

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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PLAN ORDER

PO3801 - PO3900

SEPTEMBER 2020

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Economic Viability Assessment PO3755 to PO3772 SD007.32 Green Belt Review 2018					
PO3755 to PO3772 SD007.32 Green Belt Review 2018					
		PO3755 to PO3772	SD007.32		
D00770 to D00000	Green Belt Review 2018				
PU3//3 to PU3883 SDU0/.32, SD00/.33		PO3773 to PO3883	SD007.32, SD007.33		

Habitats Regulations Assessment				
	PO3884 to PO3885 & PO3887	SD007.33		
Heritage Impact Assessment				
	PO3886	SD007.33		
Infrastructure Delivery Plan				
	PO3888 to PO3961	SD007.33, SD007.34		
Landscape Character Assessment Re				
	PO3962	SD007.34		
LPPO Report of Consultation (2018)				
	PO3963 to PO3965	SD007.34		
Statement of Community Involvement				
	PO3966	SD007.34		
Strategic Housing Land Availability Assessment				
	PO3967 to PO3968	SD007.33		
Strategic Housing Market Assessment				
	PO3969 to PO3971	SD007.34		
Sustainable Transport Impact Assess				
	PO3972	SD007.34		
Transport Impact Assessment				
	PO3973 to PO3976	SD007.34		
Policies Map	Policies Map			
	PO3977 to PO3981	SD007.34		
Sustainability Appraisal				
	PO3982 to PO4039	SD007.34		
Sustainability Appraisal – Non Techni				
	PO4040 to PO4047	SD007.34		
Sustainability Appraisal –Technical A				
	PO4048 to PO4050	SD007.34		

PO3801

EL0220



Local Plan Representations - Morris Homes Paul Williams

planningpolicy 13/03/2019 15:56



3 Attachments







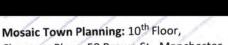
Morris Homes + Appendix.pdf Form 1.pdf Form 2.pdf

Please find attached.

With thanks,

Paul Williams

Director



Chancery Place, 50 Brown St., Manchester, M2 2JG

Registered in England No 06018747 at above address

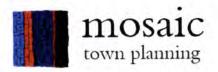


St. Helens Local Plan

Representations on behalf of Morris Homes North Ltd

March 2019





changes to justify a lower housing requirement or reduced Green Belt release. Otherwise, the Local Plan will not be positively prepared, justified, deliverable or consistent with national policy.

- 2.12 It is also important for soundness that the plan should be able to demonstrate and maintain a 5 year housing supply from the outset. This is more likely to be achieved by releasing additional smaller to medium sizes sites from the Green Belt which can be readily delivered without major infrastructure or land assembly constraints. One such site is land at Elton Head Road, St Helens.
- 2.13 Morris Homes therefore object to Policy LPA02: Spatial Strategy on the grounds that the proposed Green Belt boundaries are inadequate to meet future development needs with regard to the extent of the sites proposed for either housing allocation or safeguarding.

3 LAND SOUTH OF ELTON HEAD ROAD

- 3.1 The site promoted by Morris Homes is 2.88ha of land on the southern side of Elton Head Road to the south of St. Helens and sits directly adjacent to the settlement boundary (see Appendix for plan).
- 3.2 The site is bounded by existing residential development to the north and open countryside to the west, south and east. However, the open countryside parcel immediately to the east is already proposed for safeguarded land and there are trees to the southern boundary. There is existing built development on the south side of Elton Head Road with an enclave of dwellings to the east of the site.
- 3.3 There are a number of services and facilities within walking distance, including a local convenience shop, pharmacies, post office and restaurants. Portico Nursery and Pre-school, Nutgrove Methodist Aided Primary School and St. Austins R C Primary School are also located nearby.

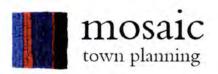
Green Belt Assessment

3.4 According to the Revised National Planning Policy Framework (NPPF) adopted in February 2019, the Local Planning Authority should identify a variety of land to accommodate growth during the plan period.



- 3.5 Paragraph 133 of the NPPF states that "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence". The purposes of the Green Belt are (parag. 134):
 - a) "To check the unrestricted sprawl of large built-up areas;
 - b) To prevent neighbouring towns merging into one another;
 - c) To assist in safeguarding the countryside from encroachment;
 - d) To preserve the setting and special character of historic towns; and
 - e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land."
- 3.6 Paragraphs 136 and 138 further explains that Green Belt boundaries should only be altered under exceptional circumstances supported and justified with evidence through the preparation of local plan reviews. Local Councils are required to promote sustainable development patterns when reviewing the Green Belt boundaries in particular, "authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary".
- 3.7 The NPPF also outlines the criteria for defining Green Belt boundaries in paragraph 139. They are to ensure "consistency with the development plan's strategy for meeting identified requirements for sustainable development" and to "identify areas of safeguarded land between urban area and Green Belt, in order to meet longer-term development needs stretching well beyond the plan period". Importantly, plans should "demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period".
- 3.8 In 2018, the Council published a Green Belt Review which considered the site as part of a larger strategic Green Belt land parcel. This resulted in the site being discounted on the grounds of making high contribution to all five purposes of Green Belt. However, in a previous 2016 Green Belt study, the site was assessed on its own as a sub-parcel of a larger strategic Green Belt gap. This resulted to the subject site being proposed to be removed from the Green Belt.





- 3.9 The 2016 Green Belt Review identified the site as making a low contribution to all purposes except preventing towns merging into one another.
- 3.10 On the contrary, the subject site would make the same 'low' contribution as the adjacent site (Ref. 7HS) towards preventing neighbouring towns from merging into one another, as the urban areas surrounding the site form part of St. Helens core area or Rainhill key settlement. Both sites are located on the northernmost end of that strategic Green Belt gap. If development were to take place, there would still be a significant strategic gap between both settlements. The gap between site and Rainhill urban area is at least 665m, whereas the narrowest point in the St. Helens and Rainhill Green Belt gap is currently 280m.
- 3.11 Should the site be allocated for development, this would remain the case as the physical gap between St. Helens and Rainhill would not be eroded. Furthermore, the site forms a logical settlement boundary in combination with the adjacent site (land south of Elton Head Road), already proposed to be released from Green Belt.

Site Specific Matters

Accessibility

- 3.12 The site can be adequately accessed by vehicles and pedestrians from Elton Head Road. Taking into account the Council's advice whereby the "access junction would need to be situated in centre of site to ensure sufficient separation distance from both The Broads and Nutgrove Hall Drive", a layout plan with sufficient visibility and width incorporated could be provided at later stages of the emerging Local Plan process.
- 3.13 The site is only 5 minutes' walk away from St John Vianney R C Primary School, 12 minutes' walk away from the centre of Thatto Heath and 20 minutes' walk away from the centre of Rainhill. The services and facilities of St. Helens town centre are approximately 3.5km away from the site.
- 3.14 The site is accessible by public transport with bus stops close to the site on Elton Head Road, with service numbers 39 and 289 running to St. Helens town centre, Rainhill, Knowsley, Prescot and Widness. Thatto Heath train station is located approximately a 12-minute walk away and Rainhill train station located approximately a 22-minute walk away.

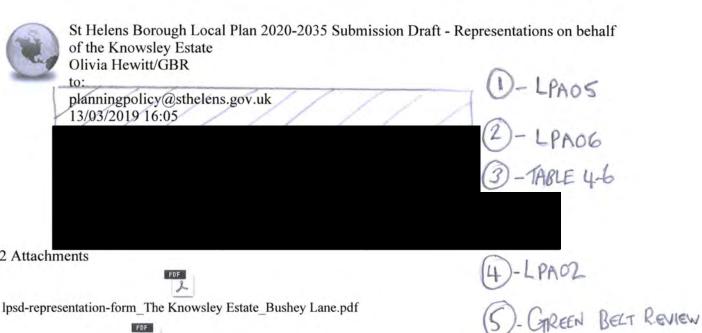


Conclusion

- 3.27 This representation demonstrates that the site fails to meet the five purposes for including land in the Green Belt, as outlined in Paragraph 134 of the National Planning Policy Framework and that it would relate well to the existing urban form and settlement boundary. Indeed, the Council has previously concluded that it should be released from the Green Belt.
- 3.28 The site is underused grassland of no particular ecological or landscape value, in a sustainable location with services and facilities nearby and easy access to larger urban centres. Its release would be in line with the spatial strategy and principles of development, Policy LPA02 and LPA03 of the emerging Local Plan.
- 3.29 The site is both deliverable and developable in terms of the NPPF definitions, being in a suitable location with a realistic prospect that housing will be delivered in the next five years. The landowner is willing to sell the land and an established developer is already in place to deliver a high-quality housing scheme.
- 3.30 It is important that St. Helens is not over dependent on large site allocations with long lead-in times, given that delivery rates from brownfield sources are also unreliable. The subject site is not of a strategic scale with associated infrastructure or land assembly issues, and as recognised by Paragraph 68 of the National Planning Policy Framework, "... medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly". Morris Homes have already developed 350 homes in a successful development to the south east of the site, with a further 100 under construction. Releasing the site would provide immediately deliverable housing land, producing continuity in output and contributing to the housing supply of St. Helens and the wider housing market area.
- 3.31 In the event that either the Local Plan Inspector supports a higher housing requirement or concludes that the identified sources of land will be insufficient to maintain a five year supply, the site is a strong contender for immediate development. Alternatively, it should be safeguarded to ensure that housing land supply can be maintained when the Local Plan is reviewed, without the need for a further Green Belt review.

PO3802

EL0225



2 Attachments



lpsd-representation-form_The Knowsley Estate_Bushey Lane.pdf



Land at Bushey Lane - St Helens - Reps - FINAL.pdf

Hello,

Please find attached representations made to the St Helens Borough Local Plan 2020-2035 Submission Draft on behalf of The Knowsley Estate with regards to land at Bushey Lane.

I would be grateful if you could confirm receipt of this email and the attachments, and keep us updated on the progress of the Local Plan.

Please don't hesitate to let me know should you have any queries.

Kind Regards,

Olivia

Olivia Hewitt MRTPI Consultant - Manchester Development and Planning



Facebook I Linkedin I Twitter I YouTube



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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.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> 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: Miss
First Name: Simon	First name: Claire
Last Name: Waller	Last Name: Pegg
Organisation/company: The Knowsley Estate	Organisation/company: Cushman & Wakefield
Address: The Estate Office, Knowsley Park Prescot Merseyside	Address: 1 Marsden Street Manchester
Postcode: L34 4AG	Postcode: M2 1HW

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 fut Plan 2020-2035? (namely submission of the Inspector's recommendations and adoption		
Yes (Via Email)	No T	
res 🖂 (via Liliali)	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 <u>5pm on Wednesday 13th March</u> <u>2019</u> 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. If you still need assistance, you can contact us via:

Email:

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.

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

Now please complete <u>PART B</u> 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.

Policy	LPA02;	Paragraph		Policies	X	ntation relate? Sustainability	Habitats
oncy	LPA05; LPA06;	/ diagram		Мар		Appraisal/ Strategic Environmental Assessment	Regulation Assessment
	ent and rel	(please name levant	е	Green B	elt Re	view	
						n 2020-2035 is: Compliance and the T	ests of Soundness
	Complian		Yes			No ⊠	
Sound?)		Yes			No 🛛	
Complie Cooper	es with the	Duty to	Yes			No 🖂	
	ck as approp		n ic ur	secund is	it ho	cause it is not:	
Please i	read the Gu	uidance note fo	r expla	nations of	the T	ests of Soundness	
	ely Prepare						
Justifie							
Effectiv	e?						
Consist	ent with N	lational Policy					
	to comply	with the duty	to coo	perate. P	lease	be as precise as pos	mpliant or is unsound sible. In, please also use thi
	LOV TILL THE	ur comments	A WY				
box to s		npanying stat	ement	of repres	sentat	ions.	

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 accompanying statement of 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)

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:

To assist the appointed Planning Inspector in his or her consideration and examination of the submitted development plan, The Knowsley Estate would like to participate in discussions around whether the Local Plan is sufficient to meet the aspiration of national planning policy to boost significantly the supply of housing, whether the proposed distribution of allocations accords with the spatial vision and welcome the opportunity to discuss the merits of the sites to the north and south of Bushey Lane, Rainford. The Knowsley Estate do not consider that this can be achieved by relying on the submitted written representations alone.

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.



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

KNOWSLEY ESTATE

March 2019

Green Belt Review 4.0

- This chapter comments specifically on the assessments undertaken in the Green Belt (GB) Review of 4.1 the relevant GB parcels and sub-parcels.
- Land north of Bushey Lane is contained in Green Belt Parcel (GBP) 001, specifically sub-parcel 4.2 GBP_001_A, with land south of Bushey Lane contained in GBP_002. There are no sub-parcels for GBP_002. Figure 2 below comprises an extract from Appendix A (North Map) of the GB Review.

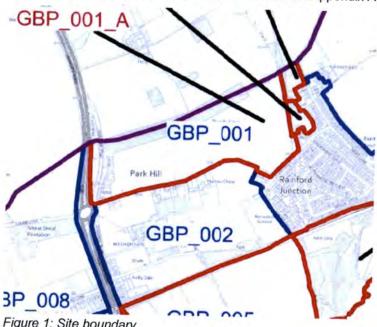


Figure 1: Site boundary

Stage 1B Assessment

- We now turn to the Stage 1B assessment of the GB parcels within which the site is located. 4.3
- Sub-parcel GBP_001_A scored medium at Stage 1B, with parcel GBP_002 scoring low. 4.4
- The detailed sub-parcel assessments are contained at Appendix C of the GB Review. We do not 4.5 disagree with the scoring for GBP_002 but consider the assessment for GBP_001_A to be incorrect and have undertaken a reassessment as set out in the table on the following page.
- When discussing the boundary features, we have referred to Table 2.1 of the GB Review which 4.6 explicitly states protected woodlands greater than 20m in width should be considered strong boundary features.

