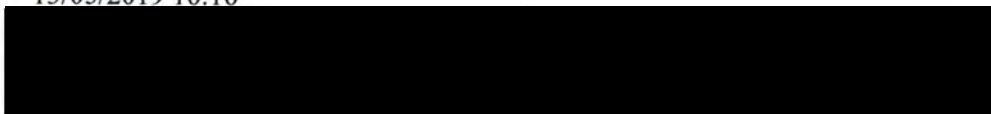
# Representations to Local Plan Submission Draft Consultation-Wallace-Email 7 of 8

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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<https://i.imgur.com/iHET88g.jpg>



Representations to Local Plan Submission Draft Consultation-Wallace-Email 8 of 8  
Rebecca Dennis  
to:  
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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Suite 4b | 113 Portland Street | Manchester | M1 6DW



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<https://i.imgur.com/iHEt88g.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**

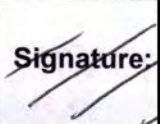
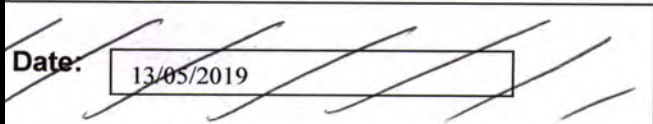
**Part B – Your Representation(s).**

**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: 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:  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)

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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	LPC01	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 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 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

WALLACE RAISE CONCERNS WITH THE BLANKET APPLICATION OF 5% BUNGALOW RATES AND 20% ACCESSIBLE HOME RATE, WHICH ARE NOT JUSTIFIED BY A ROBUST EVIDENCE BASE.

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.

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"/>	<b>No</b> , I do not wish to participate at the oral examination	<input checked="" 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:

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**



## 8. HOMES AND COMMUNITIES POLICIES (CHAPTER 6)

- 8.1 The policies and supporting text relating to the overall housing requirement and distribution strategy have been largely covered within sections 3 to 5; however we make more specific comments below on the wording and mechanisms proposed in Chapter 6 'Homes and Communities'.

### Policy LPC01 - Housing Mix

- 8.2 We welcome the flexibility in Part 1 that housing mix should be informed by 'relevant evidence' including (but not limited to) the Borough's latest SHMA, as this acknowledges that there may be more localised and site specific evidence that supports a departure from the borough wide mix requirements set out in the SHMA, and that such requirements will change through the course of the plan period. This is hugely important, as clearly any policy on housing mix must ensure that it does not frustrate delivery by being overly prescriptive. (17)
- 8.3 Part 2 of this policy requires greenfield developments of 25 or more new homes to provide optional standards on accessibility, with at least 20% designed to 'accessible and adaptable' standards in line with Part M4(2) and at least 5% designed to 'wheelchair user' standards in line with Part M4(3).
- 8.4 In addition, Part 3 requires greenfield developments of 25 or more to provide at least 5% as bungalows.
- 8.5 Whilst Wallace fully support the provision of homes that are suitable for the needs of elderly and disabled people, the blanket application of a 5% bungalow rate and 20% accessible home rate as proposed by this policy may prove counterproductive. When this requirement is coupled with a 30% requirement for affordable homes on greenfield sites (which we address in more detail below), this represents a significant proportion of non-standard housing to be accommodated within developments which will have a focus on the delivery of family housing.
- 8.6 The NPPG (section 56, paragraphs 005-007) is clear that if a Council wishes to adopt the higher optional technical standards for accessible, adaptable and wheelchair homes it requires clear evidence on the following: (17)
- the likely future need for housing for older and disabled people (including wheelchair user dwellings).
  - size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
  - the accessibility and adaptability of existing housing stock.
  - how needs vary across different housing tenures.
  - the overall impact on viability.



- 8.7 Paragraph 56-008-20160519 also notes that policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for the optional accessibility standards, particularly where step free access cannot be achieved or is not viable. ✓
- 8.8 The 2019 SHMA does reference the NPPG guidance and does include some evidence on future need for older and disabled people at the borough wide level; however, this simply reflects trends that are occurring across the country (i.e. an aging population) whilst there is no consideration of the adaptability of existing stock or any site-specific factors.
- 8.9 Furthermore, the SHMA highlights that it may be prudent to take a different approach to affordable and market housing (on the basis that many Registered Providers already build to higher standards due to households in the affordable sector being more likely to have some form of disability), yet this has not been assessed further within the policy. (17)
- 8.10 As such, it is our view that the optional accessibility requirements set out in Part 2 are not justified and should be removed unless the additional evidence referred to above is provided.
- 8.11 In terms of the 5% bungalow requirement in part 2, the previous SHMA only referred to a general requirement for bungalows (para 10.29), whilst the 2019 SHMA update specifically states how it is difficult to quantify a need/demand for bungalows. Furthermore, this requirement applies to all greenfield sites without differentiation in terms of location, the character of the area or densities, and therefore could generate conflict with other policies within the plan and frustrate delivery. (17)
- 8.12 Therefore, it is our view that this bungalow requirement is not supported by evidence and should be removed.
- 8.13 If the Council have ongoing and genuine concerns that the market will not deliver either specialist housing, bungalows or any other form of housing, we would suggest that the Council considers allocating additional land specifically for this form of development so as to attract specialist developers to the area.

#### **Policy LPC02 – Affordable Housing**

- 8.14 Wallace support the need to deliver affordable housing and fully recognise their obligations as a responsible promoter to assist in meeting such needs.
- 8.15 Wallace also support the approach of applying different affordable housing ratios to different parts of the Borough based on an understanding of needs and viability, as this accords with paragraph 34 of the 2019 NPPF which confirms that policies relating to planning contributions should not undermine the deliverability of plans.

PO3528

LP0040

EF0087

SITES - 8HS - 3HS



K Marr - St Helens LPSD representation form .  
Ken Marr to: planningpolicy

13/05/2019 14:20

2 attachments



Chapel Lane Petition Signatures.pdf St Helens LPSD response - final - 13 May 2019.pdf

Dear Planning Policy Unit

Attached is my response to the Local Plan Submission Draft dated today.  
It is also made on behalf of other residents on Chapel Lane Eccleston WA10  
5DA & 5DB.

A copy of Petition Signature schedule giving permission for this is also  
attached.

Please confirm receipt.

kind regards

Ken Marr

---

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<https://www.avg.com>

- ① - DEC - para 1.7.2
- ② - LPA01
- ③ - LPA03
- ④ - GENERAL
- ⑤ - LPA05
- ⑥ - LPA06
- ⑦ - S.A
- ⑧ - GER - GENERAL
- ⑨ - GER - 8HS
- ⑩ - GER - 3HS
- ⑪ - LPA04
- ⑫ - LPA07 - 8HS
- ⑬ - IDP
- ⑭ - LPC01





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 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).

**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: Kenneth	First name:
Last Name: Marr	Last Name:
Organisation/company:	Organisation/company:
Address: Beech Lea 7 Chapel Lane Eccleston St Helens Merseyside Postcode: WA10 5DA	Address:  Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 13 <sup>th</sup> 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.

<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

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

## 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.**



## PART B – YOUR REPRESENTATION

### B6 HOUSING MIX & TYPE (LPC01& 02)

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  <b>LPC01 &amp; 02</b>		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 <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

- The LPSPD proposes 1,983 new homes on 3HS Eccleston Park Golf Club and 8HS East Lancs Road. the 2011 census recoded the housing stock as 4,828. New housing proposed beyond 2035 is approximately 40% increase in the Eccleston and Windle area. This could be considered disproportionate & adversely affect the character of the community, failing the Community objective strand of sustainable development under national policy. 6
- The Local Plan promotes rural fringe development over Town centre /Edge of town development leaving the poorer run down central urban areas lying fallow and undeveloped over the period of the plan and beyond. – this is not consistent with NPPF policy for town centre regeneration. 2
- The notional housing Densities proposed are low and this is not consistent with NPPF section 11 for the effective use of Land. To comply with Planning policy development should be situated in town centre areas adjacent transport hubs with increased densities. 5



4. Volume house builders have only one duty. That is to make profits for their shareholders. Community interests are secondary and they can control delivery to ensure profitability<sup>14</sup>. As they control delivery and can render Local Plans out of date if Housing Delivery Tests are not met. They can produce featureless large sites of uniform housing.
5. The proposals for the supply of 30% affordable housing is not guaranteed, if developer profits are under threat, using viability rules. Affordable housing is defined as 20% below market rate making most homes of £300, 000 unaffordable to most people in St Helens. There is no mention of social housing which is determined by the council and can be as low as 60% of market rate. In comparison, the Greater Manchester Spatial Framework (GMSF) proposes 35% affordable homes with 50% being social housing.
6. The housing numbers fail to distinguish between need and demand leading to inflated housing requirements<sup>15</sup>.
7. The LPSD by favouring the large developments on rural fringe sites over central urban area sites is promoting a policy of building the wrong homes in the wrong places. Building large estates of executive style homes beyond the reach of most St Helens cannot be justified. Set against the uncertain and challenging economic background, the LPSD proposals will not provide affordable homes for local people nor will ease the social housing and homelessness situation. It is not clear how the vulnerable will benefit from this Local Plan.

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 Housing allocations require review as they are in Eccleston case disproportionate could affect local character and not satisfy Sustainable Development policy.
- The LPSD proposals must ensure Viability rules are robust.
- Housing need should distinguish between demand and need.
- The LPSD should be reviewed to ensure development is directed to Urban areas to comply with National Policy.

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)

<sup>14</sup> 'Interim and Final reports Independent Review of Build Out' by Oliver Letwin reports to Chancellor -2018

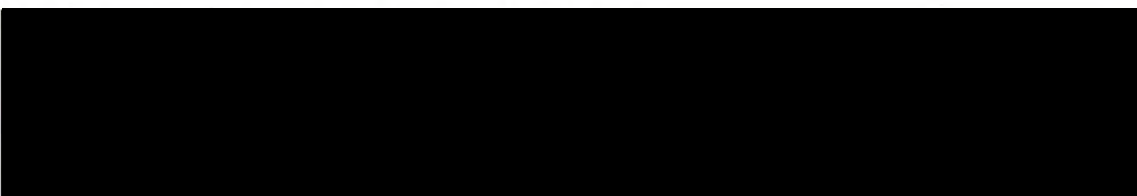
<sup>15</sup> CPRE Needless demand. Sept 2017.



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

I wish to attend the EiP, but not necessarily to speak.



Kirkwells submission was submitted on the 13<sup>th</sup> March 2019.

I would therefore like to nominate Michael Wellock of Kirkwells, to represent the groups and speak on our behalf.

I would like to attend to support him in that capacity.

**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.

PO3529





St. Helens  
Council

① - LPA02    ② - LPA05  
③ - LPA07    ④ - LPA01

384

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

Ref: LPSD

**11 MAR 2019**

(For official use only)

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**Part B** – Your Representation(s).

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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: MARTIN	First name:
Last Name: SWIFT	Last Name:
Organisation/company:	Organisation/company:
Address: 103 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

8/3/2019

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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post to:

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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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3. To which part of the Local Plan does this representation relate?									
Policy	LPC01	Paragraph / diagram / table	6.1	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	3.5.7 3.3.30 3.3.22 3.3	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 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 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

This Local Plan is not sound or justified as the proposed 8HA development is contrary to the statements within the Strategic Aims & Objectives of the Plan and Policy LPC01.

St.Helens is a borough with a falling population and house prices below the national average, and Rainford already has a large number of affordable family houses on the market for sale. There is no evidence of a housing shortage in St.Helens & it has been stated that St.helens has a greater home ownership than other parts of the country.

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This Local Plan is contrary to the policy objective of avoiding harming the amenities, character & appearance of Rainford, due to the 259 proposed units.

Given the ageing Rainford village population, any development should have a high % of homes for life ie. Bungalows with consideration given to disabled access and new pedestrian routes/ footpath improvements made to allow for disabled motorised scooters to be used to & from village to maintain independent living.

(4)



Local occupancy restrictions should be stated within planning application to ensure local residents move from a family house onto a bungalow.

There is currently a shortage within the Rainford housing market for bungalows, and would assist St. Helens tackle the growing Social Care problem all Council's are facing to support elderly residents to stay in their own homes for as long as possible.

Other planning constraints should ensure the development provides a play area & some open communal space within site, as Rainford currently does not have sufficient play areas for children.

The Local Plan for 8HA consistently fails to meet its strategic aims & objectives and is not justified.

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.

Reduce the number of proposed housing units within the allocated site 8HA.

Ensure detailed planning conditions are put in place to improve the basic infrastructure facilities of the village to support any new development.

Any new housing should have a local occupancy restriction to ensure that any young Rainford families receive priority over families from out of town

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
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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

PO3530



PFO354



St. Helens  
Council

① - LPA02    ② - LPA05  
③ - LPA07    ④ - LPC01

385

Ref: LPSD

11 MAR 2019

(For official use only)

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Title: MRS	Title:
First Name: SUSAN	First name:
Last Name: SWIFT	Last Name:
Organisation/company:	Organisation/company:
Address: 103 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

08/03/2019

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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 ☐



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

Policy	LPC01	Paragraph / diagram / table	6.1	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	3.5.7 3.3.30 3.3.22 3.3	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

This Local Plan is not sound or justified as the proposed 8HA development is contrary to the statements within the Strategic Aims & Objectives of the Plan and Policy LPC01.

St.Helens is a borough with a falling population and house prices below the national average, and Rainford already has a large number of affordable family houses on the market for sale. There is no evidence of a housing shortage in St.Helens & it has been stated that St.helens has a greater home ownership than other parts of the country.

An extra 259 units would have a significant detrimental impact on the existing community facilities and amenities currently used by Rainford residents.

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Given the ageing Rainford village population, any development should have a high % of homes for life ie. Bungalows with consideration given to disabled access and new pedestrian routes/ footpath improvements made to allow for disabled motorised scooters to be used to & from village to maintain independent living.



Local occupancy restrictions should be stated within planning application to ensure local residents move from a family house onto a bungalow.

There is currently a shortage within the Rainford housing market for bungalows, and would assist St. Helens tackle the growing Social Care problem all Councils are facing to support elderly residents to stay in their own homes for as long as possible.

Other planning constraints should ensure the development provides a play area & some open communal space within site, as Rainford currently does not have sufficient play areas for children.

The Local Plan for 8HA consistently fails to meet its strategic aims & objectives and is not justified.

Please continue on a separate sheet if necessary

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Any new housing should have a local occupancy restriction to ensure that any young Rainford families receive priority over families from out of town

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X	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.



PO3531



St. Helens  
Council

①-LPA02 ②-LPA05  
③-LPA07 ④-LPC01

375

Ref: LPSD

11 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: MARIAN	First name:
Last Name: MORGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 101 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

08/03/2019

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Yes ☐ (Via Email)

No ☐

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

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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"/>
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Other planning constraints should ensure the development provides a play area & some open communal space within site, as Rainford currently does not have sufficient play areas for children.

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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:

PO3532



①-LPA02 ②-LPA05 PFO361  
③-LPA07 ④-LPC01 (396)

361



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

Ref: LPSD  
11 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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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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ROSALINE</u>	First name: _____
Last Name: <u>SWIFT</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>40 HEYES AVENUE</u>	Address: _____
<u>RAINFORD</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA11 8AR</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>8 March 2019</u>
------------------	---------------------------

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)

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

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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.

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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	LPC01	Paragraph / diagram / table	6.1	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	3.5.7 3.3.30 3.3.22 3.3	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 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 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

This Local Plan is not sound or justified as the proposed 8HA development is contrary to the statements within the Strategic Aims & Objectives of the Plan and Policy LPC01.

St.Helens is a borough with a falling population and house prices below the national average, and Rainford already has a large number of affordable family houses on the market for sale. There is no evidence of a housing shortage in St.Helens & it has been stated that St.helens has a greater home ownership than other parts of the country.

An extra 259 units would have a significant detrimental impact on the existing community facilities and amenities currently used by Rainford residents.

This Local Plan is contrary to the policy objective of avoiding harming the amenities, character & appearance of Rainford, due to the 259 proposed units.

Given the ageing Rainford village population, any development should have a high % of homes for life ie. Bungalows with consideration given to disabled access and new pedestrian routes/ footpath improvements made to allow for disabled motorised scooters to be used to & from village to maintain independent living.



Local occupancy restrictions should be stated within planning application to ensure local residents move from a family house onto a bungalow.

There is currently a shortage within the Rainford housing market for bungalows, and would assist St. Helens tackle the growing Social Care problem all Council's are facing to support elderly residents to stay in their own homes for as long as possible.

Other planning constraints should ensure the development provides a play area & some open communal space within site, as Rainford currently does not have sufficient play areas for children.

The Local Plan for 8HA consistently fails to meet its strategic aims & objectives and is not justified.

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.

Reduce the number of proposed housing units within the allocated site 8HA.

Ensure detailed planning conditions are put in place to improve the basic infrastructure facilities of the village to support any new development.

Any new housing should have a local occupancy restriction to ensure that any young Rainford families receive priority over families from out of town

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)

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

PO3533

ELO112



HBF response to St Helens Local Plan Submission

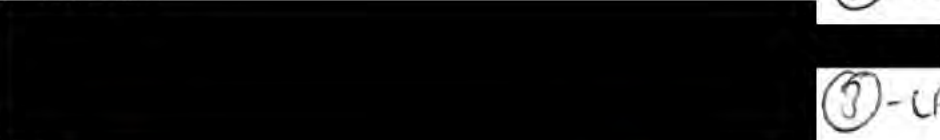
Joanne Harding

to:

planningpolicy@sthelens.gov.uk

12/03/2019 17:26

Hide Details



2 Attachments



19-03-13 St Helens Local Plan Submission.docx HBF lpsd-representation-form-signed.pdf

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

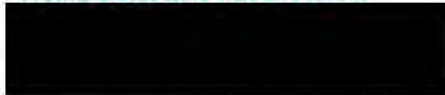
If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI

Local Plans Manager - North

HOME BUILDERS FEDERATION



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① - STRATEGICAL Aims &amp; OBJECTIVES

② - LPA05

③ - LPA05 - PARA. 3

④ - LPA05 - PARA 4

⑤ - LPA07 - PART 3C

⑥ - LPA07 - PART 9

⑦ - LPC01 - PART 1

⑧ - LPC01 - PART 2

⑨ - LPC01 - PART 3

⑩ - LPC01 - PART 4

⑪ - LPC02

⑫ - LPC10

⑬ - LPC13

⑭ - LPD07





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: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House 27 Broadwall London	Address:
Postcode: SE1 9PL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	13/03/2019
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Yes ☒ (Via Email)

No ☐

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Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

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Other documents (please name document and relevant part/section)				Please see separately attached letter.					

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 see separately attached letter.		

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"/> Please see separately attached letter.
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

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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 separately attached letter.



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 separately attached letter.

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 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:

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

**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.

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

SENT BY EMAIL  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
13/12/2018

Dear Sir / Madam,

#### **ST HELENS LOCAL PLAN SUBMISSION DRAFT**

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members. ✓

#### **Vision and Objectives**

*The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:*

The HBF support the part of the vision which 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'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as set out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply. ①



The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on matters in relation to housing delivery and would be keen to work proactively with the Council on this issue. ✓

The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure. ] (2)

#### **Policy LPA07: Transport and Travel**

*The HBF does not consider that Policy LPA07 is sound, as it is not justified or effective for the following reasons:*

Part 3c of this policy states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst the HBF do not oppose the provision of electric charging points, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others. ] (5)

The HBF also have concerns that part 9 states that further details of the operation of this policy including standards for vehicle charging provision will be set out in a Supplementary Planning Document (SPD). It is not considered appropriate to set out in SPD elements of policy, namely the number of charging points that would be 'appropriate provision', that will have a direct role in the determination of a planning application. The HBF consider that these elements should be set out in policy and open for debate at the Examination in Public, without these details it is impossible to consider the impact of these policies on viability or whether they are justified and effective. The HBF would encourage the Council to work with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require. ] (6)

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

- Further consideration is given to what the Council consider to be 'appropriate provision' supported by evidence.
- That additional standards for electric charging point provision are not included within an SPD that will not be tested at examination. ✓

#### **Policy LPC01: Housing Mix**

*The HBF does not consider that Policy LPC01 is sound, justified, effective or consistent with national policy for the following reasons:*



Part 1 of this policy looks for new market and affordable homes to include a range of types, tenures and sizes of homes as informed by relevant evidence including the SHMA. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. It is noted how frequently the Viability Assessment 2019 highlights the implications of the SHMA housing mix on the viability of development.

7

Part 2 of this policy states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards.

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for St Helens which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. The SHMA Update January 2019 does provide some limited evidence in relation to the likely future need for housing for older people and disabled people it provides limited information in relation to the size, location, type or quality of dwellings needs and no evidence in relation to the accessibility and adaptability of the existing housing. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.

8

The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

8

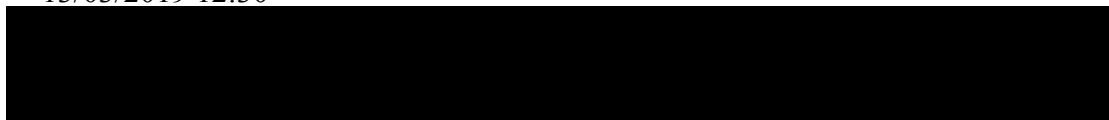
Part 3 of this policy requires at least 5% of new homes on greenfield sites of 25 or more homes to be bungalows. The reasoning for this requirement is unclear, whilst the 2016 SHMA identifies that there is typically a demand for bungalows (paragraph 10.29) this assertion is not supported by specific evidence of need. Whilst the 2019 Update to the SHMA actually states that is difficult to quantify a need/demand for bungalows. Furthermore, the policy applies to all greenfield sites without

9

PO3534



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)

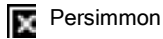


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**St. Helens Borough Local Plan  
2020-2035 Submission Draft**

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Representations submitted on behalf of Persimmon Homes North West

**March 2019**



development is not encumbered by any technical or legal constraints which would preclude delivery of homes commencing early in the Plan period.

---

**Policy LPA06: Safeguarded Land**

- 8.1 The Company supports policy LPA06 and the release of additional land from the Green Belt in order to meet needs beyond the Plan period; this being in accordance with the Framework which is clear that authorities should identify areas of safeguarded land in order to meet longer term development needs stretching beyond the plan period (para 139), also having regard to their intended permanence in the long term (para 136).

21

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**Policy LPA06 Extent of the Green Belt and Safeguarded Land**

- 9.1 As referred in our response to Policy LPA02, the Company supports the release of sites from the Green Belt to meet housing and employment requirements. It is considered that the delivery of homes to meet objectively assessed need for housing and to support economic growth constitutes the 'exceptional circumstances' required in the Framework.

22

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**Policy LPA08 Infrastructure Delivery and Funding**

- 10.1 The Company generally supports Policy LPA08 concerning developer contributions, subject to the appropriateness of contributions sought being assessed against the tests set out at para 58 of the Framework, and also that the extent of obligations sought does not threaten the viability of sites (Ref: 23b-002-20140306).

23

---

**Policy LPC01: Housing Mix**

- 11.1 The Company generally supports paragraph 1 of Policy LPC01, which seeks to provide a range of new market and affordable homes which includes a range of types, tenures and sizes in accordance with those needs set out within the SHMA; however would stress that the prospects of housing schemes coming forward should not be constrained by unrealistic and overly onerous housing mix obligations which have significant repercussions on viability.
- 11.2 Housing mix, type and size is often determined by the scale of development and market area and it would not be appropriate to assume a one size fits all approach. Paragraph 7.36 of the SHMA corresponds that although the types of homes needed in St Helens can be quantified using modelling and an understanding of the current market, 'it does not follow that such prescriptive figures should be included in the plan-making process'...the market is to some

24



degree a better judge of what the most appropriate profile of home to deliver at any point in time...'

---

11.3 It is also the case that the Company considers that the Council should remain cautious in implementing part 3 of the policy which requires 5% of new homes on greenfield sites of 25 dwellings or more be bungalows.

11.4 As the SHMA acknowledges, the sources of information used 'make it difficult to quantify a need/demand for bungalows in the Borough' with the policy being guided by discussions with estate agents. It is not considered that this represents sufficient justification to warrant the policy requirement.

25

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11.5 It also noted that the Council are seeking introduction of optional standards as set out in Parts M4 (2) and M4 (3) of Building Regulations 2010, seeking at least 20% of new dwellings be designed to the 'accessible and adaptable' standard set out in Part M4 (2); and at least 5% of new dwellings being designed to the wheelchair user' dwelling standard set out in Part M4 (3).

11.6 The Company is supportive of providing homes suitable to meet the needs of older and disabled persons; however PPG is clear that local authorities should gather evidence to determine whether there is a need for these additional standards (Ref: 56-002-20160519) and should consider the impact of using these standards as part of their Local Plan viability assessment (Ref: 56-003-20160519). Contrary to paragraph 4 of the policy, the onus is on the Council to justify the inclusion of the optional standard within policy and also to consider implications on viability of Local Plan sites at the plan-making stage. PPG is clear that the Council should take into account the following (Ref: 56-007-20150327) :-

26

- The likely future need for housing for older and disabled people (including wheelchair user dwellings).
- Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- The accessibility and adaptability of existing housing stock.
- How needs vary across different housing tenures.
- The overall impact on viability.

PO3535

E-LO229



St Helens Local Plan Submission Draft - strategic representations on behalf of

Wainhomes NW

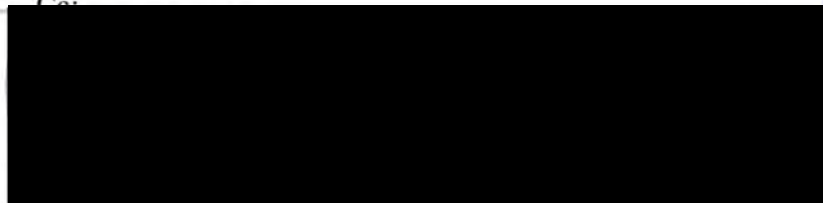
Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:16

Cc:



1 Attachment



Representations - St Helens LP Reg 19 - Wainhomes combined.pdf

Dear Sir / Madam,

Please find attached, strategic written representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan.

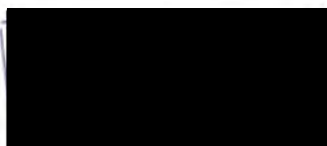
We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

**Nick Scott**

Assistant Consultant



① - GENERAL

② - LPA05

③ - LPC02

④ - LPA05.1

ns.gov.uk&gt;

⑤ - LPA06

⑥ - LPC01 - CRITERIA 1

⑦ - LPC01 - CRITERIA 2

⑧ - LPC01 - CRITERIA 3

⑨ - LPC13

⑩ - LPA05 - TABLE 4.6

Emery Planning is proud to support the Keaton Emery Memorial Foundation. To find out more about the charity or to make a donation, please visit [www.keatonemeryfoundation.com](http://www.keatonemeryfoundation.com)

**emery**  
planning

Emery Planning Partnership Ltd trading as  
Emery Planning

Emery Planning  
2-4 South Park Court  
Hobson Street  
Macclesfield  
SK11 8BS

Registered  
office as above





## Representations to the Submission Draft

St Helens Local Plan – Regulation 19

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005



## 8. Policy LPC01: Housing Mix

- 8.1 Part 1 of the policy requires the mix of housing on development proposals to be informed by "relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA)." All development plan policies must be clear and transparent. The policy as worded is extremely ambiguous and is not clear what 'relevant evidence' is (other than the SHMA). Furthermore, the wording of the policy refers to the 'latest' SHMA, suggesting that that the policy requirement could in effect change over time, without being tested through the development plan process. (6)
- 8.2 Turning to the mix set out within the 2018 SHMA, this is driven by the demographic makeup of new households. There is insufficient assessment of market demand. Many households choose to occupy houses with more bedrooms than technically required, for example older households who choose not to downsize and households requiring guestrooms, home offices etc. By failing to adequately account for demand additional pressures will be placed upon the housing market. This must be reflected within the policy.
- 8.3 Part 2 of the policy states that the Council will apply the optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended). The Council's own viability evidence indicates that such a requirement would not be viable on a number of sites (see Table 6.19 of the Council's viability assessment). The proposal therefore conflicts with paragraphs 56-002 and 56-003 of the PPG. (7)
- 8.4 Finally, Part 3 of the draft policy requires at least 5% of new homes on greenfield sites that would deliver 25 or more dwellings to be bungalows. There is no evidential basis for this requirement. The 2018 SHMA simply states at paragraph 7.37:
- "The sources used for analysis in this report makes it difficult to quantify a need/demand for bungalows in the Borough as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. However, it is typical (where discussion are undertaken with local estate agents) to find that there is a demand for this type of accommodation."* (8)
- 8.5 Therefore it is apparent that there is no analysis of need undertaken through the SHMA; it is simply assumed that there is demand because it would be 'typical' to find demand if it had been investigated.

PO3536





Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
 Hannah Payne  
 to:  
[planningpolicy@sthelens.gov.uk](mailto: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



**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](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.

**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		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 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 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 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)

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

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.

St James' Tower,  
7 Charlotte Street,  
Manchester, M1 4DZ

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

By email

planningpolicy@sthelens.gov.uk

let.001.NF..21450010

13 March 2019

Dear Sirs

## ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

### Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

### Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

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Registered number 2078863 VAT number 849246134





# indigo.

## Policy LPA08: Infrastructure Delivery and Funding

We welcome the additional clarity and flexibility introduced within the policy but the Council must ensure that they do not impose requirements that could render schemes unviable.

23

It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis and, additionally, how any such infrastructure requirements might otherwise be assisted by the introduction of CIL.

24

Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

## Policy LPC01: Housing Mix

We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, at least 20% of the new dwellings must be designed to be "*accessible and adaptable*" and 5% of the market housing should be bungalows is unjustified and contrary to national policy. The policy also refers to 'optional standards' but that a) AND b) will be applied. This reference should therefore be removed.

25

The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date market evidence.

26

Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

LPC01(4) sets out exceptions to providing the above on viability grounds however, there are also site specific conditions and limitations which would render the requirements undeliverable in some instances. The policy should there be reworded to provide flexibility.

27

It must be noted that when discussing housing mix on a site at application stage, the Local Planning Authority must refer to the most up to date SHMA.

## Policy LPC02: Affordable Housing

Barratt are one of the United Kingdom's main providers of affordable homes and

28

PO3537

ELO112



HBF response to St Helens Local Plan Submission

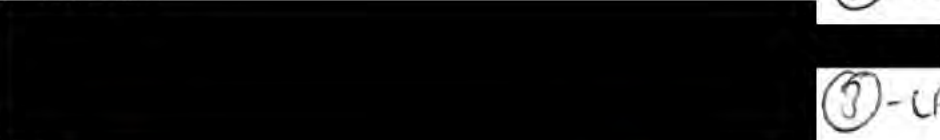
Joanne Harding

to:

planningpolicy@sthelens.gov.uk

12/03/2019 17:26

Hide Details



2 Attachments



19-03-13 St Helens Local Plan Submission.docx HBF lpsd-representation-form-signed.pdf

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

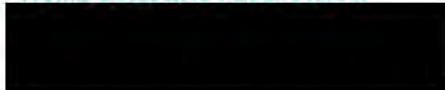
If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI

Local Plans Manager - North

HOME BUILDERS FEDERATION



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Company Reg No. 276 4757 | Vat No. 882 6294 86

① - STRATEGICAL Aims &amp; OBJECTIVES.

② - LPA05

③ - LPA05 - PARA. 3

④ - LPA05 - PARA 4

⑤ - LPA07 - PART 3C

⑥ - LPA07 - PART 9

⑦ - LPC01 - PART 1

⑧ - LPC01 - PART 2

⑨ - LPC01 - PART 3

⑩ - LPC01 - PART 4

⑪ - LPC02

⑫ - LPC10

⑬ - LPC13

⑭ - LPD07





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: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House 27 Broadwall London	Address:
Postcode: SE1 9PL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	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 ☒ (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)				Please see separately attached letter.					

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 see separately attached letter.		

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"/> Please see separately attached letter.
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 <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 see separately attached letter.



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 separately attached letter.

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:

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

**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.

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

SENT BY EMAIL  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
13/12/2018

Dear Sir / Madam,

#### **ST HELENS LOCAL PLAN SUBMISSION DRAFT**

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members. ✓

#### **Vision and Objectives**

*The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:*

The HBF support the part of the vision which 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'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as set out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply. (1)



The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on matters in relation to housing delivery and would be keen to work proactively with the Council on this issue.

The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

#### **Policy LPA07: Transport and Travel**

*The HBF does not consider that Policy LPA07 is sound, as it is not justified or effective for the following reasons:*

Part 3c of this policy states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst the HBF do not oppose the provision of electric charging points, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others.

The HBF also have concerns that part 9 states that further details of the operation of this policy including standards for vehicle charging provision will be set out in a Supplementary Planning Document (SPD). It is not considered appropriate to set out in SPD elements of policy, namely the number of charging points that would be 'appropriate provision', that will have a direct role in the determination of a planning application. The HBF consider that these elements should be set out in policy and open for debate at the Examination in Public, without these details it is impossible to consider the impact of these policies on viability or whether they are justified and effective. The HBF would encourage the Council to work with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

- Further consideration is given to what the Council consider to be 'appropriate provision' supported by evidence.
- That additional standards for electric charging point provision are not included within an SPD that will not be tested at examination.

#### **Policy LPC01: Housing Mix**

*The HBF does not consider that Policy LPC01 is sound, justified, effective or consistent with national policy for the following reasons:*



Part 1 of this policy looks for new market and affordable homes to include a range of types, tenures and sizes of homes as informed by relevant evidence including the SHMA. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. It is noted how frequently the Viability Assessment 2019 highlights the implications of the SHMA housing mix on the viability of development.

7

Part 2 of this policy states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards.

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for St Helens which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. The SHMA Update January 2019 does provide some limited evidence in relation to the likely future need for housing for older people and disabled people it provides limited information in relation to the size, location, type or quality of dwellings needs and no evidence in relation to the accessibility and adaptability of the existing housing. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.

8

The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

8

Part 3 of this policy requires at least 5% of new homes on greenfield sites of 25 or more homes to be bungalows. The reasoning for this requirement is unclear, whilst the 2016 SHMA identifies that there is typically a demand for bungalows (paragraph 10.29) this assertion is not supported by specific evidence of need. Whilst the 2019 Update to the SHMA actually states that is difficult to quantify a need/demand for bungalows. Furthermore, the policy applies to all greenfield sites without

9

PO3538



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

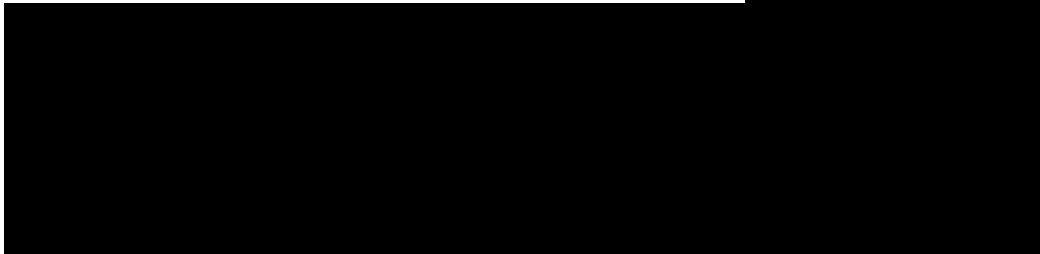
Dear Sir / Madam,

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

Response Date	3/13/2019 8:50:55 AM
---------------	----------------------

# St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019



- 3.55 As such, our Client's consider that the above policy should specify that areas of Green Infrastructure should be protected in accordance with their value in amenity and ecological value. Part 4 of the policy that states that development which would result in the loss of any Green Infrastructure assets will be refused. This is an elevated status of protection that should not be afforded to all Green Infrastructure regardless of level of value that has been afforded to it.

---

#### **Policy LPC01 – Housing Mix**

- 3.56 Our Client is supportive of the Policy's intention to seek provision of a wide range of affordable and market housing to meet local housing need. Notwithstanding this, we do not support the inclusion of a policy which places an arbitrary requirement on developments to deliver 5% of the market housing mix as bungalows.

- 3.57 Paragraph 2 of Policy LPC01 also requires that 20% of all dwellings should be designed to optional standards set out in Part M4(2) and M4(3) of the Building Regulations. We object to this requirement. It is overly onerous on developers to provide this as standard over and above what is required by Building Regulations itself and no suitable evidence has been provided to support this requirement.

---

#### **Policy LPC02 – Affordable Housing Provision**

- 3.58 Our Client is supportive of the provision of affordable housing within developments and supportive of Part 1 of the Policy which seeks to encourage Registered Providers. We consider that this policy should go further in encouraging the provision of affordable housing, particularly in circumstances where it can be demonstrated that the level of affordable housing is falling below current levels of need.

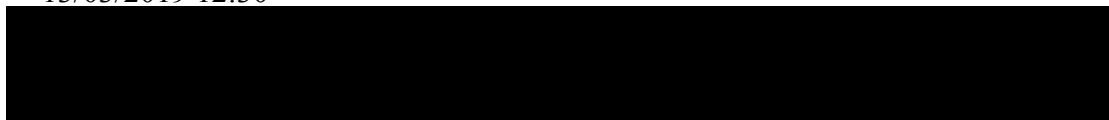
- 3.59 We object to the Part 3 of the Policy which is overly restrictive in relation to the type and tenure of affordable housing which is to be provided and does not necessarily reflect the need for affordable housing now, the availability of funding for the provision for affordable housing nationally or allow flexibility to respond to future trends in affordable need.

- 3.60 Notwithstanding this, whilst we are generally supportive of the provision of 30% affordable housing, it remains unclear how the Council has arrived at the percentage

PO3539



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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Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

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.

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

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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**



development is not encumbered by any technical or legal constraints which would preclude delivery of homes commencing early in the Plan period.

---

**Policy LPA06: Safeguarded Land**

- 8.1 The Company supports policy LPA06 and the release of additional land from the Green Belt in order to meet needs beyond the Plan period; this being in accordance with the Framework which is clear that authorities should identify areas of safeguarded land in order to meet longer term development needs stretching beyond the plan period (para 139), also having regard to their intended permanence in the long term (para 136).

21

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**Policy LPA06 Extent of the Green Belt and Safeguarded Land**

- 9.1 As referred in our response to Policy LPA02, the Company supports the release of sites from the Green Belt to meet housing and employment requirements. It is considered that the delivery of homes to meet objectively assessed need for housing and to support economic growth constitutes the 'exceptional circumstances' required in the Framework.

22

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**Policy LPA08 Infrastructure Delivery and Funding**

- 10.1 The Company generally supports Policy LPA08 concerning developer contributions, subject to the appropriateness of contributions sought being assessed against the tests set out at para 58 of the Framework, and also that the extent of obligations sought does not threaten the viability of sites (Ref: 23b-002-20140306).

23

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**Policy LPC01: Housing Mix**

- 11.1 The Company generally supports paragraph 1 of Policy LPC01, which seeks to provide a range of new market and affordable homes which includes a range of types, tenures and sizes in accordance with those needs set out within the SHMA; however would stress that the prospects of housing schemes coming forward should not be constrained by unrealistic and overly onerous housing mix obligations which have significant repercussions on viability.
- 11.2 Housing mix, type and size is often determined by the scale of development and market area and it would not be appropriate to assume a one size fits all approach. Paragraph 7.36 of the SHMA corresponds that although the types of homes needed in St Helens can be quantified using modelling and an understanding of the current market, 'it does not follow that such prescriptive figures should be included in the plan-making process'...the market is to some

24



degree a better judge of what the most appropriate profile of home to deliver at any point in time...'

---

11.3 It is also the case that the Company considers that the Council should remain cautious in implementing part 3 of the policy which requires 5% of new homes on greenfield sites of 25 dwellings or more be bungalows.

11.4 As the SHMA acknowledges, the sources of information used 'make it difficult to quantify a need/demand for bungalows in the Borough' with the policy being guided by discussions with estate agents. It is not considered that this represents sufficient justification to warrant the policy requirement.

25

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11.5 It also noted that the Council are seeking introduction of optional standards as set out in Parts M4 (2) and M4 (3) of Building Regulations 2010, seeking at least 20% of new dwellings be designed to the 'accessible and adaptable' standard set out in Part M4 (2); and at least 5% of new dwellings being designed to the wheelchair user' dwelling standard set out in Part M4 (3).

11.6 The Company is supportive of providing homes suitable to meet the needs of older and disabled persons; however PPG is clear that local authorities should gather evidence to determine whether there is a need for these additional standards (Ref: 56-002-20160519) and should consider the impact of using these standards as part of their Local Plan viability assessment (Ref: 56-003-20160519). Contrary to paragraph 4 of the policy, the onus is on the Council to justify the inclusion of the optional standard within policy and also to consider implications on viability of Local Plan sites at the plan-making stage. PPG is clear that the Council should take into account the following (Ref: 56-007-20150327) :-

26

- The likely future need for housing for older and disabled people (including wheelchair user dwellings).
- Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- The accessibility and adaptability of existing housing stock.
- How needs vary across different housing tenures.
- The overall impact on viability.

- 11.7 The Company considers that the Council should provide sufficient evidence that the introduction of the optional standards are required; and further that their introduction would not hinder the viability of the Local Plan.

26

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**Policy LPC02: Affordable Housing**

- 12.1 Whilst the Company is supportive of the delivery of affordable homes to meet identified needs within St Helens, it is important that the seeking of planning obligations, including affordable housing, does not hinder the ability of sites to be delivered, PPG being clear that Council's should ensure that seeking such obligations do not threaten the viability of the sites and scale of development identified in the development plan (Ref: 23b-002b20140306) and should be flexible in their requirements where requiring affordable housing(Ref: 23b-006b-20140306).

27

- 12.2 The Council's Economic Viability Assessment identifies that emerging greenfield housing allocations are viable at 30 dph with 30% affordable housing, however Table 6.10 identifying that 'generic' greenfield sites are largely unviable when applying the same density and affordable housing requirement.

- 12.3 Given Table 4.6 of the Local Plan identifies that a significant proportion of the Council's housing requirement is to be met on other sites identified in the SHLAA - of which a proportion will be greenfield sites within Zone 2 – a 30% affordable housing requirement will have significant implications on viability of these sites and therefore the ability of the Council to achieve its housing requirement.

28

- 12.4 We would encourage the Council to retain an element of flexibility in applying its affordable housing requirement in order to ensure Local Plan housing sites can be delivered viably and the scale of development proposed in the Plan is not threatened.

- 
- 12.5 The Company consider it important that the Council also demonstrate flexibility in renegotiating the tenure of affordable housing, should prior agreed forms of affordable housing be unattractive to Registered Providers.

PO3540





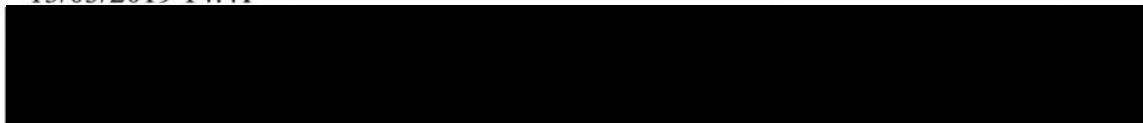
St Helens Borough Local Plan - Submission Draft - Representations on Behalf of Redrow Homes

Graham Trehwella

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:41



1 Attachment



1335 - Representation on Behalf of Redrow Homes Ltd Rev A 130319..pdf

REFERENCE EML-OUT/1335/20190313-143112-915

Dear Sirs

Please find attached a report which sets out our representations to the Submission Draft Local Plan. I would be grateful if you could confirm that it has been received.