We have also considered paragraph 2.18 of the GB Review which defines "sprawl" as an untidy or irregular spread [of development]. Paragraph 2.19 then states that in determining the extent to which sprawl may occur, the sub-parcel size, degree to which it is contained by the edge of the existing urban area and other strong physical features should be considered.

Green Belt Purpose	Council Assessment/ Score	C&W Assessment/ Score		
To check the unrestricted sprawl of large built-up areas.	The sub-parcel is contained to an extent with strong physical boundaries in the form of the railway line to the east, Bushey Lane to the south, and Rainford Road (A570) to the west. The sub-parcel does not directly adjoin or lie in	The sub-parcel is well-contained with strong physical features along its boundaries. Bawdy Brook and an associated area of woodland approximately 60m deep adjoin the site along its northern boundary, Rainford Road (A570)		



	close proximity to an identified large built-up area. Although it is recognised the parcel is sizeable relative to existing development at Rainford Junction, it is unlikely to lead to substantial sprawl in its own right if released from the Green Belt for development. Score: Medium	Junction to the east and Bushey Lane to the south.
2. To prevent neighbouring towns merging into one another	The sub-parcel does not lie adjacent to an identified settlement and provides limited contribution in itself toward preserving a strategic gap between identified settlements. Score: Low	Agreed Score: Low
3. To assist in safeguarding the countryside from encroachment	The sub-parcel is predominantly an agricultural field although some forms of inappropriate development are present, notably a string of several residential dwellings and pub/restaurant to toward the western boundary off Ormskirk Road. There are also intermittent residential dwellings and a garage adjacent to the south along Bushey Lane. The sub-parcel is relatively well enclosed by the existing treelines to the north and east; although it does retain a sense of openness facing west. Score: Medium	As per the comments made against the first GB purpose above, we consider the sub-parcel is strongly enclosed by strong boundary features. These strong boundary features contribute to a relatively limited sense of openness. We do not consider there to be a sense of openness facing west as this is obstructed by a string of residential dwellings and the A570. Whilst the majority of the sub-parcel comprises an agricultural field, inappropriate development has encroached on its western boundaries. Score: Low
Summary	The sub parcel's role in preventing sprawl is moderate although its role in preventing merger is limited. It maintains a moderate degree of countryside character and openness. Score: Medium	The sub-parcel is well-contained and bound by strong physical features on all sides. The sub-parcel is considered to have strong potential for development and the development would not result in urban sprawl. Score: Low

4.7 As set out above, we consider both sub-parcels should have had their overall contribution to the GB assessed as 'low'.

Stage 2A Assessment

4.8 We concur with the Council's assessment that neither parcel/ sub-parcel has 'prohibitive' constraints present.

Stage 2B Assessment

- 4.9 Both parcel GBP_001_A and GBP_002 were assessed in Stage 2B as having limited development potential. We do not agree with this assessment and consider both sites to have good potential for residential development within the plan period (to 2035) and they should be at least safeguarded for development.
- 4.10 The GB Review does not clearly set out how the assessment of a site against the list of constraints (Table 2.7), transport accessibility and ownership and viability has resulted in a score of good, medium or limited development potential for Stage 2B.
- 4.11 The lack of transparency in this stage of the GB assessment coupled with a lack of proformas for

- those sites which were assessed at Stage 2B has rendered it impossible to undertake a comparable and fair Stage 2B assessment of GBP_001_A and GBP_002.
- 4.12 Nonetheless we have briefly considered the parcels against both the Stage 2B criteria below and the comments made in Table 5.4 of the GB Review when considering whether the parcel/sub-parcel should be allocated, safeguarded or discounted.
- 4.13 For ease of comparison to the Council's comments made in Table 5.4, we have set this out in a table to allow for a side-by-side commentary on the assessment.

GBP_001_A

Council Assessment (contained in Table 5.4 of the GB Review)	C&W Assessment
There are significant constraints which affect this sub-parcel that impact on its developability. The sub-parcel comprises of Grade 1 agricultural land.	We do not consider there to be any significant or insurmountable constraints to development at the sub-parcel. Whilst we acknowledge that the site is currently Grade 1 agricultural land, we would comment that the vast majority of Green Belt land in St Helens comprises Grade 1, 2 or 3 agricultural land.
	Whilst it is therefore inevitable that some 'best and most versatile' (BAMV) land will be lost for housing, this will unlikely have a significant impact and should be balanced against the significant amount of BAMV land that will remain in the Borough.
It is also a considerable distance from the nearest local centre (Rainford) and key local amenities (including the nearest primary school).	unreasonable distance from the site. Further, the proposed residential development at Rainford Junction could create sufficient population growth to support a primary school in Rainford Junction itself, ensuring a sustainable pattern of development across St Helens.
	The Council's assessment fails to consider that there is a convenience store within 800m of the eastern edge of the site (locate don Kendall Drive), the route to which could be upgraded as part of any development at the parcel, subject to viability.
	Similarly, the Council fails to consider that the edge of the sub-parcel is within 750m walking distance of Rainford train station and is close to bus stops along Bushey Lane.

Its development for housing would not be focussed on any Key Settlement and would therefore not support the spatial strategy of the Plan. Development of the sub-parcel would also result in the disproportionate growth of Rainford Junction.

The draft Plan identifies Rainford Junction as a "satellite settlement" but recognises the close relationship between Rainford and Rainford Junction with Rainford acting as a service centre for Rainford Junction, whilst the latter provides a valuable train link.

Development at Rainford Junction would be consistent with the spatial vision and strategic objectives to deliver sustainable and balanced growth and regeneration in a location that is well enclosed on all sides thus resulting the impact on the wider Green Belt.

Furthermore, the site is a sustainable location for growth with a railway station, bus services and close proximity to a key settlement.

A Local Wildlife Site (LWS; Bawdy Brook) runs along the northern boundary, alongside which any development would require a considerable buffer.

Whilst we acknowledge the presence of an LWS to the north, the site is sufficiently large that a suitable buffer can be incorporated into any development at the site and likely to be able to contribute to enhancing the LWS.

Also, as the sub-parcel is believed to provide functionally linked habitat connected to European sites in the wider area (likely to be used by Pink Footed Geese), any development proposal would need to be accompanied by a suitable ecological study informed by the findings of a wintering bird survey. It would also need to include an appropriate mitigation strategy to address any loss of or harm to the habitat.

The Council comments that the site "is believed to" provide a linked habitat to nearby European sites. This comment appears unfounded and not based on any up-to-date ecology surveys.

Nonetheless, the Council also recognise that a mitigation strategy could be prepared to ensure there is no significant adverse impact.

The Knowsley Estate are prepared to undertake these surveys to identify any necessary mitigation measures.

When the constraints associated with the parcel are considered cumulatively it is clear that it would not be suitable as a potential development site to be released from Green Belt. Development here would not support a sustainable spatial approach to meeting future housing needs.

The Council does not afford any consideration to there being no highway or access issues that could restrict delivery of development at the site. The sub-parcel adjoins the adopted highway, whereby safe and convenient vehicular access can be provided from Bushey Lane. Bushey Lane then connects nearby to the A570, which is in turn a <5-minute drive to the M58.

Further, the Council does not recognise that the site is in a single ownership and there are no ransom issues to prevent development.

Development at this location would support the sustainable growth of Rainford Junction, potentially reduce its role as a satellite settlement and its reliance on Rainford and enable a more diverse spatial distribution of new development in accordance with the Council's strategic obejctives.

- 4.14 Paragraph 2.39 of the GB Review identifies that the "Preferred Development Type, Developable Area and Notional Development Capacity" are also considered in the Stage 2B assessment. In that regard, we can confirm that the land being promoted by The Knowsley Estate has an area of approximately 31.3 acres (12.6 hectares) and a potential capacity of up to 378 new homes (when applying 30 dph to the gross development area).
- 4.15 In conclusion, we acknowledge the presence of the LWS and the current lack of schooling in Rainford Junction, however these are not considered insurmountable constraints to development and indeed

the development of new residential development at Rainford Junction could result in sufficient population to support a new school(s) in the settlement. The site is well-located with good access to public transport and no technical constraints to development.

4.16 Hence, we consider the sub-parcel should have been concluded as having good potential for development, afforded an overall score of 6 and allocated for residential development in the draft Local Plan, or at least safeguarded for development.

GBP_002

Council Assessment (contained in Table 5.4 of the GB Review)	C&W Assessment
Although proposed by the Council for safeguarding at LPPO stage there are a number of constraints that affect the deliverability of development within this parcel. These constraints, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to this sub-parcel. The land is classed as Grade 1 agricultural land.	We do not consider there to be any significant or insurmountable constraints to development at the sub-parcel. Whilst we acknowledge that the site is currently Grade 1 agricultural land, we would comment that the vast majority of Green Belt land in St Helens comprises Grade 1, 2 or 3 agricultural land. Whilst it is therefore inevitable that some 'best and most versatile' (BAMV) land will be lost for housing, this will unlikely have a significant impact and should be balanced against the significant amount of BAMV land that will remain in the Borough.
Development within the parcel would not be focussed on any Key Settlement and would be affected by significant transport sustainability issues.	We strongly disagree with the Council's comment that the site has "significant transport sustainability issues. The edge of the sub-parcel is within 750m walking distance of Rainford train station and is close to bus stops along Bushey Lane. These important public transport options are absent from the Council's assessment of the site in Table 5.4.
It lies outside an 800m safe and convenient walking distance of the nearest identified local centre (Rainford), which lies approx. 1.4km away (as the crow flies). Whilst the eastern part is within 800m of a convenience shop (located on Kendall Drive), the existing road and pathway between the parcel and this shop is narrow and poorly lit, so is not considered safe and convenient.	The Council's assessment acknowledges that there is a convenience store within 800m of the eastern edge of the site (located on Kendall Drive), the route to which could be upgraded as part of any development at the parcel, subject to viability. Whilst the site is not within close walking distance of a larger local centre, as mentioned above, it is in close proximity to a train station and bus stops, with regular connections to key settlements, including Rainford which the draft Plan identifies Rainford Junction as being a satellite settlement for.
The parcel is also located outside a safe and convenient walking distance of a primary school.	Primary schools, high schools and a college are located close by in Rainford which is not considered to be an unreasonable distance from the site. Further, the proposed residential development at Rainford Junction could create sufficient population growth to support a school(s) in Rainford Junction itself, ensuring a sustainable pattern of development across St Helens.

The parcel also contains playing fields (Rainford North End), natural and semi natural greenspace (Red Delph Wood) and a children's play area, with no identified surplus of these greenspace typologies within the vicinity.

Whilst the wider parcel does contain playing fields, Red Delph Woods and playing fields, the land herein being promoted and indeed, the boundary of the previous allocation ref. HS19 boundary, does not propose to remove these features.

The Council's inference therefore that development in the parcel will result in their removal is incorrect.

Further, the parcel is of sufficient size that it can be developed to include a suitable buffer to any sensitive features, such as the woodland.

There are potential access and highway issues; Red Delph Lane is a single track road with residential dwellings on both sides. Opportunities to widen the highway are therefore limited and at its current standard it would not be suitable to support further residential development.

As shown in Figure 1, the parcel adjoins the adopted highway with the promoter's land ownership fronting onto 2 long stretches of Bushey Lane to the north of the parcel as well as Ormskirk Road to the west.

Safe and convenient vehicular access can certainly be provided into the parcel and we therefore strongly disagree with the Council's comment that the only access option is from Red Delph Lane.

Bushey Lane and Ormskirk Road then connect nearby to the A570, which is in turn a <5-minute drive to the M58.

Not all of the land has been submitted for development, and there could therefore be at least a delay in any development coming forward. The vast majority of the parcel is in a single ownership (see Figure 1) and a comprehensive and sensitive development of the site is therefore achievable, with housing capable of being delivered within the short term.

We therefore strongly disagree with the Council's comments.

The SA report for this parcel concluded that its allocation for development would have a mixed impact on the achievement of SA objectives.

When the constraints and issues with the parcel are considered cumulatively it is clear that this parcel would not be suitable as a potential development site to be released from Green Belt. Development here would result in the disproportionate growth of Rainford Junction and would not support a sustainable spatial approach to meeting future housing needs.

The Council does not afford any consideration to there being no highway or access issues that could restrict delivery of development at the site. The sub-parcel adjoins the adopted highway, whereby safe and convenient vehicular access can be provided from Bushey Lane. Bushey Lane then connects nearby to the A570, which is in turn a <5-minute drive to the M58.

Similarly, the Council does not recognise that the site is in a single ownership and there are no ransom issues to prevent development.

Development at this location would support the sustainable growth of Rainford Junction, potentially reduce its role as a satellite settlement and its reliance on Rainford and enable a more diverse spatial distribution of new development in accordance with the Council's strategic obejctives.

- 4.17 Paragraph 2.39 of the GB Review identifies that the "Preferred Development Type, Developable Area and Notional Development Capacity" are also considered in the Stage 2B assessment. In that regard, we can confirm that the land being promoted by The Knowsley Estate has an area of approximately 38.2 acres (15.5 hectares) and a potential capacity of up to 465 new homes.
- 4.18 Conclusion Whilst we acknowledge the presence of Red Delph Woods and the current lack of schooling in Rainford Junction, these are not considered insurmountable constraints to development and indeed the development of new residential development at Rainford Junction could result in

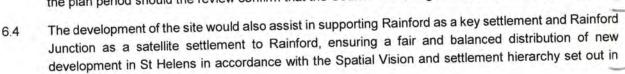
sufficient population to support a new school(s) in the settlement.