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) \* 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.

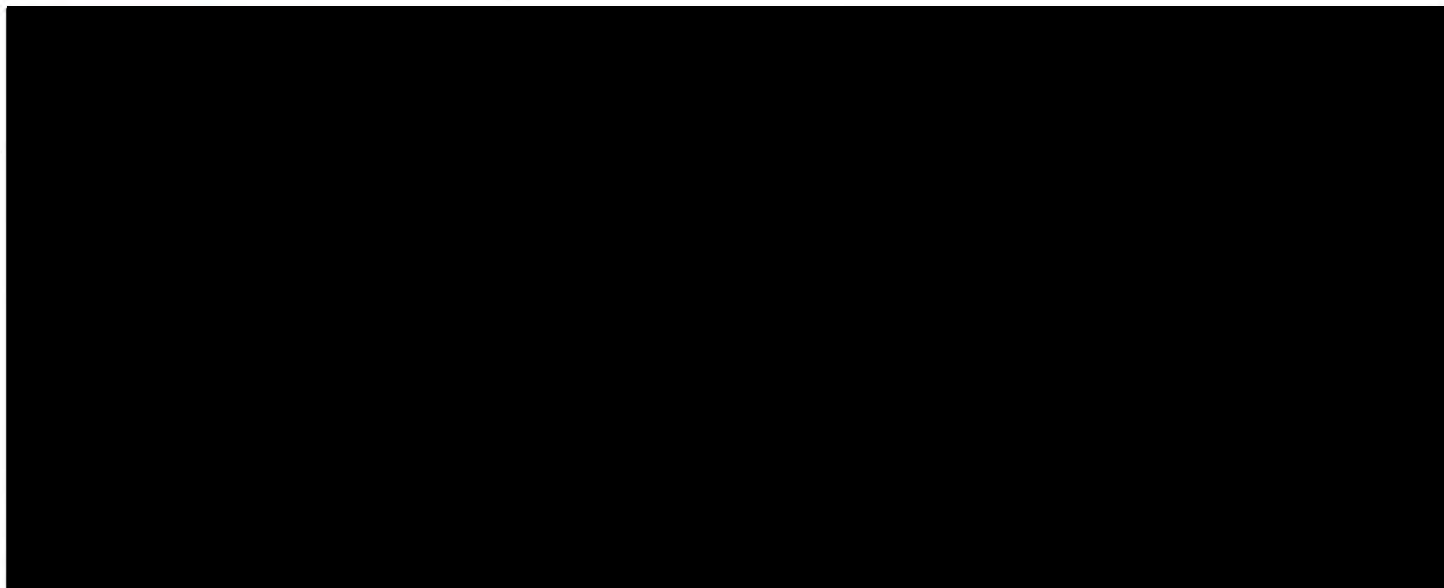
Yes (via e-mail)

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

Best regards,

**Graham Trehwella**  
Director



**Cass**  
associates

architecture  
masterplanning  
planning  
landscape  
conservation

ST HELENS BOROUGH LOCAL PLAN 2020-2035

SUBMISSION DRAFT

## **REPRESENTATIONS ON BEHALF OF REDROW HOMES LTD**

on behalf of  **REDROW**

**Cass Associates**

Studio 204B  
The Tea Factory  
82 Wood Street  
Liverpool  
L1 4DQ

March 2019

### 3 Housing Mix and Affordable Housing

**Redrow Homes does not consider that Policy LPC 01 is sound, justified or consistent with national policy**

- 3.1 Redrow Homes recognises that national planning policy requires the delivery of a wide choice of homes in mixed and inclusive communities. This should embrace housing to meet a range of needs, including affordable housing.
- 
- 3.2 It is concerned, however, that the requirements of Policy LPC01 (Housing Mix) is too prescriptive and will undermine or slow down the delivery of new homes.
- 3.3 The Government guidance on optional technical standards for housing is included in Planning Practice Guidance (PPG). These are standards that exceed the minimum required by the Building Regulations. The introduction of these standards should be fully justified and based on clear evidence.
- 3.4 The Local Plan, through Policy LPC01, proposes enhanced accessibility and adaptability standards:

At least 20% of the new dwellings across greenfield sites delivering 25 or more homes must be designed to the '*accessible and adaptable*' standard set out in Part M4 (2) of the Building Regulations 2010 and at least 5% of new dwellings must be designed to the '*wheelchair user*' standard set out in Part M4 (3) of the Building Regulations 2010. In addition, on this scale of development at least 5% of new homes should be bungalows.

- 3.5 The PPG requires Local Plan policies seeking enhanced accessibility and adaptability standards to take into account factors such as vulnerability to flooding and site topography which could make a specific site unsuitable for M4(2) and M4(3) compliant dwellings. This needs to be made clear in Policy LPC01. If there is an opportunity to take these and other factors into account on a site by site basis then the outcome will be a policy led approach that results in the delivery of accessible and adaptable housing where it is most appropriate.
- 

- 3.6 The evidence of need for bungalows is neither strong nor conclusive (SHLA Update 2019). It is a form of housing that has an impact on site layouts, density of development and the ability to deliver housing. Rather than a prescriptive ratio of bungalows for individual development in all locations it is reasonable to frame the policy in a way that encourages bungalows to be considered in the housing mix taking into account factors such as location, accessibility and the viability of including this type of housing.
- 

#### **Affordable Housing**

**Redrow Homes does not consider that Policy LPC 02 is sound as it is neither justified nor consistent with national policy.**

---

- 3.7 Redrow Homes supports the zone based approach to the assessment and delivery of affordable housing and supports the distinction between the proportion of affordable housing required on greenfield and brownfield sites.
- 
- 3.8 However, the importance of viability assessment at the strategic plan making stage is now given heightened significance (NPPF 2018 paragraph 34 and paragraph 57). It is vital that policies for development contributions should not undermine the deliverability of the plan.



PO3541



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

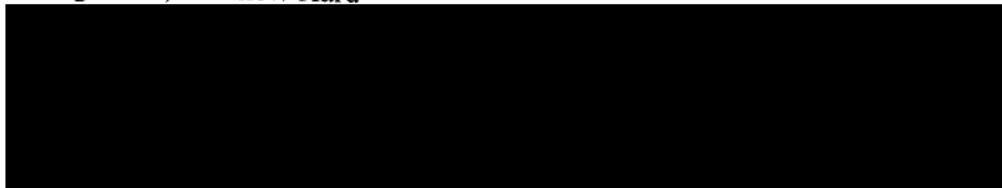
to:

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](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: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	Address: St James' Tower 7 Charlotte Street Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	
Signature	Date: 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 ☒ (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.**

EL 0200A 2.pdf

## 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	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental 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?	<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 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)

☐ **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.

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.**

Council's Ensuring and Choice of Travel Supplementary Planning Document. However, in the absence of an updated SPD, it is unclear how the Council will approach matters relating to vehicle and cycle parking standard, electric vehicle charging point provision and to the requirements concerning transport assessments, transport statements and travel. Further clarification should be for developments which come forward in the interim.

32

- 4.48. The policy needs to confirm that the most up to date SPD and / or travel studies will be used during the plan period, to ensure that the most relevant and up to date information is used.

### **Policy LPA08: Infrastructure Delivery and Funding**

- 4.49. We welcome the additional clarity and flexibility introduced within the policy, but we maintain that the council must ensure that they do not impose requirements that could render schemes unviable. We support that the council will consider site specific economic viability evidence to determine the ability of a scheme to provide the required level of contributions.
- 4.50. It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis. Additionally, it is not clear how any such infrastructure requirements might be assisted by the introduction of CIL.
- 4.51. Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

33

### **Policy LPC01: Housing Mix**

- 4.52. We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that at least 20% of the new dwellings must be designed to be "accessible and adaptable" as set out in Part M4(2) and 5% of new dwellings must be designed to the "wheelchair user" dwellings standard set out in Part M4(3). The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy in the Local Plan. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

34

- 4.53. We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date evidence and housing need.

- 4.54. Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

35

### **Policy LPC02: Affordable Housing**

- 4.55. We welcome efforts to improve affordability. However, the level of affordable housing a site can deliver should be supported by robust and up to date evidence.

36

- 4.56. We support the amendment of LPC02(3) to include provision of Starter Homes.

37

### **Policy LPC10: Trees and Woodland**


- 4.57. We support the amendment to the policy which has resulted in the removal of the reference to the ratio approach to tree replacement where development proposal will result in the loss of existing trees.

38

PO3542



ELO211


 RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2

1 Attachment


 41575\_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,  
Melissa
**Melissa Wilson**  
**Senior Planner**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

- ① LPA01
- ② LPA02
- ③ LPA03
- ④ LPA04
- ⑤ LPA05
- ⑥ LPA05
- ⑦ LPA05
- ⑧ LPA05.1
- ⑨ LPA06

⑩ LPA07

⑪ LPA08

⑫ LPA09

⑬ LPA11

⑭ GBR

⑮ EVA

⑯ LPC01/2

⑰ LPC02

⑱ LPC13

⑲ LPD01

⑳ LPC01/3

㉑ LPC05

㉒ LPD01

㉓ LPD02

㉔ LPC01/5

㉕ LPC10

㉖ LPD01

㉗ LPD03

㉘ LPC01/6

㉙ LPC12

㉚ LPD01

㉛ LPD07

㉜ SHMA

Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseYorPfo>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

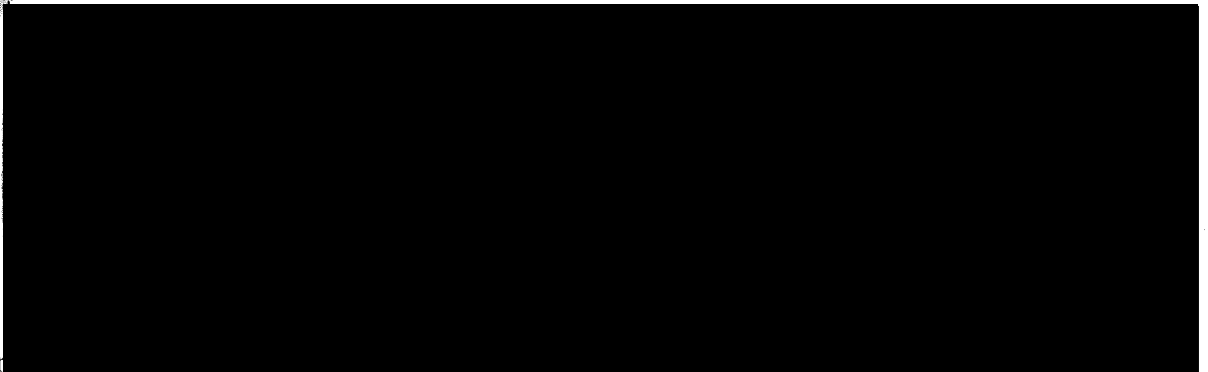
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Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2  
[NLP-DMS.FID606600]  
Brian O'Connor



1 Attachment



SPLIT 41874\_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19\_Part\_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseY9rPfO>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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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: Mr
First Name: Kate	First name: Brian
Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood	Address: Ship Canal House 98 King Street Manchester
Postcode: WA3 6GR	Postcode: M2 4WU
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

<b>Signature:</b> [REDACTED]	<b>Date:</b> 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.

**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	
See cover letter		See cover letter		See cover letter					
Other documents (please name document and relevant part/section)				See supporting Representations and Appendices					

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?	<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 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 supporting Representations and Appendices

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 supporting Representations and Appendices**

**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>Yes, I wish to participate at the oral examination</b>
--	--	--	---

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

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



EL0211

# **St Helens Local Plan Soundness Representations**

Taylor Wimpey UK Limited

13 March 2019

**LICHFIELDS**








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17081285v8

## 13.0 Policy LPCo1: Housing Mix

### Introduction

- 13.1 Policy LPCo1 seeks to ensure that new development delivers a wide choice of high quality homes that reflects St Helens Borough's housing needs.

### Consideration of Policy

- 13.2 Policy LPCo1 *Housing Mix* states that new market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by relevant evidence including the Borough's latest SHMA. TW is supportive of the need to provide a range of homes to meet the local needs of the area, but would note that other elements would feed into the provision of a suitable housing mix including viability, local aspirations and site characteristics.
- 13.3 It states that on greenfield sites capable of accommodating over 25 homes, at least 20% of the new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2); and at least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwellings standard. It also requires that at least 5% of dwellings on these sites be bungalows.
- 13.4 TW  object to Part 2 of this Policy which states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards. TW would note that the SHMA provides limited evidence in relation to this; and it is contrary to national policy to enforce higher standards without appropriate evidence of local need. The viability implication of pursuing these optional building standards has not been properly assessed and this could undermine the deliverability of some sites.  (14)
- 13.5  Part 3 provides for at least 5% of new homes on greenfield sites of 25 dwellings or more should be bungalows. TW objects to this policy as it is currently unjustified and not based on national policy. The 2016 SHMA identified a demand for bungalows (but does not support this with evidence on the number requirement) and the 2019 SHMA states that it is difficult to quantify the need/demand for bungalows; therefore there is no sound evidence base to support this policy requirement. Furthermore, the provision of 5% of bungalows across all greenfield sites does not allow for flexibility to address site constraints and characteristics or the implication of applying the densities associated with Policy LPA05. Finally,, the provision of bungalows affects the achievable density on sites and as such, it will be difficult to achieve the Council's density standards with the requirement for bungalows. This point was acknowledged in the SHMA Update 2019 (§7.40) which stated that *'the downside of providing bungalows is that they are relatively land intensive for the amount of floorspace created'*.  (15)
- 13.6 TW welcomes the inclusion of Part 4 and the reference to viability implications on Part 1-3. However, TW would note that this should not be used to justify unsustainable and unjustified requirements. 
- 13.7 In respect of Part 5, the Policy states that the *"Council will work with partners to facilitate the provision of specialist and supported housing for elderly and vulnerable people."* However, there is no explicit target for special needs/elderly housing provided.  (16)
- 13.8 Part 6 of the Policy sets out that the Council will support the delivery of suitable designed and located self-build and custom-build schemes in the Borough. However, limited evidence has been presented by the Council to justify that there is a sufficient demand for such a requirement.  (17)

Taylor Wimpey do not consider that self-build and custom-build should not be required on large scale strategic sites which are generally brought forward in accordance with a comprehensive masterplan. ] (7)

### Tests of Soundness

13.9 TW considers that Policy LPC01 fails to meet the following tests of soundness because:

- 1 **It is not justified:** The provision of 5% bungalows and optional building regulations is not based on robust or clear evidence. Similarly, there is insufficient evidence to justify the necessity for a self-build/custom build requirement.
- 2 **It is not effective:** The policy does not make it clear how development would be expected to provide for special needs/elderly housing in terms of number of units.
- 3 **It is not consistent with national policy:** The requirement to deliver development higher at an optional higher standard is not reflective of national guidance, if not fully evidenced.

### Recommended Change

13.10 In order to address the concerns raised above, TW would suggest the following changes:

- 1 Amend Part 1 of the policy to extend the evidence informing housing mix or remove reference to SHMA. ✓
- 2 Delete Part 2 of the Policy unless evidence can be provided to support the requirements. ✓
- 3 Remove Part 3 of the Policy; or if a demand for bungalows can be robustly evidenced amend this to a supportive policy context that encourages the provision of bungalows without apply a fixed threshold. ✓
- 4 Provide explicit targets for special needs/elderly housing based on robust evidence base and ensuring viability is not impacted upon.



PO3543

E-LO229



St Helens Local Plan Submission Draft - strategic representations on behalf of

Wainhomes NW

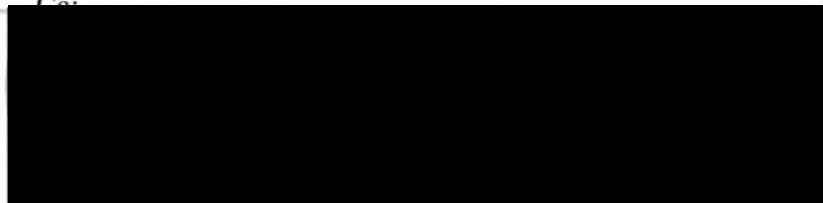
Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:16

Cc:



1 Attachment



Representations - St Helens LP Reg 19 - Wainhomes combined.pdf

Dear Sir / Madam,

Please find attached, strategic written representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan.

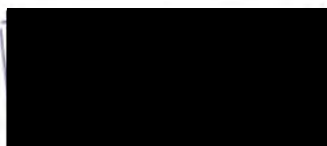
We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

**Nick Scott**

Assistant Consultant



① - GENERAL

② - LPA05

③ - LPC02

④ - LPA05.1

ns.gov.uk&gt;

⑤ - LPA06

⑥ - LPC01 - CRITERIA 1

⑦ - LPC01 - CRITERIA 2

⑧ - LPC01 - CRITERIA 3

⑨ - LPC13

⑩ - LPA05 - TABLE 4.6

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**emery**  
planning

Emery Planning Partnership Ltd trading as  
Emery Planning

Emery Planning  
2-4 South Park Court  
Hobson Street  
Macclesfield  
SK11 8BS

Registered  
office as above



## Representations to the Submission Draft

St Helens Local Plan – Regulation 19

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005





## 8. Policy LPC01: Housing Mix

- 8.1 Part 1 of the policy requires the mix of housing on development proposals to be informed by "relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA)." All development plan policies must be clear and transparent. The policy as worded is extremely ambiguous and is not clear what 'relevant evidence' is (other than the SHMA). Furthermore, the wording of the policy refers to the 'latest' SHMA, suggesting that that the policy requirement could in effect change over time, without being tested through the development plan process. (6)
- 8.2 Turning to the mix set out within the 2018 SHMA, this is driven by the demographic makeup of new households. There is insufficient assessment of market demand. Many households choose to occupy houses with more bedrooms than technically required, for example older households who choose not to downsize and households requiring guestrooms, home offices etc. By failing to adequately account for demand additional pressures will be placed upon the housing market. This must be reflected within the policy.
- 8.3 Part 2 of the policy states that the Council will apply the optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended). The Council's own viability evidence indicates that such a requirement would not be viable on a number of sites (see Table 6.19 of the Council's viability assessment). The proposal therefore conflicts with paragraphs 56-002 and 56-003 of the PPG. (7)
- 8.4 Finally, Part 3 of the draft policy requires at least 5% of new homes on greenfield sites that would deliver 25 or more dwellings to be bungalows. There is no evidential basis for this requirement. The 2018 SHMA simply states at paragraph 7.37:
- "The sources used for analysis in this report makes it difficult to quantify a need/demand for bungalows in the Borough as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. However, it is typical (where discussion are undertaken with local estate agents) to find that there is a demand for this type of accommodation."* (8)
- 8.5 Therefore it is apparent that there is no analysis of need undertaken through the SHMA; it is simply assumed that there is demand because it would be 'typical' to find demand if it had been investigated.

PO3544



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
 Hannah Payne  
 to:  
[planningpolicy@sthelens.gov.uk](mailto: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



**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](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.

**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		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 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 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 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)

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

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.

St James' Tower,  
7 Charlotte Street,  
Manchester, M1 4DZ

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

By email

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

let.001.NF..21450010

13 March 2019

Dear Sirs

## ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

### Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

### Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

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Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E1 1JX  
Registered number 2078863 VAT number 849246134



# indigo.

## Policy LPA08: Infrastructure Delivery and Funding

We welcome the additional clarity and flexibility introduced within the policy but the Council must ensure that they do not impose requirements that could render schemes unviable.

23

It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis and, additionally, how any such infrastructure requirements might otherwise be assisted by the introduction of CIL.

24

Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

## Policy LPC01: Housing Mix

We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, at least 20% of the new dwellings must be designed to be "*accessible and adaptable*" and 5% of the market housing should be bungalows is unjustified and contrary to national policy. The policy also refers to 'optional standards' but that a) AND b) will be applied. This reference should therefore be removed.

25

The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date market evidence.

26

Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

LPC01(4) sets out exceptions to providing the above on viability grounds however, there are also site specific conditions and limitations which would render the requirements undeliverable in some instances. The policy should there be reworded to provide flexibility.

27

It must be noted that when discussing housing mix on a site at application stage, the Local Planning Authority must refer to the most up to date SHMA.

## Policy LPC02: Affordable Housing

Barratt are one of the United Kingdom's main providers of affordable homes and

28

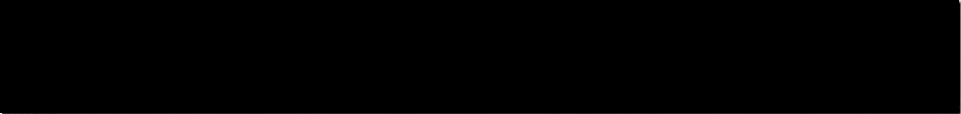


PO3545

ELOOS6



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
 Dan Ingram  
 to:  
 planningpolicy@sthelens.gov.uk  
 11/03/2019 13:18



1 Attachment



26800.A3.DI.DM - St Helens LP Submission Draft Reps - Travers Farm, Bold 190311 with Appendices.pdf

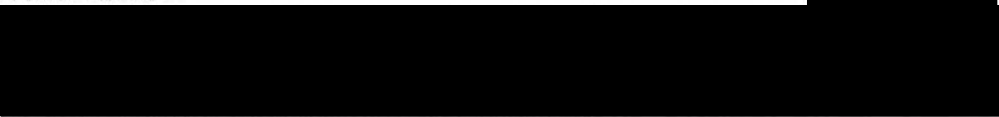
To whom it may concern,

Please find attached a copy of representations, including Vision Statement, prepared by Barton Willmore on behalf of our Client, Andrew Cotton and Family, 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 Ingram  
 Senior Planner



Consider the Environment, Do you really need to print this email?

The information contained in this e-mail (and any attachments) is confidential and may be privileged. It may be read, copied and used only by the addressee, Barton Willmore accepts no liability for any subsequent alterations or additions incorporated by the addressee or a third party to the body text of this e-mail or any attachments. Barton Willmore accepts no responsibility for staff non-compliance with our IT Acceptable Use Policy.

- ① - GEN
- ② - Spatial Vision
- ③ - Objective 4
- ④ - key Diagram
- ⑤ - LPA01

- ⑥ - LPA02
- ⑦ - LPA03

- ⑧ - LPA04
- ⑨ - LPA04.1

- ⑩ - LPA05
- ⑪ - LPA05.1

- ⑫ - LPA06
- ⑬ - LPA08

- ⑭ - LPA09
- ⑮ - LPC01

- ⑯ - LPC02
- ⑰ - LPC07

- ⑱ - LPC09

- ⑲ - Appendix 5



St. Helens  
Council

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

EF0176

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: ANDREW	First name: DAN
Last Name: COTTON	Last Name: INGRAM
Organisation/company:	Organisation/company: BARTON WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

Signature: [Redacted]	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.

<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		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 SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

**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 Andrew Cotton and Family

March 2019



- 3.60 Linking to this, our Client notes the requirements of the Site Profiles in Appendix 5 of the New Local Plan, particularly with regard to providing a well-landscaped setting including extensive green links promoting the objective of the Bold Forest Area Action Plan of increasing tree coverage by 30%. Whilst the clear aim would be to deliver a development which includes extensive green links and increased tree coverage our Client considers the wording of the Site Profile should afford some flexibility to this. The use of the word 'must' does not provide any flexibility, and does not consider whether the delivery of such Green Infrastructure would render the development unviable. Our Client requests that additional flexibility be introduced into the Site Profile in this regard. (14)
- 3.61 Notwithstanding the above however, a Concept Masterplan relating to our Client's land interest has been produced in support of this representation and is discussed further within Section 6 below.

#### **Policy LPC01: Housing Mix**

- 3.62 This Policy outlines that both new market and affordable dwellings will be expected to cater for a range of types tenures and sizes of homes as informed by the SHMA. The Policy indicates that proposals for new housing of 25 dwellings or more on greenfield sites will require at least 20% are accessible and adaptable and at least 5% area designed for wheelchair uses, in line with the Building Regulations 2010. The Policy also requires 5% of new homes on greenfield developments of 25 dwellings or more to be bungalows. (15)
- 3.63 The Policy also provides for exceptions to these requirements should a viability assessment demonstrate that meeting such requirements would render the development un-viable.
- 3.64 Our Client does have some concerns around the requirement for 5% of new homes on greenfield sites being bungalows and considers that there is little justification as to why this should be the case. The Policy does not consider factors such as the character of the area or impact upon densities. Our Client is unable to endorse this aspect of the Policy and considers that the Council should provide further evidence in order to justify its position.

- 3.65 Notwithstanding the above, our Client is generally supportive of this Policy, recognising the need to provide for a range of dwellings catering for the needs of the whole community, including the need to provide aspirational dwellings and drive economic growth. It is important however that this Policy is not overly prescriptive in its requirements which could ultimately stall the delivery of sites. It is important that the Policy is flexible, and allows for a site-by-site analysis in order to ensure that an appropriate mix of housing is secured. Notwithstanding this our Client is broadly supportive of the flexibility that the Policy offers, recognising that future market conditions may not allow for such provision to take place, although this would ultimately be determined as part of the application process.

15

### **Policy LPC02: Affordable Housing**

- 3.66 This Policy outlines that proposals for new open market housing of developments of 11 units or more will be required to provide at least 30% affordable housing in Housing Zones 2 and 3 with at least 10% of the affordable provision being available for affordable home ownership. Figure 6.1 of the Plan indicates our Client's land interest as being within Housing Zone 2 and as such the above requirements would apply.
- 3.67 Point 4 of the Policy indicates that the provision of affordable housing may vary on a site by site basis taking into account evidence on local need and economic viability subject to extensive justification.
- 3.68 Our Client welcomes the updated SHMA with regard to affordable housing, providing a clear evidence base for establishing the affordable housing requirement throughout the Plan Period.
- 3.69 Our Client broadly supports this Policy, the provision of new housing to meet the needs of the whole community clearly accords with the aims and objectives of the Council as well as the thrust of national policy. Our Client also welcomes the flexibility afforded by point 4, recognising that future market conditions may not allow for such provision to take place, although this would ultimately be determined as part of the application process. It is important to ensure that the requirement for affordable housing does not render the development unviable, particularly when considering density requirements afforded by Policy LPA05.

16

PO3546



ELO112



HBF response to St Helens Local Plan Submission

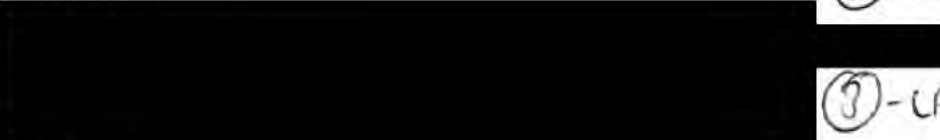
Joanne Harding

to:

planningpolicy@sthelens.gov.uk

12/03/2019 17:26

Hide Details



2 Attachments



19-03-13 St Helens Local Plan Submission.docx HBF lpsd-representation-form-signed.pdf

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

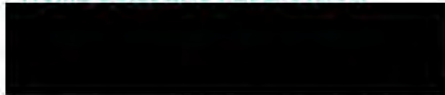
If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI

Local Plans Manager - North

HOME BUILDERS FEDERATION



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Company Reg No. 276 4757 | Vat No. 882 6294 86

① - STRATEGICAL Aims &amp; OBJECTIVES

② - LPA05

③ - LPA05 - PARA. 3

④ - LPA05 - PARA 4

⑤ - LPA07 - PART 3C

⑥ - LPA07 - PART 9

⑦ - LPC01 - PART 1

⑧ - LPC01 - PART 2

⑨ - LPC01 - PART 3

⑩ - LPC01 - PART 4

⑪ - LPC02

⑫ - LPC10

⑬ - LPC13

⑭ - LPD07



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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**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: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House 27 Broadwall London	Address:
Postcode: SE1 9PL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 13/03/2019
-----------------------	------------------

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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

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**Email:**

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

**Telephone:**

01744 676190

## NEXT STEPS

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## 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).

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



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Other documents (please name document and relevant part/section)				Please see separately attached letter.					

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 see separately attached letter.		

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"/> Please see separately attached letter.
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 <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 see separately attached letter.

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 separately attached letter.

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
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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:

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

**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.



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

SENT BY EMAIL  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
13/12/2018

Dear Sir / Madam,

#### **ST HELENS LOCAL PLAN SUBMISSION DRAFT**

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members. ✓

#### **Vision and Objectives**

*The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:*

The HBF support the part of the vision which 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'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as set out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply. (1)



The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on matters in relation to housing delivery and would be keen to work proactively with the Council on this issue.

The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

#### **Policy LPA07: Transport and Travel**

*The HBF does not consider that Policy LPA07 is sound, as it is not justified or effective for the following reasons:*

Part 3c of this policy states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst the HBF do not oppose the provision of electric charging points, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others.

The HBF also have concerns that part 9 states that further details of the operation of this policy including standards for vehicle charging provision will be set out in a Supplementary Planning Document (SPD). It is not considered appropriate to set out in SPD elements of policy, namely the number of charging points that would be 'appropriate provision', that will have a direct role in the determination of a planning application. The HBF consider that these elements should be set out in policy and open for debate at the Examination in Public, without these details it is impossible to consider the impact of these policies on viability or whether they are justified and effective. The HBF would encourage the Council to work with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

- Further consideration is given to what the Council consider to be 'appropriate provision' supported by evidence.
- That additional standards for electric charging point provision are not included within an SPD that will not be tested at examination.

#### **Policy LPC01: Housing Mix**

*The HBF does not consider that Policy LPC01 is sound, justified, effective or consistent with national policy for the following reasons:*

Part 1 of this policy looks for new market and affordable homes to include a range of types, tenures and sizes of homes as informed by relevant evidence including the SHMA. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. It is noted how frequently the Viability Assessment 2019 highlights the implications of the SHMA housing mix on the viability of development.

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Part 2 of this policy states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards.

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for St Helens which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. The SHMA Update January 2019 does provide some limited evidence in relation to the likely future need for housing for older people and disabled people it provides limited information in relation to the size, location, type or quality of dwellings needs and no evidence in relation to the accessibility and adaptability of the existing housing. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.

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The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

8

Part 3 of this policy requires at least 5% of new homes on greenfield sites of 25 or more homes to be bungalows. The reasoning for this requirement is unclear, whilst the 2016 SHMA identifies that there is typically a demand for bungalows (paragraph 10.29) this assertion is not supported by specific evidence of need. Whilst the 2019 Update to the SHMA actually states that is difficult to quantify a need/demand for bungalows. Furthermore, the policy applies to all greenfield sites without

9



differentiation in terms of location, the character of the area or reference to the densities set out within Policy LPA05. The provision of bungalows may also impact upon viability. Given these issues, if a need can be demonstrated, it is recommended that the mandatory requirement be amended to a supportive policy stance which encourages rather than requires the provision of bungalows.

Part 4 of the policy provides a viability clause. The HBF supports the inclusion of this element of the policy as it provides flexibility to deal with site specific circumstances. The inclusion of this part of the policy should not, however, be used to justify other unsustainable requirements as noted above.

The HBF considers that the policy should be modified as follows in order to make the document sound:

- '1. New market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by: relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA); site characteristics; viability; and local aspirations'.
- ~~'2. Where a proposal for new housing would be on a greenfield site on which the site as a whole would deliver 25 or more new homes, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that:~~
  - ~~a) at least 20 % of the new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2); and~~
  - ~~b) at least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwellings standard set out in Part M4(3)~~~~If the standards in Part M4(2) or Part M4(3) are amended or superseded by new standards, the Council will apply the relevant amending or superseding provisions in the same proportions as set out above.'~~
- The HBF recommends that part 2 of the policy is deleted unless evidence can be provided to support the requirements. If it is to be retained, the HBF would recommend that the following additional text is included  
'In seeking to apply this standard, the Council will take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable.  
To enable developers to factor in these additional requirements the Council will introduce this policy one year from the adoption of the Local Plan.'
- ~~'3. At least 5% of new homes on greenfield sites that would deliver 25 or more dwellings should be bungalows-~~ The Council will support the provision of bungalows and will take this provision into account when considering the density of the site'.

#### Policy LPC02: Affordable Housing

The HBF does not consider that Policy LPC02 is sound, as it is not justified or consistent with national policy for the following reasons:



PO3547



St Helens LP 2020-2035 (Submission Draft)  
Tony McAteer  
to:  
planningpolicy  
13/03/2019 08:46



2 Attachments



Local Plan Reps Form.pdf Local Plan Reps.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

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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: 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: Suite 114 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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**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**

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3. To which part of the Local Plan does this representation relate?									
Policy LPA02 LPA03 LPA05 LPA06 LPA07		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: <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 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 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 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.

**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)

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



**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.**

**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**

## 6 Policy LPC01

---

- 6.1 Eccleston Homes object to the policy's requirement that on greenfield sites of 25 or more units 5% the market housing should be bungalows. They consider that there is no planning reason for such an imposition and that the market should be allowed to determine the mix of housing on any site. There is no statistical evidence of demand to support the policy requirement, neither is it supported by national policy in the way the Council seek to assert. Bungalows are land hungry by their very nature and do not, therefore, accord with Government policy in respect of density and making efficient use of land. 13
-



PO3548



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

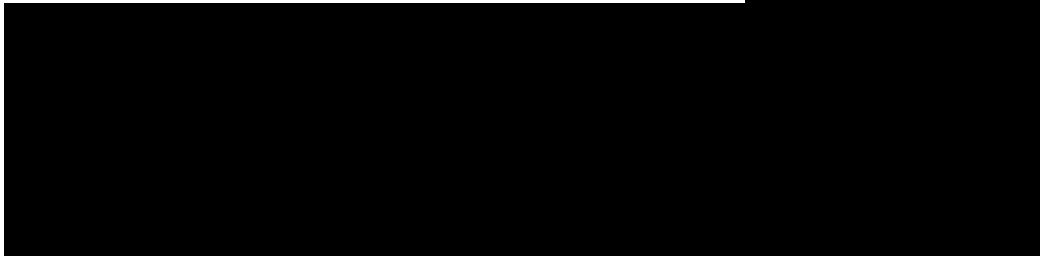
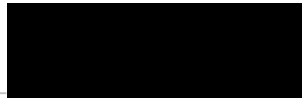
Dear Sir / Madam,

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



Response Date	3/13/2019 8:50:55 AM
---------------	----------------------

# St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.55 As such, our Client's consider that the above policy should specify that areas of Green Infrastructure should be protected in accordance with their value in amenity and ecological value. Part 4 of the policy that states that development which would result in the loss of any Green Infrastructure assets will be refused. This is an elevated status of protection that should not be afforded to all Green Infrastructure regardless of level of value that has been afforded to it.

---

**Policy LPC01 – Housing Mix**

- 3.56 Our Client is supportive of the Policy's intention to seek provision of a wide range of affordable and market housing to meet local housing need. Notwithstanding this, we do not support the inclusion of a policy which places an arbitrary requirement on developments to deliver 5% of the market housing mix as bungalows.

- 3.57 Paragraph 2 of Policy LPC01 also requires that 20% of all dwellings should be designed to optional standards set out in Part M4(2) and M4(3) of the Building Regulations. We object to this requirement. It is overly onerous on developers to provide this as standard over and above what is required by Building Regulations itself and no suitable evidence has been provided to support this requirement.

---

**Policy LPC02 – Affordable Housing Provision**

- 3.58 Our Client is supportive of the provision of affordable housing within developments and supportive of Part 1 of the Policy which seeks to encourage Registered Providers. We consider that this policy should go further in encouraging the provision of affordable housing, particularly in circumstances where it can be demonstrated that the level of affordable housing is falling below current levels of need.

- 3.59 We object to the Part 3 of the Policy which is overly restrictive in relation to the type and tenure of affordable housing which is to be provided and does not necessarily reflect the need for affordable housing now, the availability of funding for the provision for affordable housing nationally or allow flexibility to respond to future trends in affordable need.

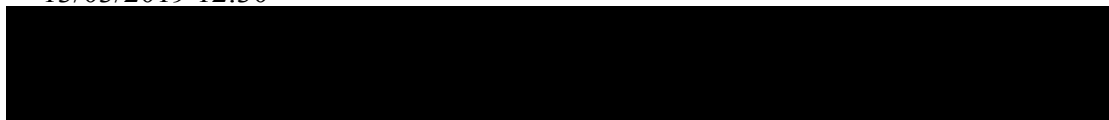
- 3.60 Notwithstanding this, whilst we are generally supportive of the provision of 30% affordable housing, it remains unclear how the Council has arrived at the percentage



PO3549



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.

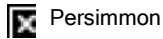
Kind regards  
 Sean

**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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Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

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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For more information please visit <http://www.symanteccloud.com>

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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**



development is not encumbered by any technical or legal constraints which would preclude delivery of homes commencing early in the Plan period.

---

**Policy LPA06: Safeguarded Land**

- 8.1 The Company supports policy LPA06 and the release of additional land from the Green Belt in order to meet needs beyond the Plan period; this being in accordance with the Framework which is clear that authorities should identify areas of safeguarded land in order to meet longer term development needs stretching beyond the plan period (para 139), also having regard to their intended permanence in the long term (para 136).

21

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**Policy LPA06 Extent of the Green Belt and Safeguarded Land**

- 9.1 As referred in our response to Policy LPA02, the Company supports the release of sites from the Green Belt to meet housing and employment requirements. It is considered that the delivery of homes to meet objectively assessed need for housing and to support economic growth constitutes the 'exceptional circumstances' required in the Framework.

22

---

**Policy LPA08 Infrastructure Delivery and Funding**

- 10.1 The Company generally supports Policy LPA08 concerning developer contributions, subject to the appropriateness of contributions sought being assessed against the tests set out at para 58 of the Framework, and also that the extent of obligations sought does not threaten the viability of sites (Ref: 23b-002-20140306).

23

---

**Policy LPC01: Housing Mix**

- 11.1 The Company generally supports paragraph 1 of Policy LPC01, which seeks to provide a range of new market and affordable homes which includes a range of types, tenures and sizes in accordance with those needs set out within the SHMA; however would stress that the prospects of housing schemes coming forward should not be constrained by unrealistic and overly onerous housing mix obligations which have significant repercussions on viability.
- 11.2 Housing mix, type and size is often determined by the scale of development and market area and it would not be appropriate to assume a one size fits all approach. Paragraph 7.36 of the SHMA corresponds that although the types of homes needed in St Helens can be quantified using modelling and an understanding of the current market, 'it does not follow that such prescriptive figures should be included in the plan-making process'...the market is to some

24



degree a better judge of what the most appropriate profile of home to deliver at any point in time...'

---

11.3 It is also the case that the Company considers that the Council should remain cautious in implementing part 3 of the policy which requires 5% of new homes on greenfield sites of 25 dwellings or more be bungalows.

11.4 As the SHMA acknowledges, the sources of information used 'make it difficult to quantify a need/demand for bungalows in the Borough' with the policy being guided by discussions with estate agents. It is not considered that this represents sufficient justification to warrant the policy requirement.

25

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11.5 It also noted that the Council are seeking introduction of optional standards as set out in Parts M4 (2) and M4 (3) of Building Regulations 2010, seeking at least 20% of new dwellings be designed to the 'accessible and adaptable' standard set out in Part M4 (2); and at least 5% of new dwellings being designed to the wheelchair user' dwelling standard set out in Part M4 (3).

11.6 The Company is supportive of providing homes suitable to meet the needs of older and disabled persons; however PPG is clear that local authorities should gather evidence to determine whether there is a need for these additional standards (Ref: 56-002-20160519) and should consider the impact of using these standards as part of their Local Plan viability assessment (Ref: 56-003-20160519). Contrary to paragraph 4 of the policy, the onus is on the Council to justify the inclusion of the optional standard within policy and also to consider implications on viability of Local Plan sites at the plan-making stage. PPG is clear that the Council should take into account the following (Ref: 56-007-20150327) :-

26

- The likely future need for housing for older and disabled people (including wheelchair user dwellings).
- Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- The accessibility and adaptability of existing housing stock.
- How needs vary across different housing tenures.
- The overall impact on viability.



PO3550



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.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

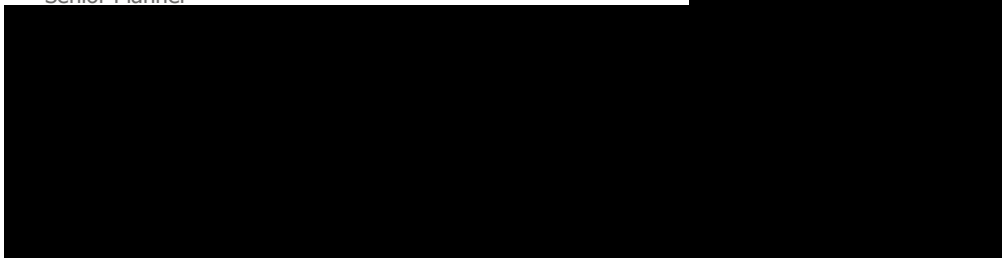
To whom it may concern,

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 WILLMORIS
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)

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

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

- 9.23 Our Client also considers that mechanisms should be put in place throughout the Plan to ensure that sites can continue to be delivered in the event that there is a shortfall in the Council's supply of new housing.

#### **Policy LPA09: Green Infrastructure**

- 9.24 This Policy outlines what the Green Infrastructure network is and why it is of value to the Borough. The Policy details how the Council will work with other organisations to improve and enhance the Green Infrastructure network noting that development proposals on strategic housing and employment sites incorporate holistic Green Infrastructure Plans. The Policy also outlines that developers will be required to provide long-term management arrangements for new and existing green infrastructure within development sites. Furthermore, the Policy states that development that would contribute to, or enhance the function of the Green Infrastructure network will be encouraged.

- 9.25 Our Client is supportive of this Policy and notes the encouragement given to development proposals which will enhance the Green Infrastructure network.

29

#### **Policy LPC01: Housing Mix**

- 9.26 This Policy outlines that both new market and affordable dwellings will be expected to cater for a range of types tenures and sizes of homes as informed by the SHMA. The Policy indicates that proposals for new housing of 25 dwellings or more on greenfield sites will require at least 20% are accessible and adaptable and at least 5% area designed for wheelchair uses, in line with the Building Regulations 2010. The Policy also requires 5% of new homes on greenfield developments of 25 dwellings or more to be bungalows.
- 9.27 The Policy also provides for exceptions to these requirements should a viability assessment demonstrate that meeting such requirements would render the development un-viable.

- 9.28 Our Client does have some concerns around the requirement for 5% of new homes on greenfield sites being bungalows and considers that there is little justification as to why this should be the case. The Policy does not consider factors such as the character of the area or impact upon densities. Our Client is unable to endorse this aspect of the Policy and considers that the Council should provide further evidence in order to justify its position.

30

- 9.29 Notwithstanding the above, our Client is generally supportive of this Policy, recognising the need to provide for a range of dwellings catering for the needs of the whole



community, including the need to provide aspirational dwellings and to drive economic growth. It is important however that this Policy is not overly prescriptive in its requirements which could ultimately stall the delivery of sites. The Policy should be flexible and allow for a site-by-site analysis in order to ensure that an appropriate mix of housing is secured.

31

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**Policy LPC02: Affordable Housing**

9.30 This Policy outlines that proposals for new open market housing of developments of 11 units or more will be required to provide at least 30% affordable housing in Housing Zones 2 and 3, and with at least 10% of the affordable provision being available for affordable home ownership. Figure 6.1 of the Plan indicates our Client's land interest as being within Housing Zone 3 and as such the above requirements would apply.

9.31 Point 4 of the Policy indicates that the provision of affordable housing may vary on a site by site basis taking into account evidence on local need and economic viability subject to extensive justification.

9.32 Our Client broadly supports this Policy; the provision of affordable housing to meet the needs of the whole community clearly accords with the aims and objectives of the Council as well as the thrust of national policy. Our Client also welcomes the flexibility afforded by point 4, recognising that future market conditions may not allow for such provision to take place, although this would ultimately be determined as part of the planning application process. It is important to ensure that the requirement for affordable housing does not render a development unviable, particularly when considering density requirements afforded by Policy LPA05.

32

9.33 Notwithstanding the above, our Client does question why the Policy differentiates between Zone 2 and 3 at all especially when the Policy's approach to affordable housing delivery within these areas is the same. Zone 2 and 3 should be merged to create a single area, allowing for the Policy to be simplified.

33

9.34 Finally, our Client considers that adequate monitoring must take place across the Borough to ensure that the need for affordable housing is met.

---

**Policy LPC09: Landscape Protection and Enhancement**

9.35 This Policy outlines that new development proposals must conserve, maintain or enhance any landscape features that are important to the local area. It requires development proposals to demonstrate that the best option for the landscape has taken forward and

PO3551



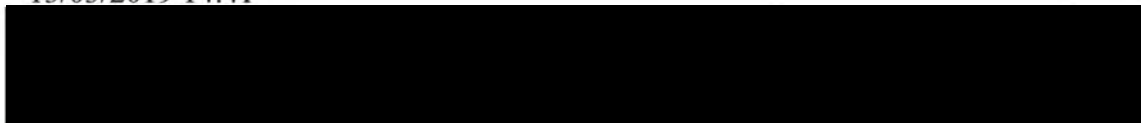
St Helens Borough Local Plan - Submission Draft - Representations on Behalf of Redrow Homes

Graham Trehwella

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:41



1 Attachment



1335 - Representation on Behalf of Redrow Homes Ltd Rev A 130319..pdf

REFERENCE EML-OUT/1335/20190313-143112-915

Dear Sirs

Please find attached a report which sets out our representations to the Submission Draft Local Plan. I would be grateful if you could confirm that it has been received.

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) \* 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.

Yes (via e-mail)

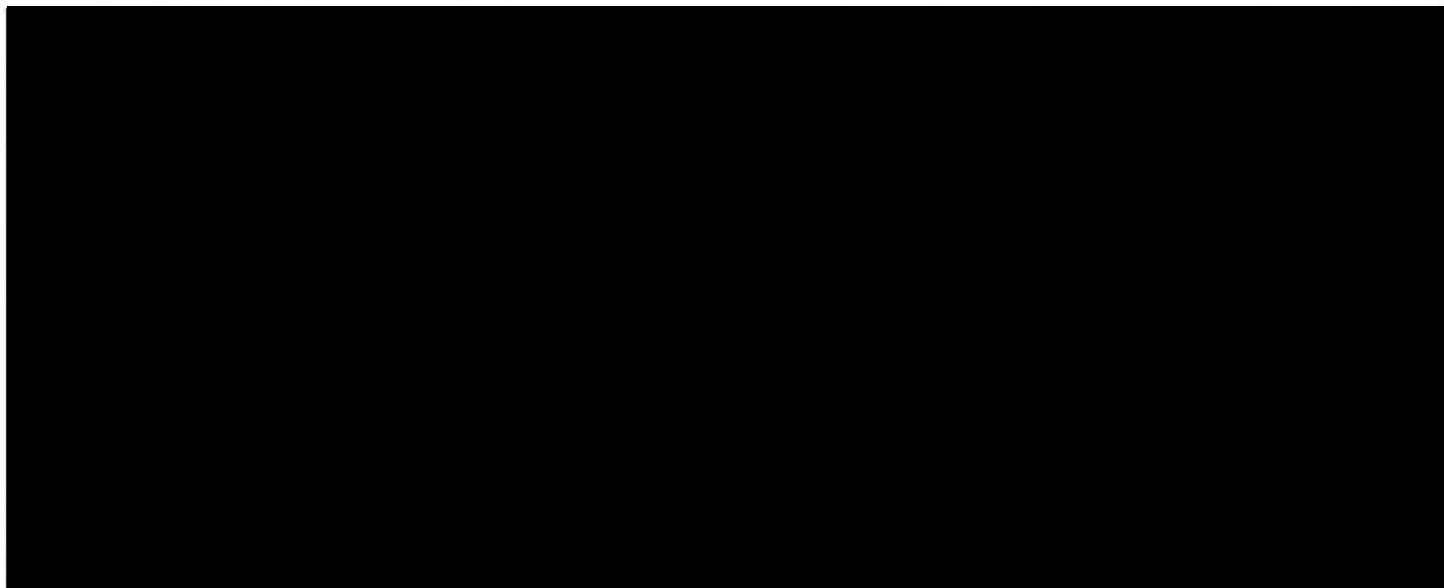
If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

Best regards,

**Graham Trehwella**  
Director

**Cass**  
associates  
architects  
planning  
consultants  
interior design





**Cass**  
associates

architecture  
masterplanning  
planning  
landscape  
conservation

ST HELENS BOROUGH LOCAL PLAN 2020-2035

SUBMISSION DRAFT

## **REPRESENTATIONS ON BEHALF OF REDROW HOMES LTD**

on behalf of  **REDROW**

**Cass Associates**

Studio 204B  
The Tea Factory  
82 Wood Street  
Liverpool  
L1 4DQ

March 2019

### 3 Housing Mix and Affordable Housing

**Redrow Homes does not consider that Policy LPC 01 is sound, justified or consistent with national policy**

- 3.1 Redrow Homes recognises that national planning policy requires the delivery of a wide choice of homes in mixed and inclusive communities. This should embrace housing to meet a range of needs, including affordable housing.
- 
- 3.2 It is concerned, however, that the requirements of Policy LPC01 (Housing Mix) is too prescriptive and will undermine or slow down the delivery of new homes.
- 3.3 The Government guidance on optional technical standards for housing is included in Planning Practice Guidance (PPG). These are standards that exceed the minimum required by the Building Regulations. The introduction of these standards should be fully justified and based on clear evidence.
- 3.4 The Local Plan, through Policy LPC01, proposes enhanced accessibility and adaptability standards:

At least 20% of the new dwellings across greenfield sites delivering 25 or more homes must be designed to the '*accessible and adaptable*' standard set out in Part M4 (2) of the Building Regulations 2010 and at least 5% of new dwellings must be designed to the '*wheelchair user*' standard set out in Part M4 (3) of the Building Regulations 2010. In addition, on this scale of development at least 5% of new homes should be bungalows.

- 3.5 The PPG requires Local Plan policies seeking enhanced accessibility and adaptability standards to take into account factors such as vulnerability to flooding and site topography which could make a specific site unsuitable for M4(2) and M4(3) compliant dwellings. This needs to be made clear in Policy LPC01. If there is an opportunity to take these and other factors into account on a site by site basis then the outcome will be a policy led approach that results in the delivery of accessible and adaptable housing where it is most appropriate.
- 

- 3.6 The evidence of need for bungalows is neither strong nor conclusive (SHLA Update 2019). It is a form of housing that has an impact on site layouts, density of development and the ability to deliver housing. Rather than a prescriptive ratio of bungalows for individual development in all locations it is reasonable to frame the policy in a way that encourages bungalows to be considered in the housing mix taking into account factors such as location, accessibility and the viability of including this type of housing.
- 

#### **Affordable Housing**

**Redrow Homes does not consider that Policy LPC 02 is sound as it is neither justified nor consistent with national policy.**

---

- 3.7 Redrow Homes supports the zone based approach to the assessment and delivery of affordable housing and supports the distinction between the proportion of affordable housing required on greenfield and brownfield sites.
- 
- 3.8 However, the importance of viability assessment at the strategic plan making stage is now given heightened significance (NPPF 2018 paragraph 34 and paragraph 57). It is vital that policies for development contributions should not undermine the deliverability of the plan.

PO3552





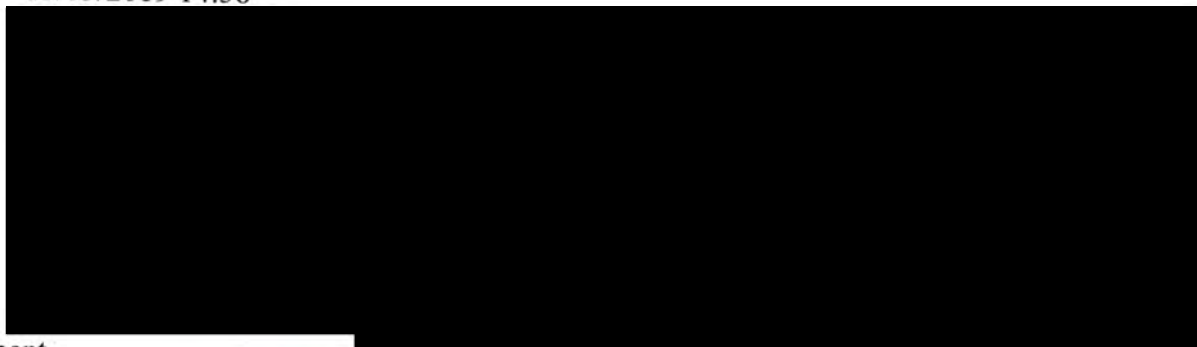
Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 1 of 4 (main representations)

Kennedy, Amy (UK - Manchester)

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:58



1 Attachment



CCfE\_reps to St Helens Local Plan\_without appendices\_March 2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 1 of 4 and the main representations are attached. The technical appendices will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

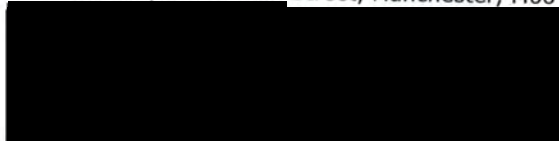
Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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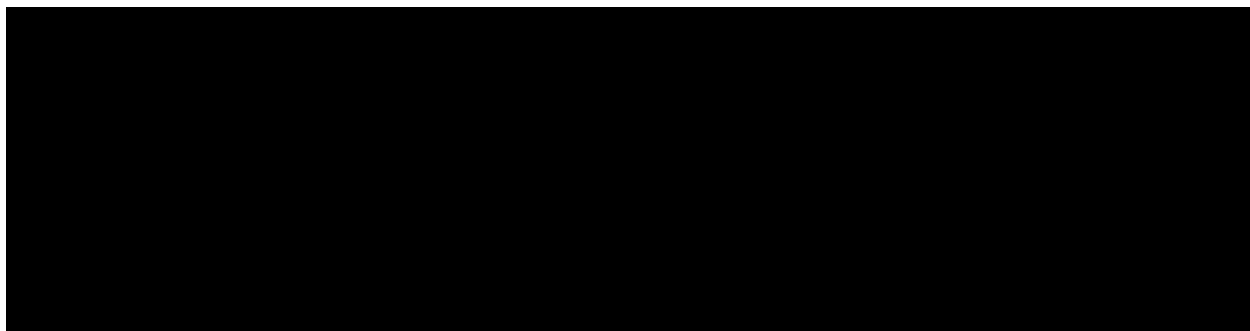
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:  
2 of 4 (Appendix A)  
Kennedy, Amy (UK - Manchester)  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:01



1 Attachment

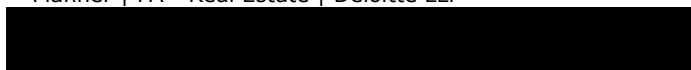


CCfE\_reps to St Helens Local Plan\_Appendix A\_March 2019.pdf

Apologies – now re-sent with attachment.

**Amy Kennedy**

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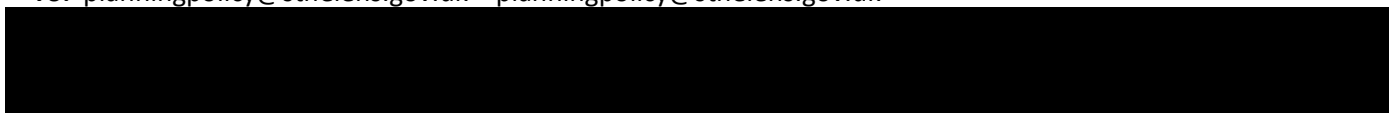



---

**From:** Kennedy, Amy (UK - Manchester)

**Sent:** 13 March 2019 15:00

**To:** 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>



**Subject:** Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 2 of 4 (Appendix A)

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix A to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 2 of 4 and Appendices B and C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

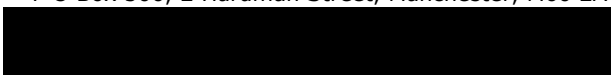
Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

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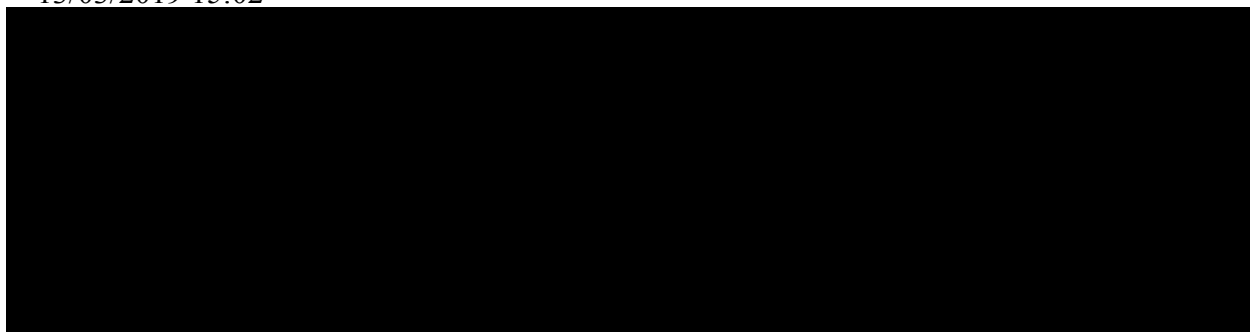
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:  
3 of 4 (Appendix B)  
Kennedy, Amy (UK - Manchester)  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:02



1 Attachment



CCfE\_reps\_to\_St\_Helens\_Local\_Plan\_Appendix\_B\_March\_2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix B to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 3 of 4 and Appendix C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

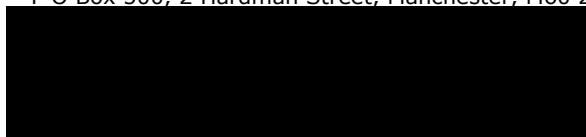
Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

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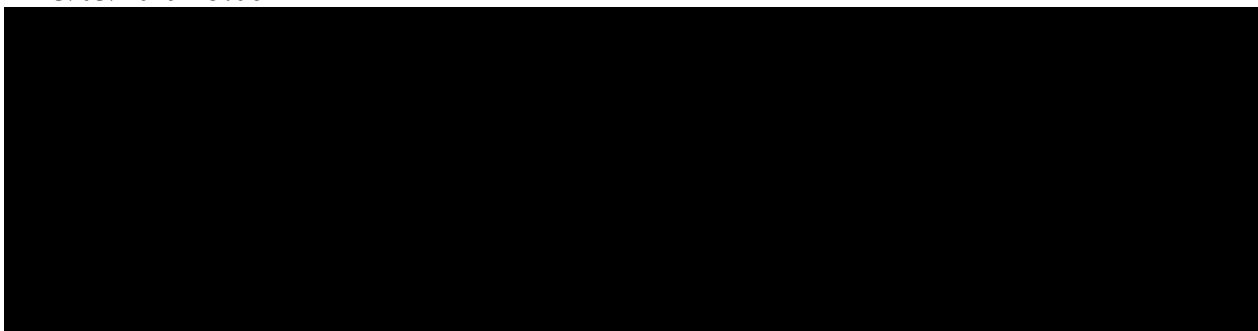
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Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)  
 Kennedy, Amy (UK - Manchester)  
 to:  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
 13/03/2019 15:06



1 Attachment



CCfE\_reps to St Helens Local Plan\_Appendix C\_March 2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix C to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 4 of 4 and is the final part of our representations. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP  
 P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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**Representations to the Submission Draft  
St Helens Borough Local Plan 2020 – 2035**  
Prepared on behalf of the Church Commissioners  
for England

March 2019



### Policy LPC01: Housing Mix

- 2.52 The Commissioners note that draft Policy LPC01 still requires at least 5% of new homes on greenfield sites that would deliver 25 or more dwellings to be bungalows. We therefore reiterate our previous objection (as made within our January 2017 representations to the Local Plan Preferred Options document) to this element of the draft policy on the basis that it is unjustified and therefore unsound.
- 2.53 As previously stated, the growing requirement to provide bungalows across the country is primarily driven by an ageing population. Bungalows are generally seen as providing housing which is more suitable for the elderly, and while the Local Planning Authority can encourage the building of bungalows, the Commissioners object to the introduction of a policy which compels developers to provide such accommodation. Bungalows tend to have much larger building footprints than the equivalent house and given this, they are not always a suitable typology for every site.
- 2.54 Draft Policy LPC01: Housing Mix should therefore be amended to delete this requirement, in order to allow developers flexibility in providing a wider choice of homes to meet the needs of a broader demographic.
- 2.55 Furthermore, it is important to note that the remaining supply identified by Table 4.6 of the Draft Plan at Row K (6,344 dwellings) is based on the sites that are capable of delivering 25 dwellings or more being brought forward at a density of between 30 and 40 dwellings per hectare (as identified in Figure 3.9 of the SHLAA 2017 Update).
- 2.56 The imposition of a target of at least 5% of these dwellings to be bungalows on greenfield sites will inevitably impact on the ability of these sites to meet the target number of units identified per site in the SHLAA and Draft Plan given that bungalows provide lower-density accommodation, and as such, the Commissioners reiterate their view that additional sites should be allocated to ensure that the Draft Plan can demonstrate that St Helens can meet the Borough's identified housing need over the Plan period.

### Policy LPC02: Affordable Housing

- 2.57 The Commissioners reiterate our previous objection (as made within our January 2017 representations to the Local Plan Preferred Options document) to the current approach to setting affordable housing contributions within the Borough.
- 2.58 We note that Rainford now falls within Affordable Housing Zone 3 within the Draft Plan, where draft Policy LPC02 stipulates that greenfield sites should provide 30% of the total number of new dwellings as affordable housing, with brownfield sites providing 10% affordable housing.
- 2.59 As outlined in our comments in paragraph 2.6 above, this approach is based on an assumption that brownfield sites have more potential viability issues than greenfield sites. This is not always the case, and there does not appear to be robust evidence to support a different affordable housing requirement for brownfield and greenfield sites. Although Part 4 of the draft policy allows for this requirement to vary on a site-by-site basis by taking into account factors such as viability, this is clearly in inequitable position and adds to the cost burden of bringing forward greenfield sites for development, which are crucial to the Council being able to provide the housing required in the Borough over the Plan period.

PO3553



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

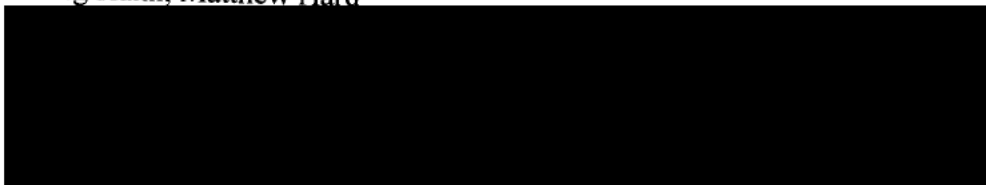
to:

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](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: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	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.

**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**

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	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	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?	<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 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 hearing 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.	
<p>The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.</p>	

**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.**

Council's Ensuring and Choice of Travel Supplementary Planning Document. However, in the absence of an updated SPD, it is unclear how the Council will approach matters relating to vehicle and cycle parking standard, electric vehicle charging point provision and to the requirements concerning transport assessments, transport statements and travel. Further clarification should be for developments which come forward in the interim.

32

- 4.48. The policy needs to confirm that the most up to date SPD and / or travel studies will be used during the plan period, to ensure that the most relevant and up to date information is used.

### Policy LPA08: Infrastructure Delivery and Funding

- 4.49. We welcome the additional clarity and flexibility introduced within the policy, but we maintain that the council must ensure that they do not impose requirements that could render schemes unviable. We support that the council will consider site specific economic viability evidence to determine the ability of a scheme to provide the required level of contributions.
- 4.50. It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis. Additionally, it is not clear how any such infrastructure requirements might be assisted by the introduction of CIL.
- 4.51. Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

33

### Policy LPC01: Housing Mix

- 4.52. We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that at least 20% of the new dwellings must be designed to be "accessible and adaptable" as set out in Part M4(2) and 5% of new dwellings must be designed to the "wheelchair user" dwellings standard set out in Part M4(3). The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy in the Local Plan. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

34

- 4.53. We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date evidence and housing need.
- 4.54. Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

35

### Policy LPC02: Affordable Housing

- 4.55. We welcome efforts to improve affordability. However, the level of affordable housing a site can deliver should be supported by robust and up to date evidence.
- 4.56. We support the amendment of LPC02(3) to include provision of Starter Homes.

36

37

### Policy LPC10: Trees and Woodland


- 4.57. We support the amendment to the policy which has resulted in the removal of the reference to the ratio approach to tree replacement where development proposal will result in the loss of existing trees.

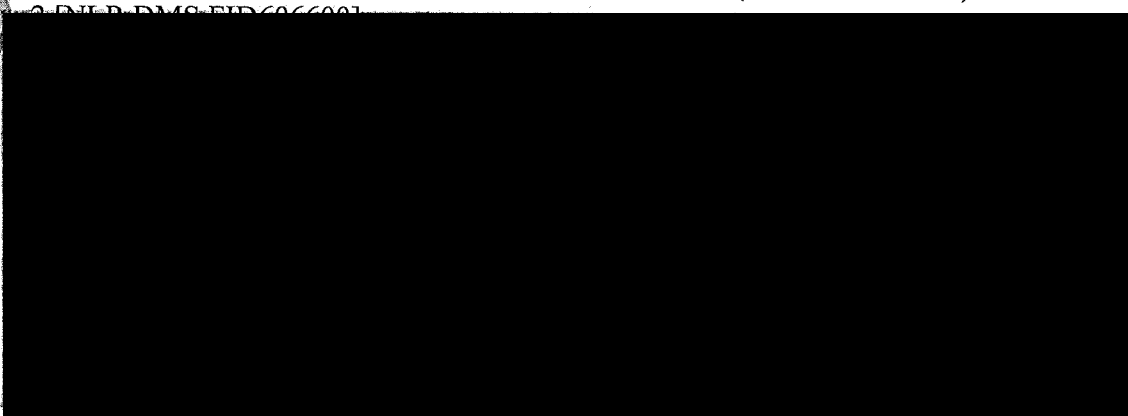
38



PO3554

ELO211


 RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2


 1 Attachment


 41575\_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,  
Melissa**Melissa Wilson**  
**Senior Planner**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

(10) LPA07

(11) LPA08

(12) LPA09

(13) LPA11

(22) LPC17

(23) LPD01

(24) LPD01

(25) LPD01

(31) GBR

(32) EVA

(14) LPC01/2

(15) LPC01/3

(16) LPC01/5

(17) LPC01/6

(18) LPC02

(19) LPC05

(20) LPC10

(21) LPC12

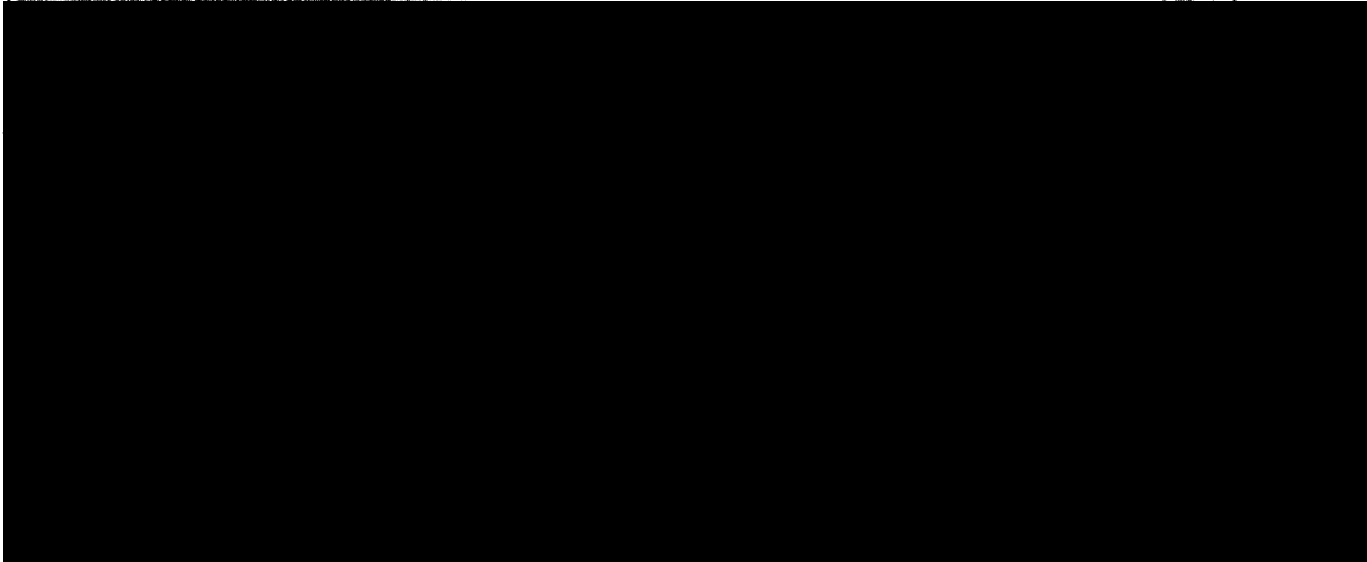
(26) LPD01

(27) LPD02

(28) LPD03

(29) LPD07

(30) SHMA


 Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseYorPfo>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

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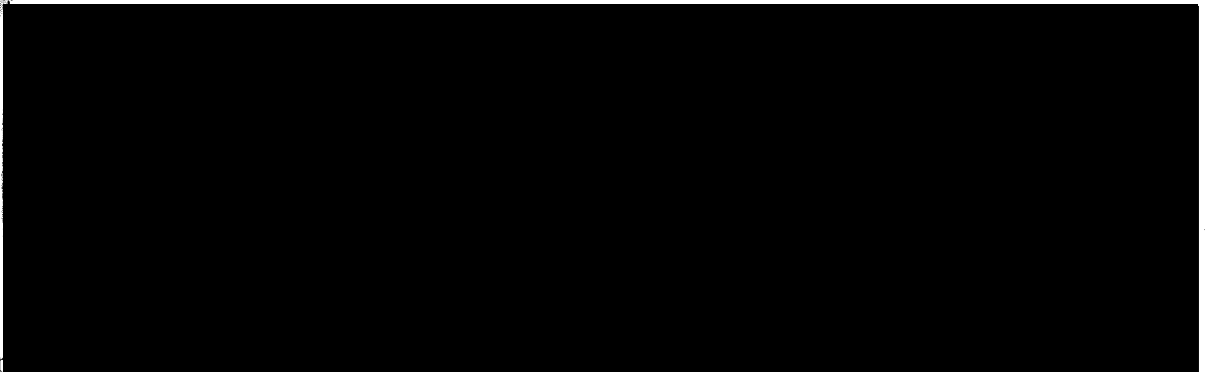


Think of the environment. Please avoid printing this email unnecessarily.





Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2  
[NLP-DMS.FID606600]  
Brian O'Connor



1 Attachment



SPLIT 41874\_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19\_Part\_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseY9rPfO>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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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: Mr
First Name: Kate	First name: Brian
Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood	Address: Ship Canal House 98 King Street Manchester
Postcode: WA3 6GR	Postcode: M2 4WU
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

<b>Signature:</b> [REDACTED]	<b>Date:</b> 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.

**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	
See cover letter		See cover letter		See cover letter					
Other documents (please name document and relevant part/section)				See supporting Representations and Appendices					

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?	<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 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 supporting Representations and Appendices



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 supporting Representations and Appendices**

**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>Yes, I wish to participate at the oral examination</b>
--	--	--	---

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

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

EL0211

## **St Helens Local Plan Soundness Representations**

Taylor Wimpey UK Limited

13 March 2019

**LICHFIELDS**







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## 13.0 Policy LPCo1: Housing Mix

### Introduction

- 13.1 Policy LPCo1 seeks to ensure that new development delivers a wide choice of high quality homes that reflects St Helens Borough's housing needs.

### Consideration of Policy

- 13.2 Policy LPCo1 *Housing Mix* states that new market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by relevant evidence including the Borough's latest SHMA. TW is supportive of the need to provide a range of homes to meet the local needs of the area, but would note that other elements would feed into the provision of a suitable housing mix including viability, local aspirations and site characteristics.
- 13.3 It states that on greenfield sites capable of accommodating over 25 homes, at least 20% of the new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2); and at least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwellings standard. It also requires that at least 5% of dwellings on these sites be bungalows.
- 13.4 TW  object to Part 2 of this Policy which states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards. TW would note that the SHMA provides limited evidence in relation to this; and it is contrary to national policy to enforce higher standards without appropriate evidence of local need. The viability implication of pursuing these optional building standards has not been properly assessed and this could undermine the deliverability of some sites.  (14)
- 13.5  Part 3 provides for at least 5% of new homes on greenfield sites of 25 dwellings or more should be bungalows. TW objects to this policy as it is currently unjustified and not based on national policy. The 2016 SHMA identified a demand for bungalows (but does not support this with evidence on the number requirement) and the 2019 SHMA states that it is difficult to quantify the need/demand for bungalows; therefore there is no sound evidence base to support this policy requirement. Furthermore, the provision of 5% of bungalows across all greenfield sites does not allow for flexibility to address site constraints and characteristics or the implication of applying the densities associated with Policy LPA05. Finally,, the provision of bungalows affects the achievable density on sites and as such, it will be difficult to achieve the Council's density standards with the requirement for bungalows. This point was acknowledged in the SHMA Update 2019 (§7.40) which stated that *'the downside of providing bungalows is that they are relatively land intensive for the amount of floorspace created'*. (15)
- 13.6 TW welcomes the inclusion of Part 4 and the reference to viability implications on Part 1-3. However, TW would note that this should not be used to justify unsustainable and unjustified requirements. 
- 13.7 In respect of Part 5, the Policy states that the *"Council will work with partners to facilitate the provision of specialist and supported housing for elderly and vulnerable people."* However, there is no explicit target for special needs/elderly housing provided.  (16)
- 13.8 Part 6 of the Policy sets out that the Council will support the delivery of suitable designed and located self-build and custom-build schemes in the Borough. However, limited evidence has been presented by the Council to justify that there is a sufficient demand for such a requirement.  (17)



Taylor Wimpey do not consider that self-build and custom-build should not be required on large scale strategic sites which are generally brought forward in accordance with a comprehensive masterplan. ] (7)

### Tests of Soundness

13.9 TW considers that Policy LPC01 fails to meet the following tests of soundness because:

- 1 **It is not justified:** The provision of 5% bungalows and optional building regulations is not based on robust or clear evidence. Similarly, there is insufficient evidence to justify the necessity for a self-build/custom build requirement.
- 2 **It is not effective:** The policy does not make it clear how development would be expected to provide for special needs/elderly housing in terms of number of units.
- 3 **It is not consistent with national policy:** The requirement to deliver development higher at an optional higher standard is not reflective of national guidance, if not fully evidenced.

### Recommended Change

13.10 In order to address the concerns raised above, TW would suggest the following changes:

- 1 Amend Part 1 of the policy to extend the evidence informing housing mix or remove reference to SHMA. ✓
- 2 Delete Part 2 of the Policy unless evidence can be provided to support the requirements. ✓
- 3 Remove Part 3 of the Policy; or if a demand for bungalows can be robustly evidenced amend this to a supportive policy context that encourages the provision of bungalows without apply a fixed threshold. ✓
- 4 Provide explicit targets for special needs/elderly housing based on robust evidence base and ensuring viability is not impacted upon.

PO3555

E-LO229



St Helens Local Plan Submission Draft - strategic representations on behalf of

Wainhomes NW

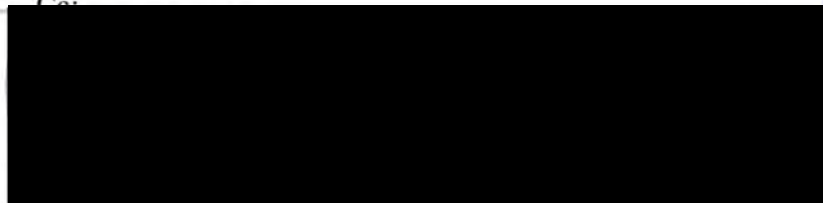
Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:16

Cc:



1 Attachment



Representations - St Helens LP Reg 19 - Wainhomes combined.pdf

Dear Sir / Madam,

Please find attached, strategic written representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan.

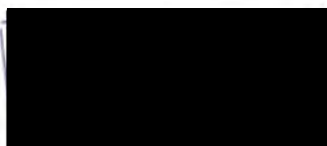
We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

**Nick Scott**

Assistant Consultant



① - GENERAL

② - LPA05

③ - LPC02

④ - LPA05.1

ns.gov.uk&gt;

⑤ - LPA06

⑥ - LPC01 - CRITERIA 1

⑦ - LPC01 - CRITERIA 2

⑧ - LPC01 - CRITERIA 3

⑨ - LPC13

⑩ - LPA05 - TABLE 4.6

Emery Planning is proud to support the Keaton Emery Memorial Foundation. To find out more about the charity or to make a donation, please visit [www.keatonemeryfoundation.com](http://www.keatonemeryfoundation.com)

**emery**  
planning

Emery Planning Partnership Ltd trading as  
Emery Planning

Emery Planning  
2-4 South Park Court  
Hobson Street  
Macclesfield  
SK11 8BS

Registered  
office as above





## Representations to the Submission Draft

St Helens Local Plan – Regulation 19

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005



## 8. Policy LPC01: Housing Mix

- 8.1 Part 1 of the policy requires the mix of housing on development proposals to be informed by "relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA)." All development plan policies must be clear and transparent. The policy as worded is extremely ambiguous and is not clear what 'relevant evidence' is (other than the SHMA). Furthermore, the wording of the policy refers to the 'latest' SHMA, suggesting that that the policy requirement could in effect change over time, without being tested through the development plan process. (6)
- 8.2 Turning to the mix set out within the 2018 SHMA, this is driven by the demographic makeup of new households. There is insufficient assessment of market demand. Many households choose to occupy houses with more bedrooms than technically required, for example older households who choose not to downsize and households requiring guestrooms, home offices etc. By failing to adequately account for demand additional pressures will be placed upon the housing market. This must be reflected within the policy.
- 8.3 Part 2 of the policy states that the Council will apply the optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended). The Council's own viability evidence indicates that such a requirement would not be viable on a number of sites (see Table 6.19 of the Council's viability assessment). The proposal therefore conflicts with paragraphs 56-002 and 56-003 of the PPG. (7)
- 8.4 Finally, Part 3 of the draft policy requires at least 5% of new homes on greenfield sites that would deliver 25 or more dwellings to be bungalows. There is no evidential basis for this requirement. The 2018 SHMA simply states at paragraph 7.37:
- "The sources used for analysis in this report makes it difficult to quantify a need/demand for bungalows in the Borough as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. However, it is typical (where discussion are undertaken with local estate agents) to find that there is a demand for this type of accommodation."* (8)
- 8.5 Therefore it is apparent that there is no analysis of need undertaken through the SHMA; it is simply assumed that there is demand because it would be 'typical' to find demand if it had been investigated.

PO3556





Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
 Hannah Payne  
 to:  
[planningpolicy@sthelens.gov.uk](mailto: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



**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](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.

**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		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 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 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 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)

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

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.

St James' Tower,  
7 Charlotte Street,  
Manchester, M1 4DZ

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

By email

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

let.001.NF..21450010

13 March 2019

Dear Sirs

## ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

### Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

### Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

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Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E1 1DT  
Registered number 2078863 VAT number 849246134





# indigo.

## Policy LPA08: Infrastructure Delivery and Funding

We welcome the additional clarity and flexibility introduced within the policy but the Council must ensure that they do not impose requirements that could render schemes unviable.

23

It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis and, additionally, how any such infrastructure requirements might otherwise be assisted by the introduction of CIL.

24

Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

## Policy LPC01: Housing Mix

We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, at least 20% of the new dwellings must be designed to be "*accessible and adaptable*" and 5% of the market housing should be bungalows is unjustified and contrary to national policy. The policy also refers to 'optional standards' but that a) AND b) will be applied. This reference should therefore be removed.

25

The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date market evidence.

26

Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

LPC01(4) sets out exceptions to providing the above on viability grounds however, there are also site specific conditions and limitations which would render the requirements undeliverable in some instances. The policy should there be reworded to provide flexibility.

27

It must be noted that when discussing housing mix on a site at application stage, the Local Planning Authority must refer to the most up to date SHMA.

## Policy LPC02: Affordable Housing

Barratt are one of the United Kingdom's main providers of affordable homes and

28

PO3557

ELO112



HBF response to St Helens Local Plan Submission

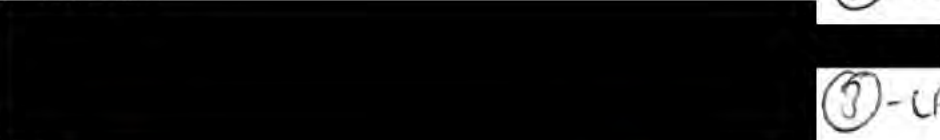
Joanne Harding

to:

planningpolicy@sthelens.gov.uk

12/03/2019 17:26

Hide Details



2 Attachments



19-03-13 St Helens Local Plan Submission.docx HBF lpsd-representation-form-signed.pdf

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

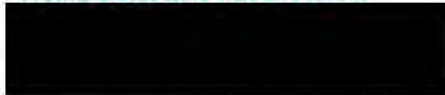
If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI

Local Plans Manager - North

HOME BUILDERS FEDERATION



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Company Reg No. 276 4757 | Vat No. 882 6294 86

① - STRATEGICAL Aims &amp; OBJECTIVES

② - LPA05

③ - LPA05 - PARA. 3

④ - LPA05 - PARA 4

⑤ - LPA07 - PART 3C

⑥ - LPA07 - PART 9

⑦ - LPC01 - PART 1

⑧ - LPC01 - PART 2

⑨ - LPC01 - PART 3

⑩ - LPC01 - PART 4

⑪ - LPC02

⑫ - LPC10

⑬ - LPC13

⑭ - LPD07





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: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House 27 Broadwall London	Address:
Postcode: SE1 9PL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	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 ☒ (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.

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

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

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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

## FURTHER INFORMATION

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

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.

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).

**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)				Please see separately attached letter.					

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 see separately attached letter.		

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"/> Please see separately attached letter.
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 <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 see separately attached letter.



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 separately attached letter.

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:

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

**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.

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

SENT BY EMAIL  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
13/12/2018

Dear Sir / Madam,

#### **ST HELENS LOCAL PLAN SUBMISSION DRAFT**

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members. ✓

#### **Vision and Objectives**

*The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:*

The HBF support the part of the vision which 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'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as set out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply. (1)



The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on matters in relation to housing delivery and would be keen to work proactively with the Council on this issue. ✓

The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure. ] (2)

#### **Policy LPA07: Transport and Travel**

*The HBF does not consider that Policy LPA07 is sound, as it is not justified or effective for the following reasons:*

Part 3c of this policy states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst the HBF do not oppose the provision of electric charging points, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others. ] (5)

The HBF also have concerns that part 9 states that further details of the operation of this policy including standards for vehicle charging provision will be set out in a Supplementary Planning Document (SPD). It is not considered appropriate to set out in SPD elements of policy, namely the number of charging points that would be 'appropriate provision', that will have a direct role in the determination of a planning application. The HBF consider that these elements should be set out in policy and open for debate at the Examination in Public, without these details it is impossible to consider the impact of these policies on viability or whether they are justified and effective. The HBF would encourage the Council to work with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require. ] (6)

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

- Further consideration is given to what the Council consider to be 'appropriate provision' supported by evidence.
- That additional standards for electric charging point provision are not included within an SPD that will not be tested at examination. ✓

#### **Policy LPC01: Housing Mix**

*The HBF does not consider that Policy LPC01 is sound, justified, effective or consistent with national policy for the following reasons:*



Part 1 of this policy looks for new market and affordable homes to include a range of types, tenures and sizes of homes as informed by relevant evidence including the SHMA. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. It is noted how frequently the Viability Assessment 2019 highlights the implications of the SHMA housing mix on the viability of development.

7

Part 2 of this policy states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards.

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for St Helens which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. The SHMA Update January 2019 does provide some limited evidence in relation to the likely future need for housing for older people and disabled people it provides limited information in relation to the size, location, type or quality of dwellings needs and no evidence in relation to the accessibility and adaptability of the existing housing. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.

8

The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

8

Part 3 of this policy requires at least 5% of new homes on greenfield sites of 25 or more homes to be bungalows. The reasoning for this requirement is unclear, whilst the 2016 SHMA identifies that there is typically a demand for bungalows (paragraph 10.29) this assertion is not supported by specific evidence of need. Whilst the 2019 Update to the SHMA actually states that is difficult to quantify a need/demand for bungalows. Furthermore, the policy applies to all greenfield sites without

9

differentiation in terms of location, the character of the area or reference to the densities set out within Policy LPA05. The provision of bungalows may also impact upon viability. Given these issues, if a need can be demonstrated, it is recommended that the mandatory requirement be amended to a supportive policy stance which encourages rather than requires the provision of bungalows.

Part 4 of the policy provides a viability clause. The HBF supports the inclusion of this element of the policy as it provides flexibility to deal with site specific circumstances. The inclusion of this part of the policy should not, however, be used to justify other unsustainable requirements as noted above.

The HBF considers that the policy should be modified as follows in order to make the document sound:

- '1. New market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by: relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA); site characteristics; viability; and local aspirations'.
- ~~'2. Where a proposal for new housing would be on a greenfield site on which the site as a whole would deliver 25 or more new homes, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that:~~
  - ~~a) at least 20 % of the new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2); and~~
  - ~~b) at least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwellings standard set out in Part M4(3)~~~~If the standards in Part M4(2) or Part M4(3) are amended or superseded by new standards, the Council will apply the relevant amending or superseding provisions in the same proportions as set out above.'~~
- The HBF recommends that part 2 of the policy is deleted unless evidence can be provided to support the requirements. If it is to be retained, the HBF would recommend that the following additional text is included  
**'In seeking to apply this standard, the Council will take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable.**  
**To enable developers to factor in these additional requirements the Council will introduce this policy one year from the adoption of the Local Plan.'**
- ~~'3. At least 5% of new homes on greenfield sites that would deliver 25 or more dwellings should be bungalows-~~ **The Council will support the provision of bungalows and will take this provision into account when considering the density of the site'**.