4.19 A number of the comments made by the Council in Table 5.4 are incorrect or not appropriately evidenced and hence, we consider the parcel should have been concluded to have good potential for development, afforded an overall score of 6 and allocated for residential development in the draft Local Plan, or at least safeguarded for development.



6.0 Conclusion

- 6.1 These representations have demonstrated that there is a clear case for considering supporting the release of the land identified in Figure 1 from the Green Belt and allocating, or safeguarding, for residential development.
- The delivery of up to 843 new homes at the site would make a significant and necessary contribution towards the Council's housing need, which as set out in Section 2, should be significantly higher to account for the Council's significant economic growth aspirations.
- Policy LPA06 should be revised to clearly identify a review mechanism of at least once every 5 years to accord with paragraph 33 of the NPPF and allow safeguarded sites to be brought forward earlier in the plan period should the review confirm that the Council are failing to meet their housing needs.



- 6.5 The land presents appropriate and logical locations for development, adjacent to the settlement edge, without causing harm to the wider landscape or threatening the wider Green Belt.
- We consider that the Council incorrectly scored the sites at Stage 2B of the GB Review and should not have discounted the sites at Stage 3. Our own assessment of the parcels demonstrates their capacity for development and as a minimum, that they should be identified as safeguarded housing land.
- 6.7 We consider that the release of the site from the Green Belt is wholly justified as the scheme will deliver a high-quality residential environment, with significant associated socio-economic benefits. The development has a willing landowner, with experience and expertise of partnering with willing developers to bring forward the delivery of new homes.
- 6.8 In summary:

Policy LPA02.

- The site is extremely well-located for access to a range of public transport options;
- The site is not subject to any significant technical constraints;
- The development will deliver high-quality market and affordable homes;
- The development would contribute towards meeting the Council's housing land supply, at a time when there is an identified requirement to release land from the Green Belt;
- The proposed development would deliver economic benefits through increased local spend from new residents; job creation during the construction phase; and monies to the Council through Council Tax;
- The release of the sites from the Green Belt would not prejudice the preservation of the wider parcel as they are well-enclosed with strong defensible boundaries to all directions; and
- The land owner is willing and available to deliver homes in the short, medium and long term.
- The development of the land parcels is strongly considered to comprise sustainable development and accord with national and local planning policy. Development can be sensitively designed and mitigated to ensure there are no significant adverse impacts and the desktop review has not identified any insurmountable technical constraints to the delivery of housing. The sites are available, suitable and

achievable for residential development and we therefore ask the Council to afford strong consideration to the release of these sites from the Green Belt, either for an allocation or safeguarding.

PO3803

FORMER HSOSSIR Page 1 of 2

GBP_078

EL0227



Representations to Submission Draft St Helens Local Plan on behalf of Muller Property Group

Helen Binns

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:14

1-LPAOS

6)-GRENI

3) LPAOS.1 4) - LPAOB

3) LEADS TABLE

5 Attachments







Site Location Plan.pdf Representations form - Part A and B.pdf 13-03-2019 Site Assessment Document.pdf



13-03-2019 St Helens Council - Representations to Submission Draft St Helens Local Plan.pdf



CLO1902_Clockface Comparative Study_Final Report_LR.pdf

Dear Sir / Madam

Please find attached representation to the Submission Draft St Helens Local Plan on behalf of our client Muller Properties Group.

Our submission comprises the following:

- · Covering letter;
- Representations form parts A and B combined;
- · Site location plan;
- · Site Assessment Document; and
- · Comparative Sites Study

I would be grateful of confirmation of receipt of this emails.

Kind regards

Helen

Helen Binns
Principal Consultant
Walsingham Planning
Brandon House, King Street, Knutsford, WA16 6DX



Our Ref: MK/KN0024/19

13th March 2019

Local Plan Team St. Helens Council Town Hall Victoria Square St. Helens Merseyside WA10 1HP Brandon House, King Street, Knutsford, Cheshire WA16 6DX

Web: www.walsinghamplanning.co.uk

Dear Sir/ Madam

Submission Draft - St Helens Borough Local Plan 2020 -2035

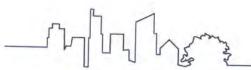
Following detailed consideration of the Submission Draft Local Plan, together with relevant supporting documents, we are instructed by Muller Property Group to make representations on their behalf to the draft Plan. Our client considers the draft Plan and in particular, Policy LPA05, LPA05. I and LPA06 to be unsound and specifically, not justified, not effective and inconsistent with government guidance contained in the NPPF.

In order to make the Plan sound we consider that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be deleted from the Green Belt and allocated for housing under Policy LPA05 Table 4.5 and Policy LPA05.1. Please find appended to this letter a site location plan identifying the extent of the site to be allocated. In the event that the Council consider that there are more suitable sites to allocate for housing to meet housing need over the Plan period, we are of the view that the site should be designated as safeguarded land under Policy LPA06 Table 4.8. Our reasons for this are set out below.

Housing Requirement

Policy LPA05 sets out a housing requirement of 9,234 dwellings for St Helens for the Plan period 2016 -2035. With a residual requirement of 7,245 dwellings, taking account of expected housing completions to April 2020. Table 4.6 which accompanies Policy LPA05 indicates that the Council anticipate the residual housing requirement being met by 5,550 dwellings from sites identified in the SHLAA (of which four sites are proposed to be allocated for housing with a total capacity of 2,029 dwellings) and 2,056 dwellings from six sites removed from the Green Belt and allocated for housing.

The Plan thus proposes that circa 73% of the housing requirement for the Plan period will come from SHLAA sites, of which only 27% are allocated sites, with another 27% of the housing requirement being met by sites removed from the Green Belt and allocated for housing. This means that the Council are reliant upon 46% of their total housing requirement for the Plan period coming from unallocated SHLAA sites.



Government guidance contained at paragraph 67 of the NPPF requires that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. It is our view that such a heavy reliance on unallocated sites contained in the SHLAA means that the Council are unable to robustly demonstrate a sufficient supply of available, suitable and viable sites. The Plan is therefore unsound on account of it being contrary to government guidance contained in the NPPF.

0

It is also worthy of note that the Plan fails to demonstrate a mix of different sizes of site. Indeed, the Plan fails to allocate any sites with a capacity of less than 180 dwellings and seven of the ten sites allocated for housing have an indicative capacity of 350 dwellings or more. This is entirely contrary to paragraph 67 of the NPPF as well as paragraph 68, which requires that LPA's "identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing equipment on sites of less than 1 hectare".



The Council's strategy appears to be to allocate a small number of large sites rather than a larger number of sites of varied scales. This approach is in our view unsound as it is contrary to advice contained in the NPPF and it is not justified. We also question the effectiveness of the Plan on the basis of its ability to deliver the Local Plan housing requirement. Such an over reliance on large sites raises questions about how quickly these sites can be delivered bearing in mind they are more likely to be subject to infrastructure constraints and technical issues.



In order to address these issues, we are of the view that there is a need to allocate an increased number of sites for housing and that the additional allocations should comprises smaller sites of up to 150 dwellings. Such sites are less likely to be subject to constraints that will delay development and will ensure the delivery of new housing in the early part of the Plan, thus safeguarding against issues of under delivery. It is considered that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be removed from the Green Belt and allocated for housing.



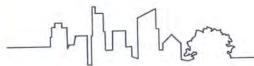
Housing Allocations

Policy LPA05 (including Table 4.5) and LPA05. I set out the Council's proposed housing allocations for the Plan period up to 2035. The policy proposes ten housing allocations. Four allocations in the urban area (3HA, 6HA, 9HA and 10HA) and six allocations which comprises land which it is proposed to remove from the Green Belt and allocate for housing (1HA, 2HA, 4HA, 5HA, 7HA and 8HA). The Council consider the removal of land from the Green Belt to be necessary in order to meet the Plan housing requirement, as there is insufficient land within the urban area to accommodate identified needs.



The Council's approach is considered sound, insofar as there is a clear and evidenced need to identify land for removal from the Green Belt in order to achieve the amount of housing required over the Plan period. Identified capacity within the urban areas of the Borough is clearly insufficient to meet the specified need and St Helens contains no land that is outside of both the urban area and Green-Belt (the Green Belt being tightly drawn around the established built up area). However, the Green Belt Review itself and the methodology adopted to determine which sites should be removed from the Green Belt (both for housing allocations and safeguarded land) is considered to be flawed and entirely unsound. This has resulted in housing and safeguarded land allocations that are unsounded and are not justified, not effective and inconsistent with government guidance contained in the NPPF.





A detailed examination of the Green Belt Review shows that there were four stages to the process of selecting sites for allocation (both housing and safeguarded land). Stage I involved assessing sites against three of the five purposes of including land in the Green Belt as set out in the NPPF. Work undertaken at Stage I appears sound, including the reasons for not assessing land against purpose four and five. Stage 2A involved excluding sites with clear constraints that would either entirely prohibit development or severely restrict it (by more than 2/3 of the site area). Work undertaken at Stage 2A appears on the face of it also to be sound.

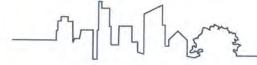
Significant issues arise however at Stage 2B and it is from this point onwards that the document and the resultant assessment of individual sites becomes fundamentally flawed and it becomes an unsound basis on which to formulate development plan allocations. Indeed, we have examined a number of Green Belt Reviews and have never seen one that adopts such a methodology whereby a decision on which sites are carried forward or rejected are made with only a limited amount of desk-based information, no specialist / technical input or assessments and using a tick box checklist and officer interpretation.

It appears to be the case that at Stage 2B, sites are considered against a list of criteria which provide an assessment of a site's suitability, availability and viability for housing development, together with its accessibility. Such an assessment is not standard practice for a Green Belt Review and seems to go beyond the scope of what such a review is intended to do. Notwithstanding this fact, the assessments are in our view fundamentally flawed as they are not based on any robust technical information or assessments, which has resulted in incorrect conclusions being reached in respect of some sites. These sites have as a consequence, then scored lowly in Stage 2 and incorrectly determined to have limited development potential. Furthermore, all sites that reach Stage 2 have been classified according to the result of the Stage 2B assessment as having either good, medium or limited development potential (with a score of 3, 2 or 1). The Green Belt Review provides no explanation as to how these different scores are reached, meaning that it is impossible to know why a site has a particular score and in particular, a low one.

The effect of Stage 2B being unsound is that sites that make little or no contribution to the five purposes of including land in the Green Belt and that are suitable, available and viable for housing development to meet identified need have not been allocated for housing.

Land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) is one such example and a parcel of land that we consider should be removed from the Green Belt and allocated for housing. In terms of its contribution to the purposes of including land in the Green Belt, the site is assessed as making "little or no contribution to the 3 purposes assessed as part of the review. The site is well contained with strong boundaries and does not form part of the wider strategic gap". In terms of Stage 2A, the site is considered to pass as it contains no constraints that will prohibit or severely restrict development.

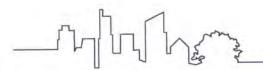
With regard to Stage 2B, the site scores poorly (I out of 3) and is deemed to have limited development potential. The reasons for this seem to relate to a number of constraints that have been identified by the Council. We disagree very strongly with the assessment and its conclusions, particularly as it is clear that there are no technical assessments or information to support the Council's conclusions, which appear to be based entirely on personal opinion and a limited amount of desktop constraints work. Contrary to the views of the Council, we consider that the site has good development potential and furthermore, could deliver new development (circa 150 dwellings) within the next five years / early part of the Plan period.



Looking in more detail at the Council's assessment, a number of specific constraints / issues are identified. These are considered in turn below:

- Substantial buffer to the M62 to provide protection for noise and air quality will adversely impact on developable area There is scope to provide a significant buffer between any new housing and the M62 to address noise and air quality concerns without compromising housing numbers. It is considered that even with a buffer the site could still accommodate circa 150 dwellings. Furthermore, it is not uncommon to find housing developments adjacent to motorways and indeed, there are a number of such examples along the M62 corridor between the M6 junction and Liverpool. It is also worth noting that the site is not in an Area Quality Management Area.
- The site has no physical boundary on the ground and any boundary would be artificial based on noise mapping. This would be contrary to paragraph 139 of the NPPF, which in respect of Green Belt boundaries states that plans should "define boundaries using physical features that are readily recognisable and likely to be permanent" it is intended that the entire parcel of land to the boundary with M62 is removed from the Green Belt and allocated for housing. The motorway is a physical and permanent feature and makes a strong and defensible Green Belt boundary which will endure over time. Indeed, there would be no logic in defining a Green Belt boundary based on land ownership. Equally, there is no reason why a proposed allocation cannot include land in the control of more than one party. Our client's intention would be to provide any noise and air quality mitigation within the site, however they would equally be willing to work with the owner of the adjacent parcel of land to bring forward a larger and more comprehensive development.
- Water main, sewage pumping main and easements our client is aware of a water main and sewage pumping main within the site both of which have associated easements. With regard to the water main, its location in the southeast of the site and the extent of its easement is unlikely to constrain development. With regard to the sewage pumping main, whilst this is likely to influence the layout of the site, its location and the extent of the easement will not significantly impact on the capacity of the site. There may also be scope to divert it. With regard to the electricity cable, this could be diverted if required.
- Whilst access is possible via Clock Face Road, a secondary access would be difficult to achieve there are a number of options with regard to access to the site. There is an existing established means of access to the site off Clock Face Road to the north via Sweet Brier Court. There is also established means of access directly to the south of properties on Bridge Road. There may additionally be scope to bring an access road from the existing residential area to the west of Clock Face Road. However, dependent upon the number of dwellings proposed, it is not necessarily the case that development would require more than one means of access particularly, if there were a secondary emergency access.

Notwithstanding the information above, in order to assist the Council in re-appraising the site in light of our comments above, we have carried out a detailed assessment of the site in terms of its availability, suitability and viability which is appended to this letter. It shows that the site is developable and could deliver a significant number of dwellings.