#### Policy LPC02: Affordable Housing

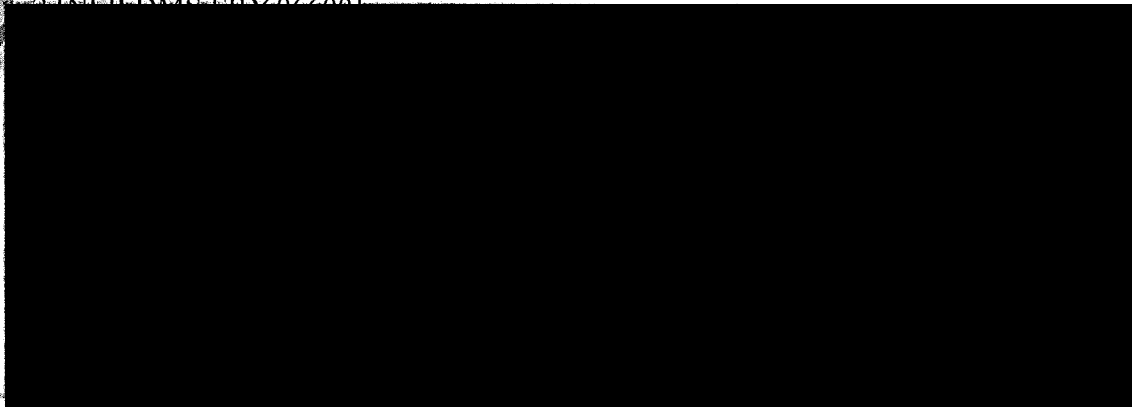
The HBF does not consider that Policy LPC02 is sound, as it is not justified or consistent with national policy for the following reasons:

PO3558



ELO211

RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2



① LPA01  
② LPA02  
③ LPA03  
④ LPA04  
⑤ LPA05  
⑥ LPA05  
⑦ LPA05  
⑧ LPA05.1  
⑨ LPA06

1 Attachment



41575\_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

⑩ LPA07

⑪ LPA08

⑫ LPA09

⑬ LPA11

⑭ GBR

⑮ EVA

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

⑯ LPC01/2

⑰ LPC02

⑱ LPC13

⑲ LPD01

Kind regards,  
Melissa

⑳ LPC01/3

㉑ LPC05

㉒ LPD01

㉓ LPD02

㉔ LPC01/5

㉕ LPC10

㉖ LPD01

㉗ LPD03

㉘ LPC01/6

㉙ LPC12

㉚ LPD01

㉛ LPD07

**Melissa Wilson**  
**Senior Planner**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

㉜ SHMA

Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseYorPfo>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

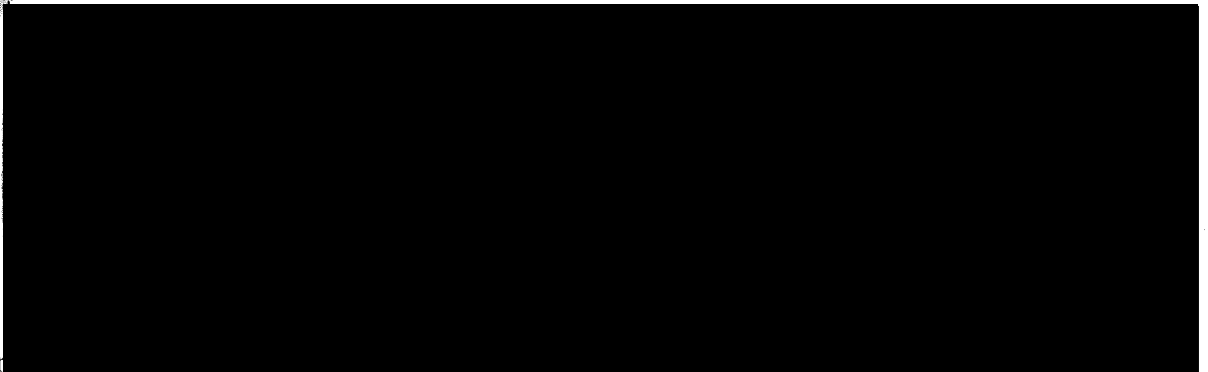
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Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2  
[NLP-DMS.FID606600]  
Brian O'Connor



1 Attachment



SPLIT 41874\_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19\_Part\_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseY9rPfO>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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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: Mr
First Name: Kate	First name: Brian
Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood	Address: Ship Canal House 98 King Street Manchester
Postcode: WA3 6GR	Postcode: M2 4WU
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

<b>Signature:</b> [REDACTED]	<b>Date:</b> 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.

**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	
See cover letter		See cover letter		See cover letter					
Other documents (please name document and relevant part/section)				See supporting Representations and Appendices					

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?	<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 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 supporting Representations and Appendices

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 supporting Representations and Appendices**

**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>Yes, I wish to participate at the oral examination</b>
--	--	--	---

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

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



EL0211

# **St Helens Local Plan Soundness Representations**

Taylor Wimpey UK Limited

13 March 2019

**LICHFIELDS**








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17081285v8

## 13.0 Policy LPCo1: Housing Mix

### Introduction

- 13.1 Policy LPCo1 seeks to ensure that new development delivers a wide choice of high quality homes that reflects St Helens Borough's housing needs.

### Consideration of Policy

- 13.2 Policy LPCo1 *Housing Mix* states that new market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by relevant evidence including the Borough's latest SHMA. TW is supportive of the need to provide a range of homes to meet the local needs of the area, but would note that other elements would feed into the provision of a suitable housing mix including viability, local aspirations and site characteristics.
- 13.3 It states that on greenfield sites capable of accommodating over 25 homes, at least 20% of the new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2); and at least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwellings standard. It also requires that at least 5% of dwellings on these sites be bungalows.
- 13.4 TW  object to Part 2 of this Policy which states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards. TW would note that the SHMA provides limited evidence in relation to this; and it is contrary to national policy to enforce higher standards without appropriate evidence of local need. The viability implication of pursuing these optional building standards has not been properly assessed and this could undermine the deliverability of some sites.  (14)
- 13.5  Part 3 provides for at least 5% of new homes on greenfield sites of 25 dwellings or more should be bungalows. TW objects to this policy as it is currently unjustified and not based on national policy. The 2016 SHMA identified a demand for bungalows (but does not support this with evidence on the number requirement) and the 2019 SHMA states that it is difficult to quantify the need/demand for bungalows; therefore there is no sound evidence base to support this policy requirement. Furthermore, the provision of 5% of bungalows across all greenfield sites does not allow for flexibility to address site constraints and characteristics or the implication of applying the densities associated with Policy LPA05. Finally,, the provision of bungalows affects the achievable density on sites and as such, it will be difficult to achieve the Council's density standards with the requirement for bungalows. This point was acknowledged in the SHMA Update 2019 (§7.40) which stated that *'the downside of providing bungalows is that they are relatively land intensive for the amount of floorspace created'*.  (15)
- 13.6 TW welcomes the inclusion of Part 4 and the reference to viability implications on Part 1-3. However, TW would note that this should not be used to justify unsustainable and unjustified requirements. 
- 13.7 In respect of Part 5, the Policy states that the *"Council will work with partners to facilitate the provision of specialist and supported housing for elderly and vulnerable people."* However, there is no explicit target for special needs/elderly housing provided.  (16)
- 13.8 Part 6 of the Policy sets out that the Council will support the delivery of suitable designed and located self-build and custom-build schemes in the Borough. However, limited evidence has been presented by the Council to justify that there is a sufficient demand for such a requirement.  (17)

Taylor Wimpey do not consider that self-build and custom-build should not be required on large scale strategic sites which are generally brought forward in accordance with a comprehensive masterplan. ] (7)

### Tests of Soundness

13.9 TW considers that Policy LPC01 fails to meet the following tests of soundness because:

- 1 **It is not justified:** The provision of 5% bungalows and optional building regulations is not based on robust or clear evidence. Similarly, there is insufficient evidence to justify the necessity for a self-build/custom build requirement.
- 2 **It is not effective:** The policy does not make it clear how development would be expected to provide for special needs/elderly housing in terms of number of units.
- 3 **It is not consistent with national policy:** The requirement to deliver development higher at an optional higher standard is not reflective of national guidance, if not fully evidenced.

### Recommended Change


13.10 In order to address the concerns raised above, TW would suggest the following changes:

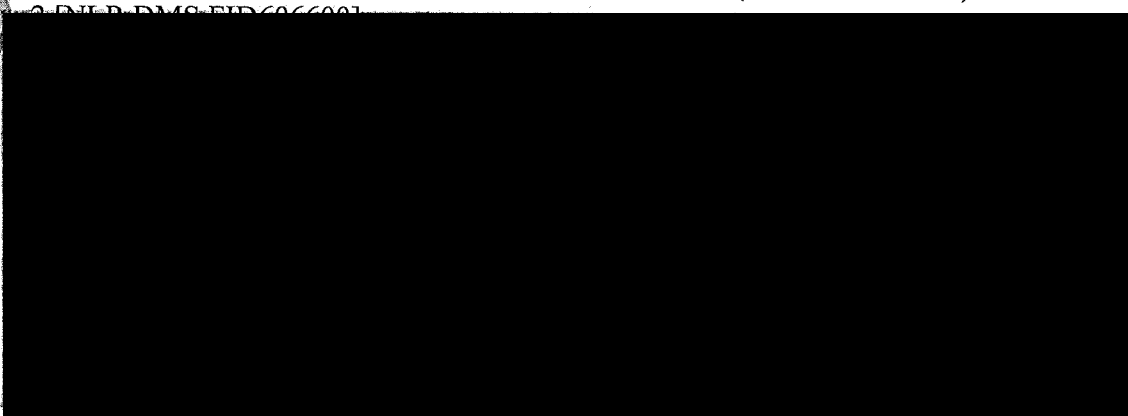
- 1 Amend Part 1 of the policy to extend the evidence informing housing mix or remove reference to SHMA. ✓
- 2 Delete Part 2 of the Policy unless evidence can be provided to support the requirements. ✓
- 3 Remove Part 3 of the Policy; or if a demand for bungalows can be robustly evidenced amend this to a supportive policy context that encourages the provision of bungalows without apply a fixed threshold. ✓
- 4 Provide explicit targets for special needs/elderly housing based on robust evidence base and ensuring viability is not impacted upon.



PO3559

ELO211


 RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2


 1 Attachment


 41575\_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,  
Melissa**Melissa Wilson**  
**Senior Planner**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

(10) LPA07

(11) LPA08

(12) LPA09

(13) LPA11

(22) LPC17

(23) LPD01

(24) LPD01

(25) LPD01

(31) GBR

(32) EVA

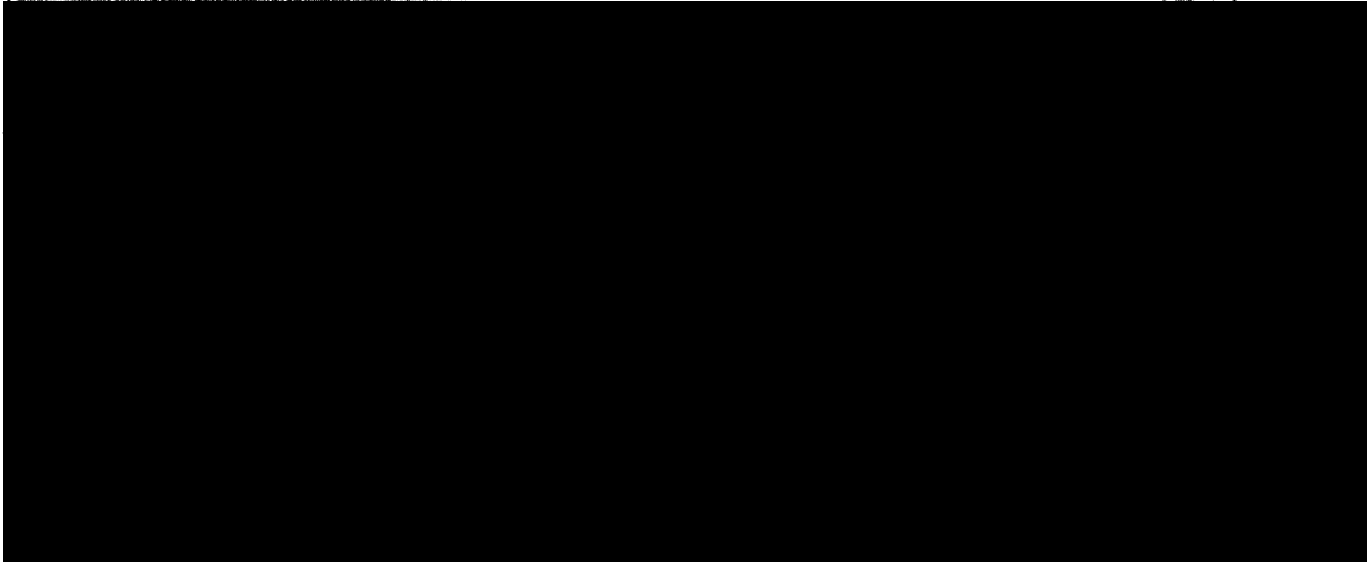
(26) LPD01

(27) LPD02

(28) LPD03

(29) LPD07

(30) SHMA


 Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseYorPfo>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

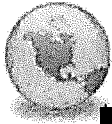
**lichfields.uk**

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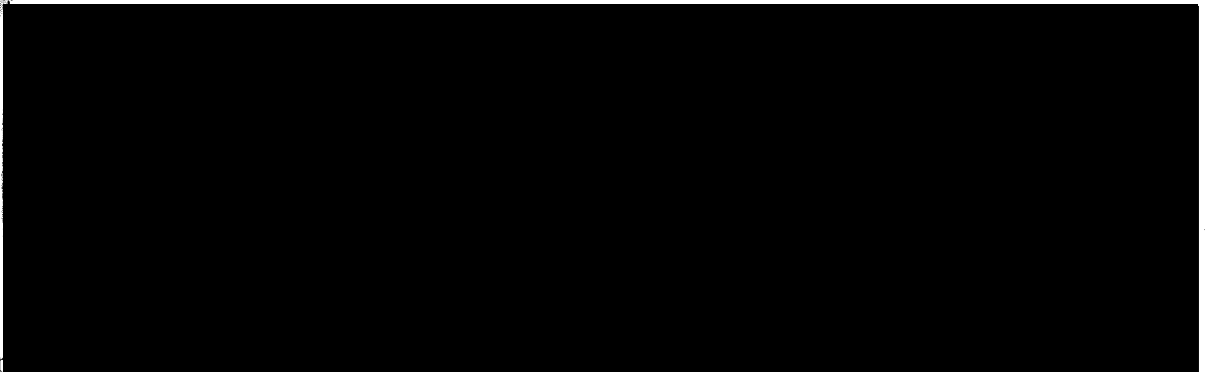


Think of the environment. Please avoid printing this email unnecessarily.





Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2  
[NLP-DMS.FID606600]  
Brian O'Connor



1 Attachment



SPLIT 41874\_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19\_Part\_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseY9rPfO>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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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: Mr
First Name: Kate	First name: Brian
Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood	Address: Ship Canal House 98 King Street Manchester
Postcode: WA3 6GR	Postcode: M2 4WU
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

<b>Signature:</b> [REDACTED]	<b>Date:</b> 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.

**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	
See cover letter		See cover letter		See cover letter					
Other documents (please name document and relevant part/section)				See supporting Representations and Appendices					

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?	<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 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 supporting Representations and Appendices



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 supporting Representations and Appendices**

**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>Yes, I wish to participate at the oral examination</b>
--	--	--	---

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

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

EL0211

# **St Helens Local Plan Soundness Representations**

Taylor Wimpey UK Limited

13 March 2019

**LICHFIELDS**







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17081285v8

## 13.0 Policy LPCo1: Housing Mix

### Introduction

- 13.1 Policy LPCo1 seeks to ensure that new development delivers a wide choice of high quality homes that reflects St Helens Borough's housing needs.

### Consideration of Policy

- 13.2 Policy LPCo1 *Housing Mix* states that new market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by relevant evidence including the Borough's latest SHMA. TW is supportive of the need to provide a range of homes to meet the local needs of the area, but would note that other elements would feed into the provision of a suitable housing mix including viability, local aspirations and site characteristics.
- 13.3 It states that on greenfield sites capable of accommodating over 25 homes, at least 20% of the new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2); and at least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwellings standard. It also requires that at least 5% of dwellings on these sites be bungalows.
- 13.4 TW  object to Part 2 of this Policy which states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards. TW would note that the SHMA provides limited evidence in relation to this; and it is contrary to national policy to enforce higher standards without appropriate evidence of local need. The viability implication of pursuing these optional building standards has not been properly assessed and this could undermine the deliverability of some sites.  (14)
- 13.5  Part 3 provides for at least 5% of new homes on greenfield sites of 25 dwellings or more should be bungalows. TW objects to this policy as it is currently unjustified and not based on national policy. The 2016 SHMA identified a demand for bungalows (but does not support this with evidence on the number requirement) and the 2019 SHMA states that it is difficult to quantify the need/demand for bungalows; therefore there is no sound evidence base to support this policy requirement. Furthermore, the provision of 5% of bungalows across all greenfield sites does not allow for flexibility to address site constraints and characteristics or the implication of applying the densities associated with Policy LPA05. Finally,, the provision of bungalows affects the achievable density on sites and as such, it will be difficult to achieve the Council's density standards with the requirement for bungalows. This point was acknowledged in the SHMA Update 2019 (§7.40) which stated that *'the downside of providing bungalows is that they are relatively land intensive for the amount of floorspace created'*. (15)
- 13.6 TW welcomes the inclusion of Part 4 and the reference to viability implications on Part 1-3. However, TW would note that this should not be used to justify unsustainable and unjustified requirements. 
- 13.7 In respect of Part 5, the Policy states that the *"Council will work with partners to facilitate the provision of specialist and supported housing for elderly and vulnerable people."* However, there is no explicit target for special needs/elderly housing provided.  (16)
- 13.8 Part 6 of the Policy sets out that the Council will support the delivery of suitable designed and located self-build and custom-build schemes in the Borough. However, limited evidence has been presented by the Council to justify that there is a sufficient demand for such a requirement.  (17)

Taylor Wimpey do not consider that self-build and custom-build should not be required on large scale strategic sites which are generally brought forward in accordance with a comprehensive masterplan. ] (7)

### Tests of Soundness

13.9 TW considers that Policy LPC01 fails to meet the following tests of soundness because:

- 1 **It is not justified:** The provision of 5% bungalows and optional building regulations is not based on robust or clear evidence. Similarly, there is insufficient evidence to justify the necessity for a self-build/custom build requirement.
- 2 **It is not effective:** The policy does not make it clear how development would be expected to provide for special needs/elderly housing in terms of number of units.
- 3 **It is not consistent with national policy:** The requirement to deliver development higher at an optional higher standard is not reflective of national guidance, if not fully evidenced.

### Recommended Change

13.10 In order to address the concerns raised above, TW would suggest the following changes:

- 1 Amend Part 1 of the policy to extend the evidence informing housing mix or remove reference to SHMA. ✓
- 2 Delete Part 2 of the Policy unless evidence can be provided to support the requirements. ✓
- 3 Remove Part 3 of the Policy; or if a demand for bungalows can be robustly evidenced amend this to a supportive policy context that encourages the provision of bungalows without apply a fixed threshold. ✓
- 4 Provide explicit targets for special needs/elderly housing based on robust evidence base and ensuring viability is not impacted upon.



PO3560



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
 Hannah Payne  
 to:  
[planningpolicy@sthelens.gov.uk](mailto: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



**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](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.

**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		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 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 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 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.

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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 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:

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.

St James' Tower,  
7 Charlotte Street,  
Manchester, M1 4DZ

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

By email

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

let.001.NF..21450010

13 March 2019

Dear Sirs

## ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

### Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

### Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

London • Manchester • Leeds • Birmingham • Dublin

Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E04 1TX  
Registered number 2078863 VAT number 849246134



# indigo.

## Policy LPA08: Infrastructure Delivery and Funding

We welcome the additional clarity and flexibility introduced within the policy but the Council must ensure that they do not impose requirements that could render schemes unviable.

23

It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis and, additionally, how any such infrastructure requirements might otherwise be assisted by the introduction of CIL.

24

Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

## Policy LPC01: Housing Mix

We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, at least 20% of the new dwellings must be designed to be "*accessible and adaptable*" and 5% of the market housing should be bungalows is unjustified and contrary to national policy. The policy also refers to 'optional standards' but that a) AND b) will be applied. This reference should therefore be removed.

25

The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date market evidence.

26

Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

LPC01(4) sets out exceptions to providing the above on viability grounds however, there are also site specific conditions and limitations which would render the requirements undeliverable in some instances. The policy should there be reworded to provide flexibility.

27

It must be noted that when discussing housing mix on a site at application stage, the Local Planning Authority must refer to the most up to date SHMA.

## Policy LPC02: Affordable Housing

Barratt are one of the United Kingdom's main providers of affordable homes and

28



# indigo.

therefore welcome efforts to improve affordability however, consider that the variation in the level of provision needs to be fully evidenced and tested. Clarification is also required as to how the Affordable Housing Zones were derived and the basis for the viability evidence base.

28

We disagree that brownfield sites should only be required to provide 10% affordable housing whereas greenfield sites are required to provide 30%. The fact that a site is brownfield does not automatically mean that providing a standard level of affordable housing would render a development unviable. The level of affordable housing a site can deliver should be supported by robust and up to date evidence.

29

We support the amendment of LPC02(3) to include provision of Starter Homes.

30

## **Policy LPC10: Trees and Woodland**

We support the amendment to the policy which has resulted in the removal of the reference to the ratio approach to tree replacement where development proposal will result in the loss of existing trees.

31

We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered accordingly.

32

## **Policy LPC13: Renewable and Low Carbon Energy Development**

We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach. However, we object to the fact that only proposals for new development within a strategic housing sites are required to ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy sources.

33

There is no justification or evidence to demonstrate that this policy should not be applied to all developments. The Plan is unsound on this basis.

## **Policy LPD01: Ensuring Quality Development**

Barratt Homes supports the provision of high quality development across all of its housing sites. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form.

34

## **Policy LPD02: Design and Layout of New Housing**

We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development.

35

PO3561



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
 Hannah Payne  
 to:  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
 13/03/2019 16:22



# 1 Attachment



Representation Form.pdf

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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



**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](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.

**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		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 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 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 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)

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

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.

St James' Tower,  
7 Charlotte Street,  
Manchester, M1 4DZ

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

By email

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

let.001.NF..21450010

13 March 2019

Dear Sirs

## ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

### Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

### Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

London • Manchester • Leeds • Birmingham • Dublin

Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E1 1DT  
Registered number 2078863 VAT number 849246134





# indigo.

## Policy LPA08: Infrastructure Delivery and Funding

We welcome the additional clarity and flexibility introduced within the policy but the Council must ensure that they do not impose requirements that could render schemes unviable.

23

It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis and, additionally, how any such infrastructure requirements might otherwise be assisted by the introduction of CIL.

24

Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

## Policy LPC01: Housing Mix

We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, at least 20% of the new dwellings must be designed to be "*accessible and adaptable*" and 5% of the market housing should be bungalows is unjustified and contrary to national policy. The policy also refers to 'optional standards' but that a) AND b) will be applied. This reference should therefore be removed.

25

The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date market evidence.

26

Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

LPC01(4) sets out exceptions to providing the above on viability grounds however, there are also site specific conditions and limitations which would render the requirements undeliverable in some instances. The policy should there be reworded to provide flexibility.

27

It must be noted that when discussing housing mix on a site at application stage, the Local Planning Authority must refer to the most up to date SHMA.

## Policy LPC02: Affordable Housing

Barratt are one of the United Kingdom's main providers of affordable homes and

28

# indigo.

therefore welcome efforts to improve affordability however, consider that the variation in the level of provision needs to be fully evidenced and tested. Clarification is also required as to how the Affordable Housing Zones were derived and the basis for the viability evidence base.

28

We disagree that brownfield sites should only be required to provide 10% affordable housing whereas greenfield sites are required to provide 30%. The fact that a site is brownfield does not automatically mean that providing a standard level of affordable housing would render a development unviable. The level of affordable housing a site can deliver should be supported by robust and up to date evidence.

29

We support the amendment of LPC02(3) to include provision of Starter Homes.

30

## **Policy LPC10: Trees and Woodland**

We support the amendment to the policy which has resulted in the removal of the reference to the ratio approach to tree replacement where development proposal will result in the loss of existing trees.

31

We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered accordingly.

32

## **Policy LPC13: Renewable and Low Carbon Energy Development**

We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach. However, we object to the fact that only proposals for new development within a strategic housing sites are required to ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy sources.

33

There is no justification or evidence to demonstrate that this policy should not be applied to all developments. The Plan is unsound on this basis.

## **Policy LPD01: Ensuring Quality Development**

Barratt Homes supports the provision of high quality development across all of its housing sites. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form.

34

## **Policy LPD02: Design and Layout of New Housing**

We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development.

35

PO3562



Objection to plans to build on Ecclestone/Windle Greenbelt land.

Gerard Banks

to:

planningpolicy@sthelens.gov.uk

11/03/2019 09:35



1 Attachment



Planning Objection.pdf

Dear Sir/Madam

Please find attached my objection to your plans to build on Ecclestone/Windle Greenbelt land.

Kind regards

Gerard Banks

54 Ecclesfield Road

Ecclestone





Mr & Mrs G Banks  
54 Ecclesfield Road  
Eccleston  
St Helens  
WA10 6BN  
[REDACTED]

11 March 2019

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

Dear Sir or Madam

On behalf of my wife and I, I wish to object to the St Helens Council Local Plan(2018). In particular, we are objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

[REDACTED]

Now, to discover that you intend to illegally build and take away the view we have enjoyed for over [REDACTED] years is heartbreaking. I actually do not have the words to describe quite how distressed we are even at the prospect. Not only will our view be destroyed, but all the wildlife that we have enjoyed for so long will disappear, including rabbits, hares, mice, voles, etc., the thought of them being slaughtered is equally distressing. This is Greenbelt land and always have been. It should never be built on. 01

From a technical standpoint, St Helens Council are using a projected annual house building target of 486, the ONS suggestion for 2014 is 468 and the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. We do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances". 02 03

The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development; it is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land. 04

According to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050 whilst agricultural land lost to land degradation is estimated at 12M hectares p.a. (23 hectares/minute, 1 hectare = 2.47 acres); enough to produce up to 20M tonnes of grain. Furthermore, the overall trend of steadily declining agricultural yields will be subject to widely fluctuating yields in the UK and worldwide due to the growing incidence of extreme weather events, such as storms, floods and heatwaves. For example, total UK cereal production had significant dips in 2001, 2007, 2012 and 2013 linked to adverse weather conditions in those years (source: Defra, 2015).

Food security is an economic, social and environmental issue. It is about consumers having access at all times to sufficient, safe and nutritious food for an active and healthy life at affordable prices. To achieve this, our food supply must be reliable and resilient to shocks and crises. Food must also be produced in a way that is environmentally sustainable or we will be storing up problems for the medium to long term. 04

Protecting food security has to run in parallel with other priorities such as tackling climate change (2015 was the warmest year on record since record keeping began in 1880, NASA 2016) and securing a healthy natural environment. These collectively are likely to be the most pressing economic and social factors affecting the UK in the 21st Century. The question is not IF food security will become a serious issue but WHEN.

The loss of any greenbelt should not be taken lightly. I can only comment on one area of greenbelt mentioned in the local plan as this is the only one that I use. The land referred to is 8HS and is south of the A580 adjacent to Windle Island. The land concerned is grade 1 and 2 agricultural land and has been farmed since the 1850's. It is also land that is enjoyed regularly by the residents who use the numerous footpaths.

If this valuable framing land is removed from Green Belt, the nearest green space would then be north of the A580 and people would be trying to cross this road to access open countryside. This is already a very busy road and as part of the Borough's strategy will get even busier.

As the figures taken from the Mott MacDonald business case for the Windle Island Improvement plan show:- 05

"Following consultation with a transport modeler, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB: (Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more:

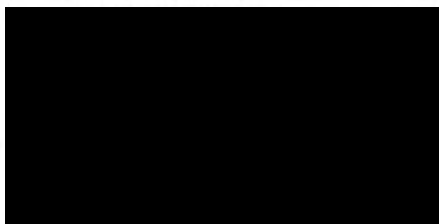
- Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more;
- Daily average speed will change by 10km/hr or more; and
- Peak hour speed will change by 20km/hr or more."

Contaminated brown field sites have not been considered for development; St Helens Council have identified 3,170 hectares of the lowest priority contaminated land but have not proposed a strategy for implementing this. It has been proposed by some Councillors that developers could be made responsible for this and offered this land as an alternative to Green Belt. This has not been seriously considered and, again, shows that there are no "exceptional circumstances" for Green Belt release. 06

Careful reading of the local plan suggests that the release of greenbelt is so that development costs would be reduced thus enabling the affordable housing target to be achieved. Hardly meeting the "exceptional circumstances" justification for releasing greenbelt. 07

For these reasons I would suggest that the Local Plan (2018) is unsound and needs to be modified. Initially the housing target figures should be reduced, secondly the Plan should only consider the fifteen-year target, eliminating any requirement for "safeguarded" sites and finally, the test of "exceptional circumstances" should be carefully and realistically applied to ensure that the precious local Green Belt continues to serve its purpose.

Yours faithfully

A large black rectangular box redacting the signature of Gerard Banks.

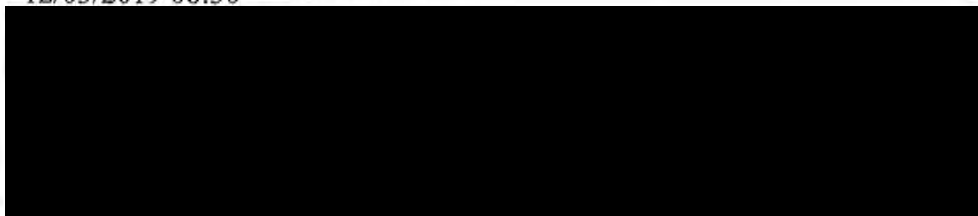
Gerard Banks

PO3563





St Helens Local Plan Submission Draft - Representations on behalf of Harworth Estates Ltd  
Kirsty Czernucha  
to:  
'planningpolicy@sthelens.gov.uk'  
12/03/2019 08:30



#### 6 Attachments



HARM3013 Representations to the SHBC Local Plan Submission Draft- Harworth Estates Final.pdf



HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPA05.pdf



HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPC01.pdf



HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPC02.pdf



HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPC13.pdf



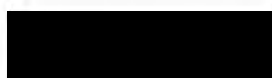
HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPD07.pdf

Good morning

On behalf of our client, Harworth Estates Ltd, please find enclosed a copy of the representations and relevant comment forms to the St Helens Borough Local Plan 2020 – 2035 (Submission Draft).

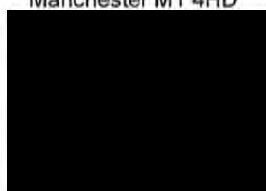
I would be grateful if you could please confirm receipt of this email and the representations enclosed.

Kind regards  
Alice Fitton



**Turley**

1 New York Street  
Manchester M1 4HD



- ① - LPD07
- ② - LPC13
- ③ - LPC02
- ④ - LPC01
- ⑤ - LPA05
- ⑥ - LPA02
- ⑦ - LPA05.1
- ⑧ - S-A
- ⑨ - LPA05 - Criterion 3

Linkedin

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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: C/O Agent	Title: Miss
First Name: C/O Agent	First name: Alice
Last Name: C/O Agent	Last Name: Fitton
Organisation/company: Harworth Estates Ltd	Organisation/company: Turley
Address: C/O Agent	Address: 1 New York Street, Manchester
Postcode:	Postcode: M1 4HD

Signature:

[Redacted Signature]

Date:

11/03/2019

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 ☒ (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.ssthelens.gov.uk/localplan](http://www.ssthelens.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	LPC02	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 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"/>
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 supporting Representations Report

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 supporting Representations Report

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:



To explain further the rationale behind the representations and be given the opportunity to respond to any changes the Council proposes to make and any further evidence that is presented.

**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 Council Local Plan -  
Submission Draft**

Moss Nook Urban Village, Watery Lane, Moss  
Nook

Representations on behalf of Harworth Estates Ltd

March 2019

**Turley**



positive effects to the land quality and as such should score 'Green'<sup>2</sup> in the SA (as opposed to 'Grey'<sup>3</sup>).

- Harworth agrees with the SA Scores for SA Objectives SA5, SA7a, SA9a, SA12a, SA12b, SA13b, SA14, SA16 and SA20 which all conclude development of the site is likely to promote positive effects on mitigating against climate change, landscape sensitivity, access to open space and green spaces, access to GPs, access to leisure, access to secondary schools, access to employment opportunities, access to housing, and access to services.
- Harworth agrees with the SA Scores for SA Objectives SA4, SA6, SA7b, SA9b, SA13a, SA15, and SA19 which all conclude that development of the site is unlikely to have any effects on sustainably managed water resources, minimising the risk of flooding, distance to a prominent ridgeline, public rights of way, access to primary schools, supporting the local economy, and reducing the need to travel.
- Harworth agrees with the SA Scores for SA Objective SA3 and SA8 which acknowledges that any negative effects on air quality and cultural heritage can be mitigated.

3.14 To summarise, the recent technical studies confirm that there are no environmental, physical or social constraints that would restrict future development on the site. As in accordance with the principle of development that has been approved for the site, the SA demonstrates how development of the site will promote many positive effects on the environment and social wellbeing.

3.15 The allocation of this land will therefore further support the delivery of a sustainable brownfield site, significantly contributing towards the housing needs of the borough.

#### Development Management Considerations

3.16 Harworth supports the principle of having policies to manage the housing mix and the provision of affordable housing within new developments. However, emerging Policies **LPC01 'Housing Mix'** and **LPC02 'Affordable Housing'** should be amended so that they are flexible enough to acknowledge that the different scale, characteristics and density of each development site will vary from site to site.

3.17 As such, Harworth recommends that the policies are more positively prepared, to acknowledge that the provision of a suitable housing mix and affordable housing will be determined by a viability case, to ensure the development sites can be delivered on an individual basis.

3.18 Harworth supports the principle of emerging Policy **LPC13 'Renewable and Low Carbon Energy Development'** which seeks to reduce carbon emissions within the borough. However, this should not be a mandatory requirement for all future developments within the borough and it should be considered suitable when it is viable to do so.

<sup>2</sup> Green: Likely to promote positive effects

<sup>3</sup> Grey: Unlikely to have significant effects

PO3564

ELO112



HBF response to St Helens Local Plan Submission

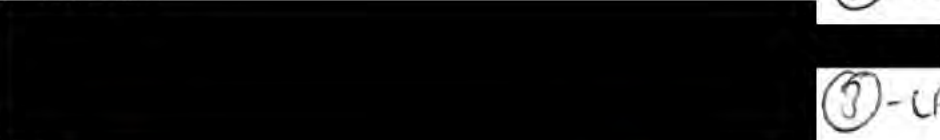
Joanne Harding

to:

planningpolicy@sthelens.gov.uk

12/03/2019 17:26

Hide Details



2 Attachments



19-03-13 St Helens Local Plan Submission.docx HBF lpsd-representation-form-signed.pdf

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

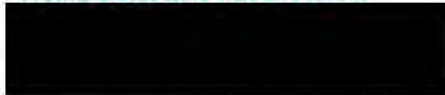
If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI

Local Plans Manager - North

HOME BUILDERS FEDERATION



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① - STRATEGICAL Aims &amp; OBJECTIVES

② - LPA05

③ - LPA05 - PARA. 3

④ - LPA05 - PARA 4

⑤ - LPA07 - PART 3C

⑥ - LPA07 - PART 9

⑦ - LPC01 - PART 1

⑧ - LPC01 - PART 2

⑨ - LPC01 - PART 3

⑩ - LPC01 - PART 4

⑪ - LPC02

⑫ - LPC10

⑬ - LPC13

⑭ - LPD07





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: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House 27 Broadwall London	Address:
Postcode: SE1 9PL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 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 ☒ (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)				Please see separately attached letter.					

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 see separately attached letter.		

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"/> Please see separately attached letter.
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 <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 see separately attached letter.



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 separately attached letter.

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:

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

**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.

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

SENT BY EMAIL  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
13/12/2018

Dear Sir / Madam,

#### **ST HELENS LOCAL PLAN SUBMISSION DRAFT**

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members. ✓

#### **Vision and Objectives**

*The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:*

The HBF support the part of the vision which 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'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as set out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply. (1)



differentiation in terms of location, the character of the area or reference to the densities set out within Policy LPA05. The provision of bungalows may also impact upon viability. Given these issues, if a need can be demonstrated, it is recommended that the mandatory requirement be amended to a supportive policy stance which encourages rather than requires the provision of bungalows.

Part 4 of the policy provides a viability clause. The HBF supports the inclusion of this element of the policy as it provides flexibility to deal with site specific circumstances. The inclusion of this part of the policy should not, however, be used to justify other unsustainable requirements as noted above.

The HBF considers that the policy should be modified as follows in order to make the document sound:

- '1. New market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by: relevant evidence including the Borough's latest Strategic Housing Market Assessment (SHMA); site characteristics; viability; and local aspirations'.
- ~~'2. Where a proposal for new housing would be on a greenfield site on which the site as a whole would deliver 25 or more new homes, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that:~~
  - ~~a) at least 20 % of the new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2); and~~
  - ~~b) at least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwellings standard set out in Part M4(3)~~~~If the standards in Part M4(2) or Part M4(3) are amended or superseded by new standards, the Council will apply the relevant amending or superseding provisions in the same proportions as set out above.'~~
- The HBF recommends that part 2 of the policy is deleted unless evidence can be provided to support the requirements. If it is to be retained, the HBF would recommend that the following additional text is included  
'In seeking to apply this standard, the Council will take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable.  
To enable developers to factor in these additional requirements the Council will introduce this policy one year from the adoption of the Local Plan.'
- ~~'3. At least 5% of new homes on greenfield sites that would deliver 25 or more dwellings should be bungalows-~~ The Council will support the provision of bungalows and will take this provision into account when considering the density of the site'.

#### Policy LPC02: Affordable Housing

The HBF does not consider that Policy LPC02 is sound, as it is not justified or consistent with national policy for the following reasons:



This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable homes where there are on greenfield sites within affordable housing zones 2 and 3, and 10% affordable homes where they are on brownfield sites in affordable housing zone 3.

11

The HBF does not dispute the need for affordable housing within St Helens and indeed supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 34 of the NPPF (2018) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened. The Council will need to confirm that this policy is viable, through its evidence.

11

It is noted within the Viability Assessment 2019 that there are issues with the viability, for example with greenfield sites within Zone 2 at 30dph the affordable housing requirement is not viable and is only marginally improved at 35dph. It is noted that one site remains unviable at 35dph, with the others having very narrow margins of viability and when consideration is given to not only the 30% affordable housing requirement but also to the cumulative impacts of the policies within the Plan the situation is worse.

11

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

- *Further consideration is given to the viability of the affordable housing requirements.*

#### **Policy LPC10: Trees and Woodland**

*The HBF does not consider that Policy LPC10 is sound as it is not justified for the following reasons:*

This policy states that where any tree is justifiably lost its replacement will normally be required on at least a 2 for 1 ratio. The HBF would like to know what the justification and evidence is for this ratio of replacement. It is considered that if the Council are seeking a 'net environmental' gain that this could be achieved in many other ways than seeking a 2:1 tree ratio. The HBF recommends that this part of the policy is deleted.

12

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

- *'6. Development proposals must be designed and laid out in a manner that would not damage or destroy any tree subject to a Tree Preservation Order, any other protected tree, any other tree of value including any veteran tree, trees of value as a group, any tree of substantive heritage value or any length of hedgerow, unless it can be justified for good arboricultural reasons or there is a clearly demonstrated public benefit that would outweigh the value of the tree(s) and or hedgerow(s). Where any tree is justifiably lost its replacement will normally be required ~~on at least a 2 for 1 ratio~~, with impacts on woodlands mitigated in line with Policy LPC06. Any tree(s) planted must be replaced in the event of failure or damage during a prescribed period'.*

PO3565



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

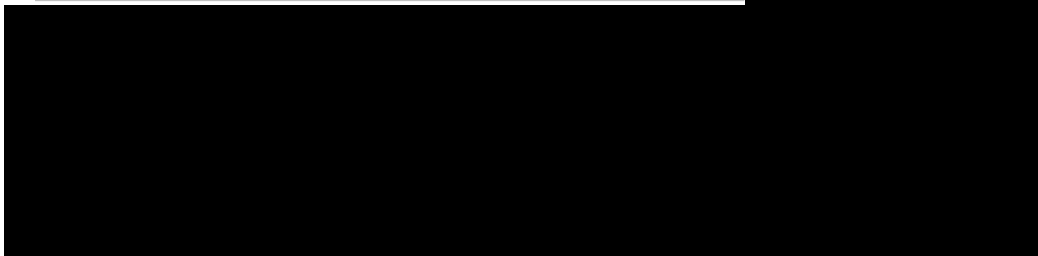
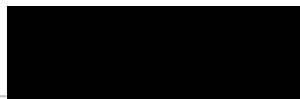
Dear Sir / Madam,

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

Response Date	3/13/2019 8:50:55 AM
---------------	----------------------

# St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.55 As such, our Client's consider that the above policy should specify that areas of Green Infrastructure should be protected in accordance with their value in amenity and ecological value. Part 4 of the policy that states that development which would result in the loss of any Green Infrastructure assets will be refused. This is an elevated status of protection that should not be afforded to all Green Infrastructure regardless of level of value that has been afforded to it.

---

**Policy LPC01 – Housing Mix**

- 3.56 Our Client is supportive of the Policy's intention to seek provision of a wide range of affordable and market housing to meet local housing need. Notwithstanding this, we do not support the inclusion of a policy which places an arbitrary requirement on developments to deliver 5% of the market housing mix as bungalows.

- 3.57 Paragraph 2 of Policy LPC01 also requires that 20% of all dwellings should be designed to optional standards set out in Part M4(2) and M4(3) of the Building Regulations. We object to this requirement. It is overly onerous on developers to provide this as standard over and above what is required by Building Regulations itself and no suitable evidence has been provided to support this requirement.

---

**Policy LPC02 – Affordable Housing Provision**

- 3.58 Our Client is supportive of the provision of affordable housing within developments and supportive of Part 1 of the Policy which seeks to encourage Registered Providers. We consider that this policy should go further in encouraging the provision of affordable housing, particularly in circumstances where it can be demonstrated that the level of affordable housing is falling below current levels of need.

- 3.59 We object to the Part 3 of the Policy which is overly restrictive in relation to the type and tenure of affordable housing which is to be provided and does not necessarily reflect the need for affordable housing now, the availability of funding for the provision for affordable housing nationally or allow flexibility to respond to future trends in affordable need.

- 3.60 Notwithstanding this, whilst we are generally supportive of the provision of 30% affordable housing, it remains unclear how the Council has arrived at the percentage



of affordable housing provision required. Moreover, as set out earlier within these representations, it is unclear the overall level of affordable housing that the Council expects to achieve across the housing requirement to be delivered by the Local Plan. It is not clear whether the above policy will be able to be effective in meeting the needs for affordable housing within the borough.

- 3.61 This policy seeks to include a caveat which allows for viability assessments to be submitted to justify any relaxation of affordable housing provision. We support this approach.

PO3566



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

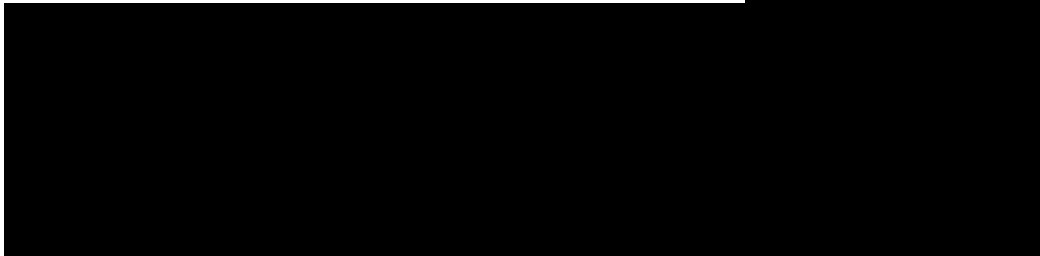
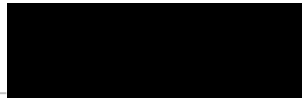
Dear Sir / Madam,

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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

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Yes (via e-mail)

**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
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



Response Date	3/13/2019 8:50:55 AM
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# St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

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---

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---

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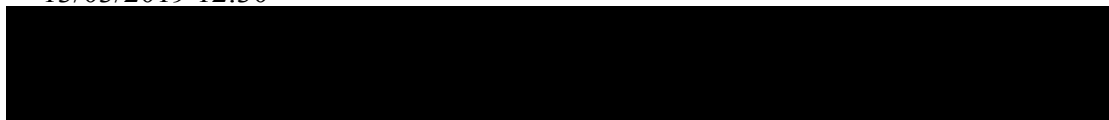
- 3.61 This policy seeks to include a caveat which allows for viability assessments to be submitted to justify any relaxation of affordable housing provision. We support this approach.



PO3567



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

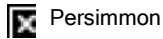
**Sean McBride**  
Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH



We are proud to be an official partner of Team GB.



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---

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Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

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**





- 11.7 The Company considers that the Council should provide sufficient evidence that the introduction of the optional standards are required; and further that their introduction would not hinder the viability of the Local Plan.

26

---

**Policy LPC02: Affordable Housing**

- 12.1 Whilst the Company is supportive of the delivery of affordable homes to meet identified needs within St Helens, it is important that the seeking of planning obligations, including affordable housing, does not hinder the ability of sites to be delivered, PPG being clear that Council's should ensure that seeking such obligations do not threaten the viability of the sites and scale of development identified in the development plan (Ref: 23b-002b20140306) and should be flexible in their requirements where requiring affordable housing(Ref: 23b-006b-20140306).

27

- 12.2 The Council's Economic Viability Assessment identifies that emerging greenfield housing allocations are viable at 30 dph with 30% affordable housing, however Table 6.10 identifying that 'generic' greenfield sites are largely unviable when applying the same density and affordable housing requirement.

- 12.3 Given Table 4.6 of the Local Plan identifies that a significant proportion of the Council's housing requirement is to be met on other sites identified in the SHLAA - of which a proportion will be greenfield sites within Zone 2 – a 30% affordable housing requirement will have significant implications on viability of these sites and therefore the ability of the Council to achieve its housing requirement.

28

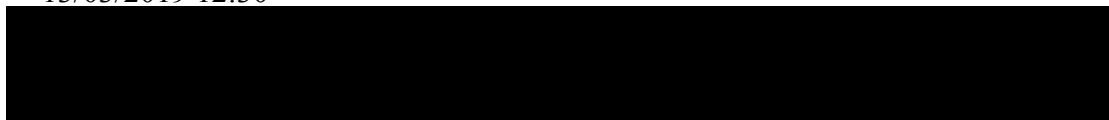
- 12.4 We would encourage the Council to retain an element of flexibility in applying its affordable housing requirement in order to ensure Local Plan housing sites can be delivered viably and the scale of development proposed in the Plan is not threatened.

- 
- 12.5 The Company consider it important that the Council also demonstrate flexibility in renegotiating the tenure of affordable housing, should prior agreed forms of affordable housing be unattractive to Registered Providers.

PO3568



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

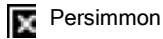
**Sean McBride**  
 Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH



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---

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Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

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**

---

Representations submitted on behalf of Persimmon Homes North West

**March 2019**



- 11.7 The Company considers that the Council should provide sufficient evidence that the introduction of the optional standards are required; and further that their introduction would not hinder the viability of the Local Plan.

26

---

**Policy LPC02: Affordable Housing**

- 12.1 Whilst the Company is supportive of the delivery of affordable homes to meet identified needs within St Helens, it is important that the seeking of planning obligations, including affordable housing, does not hinder the ability of sites to be delivered, PPG being clear that Council's should ensure that seeking such obligations do not threaten the viability of the sites and scale of development identified in the development plan (Ref: 23b-002b20140306) and should be flexible in their requirements where requiring affordable housing(Ref: 23b-006b-20140306).

27

- 12.2 The Council's Economic Viability Assessment identifies that emerging greenfield housing allocations are viable at 30 dph with 30% affordable housing, however Table 6.10 identifying that 'generic' greenfield sites are largely unviable when applying the same density and affordable housing requirement.

- 12.3 Given Table 4.6 of the Local Plan identifies that a significant proportion of the Council's housing requirement is to be met on other sites identified in the SHLAA - of which a proportion will be greenfield sites within Zone 2 –a 30% affordable housing requirement will have significant implications on viability of these sites and therefore the ability of the Council to achieve its housing requirement.

28

- 12.4 We would encourage the Council to retain an element of flexibility in applying its affordable housing requirement in order to ensure Local Plan housing sites can be delivered viably and the scale of development proposed in the Plan is not threatened.

- 
- 12.5 The Company consider it important that the Council also demonstrate flexibility in renegotiating the tenure of affordable housing, should prior agreed forms of affordable housing be unattractive to Registered Providers.

PO3569



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.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

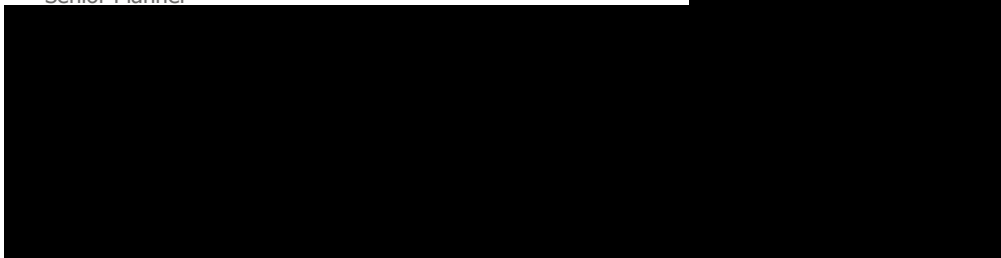
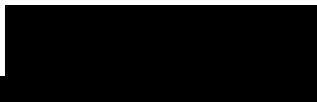
To whom it may concern,

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 WILLMORIS
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**

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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)				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)

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

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

community, including the need to provide aspirational dwellings and to drive economic growth. It is important however that this Policy is not overly prescriptive in its requirements which could ultimately stall the delivery of sites. The Policy should be flexible and allow for a site-by-site analysis in order to ensure that an appropriate mix of housing is secured.

31

---

**Policy LPC02: Affordable Housing**

9.30 This Policy outlines that proposals for new open market housing of developments of 11 units or more will be required to provide at least 30% affordable housing in Housing Zones 2 and 3, and with at least 10% of the affordable provision being available for affordable home ownership. Figure 6.1 of the Plan indicates our Client's land interest as being within Housing Zone 3 and as such the above requirements would apply.

9.31 Point 4 of the Policy indicates that the provision of affordable housing may vary on a site by site basis taking into account evidence on local need and economic viability subject to extensive justification.

9.32 Our Client broadly supports this Policy; the provision of affordable housing to meet the needs of the whole community clearly accords with the aims and objectives of the Council as well as the thrust of national policy. Our Client also welcomes the flexibility afforded by point 4, recognising that future market conditions may not allow for such provision to take place, although this would ultimately be determined as part of the planning application process. It is important to ensure that the requirement for affordable housing does not render a development unviable, particularly when considering density requirements afforded by Policy LPA05.

32

9.33 Notwithstanding the above, our Client does question why the Policy differentiates between Zone 2 and 3 at all especially when the Policy's approach to affordable housing delivery within these areas is the same. Zone 2 and 3 should be merged to create a single area, allowing for the Policy to be simplified.

33

9.34 Finally, our Client considers that adequate monitoring must take place across the Borough to ensure that the need for affordable housing is met.

---

**Policy LPC09: Landscape Protection and Enhancement**

9.35 This Policy outlines that new development proposals must conserve, maintain or enhance any landscape features that are important to the local area. It requires development proposals to demonstrate that the best option for the landscape has taken forward and

PO3570





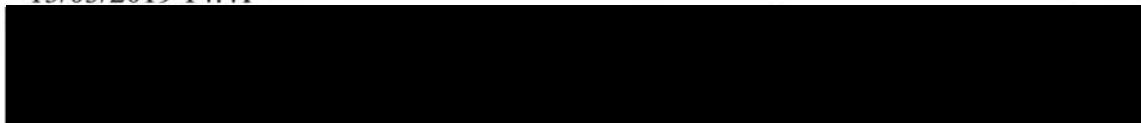
St Helens Borough Local Plan - Submission Draft - Representations on Behalf of Redrow Homes

Graham Trehwella

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:41



1 Attachment



1335 - Representation on Behalf of Redrow Homes Ltd Rev A 130319..pdf

REFERENCE EML-OUT/1335/20190313-143112-915

Dear Sirs

Please find attached a report which sets out our representations to the Submission Draft Local Plan. I would be grateful if you could confirm that it has been received.

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) \* 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.

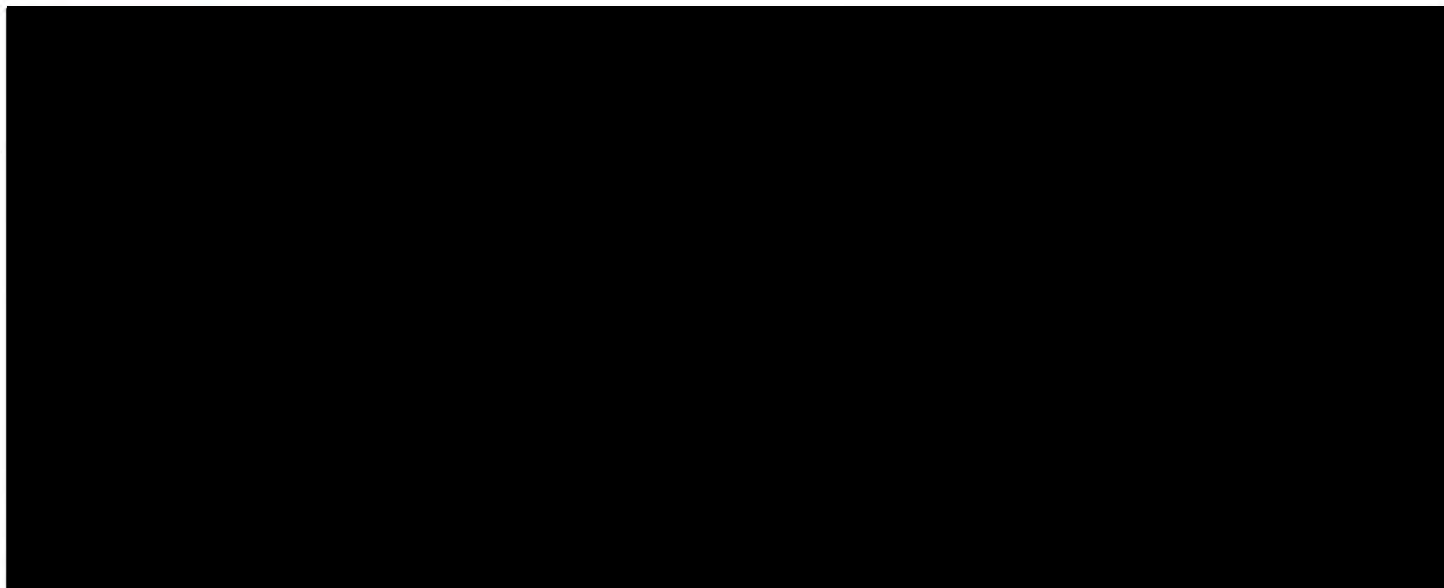
Yes (via e-mail)

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

Best regards,

**Graham Trehwella**  
Director



**Cass**  
associates

architecture  
masterplanning  
planning  
landscape  
conservation

ST HELENS BOROUGH LOCAL PLAN 2020-2035

SUBMISSION DRAFT

## **REPRESENTATIONS ON BEHALF OF REDROW HOMES LTD**

on behalf of  **REDROW**

**Cass Associates**

Studio 204B  
The Tea Factory  
82 Wood Street  
Liverpool  
L1 4DQ

March 2019

### 3 Housing Mix and Affordable Housing

**Redrow Homes does not consider that Policy LPC 01 is sound, justified or consistent with national policy**

- 3.1 Redrow Homes recognises that national planning policy requires the delivery of a wide choice of homes in mixed and inclusive communities. This should embrace housing to meet a range of needs, including affordable housing.
- 
- 3.2 It is concerned, however, that the requirements of Policy LPC01 (Housing Mix) is too prescriptive and will undermine or slow down the delivery of new homes.
- 3.3 The Government guidance on optional technical standards for housing is included in Planning Practice Guidance (PPG). These are standards that exceed the minimum required by the Building Regulations. The introduction of these standards should be fully justified and based on clear evidence.
- 3.4 The Local Plan, through Policy LPC01, proposes enhanced accessibility and adaptability standards:

At least 20% of the new dwellings across greenfield sites delivering 25 or more homes must be designed to the '*accessible and adaptable*' standard set out in Part M4 (2) of the Building Regulations 2010 and at least 5% of new dwellings must be designed to the '*wheelchair user*' standard set out in Part M4 (3) of the Building Regulations 2010. In addition, on this scale of development at least 5% of new homes should be bungalows.

- 3.5 The PPG requires Local Plan policies seeking enhanced accessibility and adaptability standards to take into account factors such as vulnerability to flooding and site topography which could make a specific site unsuitable for M4(2) and M4(3) compliant dwellings. This needs to be made clear in Policy LPC01. If there is an opportunity to take these and other factors into account on a site by site basis then the outcome will be a policy led approach that results in the delivery of accessible and adaptable housing where it is most appropriate.
- 

- 3.6 The evidence of need for bungalows is neither strong nor conclusive (SHLA Update 2019). It is a form of housing that has an impact on site layouts, density of development and the ability to deliver housing. Rather than a prescriptive ratio of bungalows for individual development in all locations it is reasonable to frame the policy in a way that encourages bungalows to be considered in the housing mix taking into account factors such as location, accessibility and the viability of including this type of housing.
- 

#### **Affordable Housing**

**Redrow Homes does not consider that Policy LPC 02 is sound as it is neither justified nor consistent with national policy.**

---

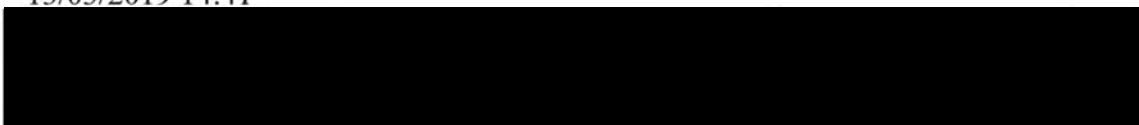
- 3.7 Redrow Homes supports the zone based approach to the assessment and delivery of affordable housing and supports the distinction between the proportion of affordable housing required on greenfield and brownfield sites.
- 
- 3.8 However, the importance of viability assessment at the strategic plan making stage is now given heightened significance (NPPF 2018 paragraph 34 and paragraph 57). It is vital that policies for development contributions should not undermine the deliverability of the plan.

PO3571





St Helens Borough Local Plan - Submission Draft - Representations on Behalf of Redrow Homes  
Graham Trehwella  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 14:41



1 Attachment



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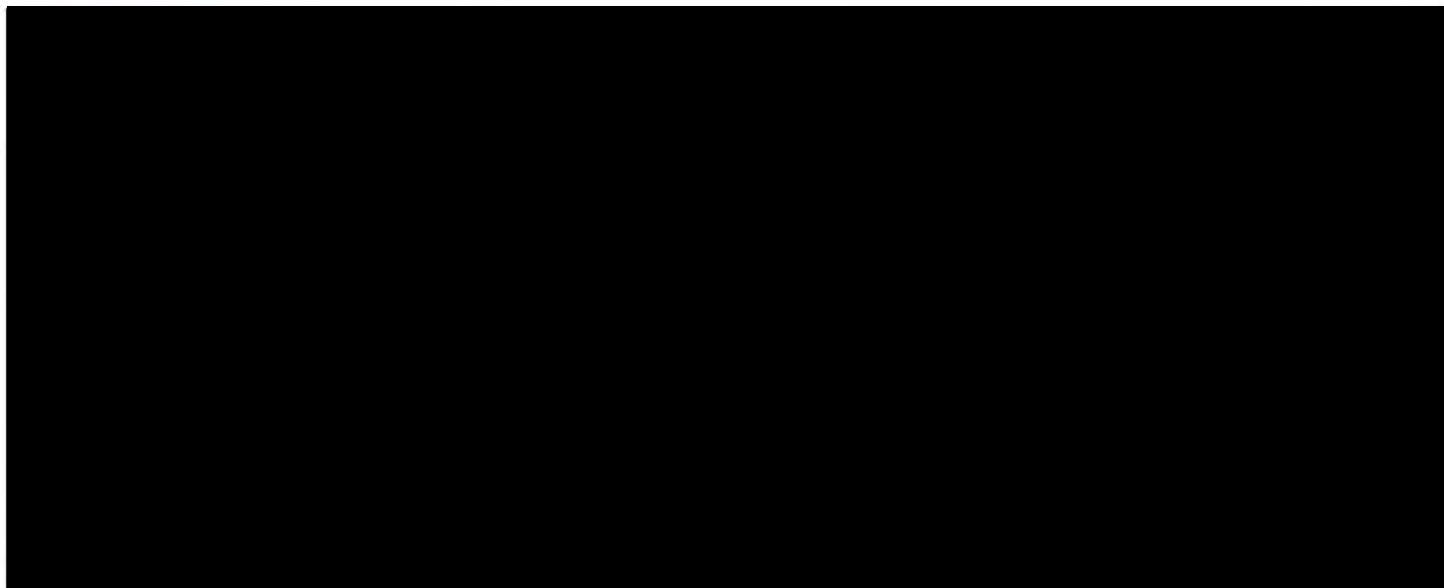
Yes (via e-mail)

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Yes, I wish to participate at the oral examination

Best regards,

**Graham Trehwella**  
Director



**Cass**  
associates

architecture  
masterplanning  
planning  
landscape  
conservation

ST HELENS BOROUGH LOCAL PLAN 2020-2035

SUBMISSION DRAFT

## **REPRESENTATIONS ON BEHALF OF REDROW HOMES LTD**

on behalf of  **REDROW**

### **Cass Associates**

Studio 204B  
The Tea Factory  
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L1 4DQ

March 2019

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- 

- 3.6 The evidence of need for bungalows is neither strong nor conclusive (SHLA Update 2019). It is a form of housing that has an impact on site layouts, density of development and the ability to deliver housing. Rather than a prescriptive ratio of bungalows for individual development in all locations it is reasonable to frame the policy in a way that encourages bungalows to be considered in the housing mix taking into account factors such as location, accessibility and the viability of including this type of housing.
- 

#### **Affordable Housing**

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---

- 3.7 Redrow Homes supports the zone based approach to the assessment and delivery of affordable housing and supports the distinction between the proportion of affordable housing required on greenfield and brownfield sites.
- 
- 3.8 However, the importance of viability assessment at the strategic plan making stage is now given heightened significance (NPPF 2018 paragraph 34 and paragraph 57). It is vital that policies for development contributions should not undermine the deliverability of the plan.



- 3.9 The Reasoned Justification relating to Policy LPC 02 makes little reference to the viability of delivering the affordable housing requirements aside from a mention of the way it has informed the zone by zone approach. A more thorough explanation is needed in the Local Plan to show the impact on the viability of delivering new housing arising from affordable housing requirements alongside other development contributions. For instance, in Zone 2 the viability of bringing greenfield sites forward with 30% affordable housing is based on narrow margins. The affordable housing could slow or frustrate the delivery of housing where it is needed. The impact is greatest for lower density development (below 35 units per hectare) where the prescriptive mix of house sizes (driving overall floor space down) could undermine viability.
- 3.10 The Economic Viability Assessment shows that the combination of the prescriptive mix of house types, the targets for minimum densities, affordable housing and other contributions can impact significantly on the ability to deliver the housing required in St Helens. A high proportion of smaller units on a site including smaller affordable housing units will reduce the total floor space in comparison with an unrestricted scheme of entirely market housing (At Table 6.10 of the Economic Viability Assessment the total floorspace per acre at 30 dwellings per acre is around 11,000 sq. ft. in comparison with a more normal provision of around 13,000 to 14,000 sq. ft. per acre). In short, the viability of bringing sites forward is sensitive to both the affordable housing requirement and the mix of housing.
- 3.11 This shows that there will need to be flexibility in the application of affordable housing requirements AND other requirements such as those relating to housing mix on certain sites in order to avoid a situation where the deliverability of the plan is undermined.
- 

08



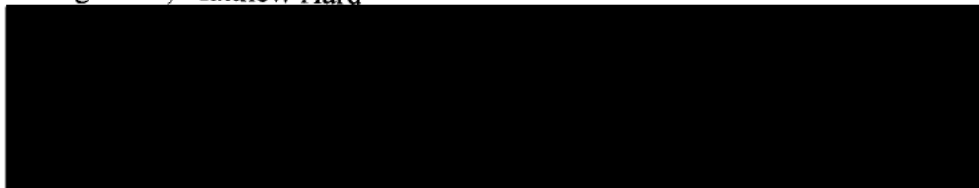
PO3572



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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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).

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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:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	Address: St James' Tower 7 Charlotte Street Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	
Signature	Date: 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 ☒ (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.**



EL 0200A 2.pdf

# 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	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	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?	<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 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.**

Council's Ensuring and Choice of Travel Supplementary Planning Document. However, in the absence of an updated SPD, it is unclear how the Council will approach matters relating to vehicle and cycle parking standard, electric vehicle charging point provision and to the requirements concerning transport assessments, transport statements and travel. Further clarification should be for developments which come forward in the interim.

32

- 4.48. The policy needs to confirm that the most up to date SPD and / or travel studies will be used during the plan period, to ensure that the most relevant and up to date information is used.

### **Policy LPA08: Infrastructure Delivery and Funding**

- 4.49. We welcome the additional clarity and flexibility introduced within the policy, but we maintain that the council must ensure that they do not impose requirements that could render schemes unviable. We support that the council will consider site specific economic viability evidence to determine the ability of a scheme to provide the required level of contributions.
- 4.50. It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis. Additionally, it is not clear how any such infrastructure requirements might be assisted by the introduction of CIL.
- 4.51. Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

33

### **Policy LPC01: Housing Mix**

- 4.52. We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that at least 20% of the new dwellings must be designed to be "accessible and adaptable" as set out in Part M4(2) and 5% of new dwellings must be designed to the "wheelchair user" dwellings standard set out in Part M4(3). The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy in the Local Plan. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

34

- 4.53. We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date evidence and housing need.

35

- 4.54. Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

### **Policy LPC02: Affordable Housing**

- 4.55. We welcome efforts to improve affordability. However, the level of affordable housing a site can deliver should be supported by robust and up to date evidence.
- 4.56. We support the amendment of LPC02(3) to include provision of Starter Homes.

36

37

### **Policy LPC10: Trees and Woodland**

- 4.57. We support the amendment to the policy which has resulted in the removal of the reference to the ratio approach to tree replacement where development proposal will result in the loss of existing trees.

38



PO3573

ELO210



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation - submitted  
on behalf of BXB (Cowley Hill) Ltd  
Gemma Williams

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:38

① - Appendix  
② - LPA08  
③ - LPC02  
④ - LPA05.1

## 2 Attachments



lpsd-representation-form.doc 13 03 19.pdf c.pdf pt 12 03 19 sh GW.pdf

Please see attached a completed Representation Form and letter of explanation submitted on behalf of BXB (Cowley Hill) Ltd.

Kind regards

Gemma Williams  
Administrator

Nexus Planning is pleased to have been shortlisted by the RTPI as a finalist for Planning Consultancy of the Year 2019



Nexus Planning  
Eastgate, 2 Castle Street  
Castlefield  
Manchester M3 4LZ



Paul Sanderson  
Strategic Director of Place Services  
St Helens Council  
Local Plan  
Town Hall, Victoria Square  
St Helens, Merseyside  
WA10 1HP

**Manchester**  
Eastgate  
2 Castle Street  
Castlefield  
Manchester M3 4LZ

[nexusplanning.co.uk](http://nexusplanning.co.uk)

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

13<sup>th</sup> March 2019

Dear Sir

**The New St Helens Borough Council Local Plan 2020 – 2035**  
**Submission Draft – ‘Regulation 19’ consultation**  
**Representation submitted on behalf of BXB (Cowley Hill) Limited in relation to Cowley Hill, St Helens (6HA)**

Thank you for the opportunity to comment on the submission draft of the New Local Plan. This representation is submitted on behalf of BXB (Cowley Hill) Ltd by Nexus Planning. ✓

A completed Representation Form is attached to this representation. ✓

BXB Ltd is a specialist land developer focussing on bringing forward brownfield, previously developed sites, for all types of development, including residential. ✓

BXB (Cowley Hill) Ltd has a land and promotion agreement with Pilkington plc in relation to the surplus land at Cowley Hill, Strategic Housing Site ref 6HA in the Draft Local Plan. BXB (Cowley Hill) Ltd intend to submit an application for residential-led development on the Cowley Hill site in 2019. Initial reclamation work on the site is due to commence in early 2020 as ‘permitted development’ demolition work. Subject to the appropriate approvals, this will be followed by further grounds works, site preparation, engineering works and reclamation and development later in 2020. ✓



of the town centre. For those who need to drive, the A580 East Lancs Road is accessible to the north of the site via Washway Lane / City Road, without the need to travel through existing residential areas.

#### *Deliverable*

The site is deliverable for residential led development. BXB (Cowley Hill) Ltd has undertaken an initial technical assessment of the site. Whilst inevitably there are a number of matters to be addressed as a consequence of the site's industrial history, BXB Ltd is confident that there are no constraints that would prevent residential development on the site. This technical work has been identified a net developable area of around 35 hectares.

BXB (Cowley Hill) Ltd has discussed the site with the Local Planning Authority and intend to submit a planning application for residential led development in 2019. This will be supported by a comprehensive masterplanning approach and a phasing strategy. The application will be prepared with the benefit of stakeholder and local community consultation. As noted earlier, and subject to the necessary approvals, BXB (Cowley Hill) Ltd expect development to start on the site in 2020, following phased site preparation, engineering and remediation.

Whilst the NPPF and extant development plan provide a very positive basis upon which an application on the site can be progressed in 2019 ahead of adoption of the new Local Plan, BXB Ltd are wholly supportive in principle of the proposed allocation of the site in the Submission Draft Local Plan. However, as noted above, the draft Local Plan is considered 'unsound' on a number of specific points.

Draft Policy LPA05.1: identifies 'Strategic Housing Sites' and refers to:

#### ***'6HA: Land at Cowley Street, Cowley Hill, Town Centre'***

The policy notes that any planning application for development within a Strategic Housing Site must be supported by a comprehensive masterplan.

Detailed development proposals within a Strategic Housing Site are required to comply with Policy LPA08. Policy LPA08 deals with Infrastructure Delivery and Funding and developer contributions secured by legal agreement or a tariff based system such as the Community Infrastructure Levy. The policy notes that development contributions will be considered in the context of the economic viability of new development. Consideration will be given to economic viability evidence to determine the ability of the development scheme to support the required level of contributions.

A similar approach is taken to the provision of Affordable Housing in Policy LPC02, which acknowledges that provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need and where appropriate, the economic viability of the development. The policy notes that affordable housing requirements can be relaxed where it is fully justified by an independent site-specific viability appraisal and where a reduced affordable housing provision is outweighed by the other benefits of the development.

BXB (Cowley Hill) Ltd welcome this clear and pragmatic approach. As noted earlier, BXB Ltd are confident that the Cowley Hill site can come forward for residential development. However, bringing the site forward will require significant investment in site remediation and infrastructure, amongst other things. The inevitable, additional costs of viably developing a large scale, brownfield site will need to be reflected in the extent of developer contributions and affordable housing provision, based on a robust viability appraisal. The significant additional investment in infrastructure and other works in bringing forward brownfield sites such as Cowley Hill



620210

should be explicitly reflected in LPA08 and LPC02. Similarly LPC02 should be reflected to take into account the benefit of delivering a range of tenures, including affordable housing, as part of providing new homes and choice, in an innovative way. (2) & (3)

#### Appendix 5

The masterplans for each Strategic Housing Site are to address the indicative requirements set out in Appendix 5.

Appendix 5 to the Draft Plan identifies the Cowley Hill site as having a 'notional' capacity of 816 units. (1)

The site extends to approximately 50 hectares and initial capacity testing undertaken by BXB (Cowley Hill) Ltd confirms that the site has a net developable area of 35 hectares and a capacity of around 1,000 – 1,200 new homes, subject to detailed masterplanning and housing mix.

Reflecting Policy LPA05.1, Appendix 5 identifies a series of 'indicative requirements' that are to be 'addressed'. These as drafted, are as follows:

- *Appropriate highway access should be provided from City Road and College Street (with any necessary off-site improvements).*
- *A Green corridor, incorporating the LWS47\*, should be provided from the north around the eastern boundary of the site linking the green spaces and habitats along Rainford Brook and the wider greenway network.*
- *Measures to 'slow the flow' and enhance biodiversity within the culvert running along the eastern boundary of the site will be required in line with Policy LPC12 'flood Risk and Water Management'.*
- *The development should include appropriate measures to attenuate noise from the adjacent employment use(s).* ✓
- *The development area allows for the inclusion of 4ha of B1 employment uses (if this is not implemented this will make more land available for housing).*
- *Any development should address any contamination issues and/or other geotechnical issues affecting the site.*
- *Related to the above, site levels should be carefully considered in relation to the site layout and surrounding area.*
- *The design and layout of the development should provide for a range of house types in character areas.*
- *Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.*


\*Local Wildlife Site 47

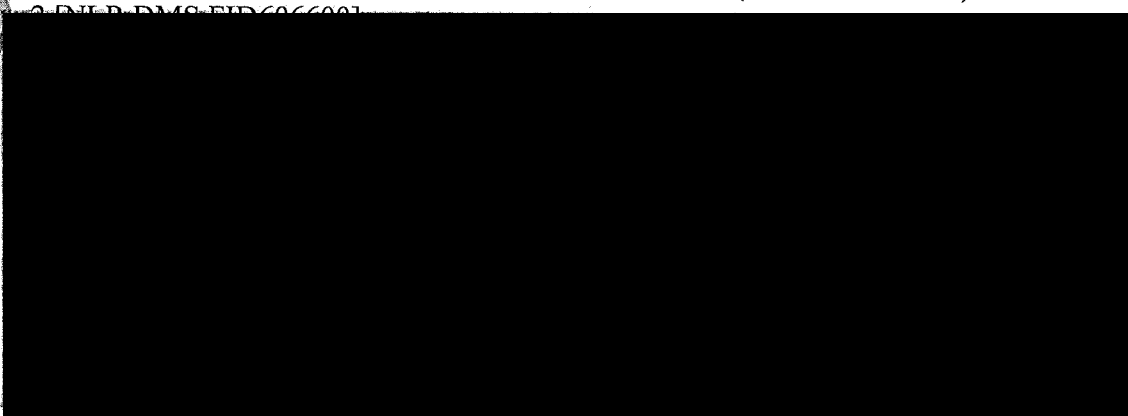
BXB (Cowley Hill) Ltd support the master planning approach to Strategic Sites including Cowley Hill and, in large part, the requirements proposed for the site. The inherent flexibility in how the 'indicative requirements' are addressed through a masterplanning process which, in the case of Cowley Hill, will inevitably have to balance a range of design, ground conditions, infrastructure, environmental and viability issues is welcomed. (4)

However for the sake of clarity, and given the scale of the site, the need to address its' industrial legacy, as well as its future relationship with remaining industrial uses, access and other considerations, it is considered that the albeit indicative requirements set out in Appendix 5, should be amended. There indicative requirements (1)

PO3574

ELO211


 RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2


 1 Attachment


 41575\_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,  
Melissa
**Melissa Wilson**  
**Senior Planner**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

(10) LPA07

(11) LPA08

(12) LPA09

(13) LPA11

(22) LPC17

(23) LPD01

(24) LPD01

(25) LPD01

(31) GBR

(32) EVA

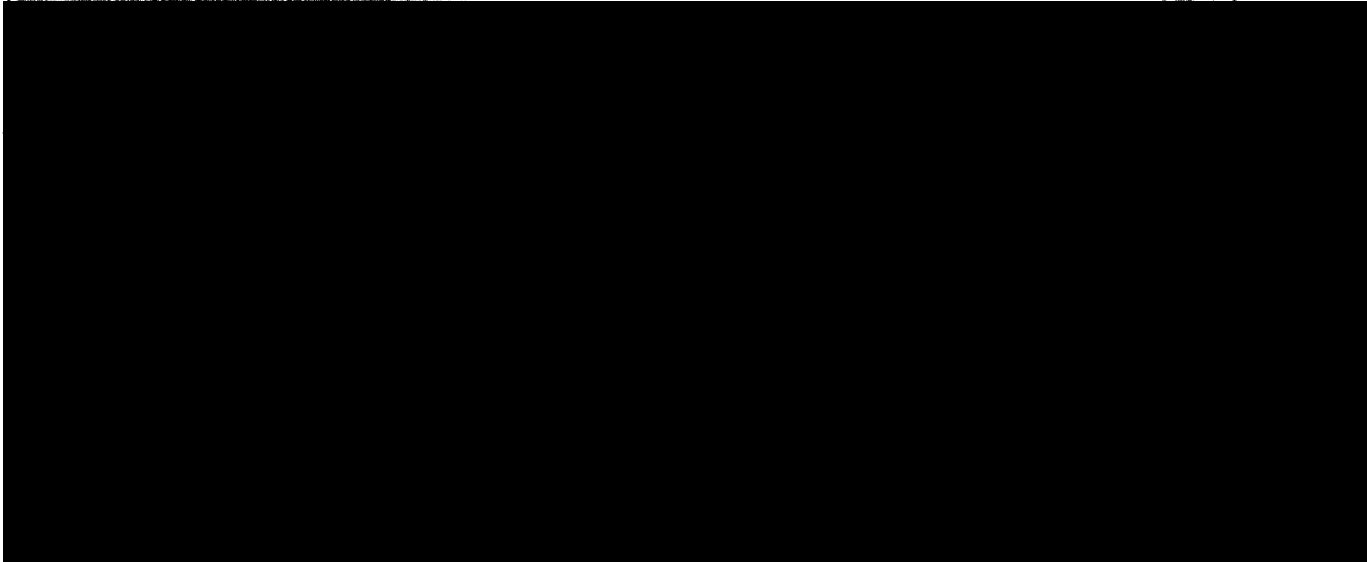
(26) LPD01

(27) LPD02

(28) LPD03

(29) LPD07

(30) SHMA


 Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseYorPfo>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

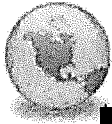
**lichfields.uk**

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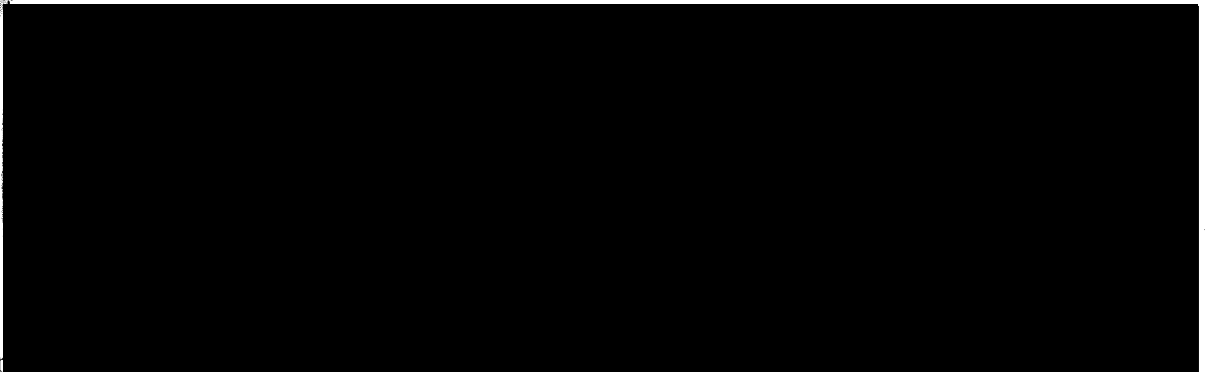


Think of the environment. Please avoid printing this email unnecessarily.





Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2  
[NLP-DMS.FID606600]  
Brian O'Connor



1 Attachment



SPLIT 41874\_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19\_Part\_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseY9rPfO>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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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: Mr
First Name: Kate	First name: Brian
Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood	Address: Ship Canal House 98 King Street Manchester
Postcode: WA3 6GR	Postcode: M2 4WU
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

<b>Signature:</b> [REDACTED]	<b>Date:</b> 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.

**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	
See cover letter		See cover letter		See cover letter					
Other documents (please name document and relevant part/section)				See supporting Representations and Appendices					

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?	<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 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 supporting Representations and Appendices

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 supporting Representations and Appendices**

**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>Yes, I wish to participate at the oral examination</b>
--	--	--	---

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

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



EL0211

# **St Helens Local Plan Soundness Representations**

Taylor Wimpey UK Limited

13 March 2019

**LICHFIELDS**

41874/03/SPM/MWI  
17081285v8  
17081285v8

14.0

## Policy LPCo2: Affordable Housing

### Introduction

14.1

Policy LPCo2 sets out the affordable housing requirements for new developments. ✓

### Consideration of Policy

14.2

TW acknowledges the need to provide affordable housing and strives to provide the maximum amount of affordable housing on all sites. However, any such requirement should be based on robust and sound evidence which demonstrates that viability is not affected.

14.3

Policy LPCo2 requires all proposals for new open market housing developments of 11 units or more to provide at least 30% of new dwellings on greenfield sites in Affordable Housing Zones 2 and 3 to fall within the definition of 'affordable housing'; this falls to 10% on brownfield sites in Affordable Housing Zone 1.

14.4

The SHMA Update concludes that there is an overall need for affordable housing equal to 117 units per annum over the 17 years to 2033. It concludes that the typical cost of buying a house in St Helens is sufficiently affordable so there is no need for a discounted new-build product. TW has concerns over the assessment for calculating affordable housing that has been carried out as part of the SHMA update, this is detailed further in the SHMA Response in Appendix 1. In summary these main concerns relate to:

- 1 The increase in household income estimates – it is not clear where this increase has come from and it does not align with ONS' Annual Survey of Hours and Earnings; and,
- 2 It is unclear whether the report is based on the 2016-SNHP or the 2014-SNHP to inform its estimate of gross household formation, which plays a key role in affordable housing need calculations.

14.5

As noted above, the SHMA suggests that St Helens has an affordable housing need of 117 dpa. In simple terms, this would equate to 24% of the overall housing target of 486 dpa, which sits below the 30% target in Part 2i; and does not provide clear evidence base for the Policy requirement.

14.6

Taylor Wimpey has a number of concerns in relation to the Viability Assessment including a number of concerns in relation to affordable housing which need to be addressed before the Local Plan will be deemed sound by an Inspector. Further detail on Taylor Wimpey's concerns are detailed in Appendix 4.

### Tests of Soundness

14.7

TW considers that Policy LPCo1 fails to meet the following tests of soundness because:

- 1 **It is not justified:** The evidence base in the SHMA is not robust.

### Recommended Change

14.8

In order to address the concerns raised above, TW would suggest the Council review the evidence base relating to affordable housing provision further.

18

18

18

PO3575

E-LO229



St Helens Local Plan Submission Draft - strategic representations on behalf of

Wainhomes NW

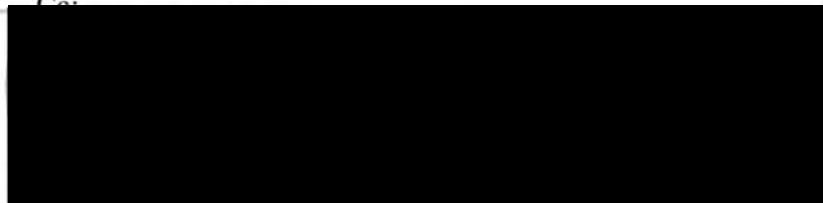
Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:16

Cc:



1 Attachment



Representations - St Helens LP Reg 19 - Wainhomes combined.pdf

Dear Sir / Madam,

Please find attached, strategic written representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan.

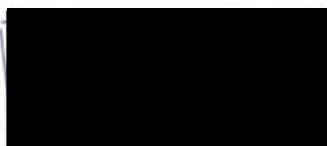
We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

**Nick Scott**

Assistant Consultant



① - GENERAL

② - LPA05

③ - LPC02

④ - LPA05.1

ns.gov.uk&gt;

⑤ - LPA06

⑥ - LPC01 - CRITERIA 1

⑦ - LPC01 - CRITERIA 2

⑧ - LPC01 - CRITERIA 3

⑨ - LPC13

⑩ - LPA05 - TABLE 4.6

Emery Planning is proud to support the Keaton Emery Memorial Foundation. To find out more about the charity or to make a donation, please visit [www.keatonemeryfoundation.com](http://www.keatonemeryfoundation.com)

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planning

Emery Planning Partnership Ltd trading as  
Emery Planning

Emery Planning  
2-4 South Park Court  
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Macclesfield  
SK11 8BS

Registered  
office as above





## Representations to the Submission Draft

St Helens Local Plan – Regulation 19

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005



- 4.28 To conclude, the SHMA Update concludes that Economic Scenario 2 results in a need for 514dpa. Such a requirement would align with the demographic baseline when a 2016 base-date is applied. However this may actually significantly underestimate need in light of the concerns we have outlined above in relation to the demographic assumptions applied in the SHMA Update and the ELNS.

### Market signals and affordable housing

- 4.29 The Council previously assessed its need at the Preferred Options stage, and determined that a continued requirement of 570dpa was necessary in order to continue stabilising and increasing the population, allow for more housing choice and competition so more households can afford to form, allow for significant economic growth and to reflect the high levels of housebuilding achieved in years before and after the 2008-2009 recession. This was higher than the OAN identified through the Mid Mersey SHMA, which was 461dpa. No justification is provided for now pursuing an alternative approach which fails to address these issues.

- 4.30 Furthermore there is no uplift from the minimum local housing need to meet affordable housing needs. Paragraph 2a-024 of the NPPG states:

*"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."*

- 4.31 The SHMA Update identifies a need for 117 net additional affordable houses per annum, which represents 24% of the overall requirement as proposed. The Council does not appear to have undertaken any assessment as to whether this level of affordable housing can realistically be achieved.

- 4.32 Policy LPC02 sets a site size threshold of 11 units, with varying rates for affordable housing dependent upon whether a site is brownfield and the zone it is located within. Sites within Affordable Housing Zone 1 are exempt from providing affordable housing. Brownfield sites within Zone 3 are only required to provide 10% affordable housing. There are also a number of large sites such as Cowley Hill (Site 6HA, 816 units) and Moss Nook (Site 10HA, 802 units) that already benefit from planning permission, with no affordable housing provided on the basis of viability.