PO3804



St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/03/2019 16:15

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc:

4 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf



Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike Director



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RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/03/2019 16:16

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc:

1 Attachment



Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike

Director

Turley



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From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk

Cc: Richard Knight

Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

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I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards



RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/03/2019 16:17

Cc

"Richard Knight

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc: "Richard Knight

1 Attachment



Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike Director

Turley
1 New York S



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From: Andrew Bickerdike Sent: 13 March 2019 16:16

To: planningpolicy@sthelens.gov.uk

Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and

Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk



Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/05/2019 15:55

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf



Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike Director



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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/05/2019 15:56

Hide Details
From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments









Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike Director

Turley
1 New York Street
Manchester M1 44



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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards



RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 16:57

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike Director

Turley

1 New York Street Manchester M1 4HD



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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

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Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

13 May 2019

Delivered via email

Team Leader Planning Policy Team St Helens Council St Helens Town Hall St Helens WA10 1HP

Turley EL0228/01.41 Policies: LPA 04 105,06 Sites 1ES, 2ES GBP-036, GBP-0539 SA Green Belt Review SHLAA e EVA

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN - REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD

PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development as an alternative to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street Manchester, M1 4HD T 0161 233 7676 turley.co.uk

Turley

- 1. Land north east of Junction 23 c.42ha being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North
- 2. Land south east of Junction 23 c.36ha being promoted for logistics uses in the longer term, known as Haydock Point South
- Land south west of Junction 23 c.32.4ha being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site¹ for employment uses and the (majority of) the Haydock Green site² for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

¹ Policy LPA04; Ref EA4

² Policy LPA05; Ref HA10



- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and
 the spatial strategy identified as the most sustainable through the SA process, reflected in an over
 provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most
 notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing
 and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most
 sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough



including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when
 considered on a collective basis, evidently do not achieve an effective colocation between residential and employment development as intended by the
 PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units
 over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

Turley

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely



Andrew Bickerdike

Director



Web Reference Number	WF0080	
Type of Submission	Web submission	
Full Name	c/o agent c/o agent	
Organisation	Peel Holdings (Land and Property) Ltd	
Address	c/o agent c/o agent	
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD	

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

Yes (via e-mail)

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

Policy		
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents	Green Belt Review	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

See representation reports submitted via email and specifically sections 3, 5 and 9 of Paper 1

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

See section 11 of Paper 1

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:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:41:59 PM	
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Web Reference Number	WF0088	
Type of Submission	Web submission	
Full Name	c/o agent c/o agent c/o agent	
Organisation	Peel Holdings (Land and Property) Ltd	
Address	c/o agent c/o agent	
Agent Details	Mr Andrew Bickerdike	-
	Turley	
	1 New York Street	
	Manchester, M1 4HD	

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

Yes (via e-mail)

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

Policy	LPA06 (land safeguarded for housing)
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.

See representations reports submitted via email, specifically section 8 of Paper 1

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

See section 11 of Paper 1

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:

Representations raise matters of strategic significant to the soundness of the Local Plan

Response Date	3/13/2019 12:26:59 PM
TARREST CONTRACTOR OF THE PROPERTY OF THE PROP	

Web Reference Number	WF0092	
Type of Submission	Web submission	
Full Name	c/o agent c/o agent c/o agent	
Organisation	Peel Holdings (Land and Property) Ltd	
Address	c/o agent c/o agent	
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	
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

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.

See representation reports submitted via email, including section 5 and 11 of Paper 1

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

See section 11 of Paper 1

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:

Representations raise issues of strategic significant to the soundness of the Local Plan

Response Date	3/13/2019 12:16:34 PM	

Web Reference Number	WF0093	
Type of Submission	Web submission	
Full Name	C/O agent C/O agent c/o agent	
Organisation	Peel Holdings (Land and Property) Ltd	
Address	c/o agent c/o agent	
Agent Details	Mr Andrew Bickerdike	
	Turley	
	1 New York Street	
	Manchester, M1 4HD	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	
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

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See representations submitted by email and specifically sections 3, 4 and 11 of Paper 1

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

See representations submitted by email and specifically sections 3, 4 and 11 of Paper 1

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Yes, I wish to participate at the oral examination

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

Representations raise matters of strategic relevance to the soundness of the Local Plan

Response Date	3/13/2019 12:13:41 PM	

EL0228/01-12 810228/18-20 EL0228/23-41 (EL0228/13-17 -21-22 in Papers 2 and 3)

Policies LPA 04, Sites 185,285 9RP 036, 9RE 053

Review, SHCAAL

EVA

St Helens Borough Local Plan 2020 - 2035 SA, Grean Oet

Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

needs, and therefore accepts that there are exceptional circumstances, demonstrates acceptance by the Council of the site's suitability and ultimate deliverability.

3.55 Nevertheless, there are aspects of the Council's evidence base that question the suitability of the site, and given Peel's contention that the Plan is unsound in the absence of the site's allocation, it is important to reiterate and demonstrate the suitability and deliverability of the site, which we now address.

03

Location

- As addressed in relation to market appeal above, the site is located adjacent to the M6 motorway and A580, with ability to access directly on to the A580 and access to the M6 (both directions) via Junction 23. The site therefore has excellent connections, with the ability to make onward connection to the regional motorway network (M62/M58/M61) and to major urban centres and facilities across the North West, including the Port of Liverpool.
- 3.57 Whilst lying close to the urban areas of Ashton in Makerfield, Newton le Willows, Golborne and in particular Haydock, with the ability to provide accessible employment opportunities for those communities, there is adequate separation from sensitive residential receptors to support large scale industrial uses.

Green Belt

- 3.58 The site is evaluated within the GBR as part of a wider land parcel including land to the North West (Parcel ref. GBP_033) which informs many of the conclusions of the assessment against Green Belt purposes. The overall evaluation score attributed to the parcel is 'high'²², i.e that it makes a high contribution to Green Belt purposes. Against only one of those purposes, purpose 2 preventing neighbouring towns merging is the contribution found to be 'high', with recognition of the strong defensible boundaries of the parcel and its strong containment contributing to lower scores against other purposes. Those boundaries are only slightly weakened (in respect of the north western section) when one considers the Haydock Point North itself; there remain strong boundaries around most of the site. The GBR considers that the development of the parcel would likely lead to unrestricted sprawl. However, given the presence of those boundaries, and the definition they can provide over the long term, that assertion is untenable.
- 3.59 The principal concern, leading to the 'high' score, is that the development of the parcel would lead to the physical merging of Haydock and Ashton-in-Makerfield and would significantly reduce the scale and integrity of the gap between Haydock and Golborne. Whilst it is accepted there would be a reduction in the gap between Haydock and both Ashton-in-Makerfield and Golborne, the development of the site (as opposed to the assessed parcel) would not lead to the merging of Haydock and Ashton-in-Makerfield and a significant gap would still remain between the expanded area of Haydock and those settlements, contained by defensible boundaries (reinforced as necessary in the north west). We consider therefore that the overall conclusion of 'high' is a product of the methodology applied, and that the contribution of the site (rather than a broader parcel) is overstated, particularly given its level of containment.

24

Green Reit Review

05

²² As presented in Appendix C, pages 256-258

PO3805



St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/03/2019 16:15

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc:

4 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 1 Overarching Representation.pdf



Peel Holdings representations to St Helens PSLP March 2019 Paper 2 Assessment of Housing Need.pdf



Peel Holdings representation to the St Helens PSLP Paper 3 Assessment of housing land supply.pdf

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

Separate representation forms have been submitted via the Council's online system.

I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards

Andrew Bickerdike Director



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Manchester, M1 4HD. Terms and Conditions



RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/03/2019 16:16

Cc:

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc:

1 Attachment



Paper 1 Appendices 1 to 3.zip

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

Andrew Bickerdike

Director

Turley



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From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk

Cc: Richard Knight

Subject: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd

Importance: High

On behalf of my client, Peel Holdings (Land and Property) Ltd, I am pleased to enclose representations to the St Helens Proposed Submission Draft Local Plan.

The cover letter addressed to outlines the component parts of the representations.

Please note that appendices to Paper 1 will follow under separate email cover due to file size restrictions.

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I would kindly request confirmation of receipt of the attached representations at your earliest convenience.

Kind regards



RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and Property) Ltd Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/03/2019 16:17

Cc

"Richard Knight

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Cc: "Richard Knight

1 Attachment



Paper 1 Appendices 4 to 6.zip

Paper 1 Appendices 4 to 6 now also attached.

Kind regards

Andrew Bickerdike Director

Turley
1 New York S



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This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions

From: Andrew Bickerdike Sent: 13 March 2019 16:16

To: planningpolicy@sthelens.gov.uk

Subject: RE: St Helens Local Plan - proposed submission draft representations by Peel Holdings (Land and

Property) Ltd

Further to my email below, please find attached Paper 1 Appendices 1 to 3.

Kind regards

From: Andrew Bickerdike Sent: 13 March 2019 16:15

To: planningpolicy@sthelens.gov.uk



Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

planningpolicy@sthelens.gov.uk 13/05/2019 15:55

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

2 Attachments



Peel Holdings representation to St Helens Proposed Submission Draft Local Plan - cover letter and summary 13 May 2019.pdf



Peel Holdings representations to St Helens PSLP May 2019 Revised Paper 1 Overarching Representation.pdf

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

Andrew Bickerdike Director



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RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk

13/05/2019 15:56

Hide Details
From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

4 Attachments









Appendix 1a.pdf Appendix 1b.pdf Appendix 1c.pdf Appendix 2.pdf

Further to my email below, please find attached Appendices 1 to 2 to Paper 1

Andrew Bickerdike Director

Turley
1 New York Street
Manchester M1 44



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From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards



RE: Representation to Pre-submission Local Plan on behalf of Peel Holdings Andrew Bickerdike

to:

planningpolicy@sthelens.gov.uk 13/05/2019 16:57

Hide Details

From: Andrew Bickerdike

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



Paper 1 Appendix 7.pdf

Further to my email below, please find attached Appendix 7 to Paper 1.

The remainder of the Appendices (1 to 6) were provided as part of representations submitted on 13th March.

Kind regards

Andrew Bickerdike Director

Turley

1 New York Street Manchester M1 4HD



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This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Turley bank account details will not change during the course of an instruction and we will never change our bank account details via email. If you are in any doubt, please do not send funds to us electronically without speaking to a member of our team first to verify our account details. We will not accept liability for any payments into an incorrect bank account. Turley is a trading name of Turley Associates Ltd, registered in England and Wales Registered No 2235387 Registered Office 1 New York Street, Manchester, M1 4HD. Terms and Conditions

From: Andrew Bickerdike Sent: 13 May 2019 15:56

To: planningpolicy@sthelens.gov.uk

Subject: Representation to Pre-submission Local Plan on behalf of Peel Holdings

Please find attached correspondence and a revised 'Paper 1' relating to the above.

Appendices to Paper 1 will follow under separate cover.

Please note that the attached Paper 1 replaces the Paper 1 submitted on behalf of Peel Holdings on 13th March 2019. This is detailed within the attached covering letter. The remainder of my client's representation remains as per the submission made on 13th March comprising Papers 2 and 3 and associated appendices.

Please kindly confirm receipt of the attached documents.

Kind regards

13 May 2019

Delivered via email

Team Leader
Planning Policy Team
St Helens Council
St Helens Town Hall
St Helens
WA10 1HP

Turley
EL0228/01-41
Policies
LPA04/05,06
Sites IES, 2ES
GBP-036, GBP-0539
SA Green Belt Review
SHLAA e EVA

Dear

ST HELENS PROPOSED SUBMISSION DRAFT LOCAL PLAN – REPRESENTATIONS BY PEEL HOLDINGS (LAND AND PROPERTY) LTD

PEEM2091

On behalf of my client Peel Holdings (Land and Property) Ltd, I am pleased to enclose a further representation to the Proposed Submission Draft St Helens Local Plan (PSLP).

UPDATE - The enclosed representation (Paper 1) replaces the original Paper 1 submitted to the Council on 13th March. Alongside the comments provided in the original Paper 1, the revised paper presents a case for the allocation of my client's landholdings at Haydock Green for logistics development **as an alternative** to its allocation for housing development in the event that the latter is not taken forward by the Council or Local Plan Inspector as part of the progression of the Local Plan. The remainder of my client's representation, as made on 13th March, is unchanged and is not resubmitted as part of this further representation.

Peel's representation is sets out in three separate reports. This includes an overarching representation (Paper 1) which considers the suitability of Peel's land interests for allocation, the employment land requirement and supply and the spatial distribution of housing land; an assessment of housing needs (Paper 2); and an assessment of the developable housing land supply (Paper 3).

A total of twelve representation forms have been submitted separately via the Council's online system. Eleven were submitted on 13th March with a further form submitted on 13th May.

The representations are made in the context of Peel's land and investment interests in the Borough and its position as one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major land interests across the North West and has been actively investing in regeneration and growth in the North West for many years.

The Council will be aware that Peel's key land interests in the Borough are located around Junction 23 of the M6 at Haydock in the east of the Borough. In summary the land it is promoting for development comprises:

1 New York Street Manchester. M1 4HD T 0161 233 7676 turley.co.uk

Turley

- 1. Land north east of Junction 23 c.42ha being promoted for the delivery of large scale logistics units in the plan period, known as Haydock Point North
- 2. Land south east of Junction 23 c.36ha being promoted for logistics uses in the longer term, known as Haydock Point South
- Land south west of Junction 23 c.32.4ha being promoted for housing development or, alternatively for logistics (employment) development in the plan period, or as safeguarded land to meet development needs beyond the plan period, known as Haydock Green

Peel has promoted this land through all stages of the Local Plan to date and has positively engaged with St Helens Council ("the Council") throughout this process as a partner intent on helping to deliver sustainable growth for the Borough. Peel's promotion of its land holdings is based upon strong market interest for the development of the above parcels.

Peel was largely supportive of the Preferred Option Local Plan ("POLP") issued for consultation in December 2016. This version of the Local Plan sought to provide a positive planning framework for the Borough and successfully balanced regeneration and sustainable growth of its built up areas; it sought to take advantage of the Borough's locational and infrastructure credentials by identifying a flexible and responsive supply of employment land; and provided housing land capable of meeting needs and sustaining the Borough's economic growth.

The POLP proposed the allocation for development within the Plan period of the (majority of) Haydock Point North site¹ for employment uses and the (majority of) the Haydock Green site² for housing.

In the context of what was expected to be an emerging positive local planning policy framework and with the express encouragement of the Council, Peel has advanced a planning application for the Haydock Point North site comprising up to c.1.8m sq ft of logistics development. That application awaits determination, but the vast majority of issues are resolved and it has generated limited objection relative to its scale and significance.

It is Peel's position that the PSLP now represents a serious retrograde step. The PSLP notably reduces both the employment land requirement and the housing requirement; it consequently reduces the amount of land allocated for both employment and housing and the amount of land to be released from the Green Belt for this purpose. This will serve to seriously constrain the economic potential of the Borough and the contribution it makes to the economy of the Liverpool City region. It will fail to adequately meet housing needs and provide housing choice, with consequential adverse social and economic effects.

In a reversal of the position in the POLP, the PSLP now proposes to only safeguard the (majority of) Haydock Point North site for employment development beyond the Plan period and to maintain the Haydock Green site as Green Belt. It is however noted that this is an acceptance that exceptional circumstances arise to remove Haydock Point North from the Green Belt.

Peel's representations set out a strong objection to the PSLP on soundness grounds. It demonstrates, through evidenced analysis, that:

- The PSLP housing requirement is too low based on a proper assessment of objective needs;
- The PSLP employment land requirement is too low based on a proper assessment of objective needs;

¹ Policy LPA04; Ref EA4

² Policy LPA05; Ref HA10



- The amount of land safeguarded for employment development is too low considered against the requirement to ensure the Green Belt endures over the long term;
- The PSLP's housing strategy does not make sufficient provision to safeguard against the risk of under delivery of the identified housing land supply over the plan period. This is itself a high risk in St Helens due to historic under delivery, identified site specific constraints and marginal viability of much of the supply;
- An unbalanced distribution of housing land is proposed, contrary to the stated objectives of the PSLP and
 the spatial strategy identified as the most sustainable through the SA process, reflected in an over
 provision within and on the edge of the St Helens Core Area at the expenses of other settlements, most
 notably Haydock / Blackbrook;
- The PSLP does not achieve an effective physical co-location of housing and employment land (both existing
 and proposed) contrary to the stated objectives of the PSLP and the spatial strategy identified as the most
 sustainable through the Sustainability Appraisal process;
- The Council has overstated the Green Belt contribution made by Peel's sites at Haydock Green, Haydock Point North and Haydock Point South;
- The Council's assessment of the sustainability of Peel's sites at Haydock Green, Haydock Point North and Haydock Point South through the Sustainability Appraisal process contains a number of factual errors and erroneous judgements, as a result of which the Council has understated the sustainability of these sites to accommodate development over the plan period.

These deficiencies collectively mean that an unsustainable plan, which does not satisfy the requirements of national planning policy, is being pursued by the Council. Most critically, the strategy as presented will constrain the economic growth potential of the Borough and prevent the realisation of the benefits which will result from this; will not deliver sufficient housing (including affordable homes) to meet the need of its current and future population with detrimental social and economic consequences; and will contribute to unsustainable travel patterns through a disconnect between the siting of residential and employment development.

As a result, the PSLP does not satisfy any of the four tests of soundness as evidenced below.

Not positively prepared

The PSLP does not seek to meet the area's objectively assessed needs for housing and employment development

Not justified

The PSLP is informed by a deficient evidence base. This includes the overall approach to the appraisal and selection of sites for allocation, the employment land evidence and the findings of the Green Belt Review and Sustainability Appraisal in respect of Peel's landholdings at Haydock Green, Haydock Point North and Haydock Point South. As a result, the evidence base does not demonstrate that reasonable alternatives, in respect of the total level of housing and employment growth and the selection of sites for allocation, do not represent more sustainable and appropriate strategies

Not effective

The PSLP's spatial strategy and aspirations to achieve the balanced growth of the Borough



including an appropriate co-location of residential and employment development will not be achieved through the mix and distribution of sites selected for residential allocation;

The PSLP will not deliver the proper and full housing and employment requirements of the plan, nor will the sites identified as part of the housing land supply deliver even the sub-optimal level of housing growth sought by the PSLP.

Not consistent with national policy

The PSLP does not meet the requirement for the provision of new homes over the plan period contrary to paragraph 60 of the NPPF. It plans for a level of housing development which is below the proper requirement and has overestimated the delivery of development from the identified housing land supply

The PSLP does not seek to meet the objectively assessed need for employment development over the plan period

The PSLP does not represent a sustainable approach to growth, based on the definition provided within NPPF having regard to:

- Its failure to select sites for allocation for residential development which, collectively, represent a balanced approach to growth based on the findings of the SA process;
- Its decision to select sites for allocation for residential development which, when considered on a collective basis, evidently do not achieve an effective colocation between residential and employment development as intended by the PSLP spatial strategy

In order to resolve these deficiencies and ensure the Plan can processed on a sound basis, the following corrective steps are considered necessary:

- The housing requirement should be increased by a minimum of 2,736 units over the plan period from 486 per annum to 600 per annum (Policy LPA05);
- The residual employment land requirement should be increased by a minimum of 60 ha over the plan period from 215.4 ha to 278 ha (Policy LPA04);
- Additional land should be allocated for housing to deliver at least a further 3,000 residential units
 over the plan period through further Green Belt releases (Policy LPA05.1);
- Additional land should be allocated for housing within the Haydock/Blackbrook area to address the unbalanced nature of the housing land supply as identified.

In the context of the above changes, Peel's representation has demonstrated that its sites around Junction 23 of the M6 represent deliverable and sustainability development opportunities, capable of making a strategic contribution to meeting the Borough's housing and employment development needs and realising unique transport

Turley

and highway benefits without affecting the strategic function of the Green Belt. As a result of the above, the following additional site allocations are needed and will go some way to addressing the soundness issues raised:

- Allocation of land at Haydock Green for residential development during the plan period or, as an alternative, its allocation for employment development;
- Allocation of land at Haydock Point North for employment development during the plan period;
- Allocation of land at Haydock Point South as safeguarded land to meet employment land requirements beyond 2035.

It is Peel's position that the PSLP is highly likely to be found unsound at examination if these issues are not addressed. The resultant risk to the progression of the plan and the threat to the timely delivery of the critical development needs of the Borough is high.

We would welcome the opportunity to discuss further the issues raised in Peel's representations to the PSLP and the means by which the necessary steps can be taken to address the critical points of soundness prior to the PSLP's submission for examination.

Yours sincerely



Andrew Bickerdike

Director



Web Reference Number	WF0080	
Type of Submission	Web submission	
Full Name	c/o agent c/o agent	
Organisation	Peel Holdings (Land and Property) Ltd	
Address	c/o agent c/o agent	
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD	

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

Yes (via e-mail)

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

Policy		
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents	Green Belt Review	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

See representation reports submitted via email and specifically sections 3, 5 and 9 of Paper 1

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

See section 11 of Paper 1

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:

Representations raise matters of strategic significance to the soundness of the Local Plan

Response Date	3/13/2019 12:41:59 PM	
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Web Reference Number	WF0088	
Type of Submission	Web submission	
Full Name	c/o agent c/o agent	-
Organisation	Peel Holdings (Land and Property) Ltd	
Address	c/o agent c/o agent	
Agent Details	Mr Andrew Bickerdike	-
	Turley	
	1 New York Street	
	Manchester, M1 4HD	

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

Yes (via e-mail)

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

Policy	LPA06 (land safeguarded for housing)
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.

See representations reports submitted via email, specifically section 8 of Paper 1

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

See section 11 of Paper 1

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:

Representations raise matters of strategic significant to the soundness of the Local Plan

Response Date	3/13/2019 12:26:59 PM
TARREST CONTRACTOR OF THE PROPERTY OF THE PROP	

Web Reference Number	WF0092
Type of Submission	Web submission
Full Name	c/o agent c/o agent
Organisation	Peel Holdings (Land and Property) Ltd
Address	c/o agent c/o agent
Agent Details	Mr Andrew Bickerdike Turley 1 New York Street Manchester, M1 4HD

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	
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

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.

See representation reports submitted via email, including section 5 and 11 of Paper 1

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

See section 11 of Paper 1

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:

Representations raise issues of strategic significant to the soundness of the Local Plan

Response Date	3/13/2019 12:16:34 PM	

Web Reference Number	WF0093	
Type of Submission	Web submission	
Full Name	C/O agent C/O agent c/o agent	
Organisation	Peel Holdings (Land and Property) Ltd	
Address	c/o agent c/o agent	
Agent Details	Mr Andrew Bickerdike	
	Turley	
	1 New York Street	
	Manchester, M1 4HD	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	
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.

See representations submitted by email and specifically sections 3, 4 and 11 of Paper 1

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

See representations submitted by email and specifically sections 3, 4 and 11 of Paper 1

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:

Representations raise matters of strategic relevance to the soundness of the Local Plan

Response Date	3/13/2019 12:13:41 PM	

EL0228/01-12 810228/18-20 EL0228/23-41 (EL0228/13-17 -21-22 in Papers 2 and 3)

Policies LPA 04, Sites 185,285 9RP 036, 9RE 053

Review, SHCAAL

EVA

St Helens Borough Local Plan 2020 - 2035 SA, Grean Oet

Submission Draft

Representation by Peel Holdings (Land and Property) Limited

Paper 1: Overarching representation

May 2019

Turley

Sensitive Uses

The presence of the residential care facility at the centre of the site does not represent 5.19 an overriding or significant constraint to development. The presence of the facility can be fully taken in to account by creating a sensitive landscape setting, locating lower scale buildings in those areas closest to the facility, and orienting buildings to mitigate any noise disturbance.

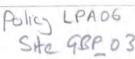
There is one non-designated heritage asset within the site (Drake Lane), and two on 5.20 the immediate boundary (including Haydock Park Farm and Park Cottages). Suitable masterplanning for the site would be able to ensure that there are no detrimental impacts upon the non-designated assets and this will not present a constraint to future development at Haydock Point South.

Summary

Following a review of the Sustainability Objectives that are applicable to employment 5.21 sites, it is evident that Haydock Point South comprises an available and suitable site that is capable of meeting the borough's longer-term employment development needs. The Council's own evaluation clearly undervalues the site in terms of its development potential, without sound evidence to underpin those conclusions.

Green Belt Review

The Green Belt Review (GBR) (December 2018) similarly appraised the land to the 5.22 south east of Junction 23, M6, as a larger parcel of land comprising 73.4 ha (Ref. GBP 036). Peel has therefore appraised Haydock Point South, as an individual parcel of land (c. 36 ha) that is suitable and available for future development, as demonstrated within the table below.



Green Belt Review Table 5.2:

GB Review Score for Site GBP_036 Peel's Contentions

Stage 1A Identification of GB parcels and sub-parcels

Land at Haydock Point South was included within the larger parcel of land comprising 73.4 ha.

As the Green Belt Review also performs the purpose of evidencing site selection, the Green Belt Review should have appraised the land at Haydock Point South on an individual basis (c. 36 ha). The site forms a well-defined parcel of land, bound by the A580 to the north, M6 motorway to the west and deep woodland belts to the east and south.

Stage 1B Assessment of parcels and sub-parcels against GB purposes

1) To check the unrestricted sprawl of large built-up areas:

'Medium - The parcel is dislocated from the urban area. The north west boundary of the parcel lies approximately 650m from the western boundary of the large built-up area of the west, and protected woodland to the east Haydock, the western boundary of the parcel

As acknowledged within the Council's review of the larger site, Haydock Point South is bound by the A580 to the north, the M6 to and south.

GB Review Score for Site GBP_036

lies approximately from 370m from the large built-up area of Newton le Willows and the north eastern boundary lies approximately 170m from the large built up area of Golborne. The parcel is bounded to the north by the A580, to the east by protected woodland, to the west by the M6 and to the south in part by the M6 and Newton Lane. The parcel is therefore well contained. However despite the parcel's containment, the dislocation of the parcel from the urban area coupled with its large size and lack of strong boundaries within it, means that development of the parcel would likely lead to unrestricted sprawl.'

Peel's Contentions

The parcel is therefore well contained, and alongside the delivery of Peel's wider land interests at Haydock Point North and Haydock Green, the development of Haydock Point South would relate well to the urban area, with immediate access to the strategic highway network. Due to the strong boundary features of the site, the development of this land would not lead to unrestricted sprawl and as such should score 'Low' against this purpose.

2) To prevent neighbouring towns merging into one another:

'High - The parcel forms part of a strategic gap between Golborne and Newton le Willows and in part between Haydock and Golborne. Development of the parcel would lead to a significant reduction in the gap between Golborne and Newton le Willows and between the south eastern part of Haydock and the south western part of Golborne.'

Haydock Point South comprises just under half of the area appraised within the GBR (49%) and as such the site does not form such a critical function to preventing neighbouring towns merging into one another. Following development of the site, a substantial strategic gap would remain between Golborne and Newton le Willows, as well as between Haydock and Golborne. Haydock Point South would not harm the overall strategic gap between neighbouring towns and as such should score 'Medium' against this purpose of the GB.