- 4.33 It is therefore apparent that a very significant portion of the Council's supply will provide less than 30% affordable housing (or indeed none at all), and the Council's identified need for



affordable housing will not be met. Under such circumstances the Council should have considered an increase in the housing requirement in accordance with the NPPG. 10

### Allowance for demolitions / clearance

- 4.34 The Council's Preferred Options Draft (paragraph 4.102) identified a need to take account of demolitions in the order of 29 per annum:

*"The loss of dwellings to demolitions and changes of use has averaged 26 dwellings per year over the ten year period 2006/07 to 2015/16, discount an abnormally high year (201 in 2008/09 resulting from housing clearances) and an abnormally low year (2 in 2009/10). The Council considers this to be a suitable indicator of future losses, and so in addition to the 20% uplift, a further requirement of 29 per annum is added to accommodate the demolitions and round the figure up to 570 dwellings per annum."* ✓

- 4.35 Demolitions in the order of 29 per annum over a 15 year plan period would amount to 435 dwellings. The figure is not insignificant. Paragraph 4.18.9 of the Submission Draft correctly identifies that the requirement is a net figure. However unlike the Preferred Options, no allowance has been made for demolitions in this plan either in the housing requirement or the identified supply. ✓

### Conclusions on the proposed housing requirement

- 4.36 The application of the standard methodology for St Helens results in a minimum local housing need of 468dpa. However the Council has chosen to identify a higher figure on the basis of an alternative approach. The application of an alternative approach is justified by the evidence. However, on determining that an alternative approach is justified, it is necessary to demonstrate that the alternative method adequately reflects current and future demographic trends and market signals. In our view the assessment of need undertaken by the Council does not fulfil this requirement for a number of reasons: ✓

- The Council is part of the Liverpool City Region Growth Deal which provides funding to drive economic growth. The Government expects such authorities to go above minimum local housing need as identified under the standard method to bridge the gap between the standard method figure of 266,000 homes nationally (based upon St Helens delivering 505dpa) and the target of 300,000. ✓

PO3576



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

to:

planningpolicy@sthelens.gov.uk

13/03/2019 17:01

SITE GBP-092-A

#### 4 Attachments

L004- Land at St Helens Road - Reps to Submission Local Plan.pdf Appendix 3- Agricultural Land Report.pdf

Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

Appendix 4a- Interim Housing Needs Assessment.pdf

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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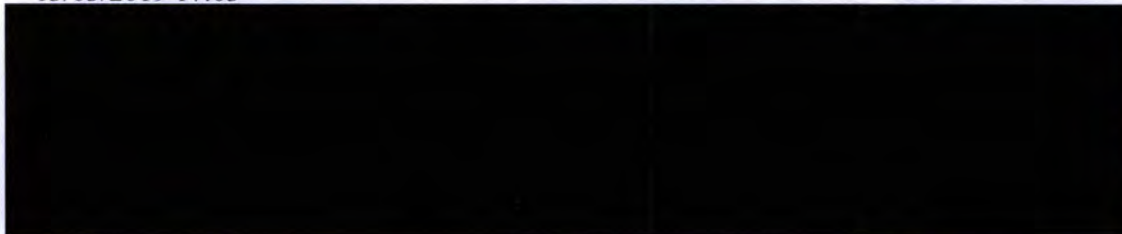
<https://i.imgur.com/iHE788g.jpg>

- |                  |                  |
|------------------|------------------|
| 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          |
| ⑪ LPA05 - PARA 3 | ⑬ APPENDIX 4     |
| ⑫ LPA05 - PARA 4 | ⑭ TABLE 4.6      |
| ⑮ LPA05.1        | ⑯ LPA07, PARA 9  |
| ⑰ LPC02          | ⑲ LPC10 - PARA 6 |
| ⑱ LPC04          | ⑳ LPC13 - PARA 4 |
| ㉑ LPA06          | ㉒ LPD07          |
| ㉓ LPC01          | ㉔ LPD02          |
|                  | ㉕ LPD03          |

 <https://i.imgur.com/05aES4f.jpg>



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

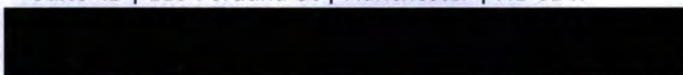
## Email 2

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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**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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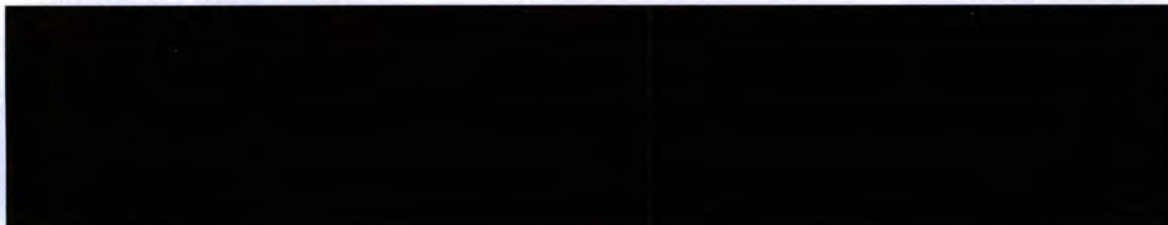
 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>





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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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. (1)
- 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.

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,

[Redacted Signature]  
Graham Lamb  
Associate Planner  
[Redacted Contact Details]

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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- 8.7 Paragraph 56-008-20160519 also notes that policies should also consider site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for the optional accessibility standards, particularly where step free access cannot be achieved or is not viable.
- 8.8 The 2019 SHMA does reference the NPPG guidance and does include some evidence on future need for older and disabled people at the borough wide level; however, this simply reflects trends that are occurring across the country (i.e. an aging population) whilst there is no consideration of the adaptability of existing stock or any site-specific factors.
- 8.9 Furthermore, the SHMA highlights that it may be prudent to take a different approach to affordable and market housing (on the basis that many RPs already build to higher standards due to households in the affordable sector being more likely to have some form of disability), yet this has not been assessed further within the policy.
- 8.10 As such, it is our view that the optional accessibility requirements set out in Part 2 are not justified and should be removed unless the additional evidence referred to above is provided.
- 8.11 In terms of the 5% bungalow requirement in part 2, the previous SHMA only referred to a general requirement for bungalows (para 10.29), whilst the 2019 SHMA update specifically states how it is difficult to quantify a need/demand for bungalows. Furthermore, this requirement applies to all greenfield sites without differentiation in terms of location, the character of the area or densities, and therefore could generate conflict with other policies within the plan and frustrate delivery.
- 8.12 Therefore, it is our view that this bungalow requirement is unjustified and should be removed.
- 8.13 If the Council have ongoing and genuine concerns that the market will not deliver either specialist housing, bungalows or any other form of housing, we would suggest that the Council considers allocating additional land specifically for this form of development so as to attract specialist developers to the area.

#### **Policy LPC02 – Affordable Housing**

- 8.14 Redrow support the need to deliver affordable housing and fully recognise their obligations as a responsible housebuilder to assist in meeting such needs.
- 8.15 Redrow also support the notion of applying different affordable housing ratios to different parts of the Borough based on an understanding of needs and viability, as this accords with paragraph 34 of the 2019 NPPF which confirms that policies relating to planning contributions should not undermine the deliverability of plans.
- 8.16 This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable on greenfield sites within affordable housing zones 2 and 3, and 10% affordable homes where they are on brownfield sites in affordable housing zone 3.



8.17 However, the Viability Assessment 2019 does raise viability issues with some of the proposed affordable requirements, with 30% affordable on greenfield sites within Zone 2 not considered viable at 30 dph and only marginally improved at 35 dph. One site remains unviable at 35 dph, with the others having very narrow margins of viability. Furthermore, when the cumulative impacts of the other policies within the Plan, on top of the 30% affordable requirement, the situation gets worse.

15

8.18 Whilst we acknowledge that there is some flexibility built into the policy, with part 4 noting that affordable provision may vary on a site by site basis dependant on local need and viability; we would still request that the Council give further consideration these requirements and zonings before the plan is submitted, as there are obviously discrepancies with the evidence.

18

8.19 With regard to the overall affordable need, table 15 of the 2019 SHMA Update confirms a net need of 117 affordable dwellings per annum for the period 2016- 2033, this equates to approximately 24% of the annual housing target of 486 dpa in the Submission Local Plan, which would seem to broadly align with the variable affordable requirement within this policy (ranging between 10 and 30%).

✓

8.20 However, we note that table 87 of the previous Mid Mersey SHMA 2016 confirmed a net need for 96 affordable dwellings; compared to an overall housing requirement of 570 dpa in the Preferred Options (which included an affordable housing uplift).

8.21 As such, whilst affordable need is clearly increasing (by 22% between 2016 and 2019) the overall housing requirement has reduced by 15%, suggesting that the plan is not providing sufficient support for affordable housing.

18

8.22 We would also kindly ask if the Council could issue further information on past affordable housing delivery. We note the last Annual Monitoring Report is dated 2011 and therefore somewhat out of date.

18

#### **Policy LPC04: Retail and Town Centres**

8.23 We fully support the identification of Eccleston as a Local Centre, which reflects the various local services and facilities present in the area and indeed demonstrates the sustainability credentials of Eccleston as a whole.

19

PO3577





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 Forms
- 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 - LPC07

㉑ - LPC02

㉒ - LPC03

㉓ - LPC04

㉔ - LPA07 - PARA 3d

㉕ - LPA07 - PARA 9

㉖ - LPC10

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

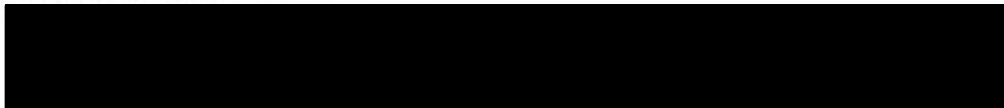
Email 2 of 4

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.

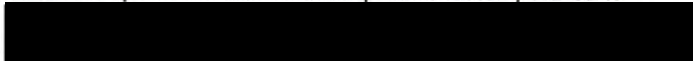
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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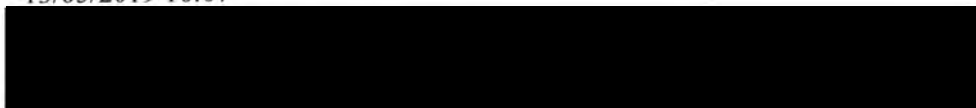


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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 3 of 4  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:07



## 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

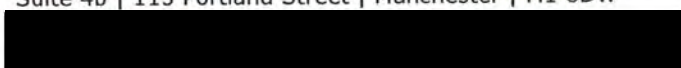
Email 3 of 4 of Redrow representations.

### 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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**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:
------------	-------

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

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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:**

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**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	LPC02	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 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"/>
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

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.

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.



## **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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- 8.7 Paragraph 56-008-20160519 also notes that policies should also consider site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for the optional accessibility standards, particularly where step free access cannot be achieved or is not viable.
- 8.8 The 2019 SHMA does reference the NPPG guidance and does include some evidence on future need for older and disabled people at the borough wide level; however, this simply reflects trends that are occurring across the country (i.e. an aging population) whilst there is no consideration of the adaptability of existing stock or any site-specific factors.
- 8.9 Furthermore, the SHMA highlights that it may be prudent to take a different approach to affordable and market housing (on the basis that many Registered Providers already build to higher standards due to households in the affordable sector being more likely to have some form of disability), yet this has not been assessed further within the policy.
- 8.10 As such, it is our view that the optional accessibility requirements set out in Part 2 are not justified and should be removed unless the additional evidence referred to above is provided.
- 8.11 In terms of the 5% bungalow requirement in part 2, the previous SHMA only referred to a general requirement for bungalows (para 10.29), whilst the 2019 SHMA update specifically states how it is difficult to quantify a need/demand for bungalows. Furthermore, this requirement applies to all greenfield sites without differentiation in terms of location, the character of the area or densities, and therefore could generate conflict with other policies within the plan and frustrate delivery.
- 8.12 Therefore, it is our view that this bungalow requirement is unjustified and should be removed.
- 8.13 If the Council have ongoing and genuine concerns that the market will not deliver either specialist housing, bungalows or any other form of housing, we would suggest that the Council considers allocating additional land specifically for this form of development so as to attract specialist developers to the area.

**Policy LPC02 – Affordable Housing**

- 8.14 Redrow support the need to deliver affordable housing and fully recognise their obligations as a responsible housebuilder to assist in meeting such needs.
- 8.15 Redrow also support the notion of applying different affordable housing ratios to different parts of the Borough based on an understanding of needs and viability, as this accords with paragraph 34 of the 2019 NPPF which confirms that policies relating to planning contributions should not undermine the deliverability of plans.
- 8.16 This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable on greenfield sites within affordable housing zones 2 and 3, and 10% affordable homes where they are on brownfield sites in affordable housing zone 3.

- 8.17 However, the Viability Assessment 2019 does raise viability issues with some of the proposed affordable requirements, with 30% affordable on greenfield sites within Zone 2 not considered viable at 30 dph and only marginally improved at 35 dph. One site remains unviable at 35 dph, with the others having very narrow margins of viability. Furthermore, when the cumulative impacts of the other policies within the Plan, on top of the 30% affordable requirement, the situation gets worse. (18)
- 8.18 Whilst we acknowledge that there is some flexibility built into the policy, with part 4 noting that affordable provision may vary on a site by site basis dependant on local need and viability; we would still request that the Council give further consideration these requirements and zonings before the plan is submitted, as there are obviously discrepancies with the evidence.
- 8.19 With regard to the overall affordable need, table 15 of the 2019 SHMA Update confirms a net need of 117 affordable dwellings per annum for the period 2016- 2033, this equates to approximately 24% of the annual housing target of 486 dpa in the Submission Local Plan, which would seem to broadly align with the variable affordable requirement within this policy (ranging between 10 and 30%).
- 8.20 However, we note that table 87 of the previous Mid Mersey SHMA 2016 confirmed a net need for 96 affordable dwellings; compared to an overall housing requirement of 570 dpa in the Preferred Options (which included an affordable housing uplift).
- 8.21 As such, whilst affordable need is clearly increasing (by 22% between 2016 and 2019) the overall housing requirement has reduced by 15%, suggesting that the plan is not providing sufficient support for affordable housing. (18)
- 8.22 We would also kindly ask if the Council could issue further information on past affordable housing delivery. We note the last Annual Monitoring Report is dated 2011 and therefore somewhat out of date.

**Policy LPC04 – Retail and Town Centres**

- 8.23 We fully support the identification of Eccleston as a Local Centre, which reflects the various local services and facilities present in the area and indeed demonstrates the sustainability credentials of Eccleston as a whole. (19)



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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



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑧ LPA02-PARA 4

⑨ LPA03

⑩ LPA04

⑪ LPA05-PARA 3

Dear Sir/Madam,

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 LPC13-PARA 4

㉑ LPA07-PARA 3c

㉒ LPA07

㉓ LPA07-PARA 9

㉔ LPA02

㉕ LPC10

㉖ LPA03

Many thanks and kind regards,

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

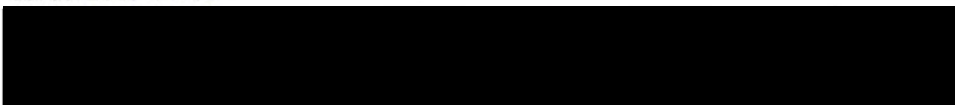
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4 Attachments



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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Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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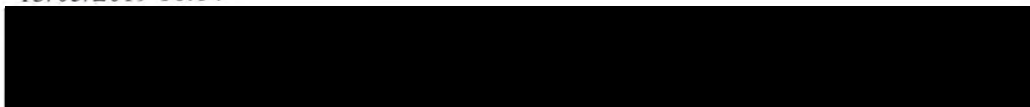


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2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

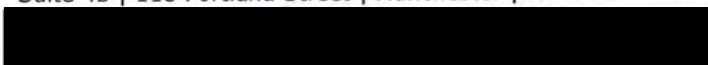
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Principal Planner

**Pegasus Group**

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Rebecca Dennis

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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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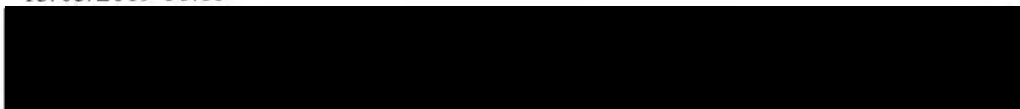
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Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

Email 6 of 8 of Wallace representations.

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**Pegasus Group**

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planningpolicy@sthelens.gov.uk

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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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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 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).

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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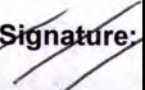
**Part B – Your Representation(s).**

**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: <span style="border: 1px solid black; padding: 2px;">13/05/2019</span>
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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**

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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	LPC02	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?	<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 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.



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"/>	<b>No</b> , I do not wish to participate at the oral examination	<input checked="" 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:

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

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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**Live: 45457800 v 3**



- 8.7 Paragraph 56-008-20160519 also notes that policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for the optional accessibility standards, particularly where step free access cannot be achieved or is not viable. ✓
- 8.8 The 2019 SHMA does reference the NPPG guidance and does include some evidence on future need for older and disabled people at the borough wide level; however, this simply reflects trends that are occurring across the country (i.e. an aging population) whilst there is no consideration of the adaptability of existing stock or any site-specific factors.
- 8.9 Furthermore, the SHMA highlights that it may be prudent to take a different approach to affordable and market housing (on the basis that many Registered Providers already build to higher standards due to households in the affordable sector being more likely to have some form of disability), yet this has not been assessed further within the policy. (17)
- 8.10 As such, it is our view that the optional accessibility requirements set out in Part 2 are not justified and should be removed unless the additional evidence referred to above is provided.
- 8.11 In terms of the 5% bungalow requirement in part 2, the previous SHMA only referred to a general requirement for bungalows (para 10.29), whilst the 2019 SHMA update specifically states how it is difficult to quantify a need/demand for bungalows. Furthermore, this requirement applies to all greenfield sites without differentiation in terms of location, the character of the area or densities, and therefore could generate conflict with other policies within the plan and frustrate delivery. (17)
- 8.12 Therefore, it is our view that this bungalow requirement is not supported by evidence and should be removed.
- 8.13 If the Council have ongoing and genuine concerns that the market will not deliver either specialist housing, bungalows or any other form of housing, we would suggest that the Council considers allocating additional land specifically for this form of development so as to attract specialist developers to the area.

#### **Policy LPC02 – Affordable Housing**

- 8.14 Wallace support the need to deliver affordable housing and fully recognise their obligations as a responsible promoter to assist in meeting such needs.
- 8.15 Wallace also support the approach of applying different affordable housing ratios to different parts of the Borough based on an understanding of needs and viability, as this accords with paragraph 34 of the 2019 NPPF which confirms that policies relating to planning contributions should not undermine the deliverability of plans.

8.16 This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable on greenfield sites within affordable housing zones 2 and 3, and 10% affordable homes where they are on brownfield sites in affordable housing zone 3.

8.17 However, the Viability Assessment 2019 does raise viability issues with some of the proposed affordable requirements, with 30% affordable on greenfield sites within Zone 2 not considered viable at 30 dph, and only marginally improved at 35 dph. One site remains unviable at 35 dph, with the others having very narrow margins of viability. Furthermore, this position is exacerbated when the cumulative impacts of the other policies within the Plan are added to the 30% affordable requirement.

8.18 Whilst acknowledging that there is some flexibility built into the policy, with part 4 noting that affordable provision may vary on a site by site basis dependant on local need and viability; we would still request that the Council give further consideration to these requirements and zonings before the plan is submitted, as there are obviously discrepancies with the evidence.

8.19 With regard to the overall affordable need, table 15 of the 2019 SHMA Update confirms a net need of 117 affordable dwellings per annum for the period 2016- 2033, this equates to approximately 24% of the annual housing target of 486 dpa in the Submission Local Plan, which would seem to broadly align with the variable affordable requirement within this policy (ranging between 10 and 30%).

8.20 However, we note that table 87 of the previous Mid Mersey SHMA 2016 confirmed a net need for 96 affordable dwellings; compared to an overall housing requirement of 570 dpa in the Preferred Options (which included an affordable housing uplift).

8.21 As such, whilst affordable need is clearly increasing (by 22% between 2016 and 2019) the overall housing requirement has reduced by 15%, suggesting that the plan is not providing sufficient support for affordable housing.

8.22 We would also request that the Council issue further information on past affordable housing delivery. We note the last Annual Monitoring Report is dated 2011 and is therefore somewhat dated.

#### **Policy LPC04: Retail and Town Centres**

8.23 We fully support the identification of Rainhill as a District Centre, which reflects the various local services and facilities present in the area and indeed demonstrates the sustainability credentials of Rainhill as a whole.

8.24 As we explore in detail in Section 3 of these Representations, the Mill Lane site is well related to the Rainhill District Centre and indeed a variety of other local services and facilities in the area.



PO3579



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

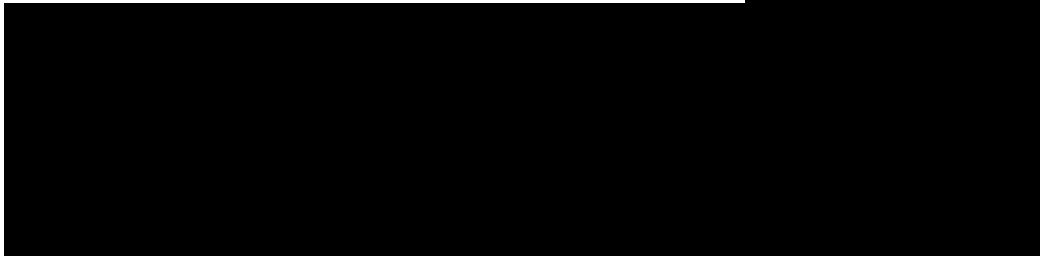
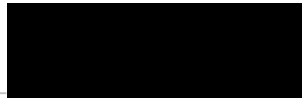
Dear Sir / Madam,

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

Response Date	3/13/2019 8:50:55 AM
---------------	----------------------



# St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.55 As such, our Client's consider that the above policy should specify that areas of Green Infrastructure should be protected in accordance with their value in amenity and ecological value. Part 4 of the policy that states that development which would result in the loss of any Green Infrastructure assets will be refused. This is an elevated status of protection that should not be afforded to all Green Infrastructure regardless of level of value that has been afforded to it.

---

### **Policy LPC01 – Housing Mix**

- 3.56 Our Client is supportive of the Policy's intention to seek provision of a wide range of affordable and market housing to meet local housing need. Notwithstanding this, we do not support the inclusion of a policy which places an arbitrary requirement on developments to deliver 5% of the market housing mix as bungalows.

- 3.57 Paragraph 2 of Policy LPC01 also requires that 20% of all dwellings should be designed to optional standards set out in Part M4(2) and M4(3) of the Building Regulations. We object to this requirement. It is overly onerous on developers to provide this as standard over and above what is required by Building Regulations itself and no suitable evidence has been provided to support this requirement.

---

### **Policy LPC02 – Affordable Housing Provision**

- 3.58 Our Client is supportive of the provision of affordable housing within developments and supportive of Part 1 of the Policy which seeks to encourage Registered Providers. We consider that this policy should go further in encouraging the provision of affordable housing, particularly in circumstances where it can be demonstrated that the level of affordable housing is falling below current levels of need.

- 3.59 We object to the Part 3 of the Policy which is overly restrictive in relation to the type and tenure of affordable housing which is to be provided and does not necessarily reflect the need for affordable housing now, the availability of funding for the provision for affordable housing nationally or allow flexibility to respond to future trends in affordable need.

- 3.60 Notwithstanding this, whilst we are generally supportive of the provision of 30% affordable housing, it remains unclear how the Council has arrived at the percentage

of affordable housing provision required. Moreover, as set out earlier within these representations, it is unclear the overall level of affordable housing that the Council expects to achieve across the housing requirement to be delivered by the Local Plan. It is not clear whether the above policy will be able to be effective in meeting the needs for affordable housing within the borough.

- 3.61 This policy seeks to include a caveat which allows for viability assessments to be submitted to justify any relaxation of affordable housing provision. We support this approach.

PO3580





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.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

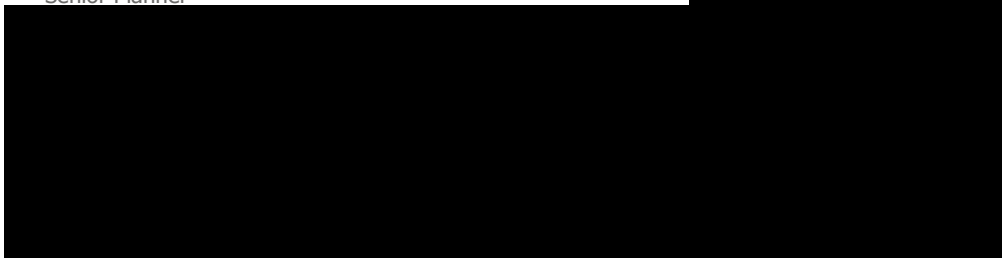
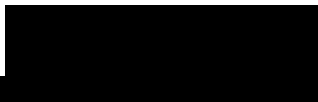
To whom it may concern,

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**

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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.

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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)				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)

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

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

community, including the need to provide aspirational dwellings and to drive economic growth. It is important however that this Policy is not overly prescriptive in its requirements which could ultimately stall the delivery of sites. The Policy should be flexible and allow for a site-by-site analysis in order to ensure that an appropriate mix of housing is secured.

31

---

**Policy LPC02: Affordable Housing**

9.30 This Policy outlines that proposals for new open market housing of developments of 11 units or more will be required to provide at least 30% affordable housing in Housing Zones 2 and 3, and with at least 10% of the affordable provision being available for affordable home ownership. Figure 6.1 of the Plan indicates our Client's land interest as being within Housing Zone 3 and as such the above requirements would apply.

9.31 Point 4 of the Policy indicates that the provision of affordable housing may vary on a site by site basis taking into account evidence on local need and economic viability subject to extensive justification.

9.32 Our Client broadly supports this Policy; the provision of affordable housing to meet the needs of the whole community clearly accords with the aims and objectives of the Council as well as the thrust of national policy. Our Client also welcomes the flexibility afforded by point 4, recognising that future market conditions may not allow for such provision to take place, although this would ultimately be determined as part of the planning application process. It is important to ensure that the requirement for affordable housing does not render a development unviable, particularly when considering density requirements afforded by Policy LPA05.

32

9.33 Notwithstanding the above, our Client does question why the Policy differentiates between Zone 2 and 3 at all especially when the Policy's approach to affordable housing delivery within these areas is the same. Zone 2 and 3 should be merged to create a single area, allowing for the Policy to be simplified.

33

9.34 Finally, our Client considers that adequate monitoring must take place across the Borough to ensure that the need for affordable housing is met.

---

**Policy LPC09: Landscape Protection and Enhancement**

9.35 This Policy outlines that new development proposals must conserve, maintain or enhance any landscape features that are important to the local area. It requires development proposals to demonstrate that the best option for the landscape has taken forward and



PO3581



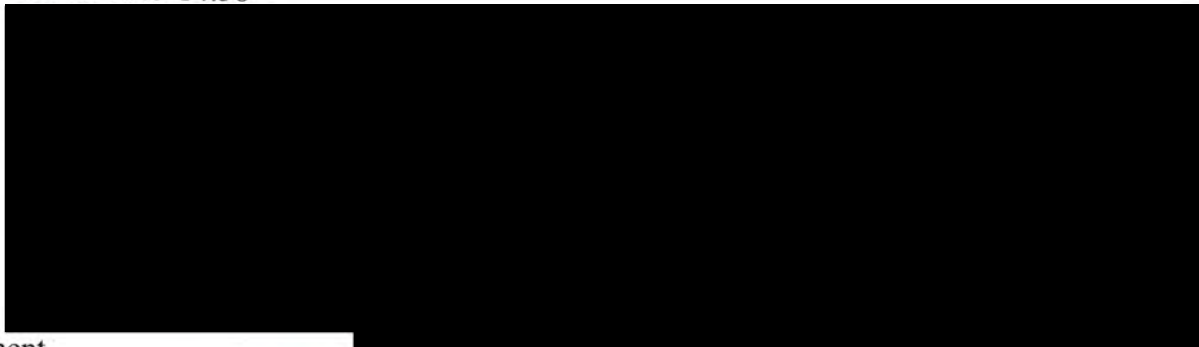
Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 1 of 4 (main representations)

Kennedy, Amy (UK - Manchester)

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:58



1 Attachment



CCfE\_reps to St Helens Local Plan\_without appendices\_March 2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 1 of 4 and the main representations are attached. The technical appendices will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



 Please consider the environment before printing.





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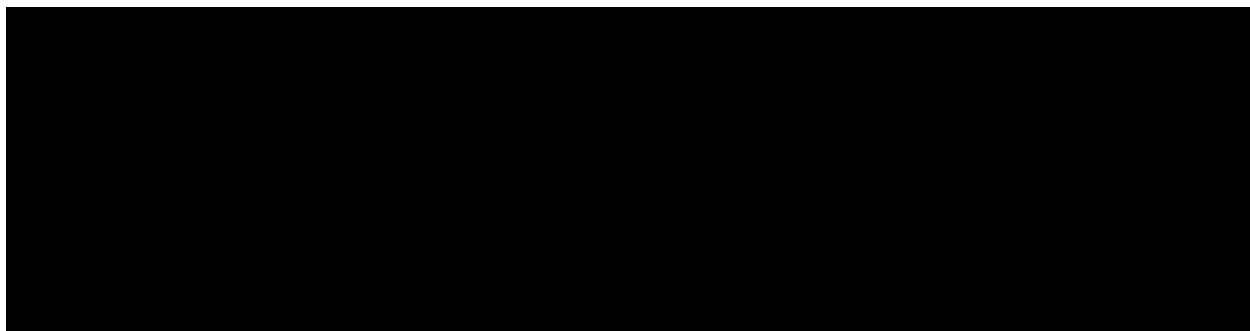
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:  
2 of 4 (Appendix A)  
Kennedy, Amy (UK - Manchester)  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:01



1 Attachment

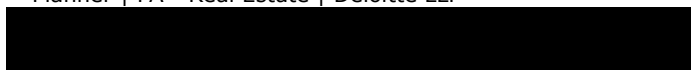


CCfE\_reps to St Helens Local Plan\_Appendix A\_March 2019.pdf

Apologies – now re-sent with attachment.

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

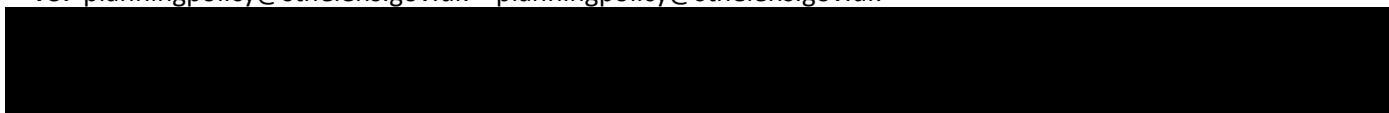



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**From:** Kennedy, Amy (UK - Manchester)

**Sent:** 13 March 2019 15:00

**To:** 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>



**Subject:** Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 2 of 4 (Appendix A)

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix A to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 2 of 4 and Appendices B and C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

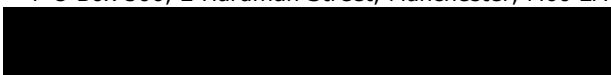
Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom







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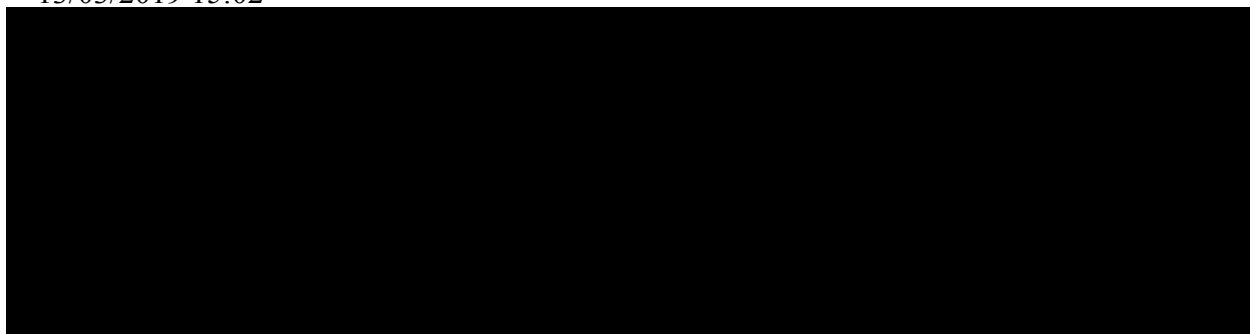
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:  
3 of 4 (Appendix B)  
Kennedy, Amy (UK - Manchester)  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:02



1 Attachment



CCfE\_reps\_to\_St\_Helens\_Local\_Plan\_Appendix\_B\_March\_2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix B to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 3 of 4 and Appendix C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

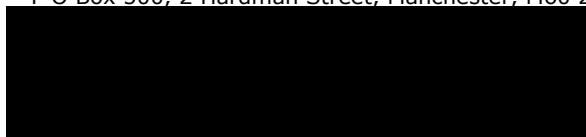
Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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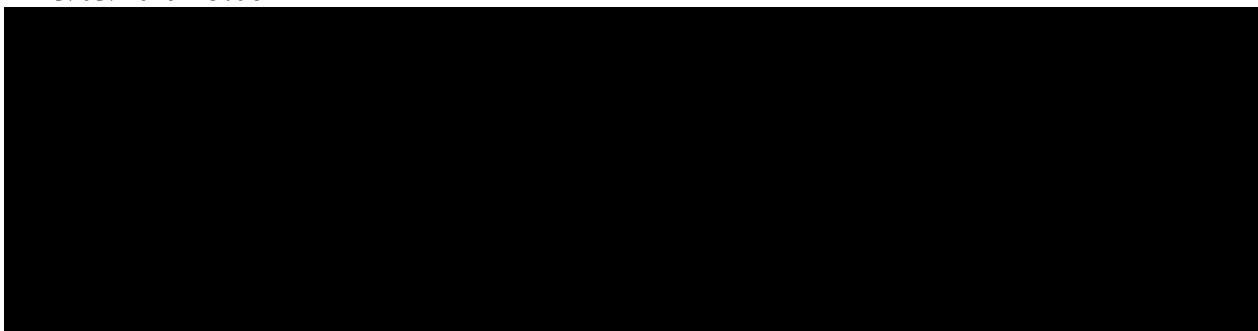
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Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)  
 Kennedy, Amy (UK - Manchester)  
 to:  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
 13/03/2019 15:06



1 Attachment



CCfE\_reps to St Helens Local Plan\_Appendix C\_March 2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix C to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 4 of 4 and is the final part of our representations. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP  
 P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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**Representations to the Submission Draft  
St Helens Borough Local Plan 2020 – 2035**  
Prepared on behalf of the Church Commissioners  
for England

March 2019



### Policy LPC01: Housing Mix

- 2.52 The Commissioners note that draft Policy LPC01 still requires at least 5% of new homes on greenfield sites that would deliver 25 or more dwellings to be bungalows. We therefore reiterate our previous objection (as made within our January 2017 representations to the Local Plan Preferred Options document) to this element of the draft policy on the basis that it is unjustified and therefore unsound.
- 2.53 As previously stated, the growing requirement to provide bungalows across the country is primarily driven by an ageing population. Bungalows are generally seen as providing housing which is more suitable for the elderly, and while the Local Planning Authority can encourage the building of bungalows, the Commissioners object to the introduction of a policy which compels developers to provide such accommodation. Bungalows tend to have much larger building footprints than the equivalent house and given this, they are not always a suitable typology for every site.
- 2.54 Draft Policy LPC01: Housing Mix should therefore be amended to delete this requirement, in order to allow developers flexibility in providing a wider choice of homes to meet the needs of a broader demographic.
- 2.55 Furthermore, it is important to note that the remaining supply identified by Table 4.6 of the Draft Plan at Row K (6,344 dwellings) is based on the sites that are capable of delivering 25 dwellings or more being brought forward at a density of between 30 and 40 dwellings per hectare (as identified in Figure 3.9 of the SHLAA 2017 Update).
- 2.56 The imposition of a target of at least 5% of these dwellings to be bungalows on greenfield sites will inevitably impact on the ability of these sites to meet the target number of units identified per site in the SHLAA and Draft Plan given that bungalows provide lower-density accommodation, and as such, the Commissioners reiterate their view that additional sites should be allocated to ensure that the Draft Plan can demonstrate that St Helens can meet the Borough's identified housing need over the Plan period.

### Policy LPC02: Affordable Housing

- 2.57 The Commissioners reiterate our previous objection (as made within our January 2017 representations to the Local Plan Preferred Options document) to the current approach to setting affordable housing contributions within the Borough.
- 2.58 We note that Rainford now falls within Affordable Housing Zone 3 within the Draft Plan, where draft Policy LPC02 stipulates that greenfield sites should provide 30% of the total number of new dwellings as affordable housing, with brownfield sites providing 10% affordable housing.
- 2.59 As outlined in our comments in paragraph 2.6 above, this approach is based on an assumption that brownfield sites have more potential viability issues than greenfield sites. This is not always the case, and there does not appear to be robust evidence to support a different affordable housing requirement for brownfield and greenfield sites. Although Part 4 of the draft policy allows for this requirement to vary on a site-by-site basis by taking into account factors such as viability, this is clearly in inequitable position and adds to the cost burden of bringing forward greenfield sites for development, which are crucial to the Council being able to provide the housing required in the Borough over the Plan period.

- 2.60 On this basis, the Commissioners assert that this policy is unsound, as it is unjustified and not positively planned. To address this issue, a flat affordable housing requirement should be identified within the Draft Plan across brownfield and greenfield sites, subject to viability assessment on a case by case basis, which is supported by robust and up to date evidence.
- 

12



PO3582



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

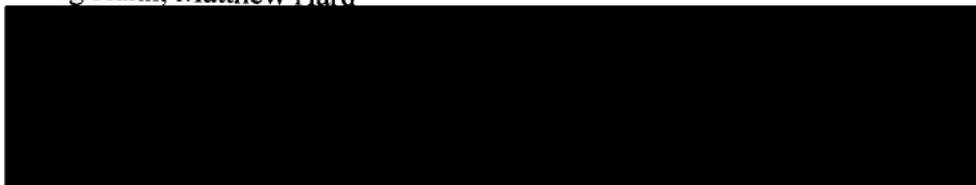
to:

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](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: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	Address: St James' Tower 7 Charlotte Street Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	
Signature <span style="background-color: black; display: inline-block; width: 150px; height: 40px; vertical-align: middle;"></span>	Date: <span style="border: 1px solid black; padding: 2px 10px;">13/03/2019</span>

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	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	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?	<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 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)			
	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.	
<p>The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.</p>	

**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.**

Council's Ensuring and Choice of Travel Supplementary Planning Document. However, in the absence of an updated SPD, it is unclear how the Council will approach matters relating to vehicle and cycle parking standard, electric vehicle charging point provision and to the requirements concerning transport assessments, transport statements and travel. Further clarification should be for developments which come forward in the interim.

32

- 4.48. The policy needs to confirm that the most up to date SPD and / or travel studies will be used during the plan period, to ensure that the most relevant and up to date information is used.

### Policy LPA08: Infrastructure Delivery and Funding

- 4.49. We welcome the additional clarity and flexibility introduced within the policy, but we maintain that the council must ensure that they do not impose requirements that could render schemes unviable. We support that the council will consider site specific economic viability evidence to determine the ability of a scheme to provide the required level of contributions.
- 4.50. It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis. Additionally, it is not clear how any such infrastructure requirements might be assisted by the introduction of CIL.
- 4.51. Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

33

### Policy LPC01: Housing Mix

- 4.52. We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that at least 20% of the new dwellings must be designed to be "accessible and adaptable" as set out in Part M4(2) and 5% of new dwellings must be designed to the "wheelchair user" dwellings standard set out in Part M4(3). The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy in the Local Plan. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

34

- 4.53. We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date evidence and housing need.

35

- 4.54. Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

### Policy LPC02: Affordable Housing

- 4.55. We welcome efforts to improve affordability. However, the level of affordable housing a site can deliver should be supported by robust and up to date evidence.
- 4.56. We support the amendment of LPC02(3) to include provision of Starter Homes.

36

37

### Policy LPC10: Trees and Woodland

- 4.57. We support the amendment to the policy which has resulted in the removal of the reference to the ratio approach to tree replacement where development proposal will result in the loss of existing trees.

38



PO3583



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

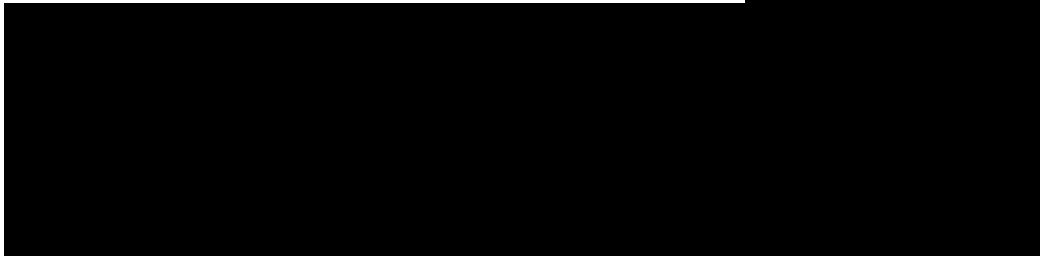
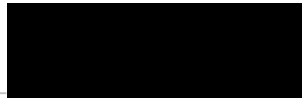
Dear Sir / Madam,

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

Response Date	3/13/2019 8:50:55 AM
---------------	----------------------



# St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.55 As such, our Client's consider that the above policy should specify that areas of Green Infrastructure should be protected in accordance with their value in amenity and ecological value. Part 4 of the policy that states that development which would result in the loss of any Green Infrastructure assets will be refused. This is an elevated status of protection that should not be afforded to all Green Infrastructure regardless of level of value that has been afforded to it.

---

### **Policy LPC01 – Housing Mix**

- 3.56 Our Client is supportive of the Policy's intention to seek provision of a wide range of affordable and market housing to meet local housing need. Notwithstanding this, we do not support the inclusion of a policy which places an arbitrary requirement on developments to deliver 5% of the market housing mix as bungalows.

- 3.57 Paragraph 2 of Policy LPC01 also requires that 20% of all dwellings should be designed to optional standards set out in Part M4(2) and M4(3) of the Building Regulations. We object to this requirement. It is overly onerous on developers to provide this as standard over and above what is required by Building Regulations itself and no suitable evidence has been provided to support this requirement.

---

### **Policy LPC02 – Affordable Housing Provision**

- 3.58 Our Client is supportive of the provision of affordable housing within developments and supportive of Part 1 of the Policy which seeks to encourage Registered Providers. We consider that this policy should go further in encouraging the provision of affordable housing, particularly in circumstances where it can be demonstrated that the level of affordable housing is falling below current levels of need.

- 3.59 We object to the Part 3 of the Policy which is overly restrictive in relation to the type and tenure of affordable housing which is to be provided and does not necessarily reflect the need for affordable housing now, the availability of funding for the provision for affordable housing nationally or allow flexibility to respond to future trends in affordable need.

- 3.60 Notwithstanding this, whilst we are generally supportive of the provision of 30% affordable housing, it remains unclear how the Council has arrived at the percentage

of affordable housing provision required. Moreover, as set out earlier within these representations, it is unclear the overall level of affordable housing that the Council expects to achieve across the housing requirement to be delivered by the Local Plan. It is not clear whether the above policy will be able to be effective in meeting the needs for affordable housing within the borough.

- 3.61 This policy seeks to include a caveat which allows for viability assessments to be submitted to justify any relaxation of affordable housing provision. We support this approach.