3) To assist in safeguarding the countryside from encroachment:

'Medium - The parcel contains limited inappropriate development and consists mostly of agricultural land and protected woodland that create a countryside character. substantial degree of enclosure due to the have some impact on the countryside character but as you move away from these roads there are open views looking southwards, and on the edge of the parcel looking eastwards, that add to countryside character.'

The proposed release of Haydock Point South from the GB will result in encroachment into the countryside. However there is a The M6 to the west and the A580 to the north site's strong boundary features and there is a relatively limited sense of openness. The site should therefore score 'Low' against this purpose.

Overall Scored 'High' overall against the first three Green Belt purposes.

However, Peel consider that this should be recorded as 'Medium' as the overall score is Overall Haydock Point South should score 'Medium', as in accordance with the GBR methodology.

GB Review Score for Sit	e GBP 036
--------------------------------	-----------

Peel's Contentions

generally equated to the highest of the individual scores against the 3 purposes²⁸.

Stage 2A Identification of parcels and sub-parcels with 'prohibitive' constraints

The site is not identified as having any prohibitive constraints.

Peel concurs with the GBR Assessment at Stage 2A.

Stage 2B Assessment of development potential within remaining parcels and sub-parcels

Identified as having 'Limited' development potential although the evidence base has not been published to demonstrate how this has been assessed.

The site is within single ownership of Peel, a willing landowner with a proven track record of delivering high quality, large scale and sustainable logistics developments. The site comprises of few technical constraints, all of which can be overcome and as such the site should be acknowledged to have 'Good' development potential.

Stage 3 Ranking and review of results

Overall Score: 1 (Tier 7)

Overall Score: 6 (Tier 1)

(Stage 1B Score = 3 and Stage 2B Score = 3)

- 5.23 Peel challenges the methodology that has been adopted to appraise the most suitable land to be removed from the Green Belt to meet the Borough's development needs. From the initial stage of the methodology (Stage 1A), the Council has not suitably identified appropriate parcels and sub-parcels which has subsequently led to inaccurate assessments of land, including Haydock Point South.
- 5.24 Peel has previously promoted the land at Haydock Point South for development and as such the GBR should have acknowledged this land as an individual parcel, not just within the wider assessment of Parcel Ref. GB_036, particularly as the GBR performs the role of a site selection methodology.
- 5.25 As has been identified in Table 5.2, Haydock Point South is defined by strong defensible boundaries, it would maintain a physical and visual separation between settlements in all directions, and the revised Green Belt boundary can form a logical permanent boundary. Therefore, if the site had been appraised on its own merits, it is evident that the Green Belt review should have reached a different conclusion in respect of its contribution to Green Belt purposes.
- 5.26 The same applies in respect of Stage 2B of the assessment, where it is concluded that the site has 'limited' development potential. The evidence underpinning this conclusion is not provided by the Council and therefore no weight can be applied to it. The evidence referred to above, and contained with the Site Prospectus provided at Appendix 3, runs entirely counter to this evaluation, and demonstrates the suitability and deliverability of the site. With adjustment made to reflect the boundary of the site rather than a wider parcel, and to reflect a more accurate evaluation of the site's

²⁸ Green Belt Review, St Helens Borough Council (December 2018), Paragraph 2.30

development potential, the overall score for the site would have been higher, and in excess of the alternative sites that have been proposed for release from the Green Belt within the PSLP.

- 5.27 Table 6.2 of the GBR provides further justification for discounting Green Belt parcel Ref. GB_036. Peel challenges the justification that has been provided for discounting the land at Haydock Point South, as follows:
 - Highways Capacity: As explained above and in the previous sections of this
 report, the existing highways capacity issues at Junction 23 of the M6 motorway
 should not restrict development of the suitable and available land at Haydock
 Point. The proposed mitigation strategy for the junction has yet to be
 established and as such suitable provision can be made for the development of
 Haydock Point South within that strategy. Indeed, the land could help to realise
 planned improvements, as necessary.
 - Protected Woodland: The supporting studies that have been undertaken confirm that areas of woodland can be retained or where loss is required, mitigated for, within the masterplanning for development of the site.
 - Biodiversity: The findings of studies undertaken for the land confirm that the site has low ecological value. More detailed surveys will be undertaken to inform final development options and any mitigation strategy, just as can be addressed with any allocated site.
 - Air Quality: The key air quality considerations of the development will be
 considered as the proposals for the site progress however given modern vehicle
 standards, it is not envisaged that air quality will pose a constraint to the
 development of the site. As Section 3 notes, no statutory objection has been
 raised in respect of the current application for Haydock Point North in relation to
 air quality; it can be reasonably assumed that Haydock Point South can advance
 on a similar basis.
 - Existing Uses on Site: The residential care unit lies central to the Haydock Point South site, but falls outside of its boundaries. As noted above, and as established within the Site Prospectus for the site, a sensitive landscape setting for the existing care unit will be proposed, with native tree and understorey buffer planting enclosing the northern and eastern boundaries. Lower scale buildings will also be located adjacent to the existing buildings at the centre of the site.
- 5.28 Haydock Point South has been inaccurately assessed and Peel has been able to provide a true reflection of the development potential for c. 36 ha of land to the south east of Junction 23, M6.

Market Potential

5.29 As addressed above, the Council's evidence on 'development potential', which directly informs the scoring of the candidate sites and hence their selection or otherwise, is deficient in that the reasoning for the scoring is entirely absent. However, it is also

10

- considered deficient in its scope, as it fails to recognise the suitability of sites to meet specific market demand.
- 5.30 The template for the assessment of development potential as provided at Appendix F of the GBR does not address market attractiveness. It does not consider how sites may respond to the particular development needs which are identified by the wider evidence base.
- 5.31 This is a serious shortcoming and further undervalues the potential of the Haydock Point South site. The Council recognises within the PSLP and the supporting evidence base the importance of the large scale logistics market for St Helens, and the notable contribution St Helens can make to meeting not only its own employment needs in this sector but those of the wider Liverpool City Region.
- 5.32 The significant advantages and appeal of Haydock Point North in responding to this market, as addressed in Section 3, are also applicable to Haydock Point South. The site's close proximity to Junction 23 and associated direct access to the motorway network, together with the opportunity to introduce buildings of significant scale, set it apart from other locations and potential sites. The site would be highly attractive to prospective occupiers and in the absence of planning policy constraint could be delivered in the short term. The assertion that the site has 'limited' development potential, and the absence of any weight being applied to the site's strong alignment with market requirements, both undermine the legitimacy of the Council's site evaluation and selection process.

Conclusion

- 5.33 Peel is committed to long term investment at Haydock Point and following the delivery of Haydock Point North, the land around Junction 23 of the M6 motorway will comprise a large scale logistics hub, serving St Helens and the wider Liverpool City Region. Haydock Point South is eminently suitable for large scale logistics development and could positively contribute to the Borough's economy by supplementing this offer and creating an employment location of considerable scale and appeal.
- 5.34 The emerging St Helens Local Plan should remove Haydock Point South from the Green Belt, in order to meet the potential long term development needs of the Borough beyond the plan period.
- 5.35 The revised Green Belt boundary would form a logical, permanent boundary and enduring well beyond the plan period. The indicative masterplan contained in the Site Prospectus demonstrates how the site can be delivered, identifying how the few technical constraints on the site can be overcome. Ultimately, Haydock Point South provides an opportunity to create a sustainable extension to Haydock Point North, set in a landscaped setting, directly aligned with market demand.
- 5.36 The site should be designated as safeguarded land for future employment development to address the deficiencies highlighted in the previous section and/or as an alternative to Site 1ES.

PO3806

EL0230



St Helens Local Plan Submission Draft - site specific representations on behalf of Wainhomes NW relating to land off Camp Road and Strong Road, Garswood Nick Scott

to:

planningpolicy@sthelens.gov.uk 13/03/2019 16:17

Cc:



1 Attach....



Land off Camp Road and Strong Road_ Garswood 2019 combined-reduced.pdf

Dear Sir / Madam,

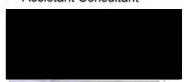
Please find attached, written site specific representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan. These representations relate to their land off Camp Road and Strong Road, Garswood.

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



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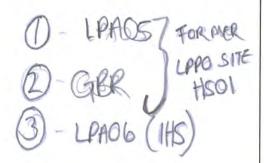


Emery Planning 2-4 South Park Court Hobson Street Macclesfield SK11 8BS

Registered office as above

Emery Planning Partnership Ltd trading as





Land off Camp Road and Strange Road, Garswood

Site-specific representations – St Helens Local Plan Submission Draft

for Wainhomes (North West) Ltd

EP Project Ref: 17-005

Emery Planning 2-4 South Park Court, Hobson Street Macclesfield, SK11 8BS Tel: 01625 433 881 www.emeryplanning.com



3. Proposed allocation

- 3.1 The site is capable of approximately 100 dwellings with a proportion comprising affordable/starter homes in accordance with planning policy requirements. The technical assessments undertaken by Tyler Grange and SCP at EP2 and EP3 provide a sound basis for securing a masterplan that responds well to the surrounding area and contributes to the sustainable growth of this part of Newton-le-Willows.
- 3.2 We would suggest that a site-specific allocation of our client's site as a strategic housing allocation with wording that requires the following:
 - The provision of around 100 homes comprising an appropriate mix of sizes and tenures.
 - The delivery of an element of affordable housing in accordance with planning policy requirements.
 - Appropriate access for vehicular traffic and pedestrians and the submission of a Transport Assessment.
 - Provision of a comprehensive landscaping plan for the retention and enhancement of landscape features such as trees.
 - Contributions to local infrastructure where appropriate and in accordance with planning policy requirements.
- 3.3 Our client's site was previously identified as safeguarded land through Policy LPA6 of the St Helens Local Plan Preferred Options document in 2016 (ref: HS01). We made representations to that public consultation supporting this designation, and also highlighting that the site does not provide a Green Belt function and it is deliverable within the short-term for new housing as a housing allocation subject to release from the Green Belt.

4. Green Belt considerations

4.1 Our client's site has been assessed as parcel reference GBP_29B through the Draft St Helens Local Plan Green Belt Review 2018. It is assessed through the Green Belt Review as having a low contribution in terms of the two identified main purposes of including land within the Green Belt for the purposes of paragraph 134 of the NPPF (i.e. preventing the merging of settlements and preventing urban sprawl), and has medium significance in terms of safeguarding the countryside from encroachment.



- 4.2 The site has been scored overall as having a 'medium' contribution to the main purposes of including land within the Green Belt. This is because the methodology set out through the Green Belt Review states that the highest of the three scores for the 3 identified main purposes of including land within the Green Belt i.e. preventing the merging of settlements, preventing urban sprawl and safeguarding the countryside from encroachment. This categorisation overstates the contribution that our client's site makes to the main purposes of including land within the Green Belt. Notwithstanding this point, we do not understand how the Council has assessed this site as having medium significance in relation to safeguarding the countryside from encroachment.
- 4.3 In terms of preventing urban sprawl, the Assessment states the following:

"The triangular shaped sub-parcel is bounded to the south by Strange Road leading onto Park Industrial Estate, to the north by Spindle Hillock to the east by Camp Road and to the west by a railway line [Wigan to Liverpool main line].

The sub-parcel predominately contains grassland and mature trees run along the northern boundary and the western half of site that screen the railway line to the west and industrial site to the south.

The sub-parcel has strong boundaries to the north, south, east and west and is therefore well contained. The subparcel does not directly adjoin any large built-up areas."

4.4 In terms of preventing towns from merging, the Assessment states the following:

"The sub-parcel broadly contributes, along with GBP_029b, to the physical and visual separation of Garswood and Ashton-in-Makerfield. However a strategic gap between Garswood and Ashton-in-Makerfield could still be maintained if this sub-parcel was released from the Green Belt."

- 4.5 The previously issued 2016 St Helens Green Belt Assessment identified our client's site as parcel GBS_142 and it provided a score of 'Low' with regard to safeguarding the countryside from encroachment. It is not understood what rationale has been used by the Council in upgrading this score to 'Medium' through the 2018 version of the Green Belt Review. Table 2.5 of the Green Belt Assessment 2018 provides guidelines for the scoring criteria for this Green Belt Purpose. 'Low' impact is where sites include one or more of the following:
 - Limited characteristics of the countryside.
 - Substantially affected by existing urban features and/or inappropriate development.



- Substantial degree of enclosure provided by strong boundary features.
- Relatively limited sense of openness.
- 4.6 The above characterises our client's site as acknowledged through the Green Belt Assessment 2016. Indeed, the text in relation to Green Belt Purpose 1 (urban sprawl) states that the site has strong boundaries and is well contained. The site does not enjoy open views given how strongly influenced it is by urban features. There is no justification for upgrading the assessment of the site from 'Low' to 'Medium' impact in relation to safeguarding the countryside from encroachment between the 2016 and 2018 versions of the Green Belt Review.
- 4.7 By way of illustrating the flawed nature of the Council's assessment, land parcel 29_A, which covers an extensive area of open countryside to the east of our client's site, is assessed as having a 'Low' Impact with regard to Green Belt Purpose 3:

"The sub-parcel has strong boundaries to the north, south, east and west and so is well contained. The sub parcel is bordered by the M6 and industrial estate so has limited countryside characteristics."

4.8 It cannot be the case that our client's site (29B on the map below) makes a higher contribution to safeguarding the countryside than the adjacent site which is extensive in size and benefits from open views. It may well be the case that the Council have made an error in the report and that our client's site should have been assessed as 'Low' whilst the adjacent site should have been assessed as 'Medium':





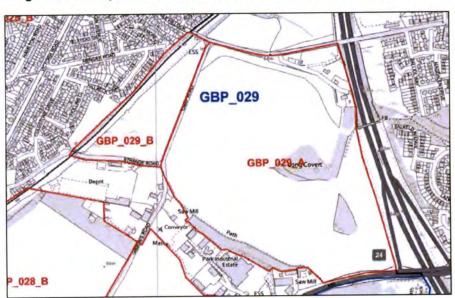


Image: Parcel 29B (our client's site in relation to 29A) taken from GB Review 2018

4.9 We also copy a Google Earth image below, which clearly shows that the adjacent parcel has a greater contribution towards safeguarding the countryside from encroachment when compared to our client's site:



Image: Parcel 29B (our client's site in relation to 29A) taken from Google Earth

- 4.10 As with our previous representations to the Preferred Options consultation in 2016, a site-specific assessment of the existing site has also been undertaken by Tyler Grange with regard to Green Belt and landscape. Their main points in terms of the landscape credentials of the existing site are as follows:
 - Although mostly open and undeveloped, the site character is heavily influenced by the surrounding urban context of residential development, industrial units and railway line infrastructure, which contribute to a more urban fringe character being evident on-site;
 - the railway line and roads form strong boundaries around the site in all directions and this means the site is relatively well-contained physically;
 - in terms of visual receptors, there are two main receptors, namely residential properties and open space to the west and users of Public Footpath SN918 to the south east.
 - fields within the site are a mixture of semi-improved grassland and unmanaged scrub, small in size and irregular in shape;
 - the topography varies with the highest point located to the north west and there is general reduction in elevation southwards with the exception of an area of elevated land to the south west;
 - the settlement of Garswood to the west steadily developed after the development of the railway line with the majority of building occurring during the 1970s;
 - the residential development along Hillbeck Crescent and Hollins Close is partially visible from the site; and
 - industrial units located to the south of the site are partially visible from the site. .
- 4.11 We also provide a summary of the Green Belt assessment undertaken by Tyler Grange with due regard for the main purposes of including land within the Green Belt as set out at paragraph 134 of the NPPF. See the table below:

Main purpose	Summary assessment undertaken by Tyler Grange								
To check unrestricted urban sprawl	The triangular-shaped site is bounded by:								
	 Camp Road to the east; Strange Road to the south with a large industrial estate beyond; Spindle Hillock to the north; Liverpool to Wigan railway line to the west. 								
	These boundaries provide a robust, permanent and defensible edge such that development would not sprawl								



	further in any direction.
To prevent neighbouring towns merging into one another	Development of this site would not result in the coalescence of Garswood and Ashton-in-Makerfield due to the physical separation provided by Camp Road to the east and densely wooded tree belts within the fields beyond. Furthermore, the site area is small and a considerable gap would be retained between Garswood and the M6, which itself provides the most robust boundary to contact Ashton-in-Makerfield to the east.
	The Tyler Grange assessment does not consider that the site makes a 'high' contribution in terms of this main purpose.
Safeguarding the countryside from encroachment	Whilst the open and currently undeveloped nature of the site gives it a somewhat open character, the direct inter-visibility with the residential edge, the adjacent railway infrastructure and industrial units influences the character of the site and limits the extent to which the site can be considered rural or of a countryside character.
	Development of this site would safeguard the countryside from encroachment.
Preserve the setting and special character of historic towns	The site does not play a role in the setting or significance of any historic settlement.

- 4.12 The site-specific assessment undertaken by Tyler Grange demonstrates that this site is suitable for residential development in Green Belt terms. The analysis undertaken by Tyler Grange is informed by fieldwork, an analysis of desktop data sources and an assessment of the visual receptors to development of the site with reference to photoviewpoints. It concludes that the site does not perform any Green Belt functions in terms of preventing settlements merging, preventing urban sprawl, or preventing encroachment on the countryside due to the strong physical and visual containment provided by the residential edge, industrial development and railway line adjoining the site. It is also not considered to have a role in preserving the historic setting of any settlements or landscape features. As such, development of the site would be unlikely to affect the integrity of the wider Green Belt.
- 4.13 Paragraph 135 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The release of Green Belt land for housing development is necessary in order to meet unmet and future housing needs of the Borough as illustrated through our strategic representations on the overall

strategy of the St Helens Local Plan Submission Draft. This comprises exceptional circumstances for the purposes of the NPPF.

4.14 The release of Green Belt land across the Borough should also be seen within the context of the following bullet points of paragraph 136 of the NPPF:

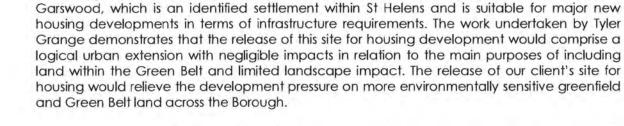
"When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the
 present time. Planning permission for the permanent development of
 safeguarded land should only be granted following a Local Plan review which
 proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."
- 4.15 With regard to the bullet points set out above, the release of our client's site for housing development would help to meet the identified housing requirements for sustainable development. As demonstrated through the work undertaken by Tyler Grange, the revised Green Belt boundary would be delineated by defensible, permanent and readily recognisable features to all sides.
- 4.16 Paragraph 136 of the NPPF states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. We undertake an assessment below of our client's land with regard to the three roles of sustainable development as set out at paragraph 8 of the NPPF:

Economic: New housing development is required across the Borough to include areas of the designated Green Belt in order to ensure that the Borough has a stable workforce in terms of ability and age profile. The construction of new houses would also create construction jobs in the short term, and once occupied, new residents would boost householder spending on goods and services within the surrounding area. New housing development would also generate a New Homes Bonus for the Borough.

<u>Social:</u> Paragraph 8 of the NPPF states that one of the requirements is the supply of housing to meet the needs of present and future generations. The release of our client's site for new housing development would help to ensure that the identified housing needs of the Borough in terms of market and affordable housing are met.

Environmental: The site is highly locationally sustainable with easy and convenient access to a wide range of local services and public transport options. The site is located at the edge of



4.17 The release of our client's site from the Green Belt for new housing development with immediate effect as part of the emerging local plan is considered to be fully justified with due regard for paragraphs 134 to 139 of the NPPF.

5. Masterplan and technical considerations

- 5.1 Our client's site-specific representations are supported by the following technical assessments, which are summarised in this part of our Statement:
 - Landscape, Ecology and Arboricultural Briefing Note (Ref: 10786/R02) (Tyler Grange) see EP2.
 - Highways Technical Note (Ref: DR/17022/TN02) (SCP) see EP3.

Landscape Impact

- The assessment undertaken by Tyler Grange at EP2 is informed by fieldwork, desktop data search and an analysis of the visual envelope of the site and photoviewpoints likely to be affected by the development of our client's site. Their points can be summarised as follows:
 - Although mostly open and undeveloped, the site character is heavily influenced by the surrounding urban context of residential development, industrial units and railway line infrastructure, which contribute to a more urban fringe character being evident on-site:
 - · the railway line and roads form strong boundaries around the site in all directions and this means the site is relatively well-contained physically;
 - in terms of visual receptors, there are two main receptors, namely residential properties and open space to the west and users of Public Footpath SN918 to the south east.
 - · fields within the site are a mixture of semi-improved grassland and unmanaged scrub, small in size and irregular in shape;





PO3807

EL0231



St Helens Local Plan Submission Draft - site specific representations on behalf of Wainhomes NW relating to land off Lords Fold, Rainford Nick Scott

to:

planningpolicy@sthelens.gov.uk 13/03/2019 16:17



1 Attachment



Land off Lords Fold - 2019 combined.pdf

Dear Sir / Madam,

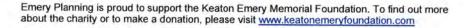
Please find attached, written site specific representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan. These representations relate to their land southeast of Lords Fold, Rainford.

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





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

Emery Planning Partnership Ltd trading as

Registered office as above

Former LAPOHAIL EL 023



(D-LPAOS (2)-GBR

Land off Lords Fold, Rainford

Site-specific representations – St Helens Local Submission Draft

for Wainhomes (North West) Ltd

EP Project Ref: 17-005

Emery Planning 2-4 South Park Court, Hobson Street Macclesfield, SK11 8BS Tel: 01625 433 881 www.emeryplanning.com

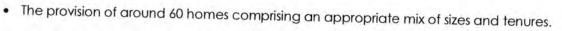


2.4 The site is under option to Wainhomes. It is 'deliverable' for the purposes of the NPPF.



3. Allocation

- 3.1 These representations support the re-instatement of our client's site as a housing allocation through the emerging local plan. This site was previously identified through the St Helens Local Plan Preferred Options document as a housing allocation for 55 dwellings (Policy HA14).
- 10
- 3.2 The technical assessment undertaken by SCP at EP2 demonstrates that access and highways does not represent a constraint to the development of the site. We would suggest that a sitespecific allocation of our client's site through the local plan could be worded as follows:



- The delivery of an element of affordable housing in accordance with planning policy requirements.
- Appropriate access for vehicular traffic and pedestrians and the submission of a Transport Assessment.
- Provision of a comprehensive landscaping plan for the retention and enhancement of the existing trees and the Randle Brook Local Wildlife Site.
- Contributions to local infrastructure where appropriate and in accordance with planning policy requirements.

4. Green Belt considerations

- 4.1 Our client's site has been assessed through parcel reference GBP_10_A of the St Helens Local Plan Green Belt Review 2018. It is assessed through the Green Belt Review as having a low contribution in terms of all three of the identified main purposes of including land within the Draft Green Belt for the purposes of paragraph 134 of the NPPF:
 - 'Check Urban Sprawl' Low contribution.
 - 'Prevent neighbouring towns merging into one another' Low contribution.
 - 'Assist in safeguarding the countryside from encroachment' Low contribution.
- 4.2 The Proforma at Part 1 of the Green Belt Review provides more detailed site-specific commentary on the contribution that our client's site makes to the main purposes of including land within the Green Belt. We copy extracts below:





- "The sub-parcel is well contained by the physical features of Lords Fold and industrial premises to the north-west and north-east; Randle Brook and residential properties to the south-east; and Rainford Brook to the south-west."
- "The sub-parcel does not directly adjoin or lie in close proximity to an identified large built-up area. It is considered insufficient in size to result in substantial sprawl in its own right if released from the Green Belt for development."
- "The sub-parcel lies adjacent to the identified settlement of Rainford but does not fall within a strategic gap between other identified settlements."
- "The sub-parcel in itself contains little inappropriate development; however it is well
 enclosed on three sides by development of a more urban nature limiting the sense of
 openness and affecting any countryside character."
- "The sub-parcel does not perform a significant role in preventing sprawl and in maintaining a gap between identified settlements; high levels of enclosure from existing adjacent development limits its openness and countryside character."
- 4.3 We agree with the findings of the Green Belt Review. The existing site does not perform a Green Belt function and development of the site would not undermine the integrity of the wider Green Belt. Paragraph 136 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The release of Green Belt land for housing development is necessary in order to meet unmet and future housing needs of the Borough. This comprises exceptional circumstances for the purposes of the NPPF.
- 4.4 With regard to paragraph 139 of the NPPF, the release of our client's site for housing development would help to meet the identified housing requirements for sustainable development. The revised Green Belt boundary would be delineated by defensible, permanent and readily recognisable features to all sides.
- 4.5 Paragraph 139 of the NPPF states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. We undertake an assessment below of our client's land with regard to the three roles of sustainable development as set out at paragraph 8 of the NPPF:

Economic: New housing development is required across the Borough to include areas of the designated Green Belt in order to ensure that the Borough has a stable workforce in terms of ability and age profile. The construction of new houses would also create construction jobs in the short term, and once occupied, new residents would boost householder spending on goods and services within the surrounding area. New housing development would also generate a New Homes Bonus for the city-region.





<u>Social:</u> Paragraph 8 of the NPPF states that one of the requirements is the supply of housing to meet the needs of present and future generations. The release of our client's site for new housing development would help to ensure that the identified housing needs of the Borough in terms of market and affordable housing are met.

Environmental: The site is highly locationally sustainable with easy and convenient access to a wide range of local services and public transport options. The site is located at the edge of Rainford, which is an identified settlement within St Helens and is suitable for major new housing developments in terms of infrastructure requirements. The development of the site would comprise a logical urban extension with negligible impacts in relation to the main purposes of including land within the Green Belt and limited landscape impact. The release of our client's site for housing would relieve the development pressure on more environmentally sensitive greenfield and Green Belt land across the Borough.

4.6 The release of our client's site from the Green Belt for new housing development with immediate effect as part of the emerging local plan is considered to be fully justified with due regard for paragraphs 135 to 139 of the NPPF.



5. Masterplan and technical considerations

- 5.1 Our client's site-specific representations are supported by a Highways Technical Note prepared by SCP (Ref: DR/17022/TN01) (see EP2). The main points raised by SCP can be summarised as follows:
 - Access to the site could potentially be taken from Pine Dale with the ability to provide a good standard of access.
 - The site is locationally sustainable with shops and local services being located within 800m of the site and buses with links to Rainford Train Station, St Helens, Aston-in-Makerfield and Garswood running every 30 minutes along the B5203.
 - A number of key destinations can be reached from Rainford Train Station, which is within walking distance, with Liverpool being 30 minutes away.
 - Rainford Primary School and Rainford Technology College are within 1km of the site with safe and convenient footway provision between these educational facilities and the site.
 - There are no obstacles to the successful delivery of residential development on this site.
- 5.2 There is no question as to whether a safe and appropriately access can be secured via Pine Dale. In terms of deliverability, our client has full control over one of the residential properties along Pine Dale and there is no uncertainty as to whether this access arrangement can be delivered within the short-term.