PO3584



**Representor Details**

Web Reference Number	WF0449
Type of Submission	Web submission
Full Name	Mrs Carmel Farmer
Organisation	
Address	46 Ecclesfield Rd, Eccleston, St Helens, Merseyside WA105NB
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	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

**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.**

Positively prepared.

Although within the plan it states that there is cross border communication and collaboration, this has not been shared or how bordering boroughs plans have informed St Helens plan or visa versa. 01

Justified

The Housing Needs assessment has not used standard methodology and has been informed by out of date statistics (ONS 2016 predicts 383 houses, Local plan has been prepared using previous figure (2014) of 486 houses per year). 02

This leads to an over estimation of houses required.

St Helens is a working class town, with many brownfield sites which are under-utilised. Brownfield register does not take into account contaminated sites, which should be further explored before taking any action on green belt sites.

The land identified as 8HS has attracted a large developer and their need for this prime land appears to have influenced the decision making of the council. In that, within the council Green Belt Review, within the comment section the rational used to protect other green belt site have not been applied to 8HS despite the same findings. In fact the findings are used to justify releasing 8HS from green belt status. 03

With the many brownfield sites across the borough it is highly likely that other site are made available to the council within the time period of this plan. Thus negating the need to release this green belt land.

The plan makes no reference to the current funding and plans of Torus Housing Association who have recently won substantial funding through Homes England. They have published their intent to build 800 new homes across St Helens. Furthermore, from their website they state they are aspiring to build 1800 affordable homes over the next four years within St Helens.

04

#### Effective

How local infrastructure will support the plan has not been explored or defined.

The large development would not be sustainable and no further information has been made available how transport, access to health care and education would be met.

05

This area would promote car dependence in an area which reports frequent road traffic accidents and which has a high volume of traffic. Current public transport is infrequent, any increase will impact further on road congestion. There is no rail links within this area of St Helens.

As a result, it is to be expected that there will be an increase both air, noise and environmental pollution, which will impact on people's health and well being.

06

The land is high quality agricultural land, which offers economic growth in the form of produce and the plan does not take into account the impact of losses in employment and farming industry.

07

8HS offers significant protection and food for wildlife.

03

#### Consistent with National policy

It does not comply with NPPF 2018 specifically point 11 and 13 (failure to demonstrate "exceptional circumstance")

Green belt is precious to us. St Helens is a historic working class town which bares the scars that many industries have left behind. These areas are crying out to be developed, as open spaces, housing and recreational activities. However, this plan chooses to ignore this heritage and need, choosing to demote green belt land to safeguarded land to enable greedy developers the opportunity to destroy part of our town.

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

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 existing 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	2/23/2019 6:36:43 PM
---------------	----------------------

PO3585



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
 Hannah Payne  
 to:  
[planningpolicy@sthelens.gov.uk](mailto: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



**indigo.**



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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 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"/>
------------	---

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:**

*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 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 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)

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

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.

St James' Tower,  
7 Charlotte Street,  
Manchester, M1 4DZ

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

By email

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

let.001.NF..21450010

13 March 2019

Dear Sirs

## ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

### Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

### Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

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Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E04 1TX  
Registered number 2078963 VAT number 849246134



# indigo.

## Policy LPA08: Infrastructure Delivery and Funding

We welcome the additional clarity and flexibility introduced within the policy but the Council must ensure that they do not impose requirements that could render schemes unviable.

23

It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis and, additionally, how any such infrastructure requirements might otherwise be assisted by the introduction of CIL.

24

Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

## Policy LPC01: Housing Mix

We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, at least 20% of the new dwellings must be designed to be "*accessible and adaptable*" and 5% of the market housing should be bungalows is unjustified and contrary to national policy. The policy also refers to 'optional standards' but that a) AND b) will be applied. This reference should therefore be removed.

25

The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date market evidence.

26

Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

LPC01(4) sets out exceptions to providing the above on viability grounds however, there are also site specific conditions and limitations which would render the requirements undeliverable in some instances. The policy should there be reworded to provide flexibility.

27

It must be noted that when discussing housing mix on a site at application stage, the Local Planning Authority must refer to the most up to date SHMA.

## Policy LPC02: Affordable Housing

Barratt are one of the United Kingdom's main providers of affordable homes and

28

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therefore welcome efforts to improve affordability however, consider that the variation in the level of provision needs to be fully evidenced and tested. Clarification is also required as to how the Affordable Housing Zones were derived and the basis for the viability evidence base.

28

We disagree that brownfield sites should only be required to provide 10% affordable housing whereas greenfield sites are required to provide 30%. The fact that a site is brownfield does not automatically mean that providing a standard level of affordable housing would render a development unviable. The level of affordable housing a site can deliver should be supported by robust and up to date evidence.

29

We support the amendment of LPC02(3) to include provision of Starter Homes.

30

## **Policy LPC10: Trees and Woodland**

We support the amendment to the policy which has resulted in the removal of the reference to the ratio approach to tree replacement where development proposal will result in the loss of existing trees.

31

We question the necessity for the policy to refer to the protection of trees already subject to a Tree Preservation Order (which of its own standing, affords protection), and also references to 'veteran trees' and 'hedgerows'. During the course of an application, the value and significance of any landscape features on site (including TPO trees, non-designated trees and hedgerows) would be assessed and the impact of a development proposal considered accordingly.

32

## **Policy LPC13: Renewable and Low Carbon Energy Development**

We support the changes made to the policy which previously required a 10% increase required for energy efficiency measures in excess of those required within most recent Building Regulations and a fabric first approach. However, we object to the fact that only proposals for new development within a strategic housing sites are required to ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy sources.

33

There is no justification or evidence to demonstrate that this policy should not be applied to all developments. The Plan is unsound on this basis.

## **Policy LPD01: Ensuring Quality Development**

Barratt Homes supports the provision of high quality development across all of its housing sites. However, the reference to the need to 'avoid loss of high quality soils' at LPD01(3)(d) is not explained or justified. In the absence of such evidence, we object to this particular part of the draft policy in its current form.

34

## **Policy LPD02: Design and Layout of New Housing**

We are generally supportive of this policy however, there is significant overlap between this policy and LPD01. It may be more appropriate to apply more generic development criteria within a single policy for all new development.

35

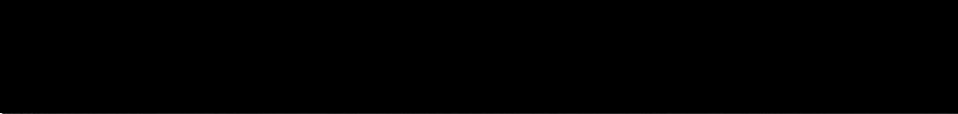
PO3586



ELOOS6



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
 Dan Ingram  
 to:  
 planningpolicy@sthelens.gov.uk  
 11/03/2019 13:18



1 Attachment



26800.A3.DI.DM - St Helens LP Submission Draft Reps - Travers Farm, Bold 190311 with Appendices.pdf

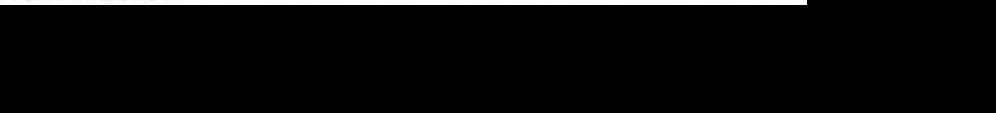
To whom it may concern,

Please find attached a copy of representations, including Vision Statement, prepared by Barton Willmore on behalf of our Client, Andrew Cotton and Family, 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 Ingram  
 Senior Planner



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- ① - GEN
- ② - Spatial Vision
- ③ - Objective 4
- ④ - key Diagram
- ⑤ - LPA01

- ⑥ - LPA02
- ⑦ - LPA03

- ⑧ - LPA04
- ⑨ - LPA04.1

- ⑩ - LPA05
- ⑪ - LPA05.1

- ⑫ - LPA06
- ⑬ - LPA08

- ⑭ - LPA09
- ⑮ - LPC01

- ⑯ - LPC02
- ⑰ - LPC07

- ⑱ - LPC09

- ⑲ - Appendix 5



St. Helens  
Council

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

EF0176

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: ANDREW	First name: DAN
Last Name: COTTON	Last Name: INGRAM
Organisation/company:	Organisation/company: BARTON WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

Signature: [Redacted]	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.

<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		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 SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

**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 Andrew Cotton and Family

March 2019

- 3.65 Notwithstanding the above, our Client is generally supportive of this Policy, recognising the need to provide for a range of dwellings catering for the needs of the whole community, including the need to provide aspirational dwellings and drive economic growth. It is important however that this Policy is not overly prescriptive in its requirements which could ultimately stall the delivery of sites. It is important that the Policy is flexible, and allows for a site-by-site analysis in order to ensure that an appropriate mix of housing is secured. Notwithstanding this our Client is broadly supportive of the flexibility that the Policy offers, recognising that future market conditions may not allow for such provision to take place, although this would ultimately be determined as part of the application process.

**Policy LPC02: Affordable Housing**

- 3.66 This Policy outlines that proposals for new open market housing of developments of 11 units or more will be required to provide at least 30% affordable housing in Housing Zones 2 and 3 with at least 10% of the affordable provision being available for affordable home ownership. Figure 6.1 of the Plan indicates our Client's land interest as being within Housing Zone 2 and as such the above requirements would apply.
- 3.67 Point 4 of the Policy indicates that the provision of affordable housing may vary on a site by site basis taking into account evidence on local need and economic viability subject to extensive justification.
- 3.68 Our Client welcomes the updated SHMA with regard to affordable housing, providing a clear evidence base for establishing the affordable housing requirement throughout the Plan Period.
- 3.69 Our Client broadly supports this Policy, the provision of new housing to meet the needs of the whole community clearly accords with the aims and objectives of the Council as well as the thrust of national policy. Our Client also welcomes the flexibility afforded by point 4, recognising that future market conditions may not allow for such provision to take place, although this would ultimately be determined as part of the application process. It is important to ensure that the requirement for affordable housing does not render the development unviable, particularly when considering density requirements afforded by Policy LPA05.

3.70 Notwithstanding the above, our Client questions why the Policy differentiates between Zone 2 and 3 at all especially when the policy's approach to affordable housing delivery within these areas is the same. Zone 2 and 3 should be merged to create a single area, allowing for the policy to be simplified.

3.71 Our Client considers that the Council should ensure that adequate monitoring takes place across the Borough to ensure that the need for affordable housing is met. Equally however, our Client considers a policy mechanism should be established so that should an over provision of affordable housing in the borough be demonstrated, a lower requirement would be sought on new greenfield developments.

#### **Policy LPC07: Greenways**

3.72 This Policy outlines that development proposals that would affect a designated Greenway will be refused if they prejudice the continuity of public access to the Greenway; harm the integrity of the Greenway in terms of off-road linkages, character or amenity; harm the appearance of the Greenway or impede the integrity of a Greenway with regard to its function as a wildlife network.

3.73 Figure 7.2 of the New Local Plan illustrates the existing Greenway Network as well as potential new routes through it. In this regard a New Route is indicated as running through our Clients land interest.

3.74 Neither the Policy or the supporting text provide any detail as to what these new routes are, their precise location or how they will be delivered/funded. This lack of information is a cause of concern for our Client and greater clarity is required as to what this New Route will entail, its impact on the housing allocation and how this Greenway will be delivered. Accordingly, our Client is unable to support this Policy presently.

#### **Policy LPC09: Landscape Protection and Enhancement**

3.75 This Policy outlines that new development proposals must conserve, maintain or enhance any landscape features that are of importance to the local area. It requires development proposals to demonstrate that the best option for the landscape has taken forward and requires proposals to be backed up by suitable evidence demonstrating that the landscape will not be harmed as a result of development. In instances where there will be harm to the landscape which is outweighed by the benefits of the proposed development the Policy provides a mechanism for mitigation and/or compensation as appropriate.

PO3587



E0258



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

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:01

Site GBP-092-A

## 4 Attachments

L004- Land at St Helens Road - Reps to Submission Local Plan.pdf Appendix 3- Agricultural Land Report.pdf

Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

Appendix 4a- Interim Housing Needs Assessment.pdf

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**  
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

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<https://i.imgur.com/ZuAcceY.jpg>

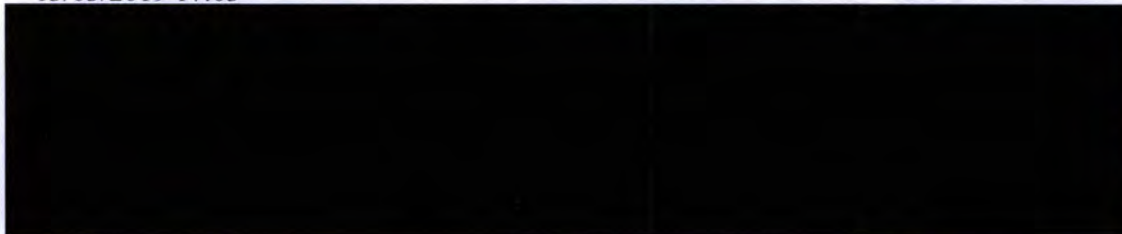
<https://i.imgur.com/iHE788g.jpg>

- |                  |                  |
|------------------|------------------|
| 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          |
| ⑪ LPA05 - PARA 3 | ⑬ APPENDIX 4     |
| ⑫ LPA05 - PARA 4 | ⑭ TABLE 4.6      |
| ⑮ LPA05.1        | ⑯ LPA07, PARA 9  |
| ⑰ LPC02          | ⑲ LPC10 - PARA 6 |
| ⑱ LPC04          | ⑳ LPC13 - PARA 4 |
| ㉑ LPA06          | ㉒ LPD07          |
| ㉓ LPC01          | ㉔ LPD02          |
|                  | ㉕ LPD03          |

 <https://i.imgur.com/05aES4f.jpg>



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

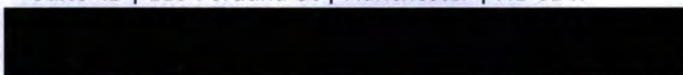
## Email 2

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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**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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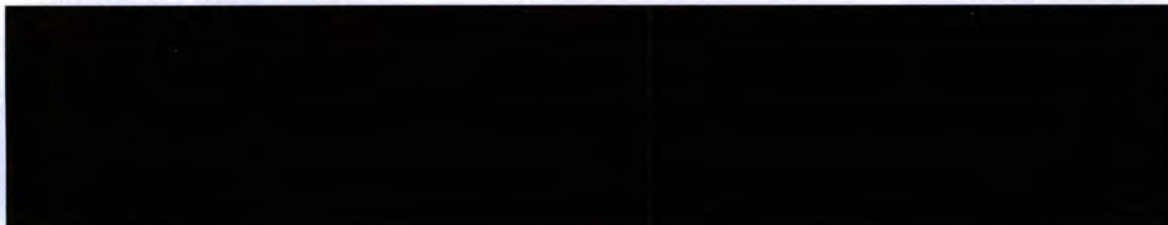
 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>





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

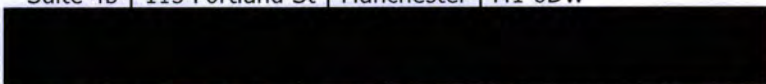
Email 3

**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/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>



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.

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**

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**T** 0161 393 3399 | **W** [www.pegasuspg.co.uk](http://www.pegasuspg.co.uk)

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8.17 However, the Viability Assessment 2019 does raise viability issues with some of the proposed affordable requirements, with 30% affordable on greenfield sites within Zone 2 not considered viable at 30 dph and only marginally improved at 35 dph. One site remains unviable at 35 dph, with the others having very narrow margins of viability. Furthermore, when the cumulative impacts of the other policies within the Plan, on top of the 30% affordable requirement, the situation gets worse.

15

8.18 Whilst we acknowledge that there is some flexibility built into the policy, with part 4 noting that affordable provision may vary on a site by site basis dependant on local need and viability; we would still request that the Council give further consideration these requirements and zonings before the plan is submitted, as there are obviously discrepancies with the evidence.

18

8.19 With regard to the overall affordable need, table 15 of the 2019 SHMA Update confirms a net need of 117 affordable dwellings per annum for the period 2016- 2033, this equates to approximately 24% of the annual housing target of 486 dpa in the Submission Local Plan, which would seem to broadly align with the variable affordable requirement within this policy (ranging between 10 and 30%).

✓

8.20 However, we note that table 87 of the previous Mid Mersey SHMA 2016 confirmed a net need for 96 affordable dwellings; compared to an overall housing requirement of 570 dpa in the Preferred Options (which included an affordable housing uplift).

8.21 As such, whilst affordable need is clearly increasing (by 22% between 2016 and 2019) the overall housing requirement has reduced by 15%, suggesting that the plan is not providing sufficient support for affordable housing.

18

8.22 We would also kindly ask if the Council could issue further information on past affordable housing delivery. We note the last Annual Monitoring Report is dated 2011 and therefore somewhat out of date.

18

#### **Policy LPC04: Retail and Town Centres**

8.23 We fully support the identification of Eccleston as a Local Centre, which reflects the various local services and facilities present in the area and indeed demonstrates the sustainability credentials of Eccleston as a whole.

19

PO3588





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 Forms
- 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 - LPD02

㉒ - LPD03

㉓ - LPC04

㉔ - LPA07 - PARA 3d

㉕ - LPA07 - PARA 9

㉖ - LPC10

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

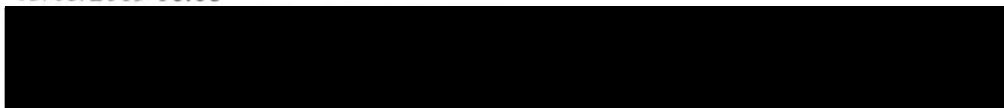
Email 2 of 4

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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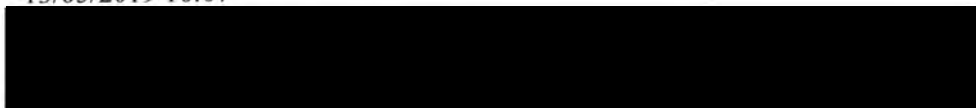
<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>



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

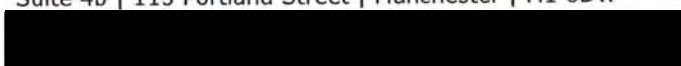
Email 3 of 4 of Redrow representations.

### 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/iHET88g.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;

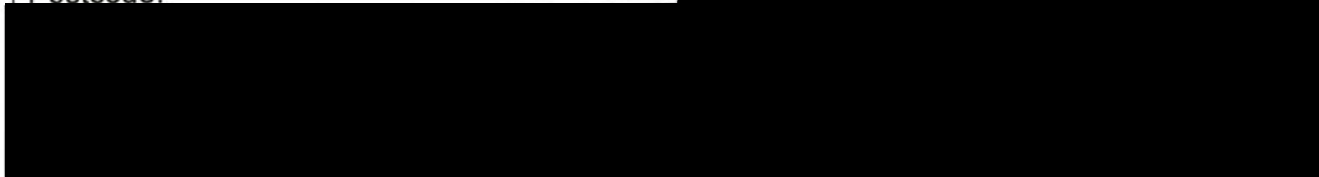
**Part A** – Personal Details

**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:
------------	-------

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.**



**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	LPC04	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 type="checkbox"/>
Sound?	Yes <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 unsound, is it because it is not:**

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

Positively Prepared?	
Justified?	
Effective?	
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

REDROW ARE SUPPORTIVE OF THIS POLICY, WHICH RECOGNISES THE IDENTIFICATION OF ECCLESTON AS A LOCAL RETAIL CENTRE.

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.

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)

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

Suite 4b | 113 Portland Street | Manchester | M1 6DW



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- 8.17 However, the Viability Assessment 2019 does raise viability issues with some of the proposed affordable requirements, with 30% affordable on greenfield sites within Zone 2 not considered viable at 30 dph and only marginally improved at 35 dph. One site remains unviable at 35 dph, with the others having very narrow margins of viability. Furthermore, when the cumulative impacts of the other policies within the Plan, on top of the 30% affordable requirement, the situation gets worse. (18)
- 8.18 Whilst we acknowledge that there is some flexibility built into the policy, with part 4 noting that affordable provision may vary on a site by site basis dependant on local need and viability; we would still request that the Council give further consideration these requirements and zonings before the plan is submitted, as there are obviously discrepancies with the evidence.
- 8.19 With regard to the overall affordable need, table 15 of the 2019 SHMA Update confirms a net need of 117 affordable dwellings per annum for the period 2016- 2033, this equates to approximately 24% of the annual housing target of 486 dpa in the Submission Local Plan, which would seem to broadly align with the variable affordable requirement within this policy (ranging between 10 and 30%).
- 8.20 However, we note that table 87 of the previous Mid Mersey SHMA 2016 confirmed a net need for 96 affordable dwellings; compared to an overall housing requirement of 570 dpa in the Preferred Options (which included an affordable housing uplift).
- 8.21 As such, whilst affordable need is clearly increasing (by 22% between 2016 and 2019) the overall housing requirement has reduced by 15%, suggesting that the plan is not providing sufficient support for affordable housing. (18)
- 8.22 We would also kindly ask if the Council could issue further information on past affordable housing delivery. We note the last Annual Monitoring Report is dated 2011 and therefore somewhat out of date.

**Policy LPC04 – Retail and Town Centres**

- 8.23 We fully support the identification of Eccleston as a Local Centre, which reflects the various local services and facilities present in the area and indeed demonstrates the sustainability credentials of Eccleston as a whole. (19)

PO3589



Sinc: Formex 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



Appendix 1-Illustrative Masterplan-Wallace.pdf

Dear Sir/Madam,

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.

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

- ⑧ LPA02-PARA 4
- ⑨ LPA03
- ⑩ LPA04
- ⑪ LPA05-PARA 3

⑫ LPA05-PARA 4

- 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.

Many thanks and kind regards,

**Rebecca Dennis**  
Principal Planner

**Pegasus Group**

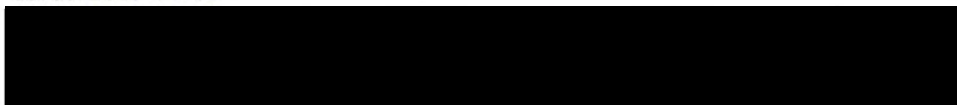
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Suite 4b | 113 Portland Street | Manchester | M1 6DW

- ⑲ LPC04
- ⑳ LPA07-PARA 3c
- ㉑ LPA07-PARA 9
- ㉒ LPC10
- ㉓ LPC13-PARA 4
- ㉔ LPA07
- ㉕ LPA02
- ㉖ LPA03





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.

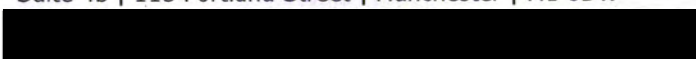
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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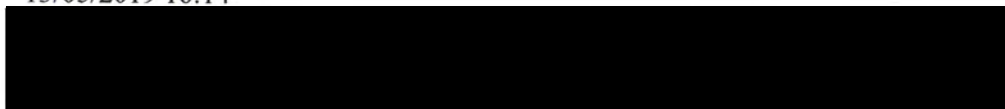
Representations to Local Plan Submission Draft Consultation-Wallace-Email 3 of 8

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.

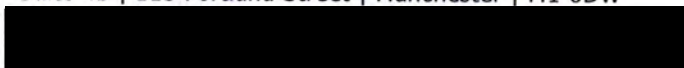
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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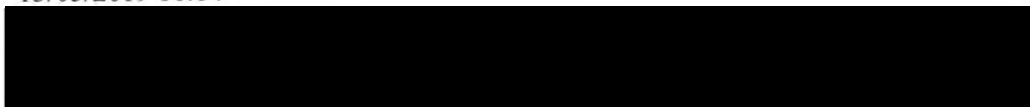
<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>



Representations to Local Plan Submission Draft Consultation-Wallace-Email 4 of 8  
Rebecca Dennis  
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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.

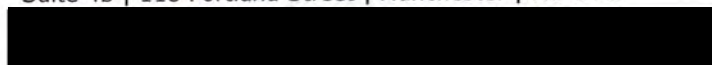
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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mailto:rebecca.dennis@pegasusgroup.co.uk

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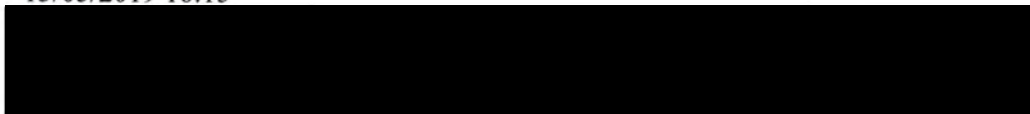
Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8

Rebecca Dennis

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planningpolicy@sthelens.gov.uk

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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.

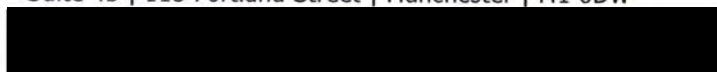
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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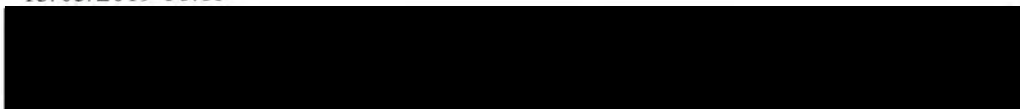


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Representations to Local Plan Submission Draft Consultation-Wallace-Email 6 of 8  
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to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:15



1 Attachment



Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

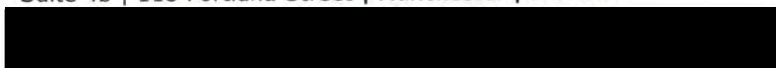
Email 6 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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 <https://i.imgur.com/05aES4f.jpg>



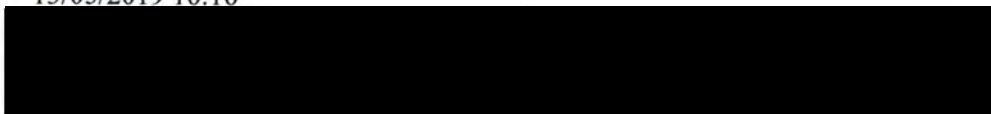
Representations to Local Plan Submission Draft Consultation-Wallace-Email 7 of 8

Rebecca Dennis

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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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St.Helens  
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**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;

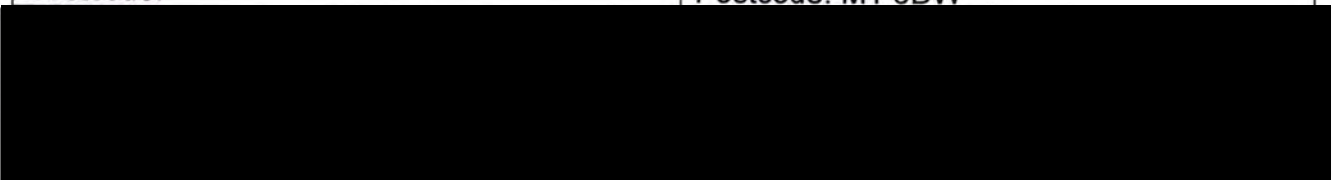
**Part A – Personal Details**

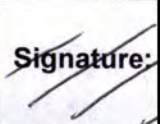
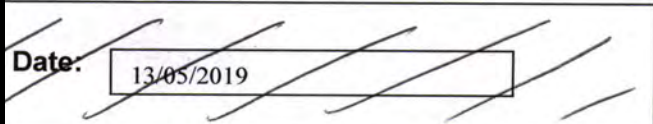
**Part B – Your Representation(s).**

**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:  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	LDC04	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 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 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 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

WALLACE ARE SUPPORTIVE OF THIS POLICY, WHICH RECOGNISES THE IDENTIFICATION OF RAINHILL AS A DISTRICT RETAIL CENTRE.

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.



NA

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 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:

NA

**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**



8.16 This policy requires housing developments of 11 or more dwellings to provide at least 30% affordable on greenfield sites within affordable housing zones 2 and 3, and 10% affordable homes where they are on brownfield sites in affordable housing zone 3.

8.17 However, the Viability Assessment 2019 does raise viability issues with some of the proposed affordable requirements, with 30% affordable on greenfield sites within Zone 2 not considered viable at 30 dph, and only marginally improved at 35 dph. One site remains unviable at 35 dph, with the others having very narrow margins of viability. Furthermore, this position is exacerbated when the cumulative impacts of the other policies within the Plan are added to the 30% affordable requirement.

8.18 Whilst acknowledging that there is some flexibility built into the policy, with part 4 noting that affordable provision may vary on a site by site basis dependant on local need and viability; we would still request that the Council give further consideration to these requirements and zonings before the plan is submitted, as there are obviously discrepancies with the evidence.

8.19 With regard to the overall affordable need, table 15 of the 2019 SHMA Update confirms a net need of 117 affordable dwellings per annum for the period 2016- 2033, this equates to approximately 24% of the annual housing target of 486 dpa in the Submission Local Plan, which would seem to broadly align with the variable affordable requirement within this policy (ranging between 10 and 30%).

8.20 However, we note that table 87 of the previous Mid Mersey SHMA 2016 confirmed a net need for 96 affordable dwellings; compared to an overall housing requirement of 570 dpa in the Preferred Options (which included an affordable housing uplift).

8.21 As such, whilst affordable need is clearly increasing (by 22% between 2016 and 2019) the overall housing requirement has reduced by 15%, suggesting that the plan is not providing sufficient support for affordable housing.

8.22 We would also request that the Council issue further information on past affordable housing delivery. We note the last Annual Monitoring Report is dated 2011 and is therefore somewhat dated.

#### **Policy LPC04: Retail and Town Centres**

8.23 We fully support the identification of Rainhill as a District Centre, which reflects the various local services and facilities present in the area and indeed demonstrates the sustainability credentials of Rainhill as a whole.

8.24 As we explore in detail in Section 3 of these Representations, the Mill Lane site is well related to the Rainhill District Centre and indeed a variety of other local services and facilities in the area.

PO3590





St. Helens  
Council

269

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

Ref: LPSD

01 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

(we will correspond via your agent)

Title: Mrs

First Name: Shirley Manley

Last Name: Manley

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

Address: 34 smock Lane

Garswood

Postcode: WN4 0SN

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

Mobile: \_\_\_\_\_

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

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

Title: \_\_\_\_\_

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

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

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

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

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

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

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

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

Signature: \_\_\_\_\_

Date: 28/2/19

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☒ Yes (via email)

☐ No

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Victoria Square  
St Helens  
WA10 1HP**

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Telephone: **01744 676190**

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setting out your representation/comment.**

**Please use a separate copy of Part B  
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## 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? **HA- HS**

Policy <b>LP08</b> <b>LP09</b> <b>LP11</b> <b>LP12</b> <b>LP04</b>	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 checked="" 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 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.

no infrastructure for ex-conv house / no schools  
 doctors / dentist to support / use Ashkan as the  
 doctors could never give appointments 2 weeks  
 there are 500 more gangs to help  
 cost of child to go to Wigan School as none in Area  
 5K + 5K Helens policy not to build any more (500 jobs  
 child & more)  
 Junction 23 cant support 1 travel to Manchester  
 it would cause extra hour a hour to an the other  
 long drive / which also increase pollution & health  
 and mental health issues it will cause this  
 Junction has taken the biggest hit at all and Haydon  
 and it will continue to decline if more buildings  
 is done  
 Brexit require 5 grow own, so grade 2 fields  
 are needed to supply food - loan figures don't support  
 can't. figures

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.

- Infrastructure in place for existing houses
- schools to be built + floodings to be rectified - provisions for increase of pollution on health of community!
- Train station to be upgraded to acomoder Prans / Disabled /
- Brown field sites to be exhausted. Still a lot available which are not being used.
- Mental Health provisions as decrease in Greenbelt will cause depression.

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
--	---

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

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

PO3591



270

PF 0249

Ref: LPSD

01 MAR 2019  
(For official use only)

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

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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: .....
First Name: <u>LEAH</u>	First name: .....
Last Name: <u>GLYNW-MANLEY</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>34 Smack Lane</u> <u>Garswood St</u>	Address: .....
Postcode: <u>WN4 0SN</u>	Postcode: .....
Tel No: .....	Tel No: .....
Mobile: [REDACTED]	Mobile No: .....
Email: .....	mail: .....

Signature: [REDACTED]	Date: <u>28-2-19</u>
-----------------------	----------------------

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)

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☐ No

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

1H1A 1H1S

Policy LPA12 LPA11 LPA07 LPA08 LPA04	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

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Legally Compliant?

☒ Yes

☐ No

Sound?

☒ Yes

☐ No

Complies with the Duty to Cooperate

☒ Yes

☐ No

Please tick as appropriate

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

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Positively Prepared?

☐

Justified?

☒

Effective?

☒

Consistent with National Policy?

☒

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

Brexit requires us to be more self-sufficient so loss of grade 2 fields - No schools to support high increase in pollution so increase in health problems no budget / risk to support increase St Helens population has declined and is continue to so no need to build these houses as OAN doesn't support this number - Traffic junction 23 is already under strain with this plus Frinds farm it would be a major standstill - Mental health will decline due to the amount of greenbelt already taken in this area - Cost of sending child to Wigan is 5K so doesn't make cost effective for St Helens

Please continue on a separate sheet if necessary



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- Provision to be made for secondary & primary schools + flood risk area.
- Health service that exist - not a baby clinic.
- Transport - regular trainings taken and regular maintenance facilities in station required.
- Shop was stopped due to high traffic in area.
- There is 500 plus cows going to affect area if one shop is stopped?
- Better provision required of farmland. Required to support this.

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
-------------------------------------	--	--------------------------	--

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

PO3592



EF0043



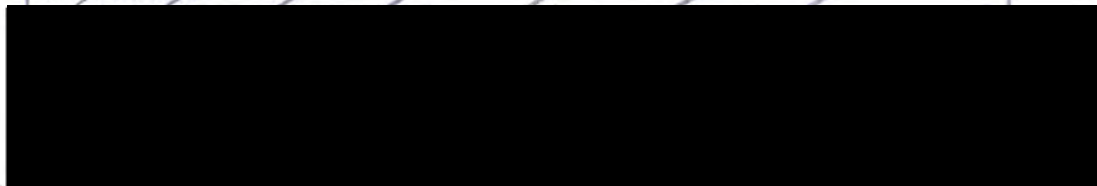
St.Helens Borough Local Plan 2020-2035: Submission Draft  
Victoria Vernon

to:

planningpolicy@sthelens.gov.uk

12/03/2019 15:37

Hide Details



1 Attachment



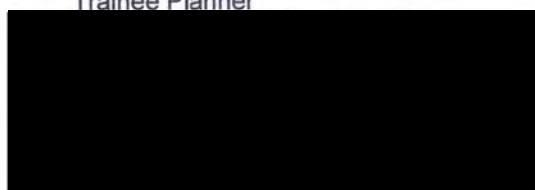
SP\_19\_00000483\_St Helens LP\_lpsd-representation-form..doc

Dear [REDACTED]

Please find attached Sport England's comments to the above consultation,

Kind regards,

**Victoria Vernon BSc (Hons) MA**  
Trainee Planner



- ① - LPA05.1
- ② - LPA09
- ③ - LPC05
- ④ - LPD03
- ⑤ - LPA03



☒ This girl can

Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

☒ ☒ ☒ ☒ ☒

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Erin Stephens](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Erin Stephens, Sport England's Data Protection Officer directly by emailing [DPO@sportengland.org](mailto:DPO@sportengland.org)



St. Helens  
Council

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

Ref: LPSD

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Victoria	First name:
Last Name: Vernon	Last Name:
Organisation/company: Sport England	Organisation/company:
Address: Sport Park, 3 Oakwood Drive, Loughborough, Leicester,	Address:
Postcode: LE11 3QF	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11/03/19

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Yes ☐ (Via Email)

No ☐

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sites as part of the developments this has not been clarified in the policy and no replacement sites have been identified. The loss of the facilities without replacement has not been justified by the Council's evidence base which demonstrates the sites are not surplus to requirements. As these sites contain important sports facilities which serve the community in the area, the loss of these facilities would be contrary to Government planning policy on playing fields/sports facilities set out in paragraph 97 of the NPPF.

Consequently, at this stage, Sport England would object to the potential allocation of this sites for residential unless (in accordance with Government policy) off-site replacement playing field provision was made to mitigate the impact through confirmation in the policy that the facilities will be replaced with equivalent or better replacement facilities in terms of quantity and quality prior to commencement of development and the proposed replacement sites are identified in the plan to provide certainty.

The Council will be aware of Sport England's role as a statutory consultee on planning applications affecting playing fields. To avoid potential objections and delays at a later date should these sites remain allocated for development which may affect the delivery of the allocation, it is advised that discussions take place with Sport England before this site allocation is confirmed in the submission version of the Local Plan. Further advice can be provided on how our concerns could be potentially addressed as well as advice on how to avoid some of the problems experienced by other local authorities who have allocated playing fields for development in their local plans.

LPA09 – This policy refers to the councils Green Infrastructure provision.

Para 4.33.3 states that sports grounds and playing fields are included by this policy. The policy is not consistent with the council's evidence base. The council's Playing Pitch Strategy 2016 highlights deficiencies of almost 26 match equivalent sessions. However, paragraph 4.33.5 of this policy states that the councils open space study 2016 concluded that there is sufficient quantity of open space.

This part of the policy also provides a link to the open space standards in policy LPC05. However, policy LPC05 quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As Green Infrastructure includes playing fields it is important that policy LPA09 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.

Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if you consider a tennis court, and up to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

LPC05 - Table 7.1 referred to in policy LPC05 (part 2) quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As outdoor sport is a typology of open space it is important policy LPC05 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.

As stated above, local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if you consider a tennis court, and up to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space



LPD03 - Outdoor sport is a typology of open space but Sport England would be extremely concerned if this policy included a requirement for onsite sports provision. A quantitative standard is not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if a tennis court to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

Please continue on a separate sheet if necessary

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LPA03: Part 5 – Sport England suggest strengthening of the policy to include physical activity opportunities within the design of new developments. Sport England has produced guidance in partnership with Public Health England that sets out ten principles to incorporate into design to promote physical activity. The Active Design Guidance can be found on Sport England's website.  
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

The recent change in Government thinking has led to the emergence of DCMS Strategy "Sporting Future: A New Strategy for an Active Nation". In response to this strategy Sport England has published 'Towards an Active Nation' which sets out how Sport England will work in partnership with a range of organisations, including Local Planning Authorities, to implement the Strategy.  
<https://www.sportengland.org/news-and-features/news/2016/may/19/sport-england-triples-investment-in-tackling-inactivity/>

LAP05.1 – Whilst the protection of these sites and the removal of the proposed allocations from the Plan would be an acceptable solution, as an alternative potential may exist for this objection to be addressed in accordance with paragraph 97 of the NPPF and Sport England's playing fields policy if the playing fields were acceptably replaced as a requirement of the site allocation policy.

LPA09 - Sport England suggest removing the reference to sufficient quantity of provision from this policy and amending para 4.33.5 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

LPC05 - Sport England suggest providing a new point within policy LPC05 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

Sport England also suggests strengthening para 7.10 to say "Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. In addition, the catchment area for sports range from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want



to participate in sport. The Playing Pitch Strategy and Action Plan, informed by a comprehensive Playing Pitch Assessment, has established the supply and demand for playing pitch facilities across the Borough in terms of usage and provision. The accompanying Playing Pitch Strategy and Action Plan identifies a series of sport by sport recommendations which provide a strategic framework for the protection, enhancement and provision of outdoor sports facilities."

LDP03 - It is suggested it is made clear within this policy that the onsite open space requirement does not include outdoor sport but that offsite contributions will be sought where the Playing Pitch Strategy identifies shortfalls in provision that would be exacerbated by the additional demand for sport generated by housing growth.

Please continue on a separate sheet if necessary

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<input checked="checked" type="checkbox"/> <b>X</b>	<b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/>	<b>Yes</b> , I wish to participate at the oral examination
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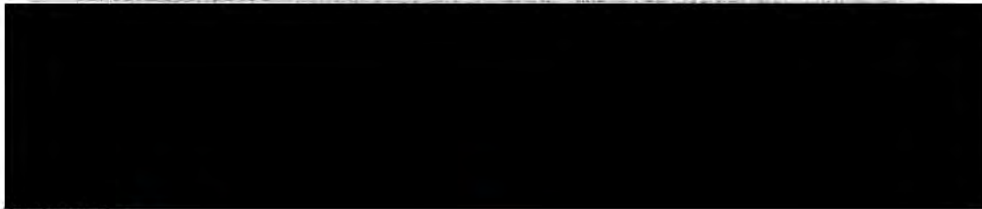
PO3593



15/02/19



St Helens Local plan - Pre-Submission Draft - Response by Revelan  
John Pearce  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:53



- ① - LPA02
- ② - LPA04
- ③ - SPATIAL Vision
- ④ - LPC 05
- ⑤ - LPA03
- ⑥ - STRATEGIC Aims & OBJECTIVE

10 Attachments



Ltr to St. Helen's Council JP 13.03.19.pdf Site Location Plan.pdf



lpsd-representation-form Strategic Aims and Objectives.pdf lpsd-representation-form Policy LPA03.pdf



lpsd-representation-form Proposals Map .pdf lpsd-representation-form Policy LPA04.pdf



lpsd-representation-form Spatial Vision.pdf lpsd-representation-form Omission Site.pdf



lpsd-representation-form Policy LPA02.pdf Proposals Map Extract Newton-le-Willows.pdf

Dear Sir or Madam

Please find attached a response to the Local Plan – Pre-submission Draft Submitted on behalf of Revelan.

Kind regards

**John Pearce** BSc (Hons) MTPL MRTPI  
Senior Planner



**harris lamb**  
PROPERTY CONSULTANCY

Harris Lamb Ltd | 75-76 Francis Road | Birmingham | B16 8SP



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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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**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: John
Last Name:	Last Name: Pearce
Organisation/company: Revelan Developments Ltd.	Organisation/company: Harris Lamb Planning Consultancy
Address: c/o Agent	Address: Grosvenor House 75 – 76 Francis Road Edgbaston Birmingham
Postcode:	Postcode: B16 8SP
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No:
Email:	Email: [REDACTED]

Signature:

[REDACTED]

Date:

13<sup>th</sup> March 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 ☐

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map	Junction Lane – OSR designation	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 attached.



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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<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:

The need or not to retain the designation is nuanced and would benefit from discussion in public.

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Postcode:	Postcode: B16 8SP
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No:
Email:	Email: [REDACTED]

Signature: [REDACTED]	Date: 13 <sup>th</sup> March 2019
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Other documents (please name document and relevant part/section)				Omission Site – Land at Junction Lane, Newton-le-Willows					

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

Please tick as appropriate

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Positively Prepared?	<input type="checkbox"/> <input checked="" type="checkbox"/>
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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:

We would welcome the opportunity to explore and present the merits of the site in detail and would benefit from an open discussion on this.

**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.**

Our Ref: P1635/JP  
Date: 13<sup>th</sup> March 2019

Grosvenor House  
75-76 Francis Road  
Edgbaston  
Birmingham B16 8SP

[REDACTED]  
Head of Local Plans  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP

BY EMAIL ONLY  
planningpolicy@sthelens.gov.uk

Dear [REDACTED]

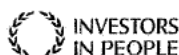
**St Helens Pre-Submission Draft Local Plan  
Response by Revelan Developments Ltd.**

We are instructed by Revelan Developments Ltd. to submit representations to the St Helens Pre-Submission Draft Local Plan. Revelan have let and sold a number of industrial premises on the Sankey Valley Industrial Estate, Newton-le-Willows. These units have been successfully let and the location has proved very attractive to occupiers, which affords convenient access to the strategic motorway network and major conurbations of Liverpool and Manchester. The area has proved very attractive to potential occupiers and a number of enquiries have been received by Revelan's agent from a wide variety of B Class users looking to locate in the Borough.

The representations submitted below relate principally to an area of unused land within Revelan's ownership at Junction Lane, Newton-le-Willows. Please see site location attached. The area of land is currently identified as open space in the Pre-Submission Draft Local Plan, although it has not performed this function for more than 10 years and is not publicly accessible. Revelan have never been approached by another other user seeking to purchase the site for sports or recreation use. Revelan are, therefore, seeking the removal of the open space designation and for the site to be allocated for employment use instead. Our detailed comments are set out below.

**Spatial Vision**

We support the vision of creating a range of high quality employment development within the Borough, which makes use of the excellent transport links that benefit the Borough. Similarly, we agree that established employment areas will continue to provide affordable accommodation for a wide range of employers, thereby helping to facilitate local employment and job growth, whilst attracting inward investment.





## Proposals Map

As stated in the introduction, Revelan's principal objection to the Plan is the open space and recreation designation that covers land in their ownership at Junction Lane, Newton-le-Willows. The attached extract from the Proposals Map identifies the area of land that is subject to the designation, and which we wish to see deleted.

The site is classed by the Council as being an open space and outdoor sport or recreation facility under Policy LPC05. The policy states proposals that would result in the loss of the open space will only be permitted in certain circumstances, and which reflect the tests set out at paragraph 97 of the Framework. Whilst no specific development proposal is in front of the Council at present, similar tests would need to be considered when determining whether the designation should remain for the site as part of the preparation of the Local Plan.

In light of the above, we have sought to clarify with the local planning authority what the site is and, therefore, what type of open space category it falls within. The Council indicated that it fell within the Outdoor Sports and recreation Facilities category, which includes playing fields, golf course, bowling greens, tennis courts and sailing spaces. Notwithstanding that the site has been unused for any form of recreation or formal sports use in over 10 years, it was previously used in as a private sports club, for use by employees of the former occupier that was linked to a previous business located adjacent to the site.

In light of the previous use of the site, we have reviewed the Council's evidence base including the Playing Pitch Strategy Assessment Report (February 2016). The assessment considered the provision of existing sports pitches and facilities in the Borough. In relation to playing pitches, the Assessment confirms at Table 2.10 that there are the equivalent of 29.75 match equivalent sessions of actual spare capacity on existing pitches in Borough. Furthermore, Table 2.13 confirms that there is spare capacity to accommodate adult teams both now and in the future across all analysis areas. The Assessment also confirms that future developments at Ruskin Drive Sports Ground and Garswood Recreation Field would create additional capacity for a further match session on adult pitches and a further three youth 9v9 pitches respectively.

In relation to cricket pitches, the assessment confirms that there is sufficient capacity to accommodate overplay, unmet and future demand at the required peak times, however, there is no spare capacity for rugby union whilst Council plans for the development of Ruskin Drive Sports Ground to include an artificial grass pitch will assist in meeting additional training requirements for both rugby union and rugby league requirements. St Helens is currently adequately provided for with artificial pitches for hockey use.

The Council's evidence indicates that the existing provision of pitches for football, rugby union, rugby league, cricket and hockey is meeting current demand and that there is some spare capacity to accommodate additional use. The Council's proposal for further development at Ruskin Drive Sports Ground and new development at Garswood Recreation Field will also add additional capacity to meet emerging demands. The Assessment of playing pitches indicates that there are no overriding capacity issues with the current level of provision. There is also the potential for the proposed strategic housing allocations to deliver new pitches and facilities, where these are of a sufficient scale to warrant there provision.

In light of the position set out above, there is no overriding reason to retain the site as an area of open space or recreation. The site owner has no intention to use the site as open space, nor is it publicly accessible. Due to the length of time since it was last used, it has become overgrown

To: St Helens Council

Date: 13<sup>th</sup> March 2019

and fallen into disrepair. Accordingly, we seek the deletion of the open space designation covering the site on the Proposals Map.

The evidence is such that designating the site for open space and recreation use is not justified as there is no compelling need for the site to be retained for such a use. Furthermore, Revelan's view is that the site would be better put to use for an alternative use, principally employment. ✓

### **Omission Site**

In seeking the removal of the open space designation for the site, Revelan also propose that the site should be identified as being suitable for employment development, principally, but not exclusively, within the B Use Classes. Chapter 6 of the Framework sets out the Government's policies for building a strong and competitive economy. Paragraph 80 states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The omission site is currently being marketed and has attracted considerable interest from potential occupiers who are looking for new premises and who operate within the storage and distribution sectors. As evidenced by the Council's proposal to remove land from the Green Belt and to allocate this and/or safeguard land for future development, there is clearly a need for additional employment to come forward to meet the Borough's needs. ✓

The site is located adjacent to a well-established industrial estate, that has good access and road and rail links. Additional employment development on the site would relate well to existing development and would have limited impact, if any, on the residential amenity of existing residents located to the south east.

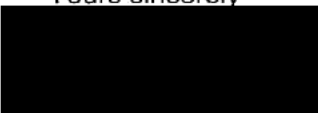
Development of the site would, therefore, make a positive contribution to the supply of employment land and premises in the Borough, whilst making use of an underused area of land in a sustainable location. If the Council continue to pursue the emerging designation, the site will continue to remain unused and vacant and will serve no open space or recreational function, thereby benefiting no one.


As such, the Plan is unsound as it is not positively prepared. In order to make the Plan sound, we suggest that the land at Junction Lane, Newton-le-Willows is identified as being suitable for employment development.

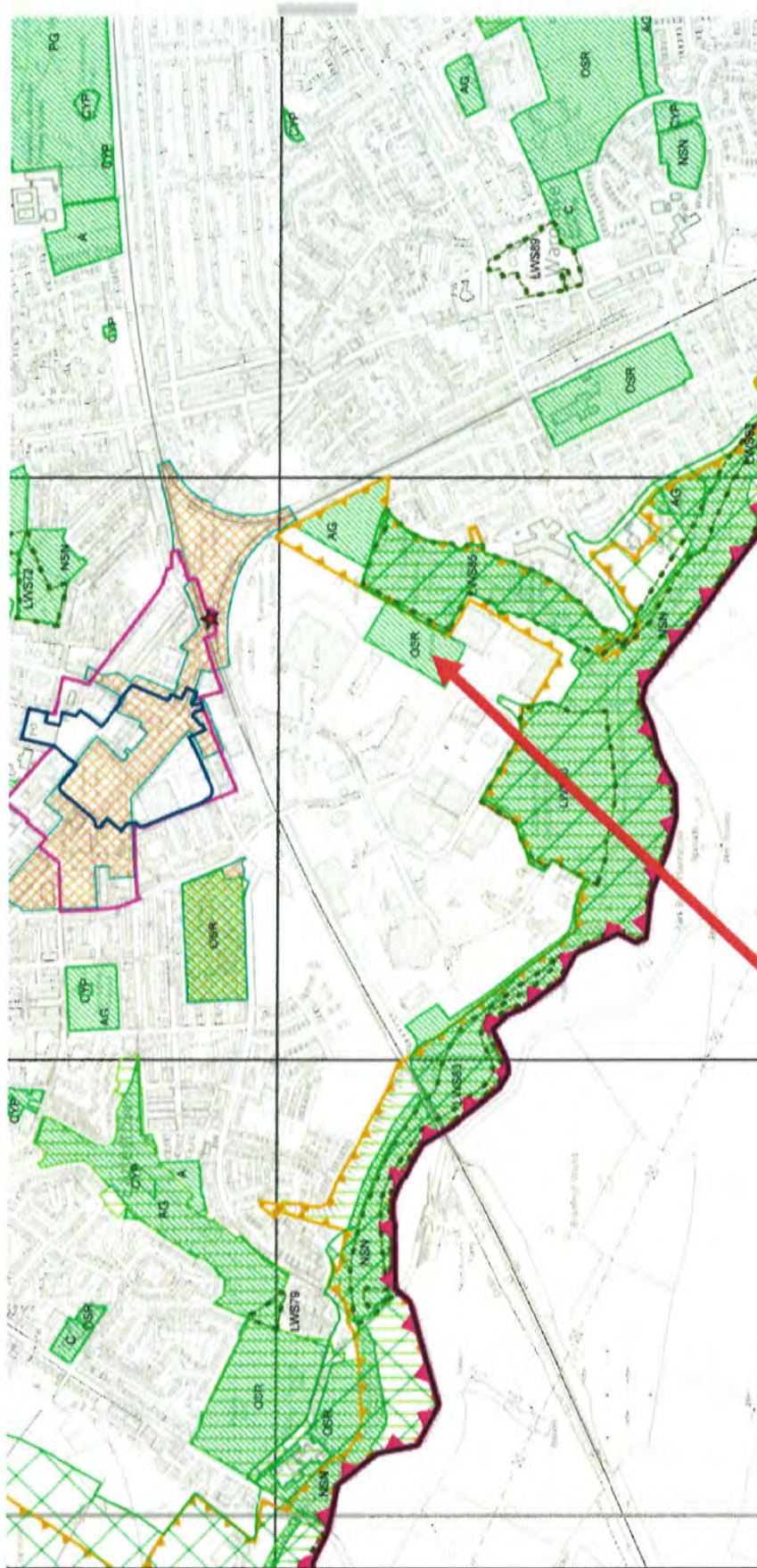
We trust you take our comments into consideration. We would also like to attend the Examination in due course in order to present our case for the reuse and allocation of the site.

In the interim, if you have any questions or require any explanation of the above please do not hesitate to contact me.

Yours sincerely

  
**John Pearce BSc (Hons) MTPL MRTPI**  
**Senior Planner**

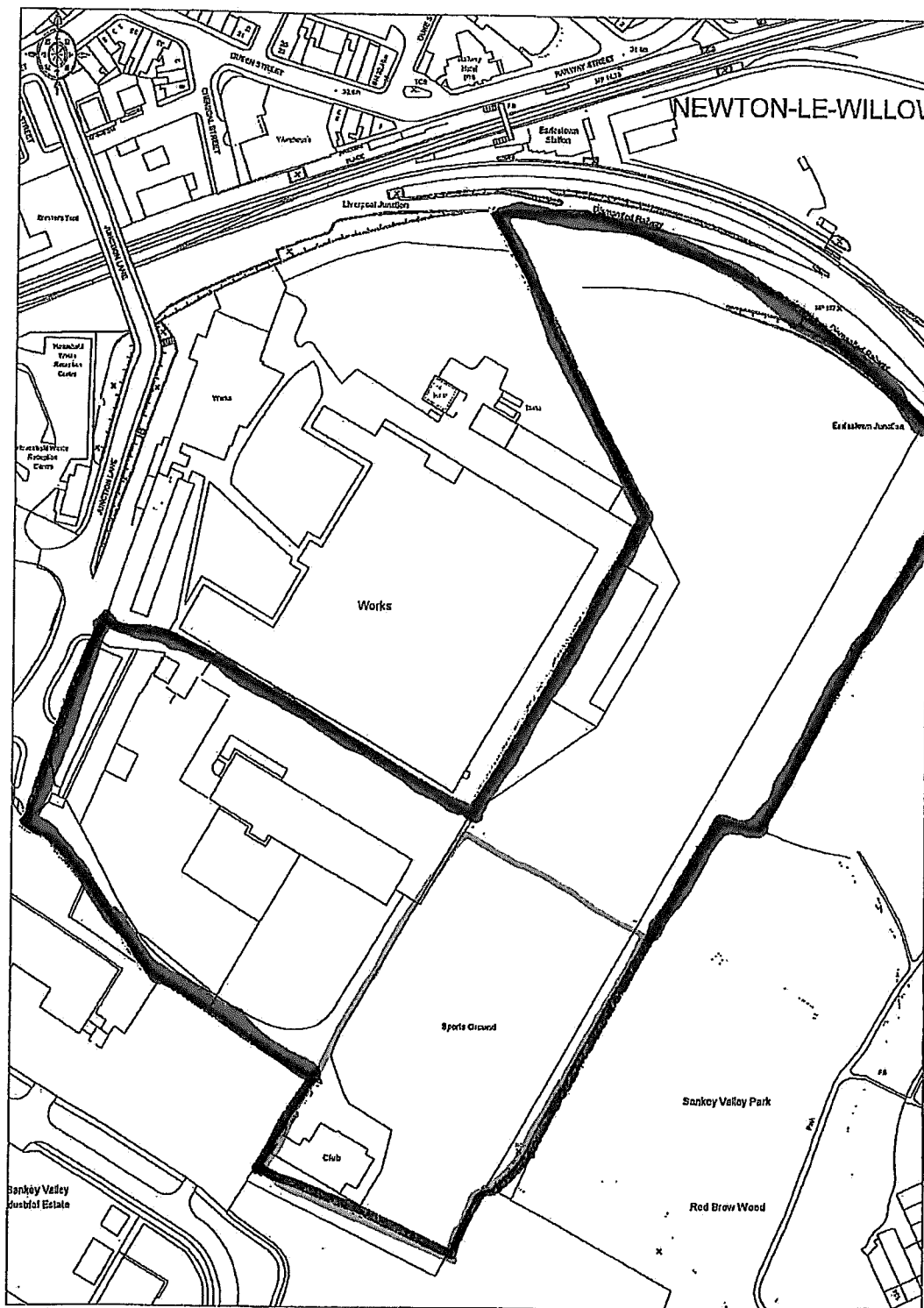
  
cc D Fairman – Revelan



OUTDOOR  
SPORTS + RECREATION  
FACILITIES

Land at Junction Lane, Newton-le-Willows

# Junction Lane, Newton Le Willows.WA12 8DL



Ordnance  
Survey

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PO3594

ELO260



St Helens Borough Local Plan Draft Submission Reps - on behalf of Star Pubs and Bars

Paul Tunstall

to:

planningpolicy@sthelens.gov.uk

13/03/2019 17:27

①-LPCOS

2 Attachments



image001.jpg image002.jpg lpsd-representation-form.doc Local Plan Representations .pdf

Dear Sirs,

Please find attached a completed form and brief Statement on behalf of the above.

Please can you acknowledge receipt?

Many thanks

Paul Tunstall MRTPI  
MANAGING DIRECTOR

JWPC Limited  
1B Waterview, White Cross, Lancaster, LA1 4XS



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St. Helens  
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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: Charlie	First name: Bryanni
Last Name: Gale	Last Name: Cartledge
Organisation/company: Star Pubs and Bars	Organisation/company: JWPC Chartered Town Planners
Address: c/o agent	Address: 1B Waterview White Cross Lancaster Postcode: LA1 4XS
Postcode:	

Signature:

Date:

12/03/2019

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

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

Please tick as appropriate

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Justified?	<input type="checkbox"/>
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PLEASE SEE SUPPORTING LETTER ATTACHED

These representations are made on behalf of Star Pubs and Bars in **SUPPORT** of the emerging New 'St.Helens Borough Local Plan 2020-2035', in particular the allocations shown on the Proposals Map for policy LPC05 Open Space.

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 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
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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 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.**



# Local Plan Representations

The New 'St.Helens Borough Local Plan 2020-2035'



The Golden Lion, Rainford

Job No: 18/L/130

Version: 1

Prepared by: Bryanni Cartledge

# 1. Local Plan Representations

1.1. These representations are made on behalf of our client, Star Pubs and Bars, in **SUPPORT** of the emerging New 'St.Helens Borough Local Plan 2020-2035', in particular the allocations shown on the Proposals Map for policy LPC05 Open Space.

1.2. Our client has interest in the Golden Lion Public House in Rainford. It is believed that there was previously a bowling green at the rear of the pub, although this used ceased in 1964/65 according to a former user. The St. Helens Playing Pitch Strategy Report (2016) is silent on the Golden Lion site, that is, it does not count the site as an active or disused/lapsed bowling green (or any other sports pitch).

1.3. Since the 1960's, the land has been used as an ancillary outdoor seating area for customers of the Golden Lion. The outdoor space is screened and enclosed by mature hedges which separate it from the playing fields to the rear and it is not available for use by the general public.



*Figure 1: Aerial Image (Google Earth, 2018) showing the site edged in red. The site is well enclosed and has been used to house picnic benches as outdoor seating for the Golden Lion.*



- 1.4. The site was allocated as Open Space in the St. Helens Unitary Development Plan (1998) and categorised as a Private Recreation Facility. The site was also included in the St. Helens Open Space Study (2006) in which it fell under the typology of Amenity Green Space. At the time of consultation for the UDP, the site owners were not aware of the designation. If they were, they would have objected to it on the basis that, at the time it has not been used by the public for such purposes for 30 plus years.
- 1.5. The St. Helens Open Space Assessment (2016) served to update the Open Space Study (2006). In accordance with best practice recommendations a size threshold of 0.2 hectares was applied to the inclusion of some typologies within the study, this included the Amenity Green Space typology. Some sites below the 0.2ha threshold were included if identified through consultation as being of significance.
- 1.6. The site at the Golden Lion is under 0.2ha and it was not identified through consultation as being of significance. The site was therefore excluded from the Open Space Assessment (2016).
- 1.7. In the 'St.Helens Borough Local Plan 2020-2035 Proposed Submission Draft Policies Map' the small site at the Golden Lion has been removed from the Open Space (Policy LPC05) designation. Rainford retains a large amount of Open Space, including two large recreation grounds, the cemetery, various school playing fields, Rainford Linear Park and a number of other smaller Open Space designations.
- 1.8. The Open Space designation as proposed in the New Local Plan offer areas of high value to benefit the wider community.
- 1.9. **We support the Open Space designations as per the Submission Draft of the St Helens Borough Local Plan, as set out in Policy LPC05 and as shown on the draft Proposals Map**
- 1.10. **The land at the Golden Lion, Rainford is no longer able to provide community benefits as it is used entirely as a private amenity space for the purpose of the Golden Lion operations, and has been for many years.**

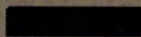
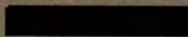
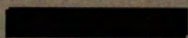


Thank you.

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JWPC Ltd

1B Waterview, White Cross  
Lancaster, Lancashire, LA1 4XS





PO3595



St. Helens  
Council

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

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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>Ced</u>	First name: _____
Last Name: <u>Parkes</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>297, Liverpool Road</u> <u>Pewfall, Haydock</u>	Address: _____
Postcode: <u>WA11 0YN</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: <u>/</u>	Mobile No: _____
Email: <u>/</u>	Email: _____

Signature: _____	Date: <u>12.3.19</u>
------------------	----------------------

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)

**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: [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: [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 ① ①	LPA 05.1 [2HA] LPC 05	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	<input checked="" type="checkbox"/> don't know
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> 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?	<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 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.

① unsound as it is irresponsible to build a housing estate within the ever-expanding economic zone of the A580 Liverpool-Manchester Corridor with the attendant noise, air pollution, speeding and ever-increasing traffic [mainly heavy]; an estate surrounded by existing traffic congestion [Clipsley Lane - Blackbrook]; an estate with limited supporting amenities/facilities. It is irresponsible to destroy the existing natural environment: woodland, nature, etc., particularly when existing housing lies unused; brownfield sites/land already for sale are ignored. There must be sites that are more appropriate for use.

②



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.

to make the LP sound, the Authority must act fairly throughout its boundaries and take note of FACTS like traffic congestion, use of brownfield sites, existing land up for sale, the natural environment, pollution, facilities; as in act fairly and responsibly.

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

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

PO3596



PF1350

# BOLD & CLOCK FACE VILLAGE ACTION GROUP PART B REPRESENTATION

① - LPA01

② - LPA02

③ - Gen. Bldg. Review

④ - LPA04

⑤ - LPA05

⑥ - LPA05.1

⑦ - IDP

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/Gorsey 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)

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**Part B** – Your Representation(s).

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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: 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:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	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.

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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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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:**

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

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 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

**Please see attached representation made on behalf of Bold and Clock Face Village Action Group with regards to Policy LPC05: Open Space**

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.

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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, 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



**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 LPSP 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 LPC05: Open Space**

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPA05 and sites 4HA and 5HA within the Bold Forest Park and is not consistent with national policy, paragraphs 96, 97 and 98 of the NPPF. 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 Bold Forest Park Area Action Plan, Policy BFP ENV1: Enhancing Landscape Character** is justified by ensuring the planning system protects and enhances valued landscapes and contribute to and enhance the local environment.

The Council state under **Policy LPC05** that it, 'will seek to ensure that the Boroughs network of open spaces is protected, managed, enhanced and where appropriate expanded. To achieve this, it will support the implementation of programmes and strategies to manage and enhance all forms of open space.'

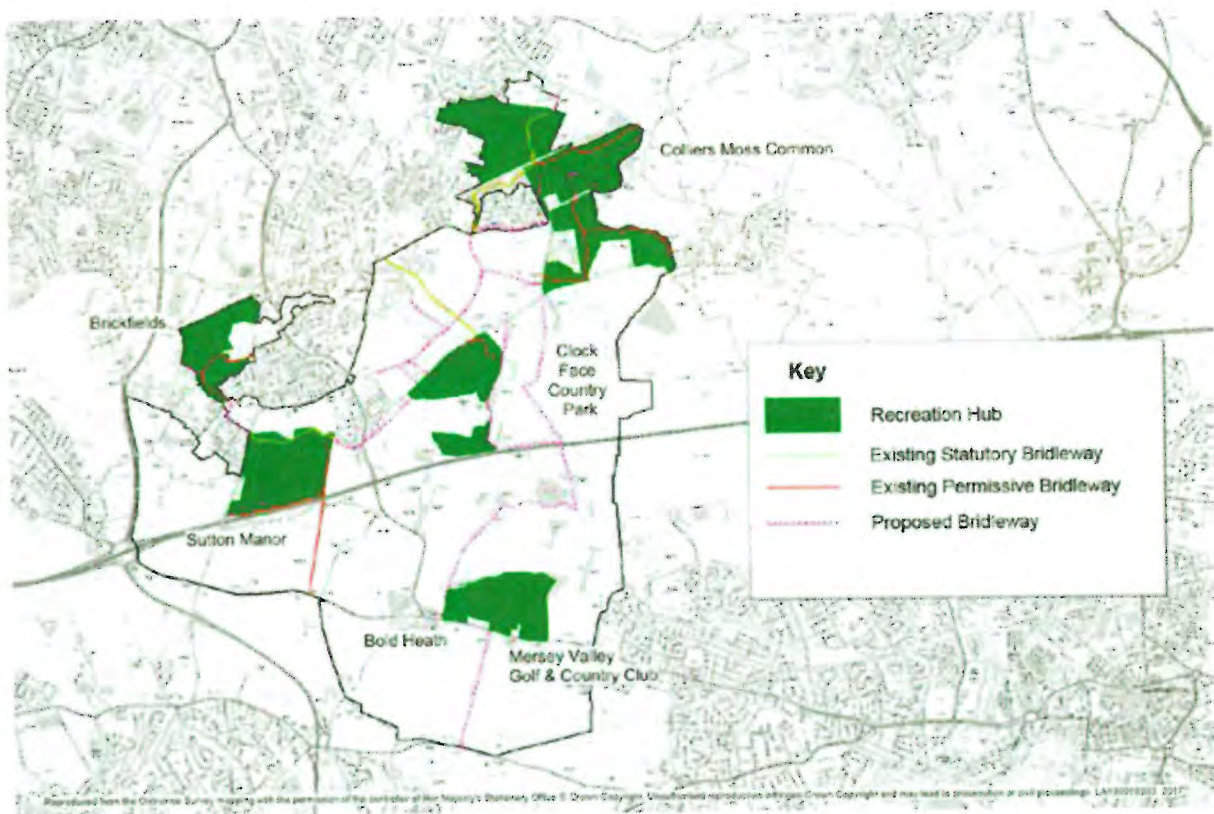
The **NPPF Paragraph 96** states, 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits and surpluses) and opportunities for new provision. Information gained from assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.'

---

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

Open space includes any open space of public value which can take many forms including land for recreation, country and forest parks. As part of the process for developing the Bold Forest Park Area Action Plan, several studies and assessments were conducted with regards to the need of the open spaces within the Bold Forest Park boundary and neighbouring settlements which have easy access to the Forest Park. The information gathered determined the need to further develop the bridleway network through a safe off-road environment. The equestrian sector was determined as much of an anchor activity within the Forest Park as cycling and walking. This was accommodated in the BFPAAP with plans to expand the existing bridleway network and manage and enhance the already existing bridleways and Public Rights of Way throughout the open space now covered by site 4HA. The BFPAAP was adopted by St Helens Council in July 2017 in its entirety, inclusive of the recommendations and development plan to enhance the bridleway and Public Rights of Way.

**Figure 1. Existing and Proposed Bridleway Network<sup>2</sup>**



In direct contravention of the **NPPF Paragraph 97**, The Council have failed to conduct an assessment and there was no consideration in the GBR 2018 of sites 4HA and 5HA in their context of their function as open space of public value within the Forest Park and the function of site 4HA regarding its use as an open space for recreation and its contribution to the development of the rural economy. It has therefore failed to provide any evidence to support

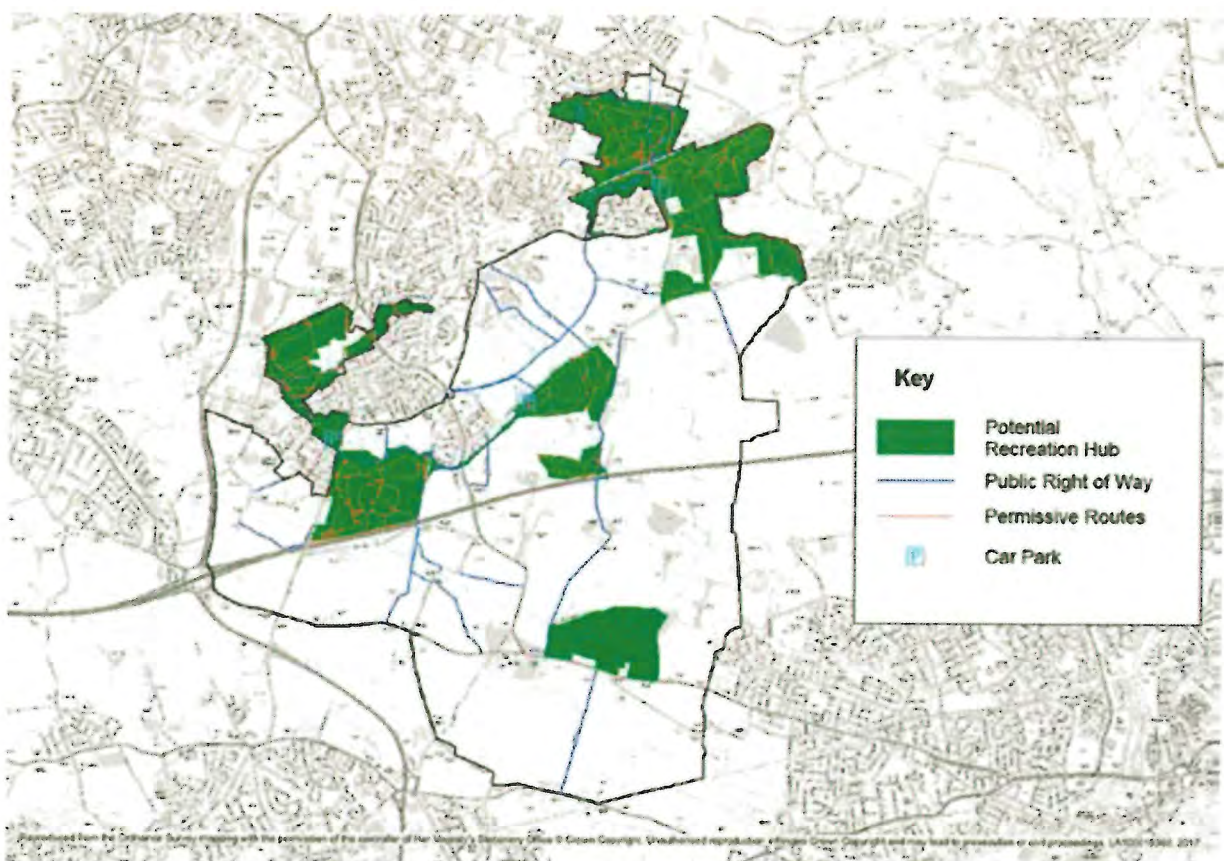
<sup>2</sup> Bold Forest Park Area Action Plan, Adopted 2017, Page 42



the land being surplus to requirements as required under **NPPF Paragraph 97** part a. Due to the lack of assessment, The Council have also failed to demonstrate how the loss of these public open spaces to, 'proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.'<sup>3</sup> Other areas within the Bold Forest Park have already been earmarked for the development of other activities which will make it unfeasible to locate within the Forest Park. Taking in to consideration the nature of some of the planned activities, it would not be possible to run these adjacent to each other, this would result in the safety of visitors and participants being compromised.

Under **Paragraph 98** of the NPPF Public Rights of Way and access should be protected by planning policy and decisions. The area now referred to as 4HA is criss-crossed by several Public Rights of Way and forms part of the recognised Mersey Forest Bold Loop circular walk. A challenging walk of approximately 7.3 miles. Removal of site 4HA from Green Belt and allocation for development will fail to protect the existing Public Rights of Way and compromise the ability of residents to access the Forest Park.

**Figure 2. Current Forest Park Infrastructure<sup>4</sup>**



<sup>3</sup> NPPF, February 2019, Paragraph 97, b.

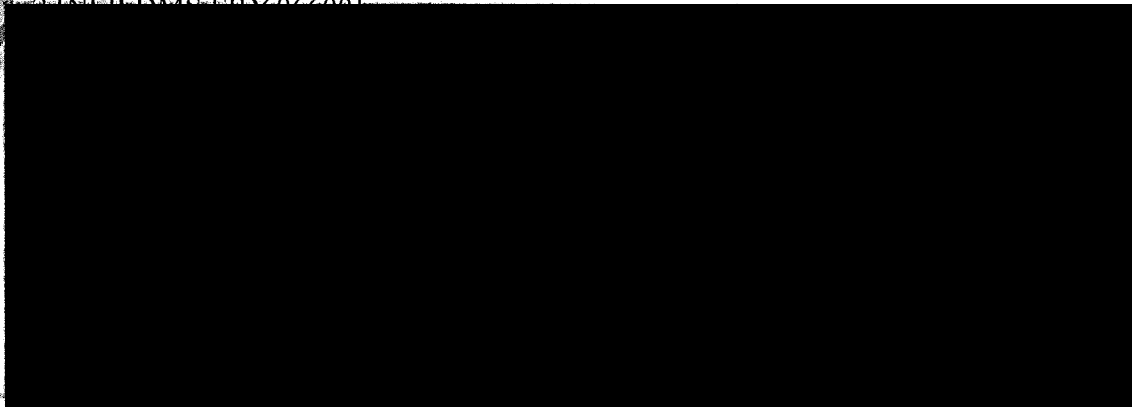
<sup>4</sup> Bold Forest Park Area Action Plan, Adopted 2017, Page 27

PO3597



ELO211

RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2



① LPA01  
② LPA02  
③ LPA03  
④ LPA04  
⑤ LPA05  
⑥ LPA05  
⑦ LPA05  
⑧ LPA05.1  
⑨ LPA06

1 Attachment



41575\_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

⑩ LPA07

⑪ LPA08

⑫ LPA09

⑬ LPA11

⑭ GBR

⑮ EVA

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,  
Melissa

**Melissa Wilson**  
**Senior Planner**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

⑭ LPC01/2

⑮ LPC02

⑯ LPC13

⑰ LPD01

⑱ LPC01/3

⑲ LPC05

⑳ LPD01

㉑ LPD02

㉒ LPC01/5

㉓ LPC10

㉔ LPD01

㉕ LPD03

㉖ LPC01/6

㉗ LPC12

㉘ LPD01

㉙ LPD07

㉚ SHMA

Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseYorPfo>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

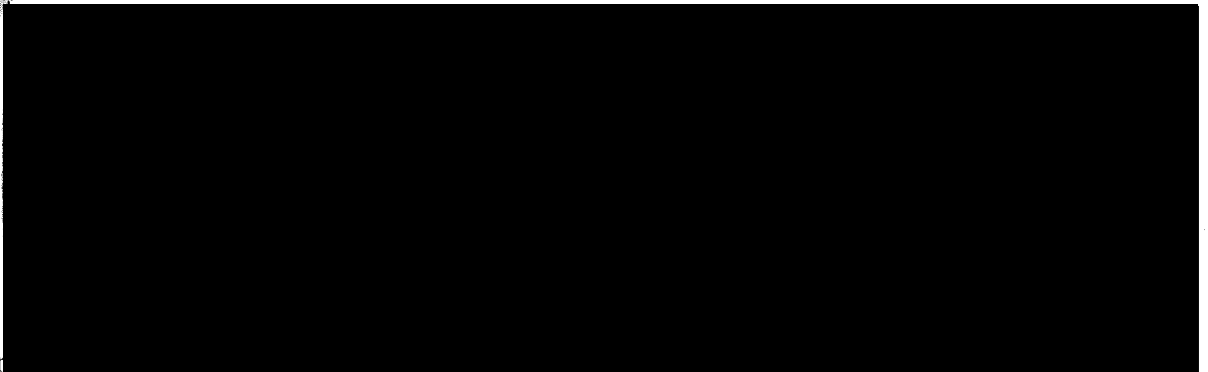
This email is for the use of the addressee. It may contain information which is confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or attachments to anyone other than the addressee. If you receive this communication in error please advise us by telephone as soon as possible. Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



Think of the environment. Please avoid printing this email unnecessarily.



Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2  
[NLP-DMS.FID606600]  
Brian O'Connor



1 Attachment



SPLIT 41874\_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19\_Part\_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseY9rPfO>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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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: Mr
First Name: Kate	First name: Brian
Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood	Address: Ship Canal House 98 King Street Manchester
Postcode: WA3 6GR	Postcode: M2 4WU
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

<b>Signature:</b> [REDACTED]	<b>Date:</b> 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.



**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	
See cover letter		See cover letter		See cover letter					
Other documents (please name document and relevant part/section)				See supporting Representations and Appendices					

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?	<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 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 supporting Representations and Appendices

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 supporting Representations and Appendices**

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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)

			<b>Yes, I wish to participate at the oral examination</b>
--	--	--	---

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

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

EL0211

# **St Helens Local Plan Soundness Representations**

Taylor Wimpey UK Limited

13 March 2019

**LICHFIELDS**

41874/03/SPM/MWI  
17081285v8  
17081285v8

## 15.0 **Policy LPCo5: Open Space**

### **Introduction**

- 15.1 Policy LPACo5 seeks to ensure that new development contributes to the protection and management of Open Space in St Helens.

### **Consideration of Policy**

- 15.2 TW acknowledges that need for new development to make a contribution towards the provision of open space.
- 15.3 Part 3 makes reference to the requirement for development to contribute towards open space needs in accordance with Policies LPAo8 and LPDo3. TW has made separate representations on the soundness of each of these policies.
- 15.4 Part 2 of the Policy (a) makes reference to Table 6.9; TW notes that this is a minor typo and should state 'Table 7.1'. TW broadly supports the provisions set out in the table identified in Policy LPCo5 which state the Open Space Standards as identified in the St Helens Open Space Sport and Recreation Assessment (2016). TW supports the Council's commitment to update the standards as part of a future Local Plan review or within a Supplementary Planning Document [SPD] but this must take full account of viability when being prepared.
- 15.5 TW suggest quality standards for open space are well placed within a SPD and reserve the right to comment on the SPD and its contents in the future.

### **Tests of Soundness**

- 15.6 TW considered Policy LPCo5 to be sound.

### **Recommended Change**

- 15.7 TW considers that no further change to the policy is required.



PO3598



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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**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.

13 MAY 2019  
1380

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:
	el No:
	obile No:
	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

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

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	<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: 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"/>	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: Please read the Guidance note for explanations of the Tests of Soundness	
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.

PO3599



**Representor Details**

Web Reference Number	WF0112
Type of Submission	Web submission
Full Name	Mr Mark Daly
Organisation	Mr
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)**

No

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

Policy	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.**

I wish to object to the current St Helens Local Plan, (LPA05 and LPA06) The plan fails on several key issues.

The Councils statement of Contaminated Land, in 2015, was 3,170 hectares, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is 204.6 hectares. This is 6% of the contaminated land available to the council. The Council should adopt a Brownfield first policy and use all the available brownfield land for development before considering the use of greenfield land. Developers prefer to use greenfield sites, using the argument that it enables them to deliver "affordable housing". This argument is not delivering any exceptional circumstance that would be required to remove the greenbelt projection to the land stated in the plan, (3HS and 8 HS)

The Council has no policy for bringing previously Used land that is not on the Brownfield Register on to the register. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan, this is an oversight that needs to be rectified immediately,

The Council claim that they need to safeguard land for development, that will enough to satisfy the requirements for 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use. The time taken to execute 2 or 3 local plans, would be more than adequate to clean the contaminated land and make it ready for use.

01

02

01

01

03



So, there can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

03

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology. The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

01

The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years. This shows that, the economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).

The plan proposes to build houses in an area that are already over congested. The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework.

04

Such and increase in traffic would also lead to increases in health issues caused by the emissions of such are large amount of traffic on narrow roads in a small built up areas.

The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

06

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe". Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

04

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car.

06

The Schools in Eccleston and Windle are already oversubscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. There is no crossing assistance for St Julies School, where most children must cross Springfield Lane, which is a main road that leads to the A580. There have been a number of accidents here over the years. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring.

04



The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents must rely on cars. 06

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever. The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to appreciate the current value that land has, in terms of crop production, employment and biodiversity. 07

I have been shocked by the cynical way in which the council has marked huge areas of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development. When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years. Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected. 03

By failing to use the most up to date information the plan is seriously flawed from the beginning. Ignoring the use of brownfields site, to benefit developers. Compounds this error. The brownfield sites have the capacity to for fill the needs of the plan and could do so well within the 15-year term of the plan. 01

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable. 08

Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely be regarded as unsound.

**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	3/13/2019 8:53:31 AM
---------------	----------------------

PO3600

EF0021



Submission to Draft Local Plan

Peter Astles

to:

11/03/2019 16:03

Cc:

"Peter Astles"



① - LPC06

② - GEN

③ - LPA04

2 Attachments



PBA representation Draft Local Plan 2019.pdf



PBA representation form - St Helens MBC Draft Local Plan 2019.pdf

Please find attached my submission to local plan and response form.

I have ticked on the response form to orally present at the hearing if possible I would like to raise a point about specific biodiversity planning

Peter Astles



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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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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: Peter	First name:
Last Name: Astles	Last Name:
Organisation/company: Our Local Voice	Organisation/company:
Address: 81 The Parchments Newton-le-Willows	Address:
	Postcode:
Postcode: WA12 0DX	
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11th 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.

## **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**

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

**Telephone:** 01744 676190

## **NEXT STEPS**

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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 LPA 10		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 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 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 my document response to St Helens Local Plan Submission Draft January 2019 Final sent via email.



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 my document response to St Helens Local Plan Submission Draft January 2019 Final sent via email.*

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
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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:

I wish to present the proposal for more effective biodiversity protection via improved planning as set out in my document response

***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.**

**RESPONSE BY**

**PETER BRIAN ASTLES**

**COMMUNITY GROUP OUR LOCAL VOICE**

**81 THE PARCHMENTS**

**NEWTON-LE-WILLOWS**

**MERSEYSIDE, WA120DX**

**THE RESPONSE IS IN TWO PARTS**

**1 – BIODIVERSITY ACTION PLAN – SECTION A**

**2 – GENERAL COMMENTS – SECTION B**

**SECTION A – BIODIVERSITY ACTION PLAN**

**Refers to**

Policy LPA03 Development Principles

Policy LPA04 A Strong and Sustainable Economy

PolicyLPA04.1: Strategic Employment Sites

Policy LPA09m Green Infrastructure

PolicyLPA11 Health and Wellbeing

Policy LPA10 Parkside East

**NPPF Statement**

*“The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature”*

**The Issue**



*St Helens MBC Draft local plan is ineffective in that it does not contain or any reference to Biodiversity Planning.*

Whilst there are a number of general references and broad objectives to local biodiversity the plan contains no enablers to preserving or mitigating harm to local wildlife. Many areas of the St Helens borough are rich in wildlife and contain a variety of species that have existed in the borough for centuries. They are part of the fabric and character of the lives of local people and contribute to general well being. Simply inserting general objectives that without facilitation methods make St Helens MBC LP objectives meaningless and hence the plan ineffective and unsound. Where very large areas of land are to be developed, where it can be demonstrated that high quality local habitat and biodiversity, will be negatively impacted.

*Then the local plan should include specific provision for biodiversity planning.*

Currently this is absent in the draft local plan

#### **What is Biodiversity Planning?**

This is the specific recognition of the habitat and species in the area proposed to be developed, particularly very large scale projects in green belt and local countryside. The recognition of the potential harm to those species and the provision of specific mitigation measures. It is accepted that is land is proposed for commercial development it will not be possible to maintain the existing habitat and full biodiversity scale. However if the guidelines of the NPPF are to be achieved and St Helens Councils

own objectives then some form of facilitation capacity must be inserted into the local plan. Otherwise mitigation is impossible and simply lost in the fog of generalised and meaningless planning jargon.

The NPPF includes now specific provision for protection of local wildlife sites.

Local examples are Willow Tit, Barn Owl, and Brown Hare some of which have formed part of Wigan Metros Greenheart Project working alongside Lancashire Wildlife Trust. Birchwood Business Park via deliberate planning and habitat development is one of the best regional locations for Long Eared Owl. Chester Business Park by cultivating wild grassland habitat encouraging the vole population has preserved the Barn Owl population which now thrives alongside the business park. Local employers in the business park contribute financially to this scheme in addition to employees volunteering in community events with Cheshire Wildlife Trust. These are positive schemes where commercial development can sit alongside biodiversity and in some cases enhance it. This is absent from the St Helens MBC draft plan.

<https://www.wildlifetrusts.org/news/some-protection-reinstated-risk-local-wildlife-sites>

The St Helens Local plan in its current version only logs local regional wildlife sites none of which are in the St Helens Borough. Whilst no doubt this is adherence strictly to planning guidelines surely it cannot be in the spirit of the NPPF to exclude potential and existing local wildlife sites in the plan area? Whilst the local

plan does point to Bold Forest Park, Sankey Valley and Lyme and wood pit Country Park these are essentially used as justification for ignoring biodiversity planning elsewhere. Bold Forest Park, Sankey Valley and Lyme and wood pit Country Park are not new areas of countryside they are simply designated as country parks. In order that future generations will have wildlife enjoyed by previous generations (as the NPPF directs) an interconnecting wildlife network and corridors should form an element of the 2020 – 2035 local plan. Tactically backed by biodiversity planning in areas appropriate such as large scale commercial development on local countryside.

This to be part of a spatial plan “what type of place St Helens borough” is to be from the context of biodiversity.

**Local Examples of Biodiversity Planning alongside strategic commercial development**

Birchwood Forest Park – forest park alongside Risley Moss SSSI.

This is integral with a large business park. Warrington MBC

Three Sisters Local Nature Reserve – Ashton in Makerfield – This is integral with a business centre and logistics facility. Wigan Metro

Chester Business Park – Biodiversity Planning integral with strategic business park with a number of large employers

These sites have specific biodiversity action plans and are part of interconnecting wildlife corridors planned by the borough e.g.

Project Greenheart Wigan Metro

**Parkside West and East**