Local Plan evidence base with regard to site constraints

- 6.1 Our client's site has been subject to the site selection process set out through the St Helens Green Belt Review 2018:
 - Step 1: All parcels assessed as having a high or high+ contribution to the Green Belt are excluded.
 - Step 2 All sites with 'prohibitive constraints' are excluded.
 - Step 3 The remaining parcels (69 in total) were then assessed as having 'good', 'medium' or 'limited' development potential based on site constraints and deliverability.
- 6.2 With regard to Step 1, we agree with the findings of the St Helens Green Belt Review 2018 that the site performs poorly in relation to the main purposes of including land within the Green Belt. We also agree that the site is not subject to prohibitive constraints for the purposes of Step 2.
- 6.3 In terms of Step 3, our client's site is assessed through the Green Belt Review 2018 as having 'limited' development potential. We do not understand how the Council has come to this conclusion with due regard for the available evidence and it represents a fundamental change in position further to the Preferred Options consultation in 2016.
- 6.4 Page 70 of the Green Belt Review 2018 sets out the basis for identifying our having a low contribution in this regard, and copy extracts below:
 - "Vehicular access to the sub-parcel can only suitably and readily be provided via Ormskirk Road, the access route from which would require significant improvements to enable the sub-parcel to be developed for housing."
 - "There are two Local Wildlife Sites (LWS) within the sub-parcel (Randle Brook and Rainford Brook) both of which are prone to flooding and would require a significant buffer from any development."
 - "In addition, parts of the sub-parcel lie within flood zones 2 and 3, which would further restrict development in these areas."
 - "Furthermore, there are protected trees within the sub-parcel that would also require appropriate protection from development."
- 6.5 In terms of access, as per our previous representations to the Preferred Options 2016 consultation and comments earlier at Section 6 there is no question mark as to whether suitable access can be achieved for the proposed development. SCP have carried out an assessment



on behalf of our client and we are not aware that the local highways authority have queried these findings.

- 6.6 With regard to biodiversity and the Randle Brook Local Wildlife Site, there is no evidence to suggest that the development would undermine the ecological value of the brook which extends around the boundaries of the site. This is a non-statutory ecology designation, and the St Helens Local Plan Consultation Report 2018 notes that Lancashire Wildlife Trust raised no objections to the principle of our client's site being allocated for housing through the Preferred Options consultation exercise in 2016 subject to conditions.
- 6.7 Turning to flood risk, the Randles Brook corridor to the boundary of the site is identified as a Flood Zone 2/3 through the Environment Agency Flood Risk Maps. The site itself as identified as a Flood Zone 1 i.e. at low risk of flooding. There is no evidence to suggest that the development of this site would increase the risk of flooding and the developable platform for the site falls wholly within a Flood Zone 1. Hence, the Draft Sustainability Appraisal 2018 underpinning the emerging local plan does not identify flood risk as a fundamental constraint to development (it is not assessed as 'red' in this regard).
 - 6.8 Finally, the site is within influencing distance of trees along the site boundaries. However, there are no trees within the site itself which would require removal or alteration in order to facilitate the development of the site for housing development.
 - 6.9 The rationale provided at page 70 of the Green Belt Review 2018 for identifying our client's site as having 'limited' development potential is not justified. The Sustainability Appraisal (SA) 2018 for the Submission Draft Local Plan assesses our client's site as an alternative housing allocation, which is scored as follows:
 - 5 green scores relating to access to GP, secondary school, leisure & employment opportunities and reducing the need to travel.
 - 10 neutral scores relating to land quality, air quality, water resources, climate change, distance to a prominent ridgeline, protecting cultural heritage, access to open space, local economy, access to housing and access to services.
 - 2 amber scores relating to flood risk and public rights of way.
 - 2 red scores relating to biodiversity and landscape/visual impact.

- 6.10 In terms of the 2 red scores, we emphasise the following points that show that our client's site should not be subject to any red scores:
 - The point that a site is within influencing distance of a non-statutory ecology designation is not a sound reason for identifying biodiversity as a significant constraint. Lancashire Wildlife Trust have raised no objections to the principle of our client's site as a housing allocation subject to conditions, and there is no evidence to suggest that housing on our client's site could undermine the value of Randles Brook as a Local Wildlife Site (indeed, there may be enhancement as a result of a properly planned residential development). It may be that this is instead assessed as amber i.e. effects that can be mitigated.
 - The St Helens Landscape Study 2006 identifies our client's site as falling within Landscape Character Area 'AM3', which is assessed as having 'Medium' landscape and visual sensitivity for new development. There is no evidence to suggest that development of our client's site, which is enclosed on 3 sides by built development and is heavily influenced by urban features, could have significantly adverse landscape and visual impacts. See the following image taken from the St Helens Landscape Study 2006:

Image: St Helens Landscape Study 2006 Landscape Sensitivity Plan (green shows medium sensitivity and yellow shows medium-high sensitivity)



6.11 As shown through the image above, which is the Landscape Sensitivity Map for the Borough, our client's site falls within an area at Medium landscape sensitivity. The area of Rainford itself falls within a 'Medium-High' landscape sensitivity area. Furthermore, a site-specific assessment of our client's site shows that it is heavily influenced by existing urban features, surrounded on 3 sides by built development and there would be negligible landscape impacts as a result of its

- release for new housing development subject to detailed design matters and the incorporation of a robust landscaping scheme.
- 6.12 There is no basis for the application of two red scores for our client's site. We have copied below the relevant table of the SA showing our client's site below and scoring applied (Site: GBP_10A):

Access to open space and green Protect and enhance cultural SA13b. Access to Secondary SA13a. Access to Primary SA14. Access to employment SA16. Access to GB ref SA5. Mtigate SA12b. SA3 SA9b. SA6 SA1 SA2 SA17 SA4 SAB. SA9a. Land North of Bushey Lane, east of Rainford Road Land North of Bushey Lane, east of Rainford Road GBP_001_c Land North of Bushey Lane, east of Rainford Road Red Delph Farm/Land to the South of Bushey Lane Rainford GBP_002 GBP_005_a Discard Land east of Rainford By-Pass south of railway line Land east of Rainford By-Pass south of railway line Land east of News Lane west of Junction Road Land east of News Lane west of Junction Road Land between Lords Fold and Mossborough Road, east of Rainford By-Pass Land between Lords Fold and Mossborough Road, east of Rainford By-Pass Land between Lords Fold and Mossborough Road, east of Rainford By-Pass GBP_006_c GBP_010_a GBP_010_b GBP_010_c

Table: SA Scoring for our client's site (Ref: 10A)

- 6.13 Notwithstanding the above, our client's site performs well through the SA even taking into account question marks surrounding the two red scores applied. It performs better than other sites that have been identified through the Submission Draft Local Plan as a housing allocation.
- 6.14 It is not understood how our client's site has been assessed as having only 'limited' development potential. The evidence base strongly shows that our client's site should instead be assessed as having 'good' development potential. This would lead to our client's site being reinstated as a housing allocation through the emerging local plan.

PO3808

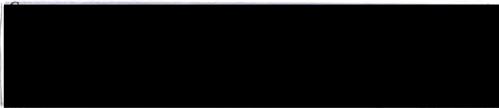
EL0232



St Helens Local Plan Submission Draft - site specific representations on behalf of Wainhomes NW relating to land off Winwick Road, Newton-le-Willows Nick Scott

to:

planningpolicy@sthelens.gov.uk 13/03/2019 16:18



1 Attachment



Land off Winwick Road Newton-le-Willows 2019 combined-reduced.pdf

Dear Sir / Madam,

Please find attached, written site specific representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan. These representations relate to their land off Winwick Road, Newton-le-Willows.

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



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

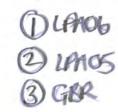


Emery Planning Partnership Ltd trading as

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

Registered office as above





Land off Winwick Road, Newtonle-Willows

Site-specific representations – St Helens Local Plan Submission Draft

for Wainhomes (North West) Ltd

EP Project Ref: 17-005

Emery Planning 2-4 South Park Court, Hobson Street Macclesfield, SK11 8BS Tel: 01625 433 881 www.emeryplanning.com



4. Green Belt considerations

St Helens Green Belt Review 2018

4.1 Our client's site has been assessed through parcel reference GBP_45A through the St Helens Local Plan Green Belt Review 2018. It is assessed through the Green Belt Review as performing poorly in terms of all three identified main purposes of including land within the Green Belt for the purposes of paragraph 134 of the NPPF.



4.2 In terms of restricting urban sprawl, the Green Belt Assessment states the following:

"The sub-parcel is bounded to the north by residential development at Wayfarers Drive and Newton Brook Greenway, to the west by Newton Brook Greenway, to the east by the West Coast Mainline railway line, to the south by agricultural land and to the south/west by Newton Brook Greenway leading to Newton-le-Willows Cemetery. The sub-parcel is therefore well contained to the north, east and relatively well contained to the south and west."

4.3 In terms of merging of towns, the Green Belt Assessment states the following:

"The sub-parcel does not fall within a strategic gap between two towns. The nearest towns that are not "washed over" by Green Belt are: Newton-le-Willows which adjoins the subparcel and Winwick, Warrington, which lies approximately 1.8km south east of the sub-parcel. A strategic gap could be maintained between Winwick and Newton-le-Willows if this sub-parcel was developed."

4.4 In terms of safeguarding the countryside from encroachment, the Green Belt Assessment states the following:

"The sub-parcel has strong permanent boundaries to the north and east. Given the high level of enclosure, it is considered that the sub-parcel does not have a strong sense of openness or countryside character."

4.5 We agree that the site makes a 'low' contribution to the main purposes of including land within the Green Belt as per the St Helens Green Belt Assessment 2018.

Tyler Grange assessment and summary in relation to Green Belt contribution

4.6 A site-specific assessment of the existing site has also been undertaken by Tyler Grange with regard to Green Belt and landscape. Their main points in terms of the landscape credentials of the existing site are as follows:





- the site character is heavily influenced by the surrounding urban context of residential development at Wayfarers Drive to the north and Mill Lane (A49) and the West Coast Main Line railway to the east;
- the site has an urban fringe character due to its edge of settlement location and direct visibility towards the existing settlement edge and houses along Wayfarers Way in particular;
- the site is relatively flat and it is contained by strong boundaries in the form of existing residential development, the West Coast Main Line railway and planting associated with Newton Brook;
- there are two visual receptors to consider through the development of the site with these being footpaths beyond the site and occupiers of nearby residential properties.
- 4.7 We also provide a summary of the Green Belt assessment undertaken by Tyler Grange with due regard for the main purposes of including land within the Green Belt as set out at paragraph 80 of the NPPF. See the table below:

Main purpose	Summary assessment undertaken by Tyler Grange								
To check unrestricted urban sprawl	 Residential development at Wayfarers Way to the north; Mill Lane (A49) and the West Coast Main Line railway to the east; Newton Brook, a wooded area of open space, to the west. These boundaries provide a robust, permanent and defensible edge such that development would not spraw								
To prevent neighbouring towns merging into one another	further in any direction. Development of this site would not result in the coalescence of Newton-le-Willows and Wargrave due to the physical separation provided by the brook and its associated vegetation, which serves to provide existing separation to the west of the site. Development of the site can ensure the retention of the vegetation to Newton Brook and as such would not reduce the level of separation provided by this existing landscape feature.								
Safeguarding the countryside from encroachment	Although the site is open and undeveloped in its existing form, the site is heavily influenced by surrounding urban features that include residential development, the adjacent West Coast Main Line railway and Mill Lane (A49) and the planting associated with Newton Brook.								
	The retention of the strong framework of vegetation to the								

	west and south along Newton Brook and the presence of the West Coast Main Line railway line in particular would limit the extent to which any proposed development would be visible from the wider open countryside south of the site.
	Development of this site would safeguard the countryside from encroachment.
Preserve the setting and special character of historic towns	The site does not play a role in the setting or significance of any historic settlement.

- The site-specific assessment undertaken by Tyler Grange demonstrates that this site is suitable for residential development in Green Belt terms. The analysis undertaken by Tyler Grange is informed by fieldwork, an analysis of desktop data sources and an assessment of the visual receptors to development of the site with reference to photoviewpoints. It concludes that the site is well contained by strong, physical and permanent boundaries, development would not lead to further sprawl and that there would no prospect for the merging of Wargrave and Newton-le-Willows.
- Paragraph 135 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The release of Green Belt land for housing development is necessary in order to meet unmet and future housing needs of the Borough as illustrated through our strategic representations on the overall strategy of the St Helens Local Plan Preferred Options. This comprises exceptional circumstances for the purposes of the NPPF.
- 4.10 The release of Green Belt land across the Borough should also be seen within the context of the following bullet points of paragraph 139 of the NPPF:

"When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;

- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."
- 4.11 With regard to the bullet points set out above, the release of our client's site for housing development would help to meet the identified housing requirements for sustainable development. As demonstrated through the work undertaken by Tyler Grange, the revised Green Belt boundary would be delineated by defensible, permanent and readily recognisable features to all sides.
- 4.12 Paragraph 135 of the NPPF states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. We undertake an assessment below of our client's land with regard to the three roles of sustainable development as set out at paragraph 7 of the NPPF:

Economic: New housing development is required across the Borough to include areas of the designated Green Belt in order to ensure that the Borough has a stable workforce in terms of ability and age profile. The construction of new houses would also create construction jobs in the short term, and once occupied, new residents would boost householder spending on goods and services within the surrounding area. New housing development would also generate a New Homes Bonus for the Borough.

<u>Social:</u> Paragraph 8 of the NPPF states that one of the requirements is the supply of housing to meet the needs of present and future generations. The release of our client's site for new housing development would help to ensure that the identified housing needs of the Borough in terms of market and affordable housing are met.

Environmental: The site is highly locationally sustainable with easy and convenient access to a wide range of local services and public transport options. The site is located at the edge of Newton-le-Willows, which a principal urban area of St Helens and is suitable for major new housing developments in terms of infrastructure requirements. The work undertaken by Tyler Grange demonstrates that the release of this site for housing development would comprise a logical urban extension with negligible impacts in relation to the main purposes of including land within the Green Belt and limited landscape impact. The release of our client's site for housing would relieve the development pressure on more environmentally sensitive greenfield and Green Belt land across the Borough.

4.13 The release of our client's site from the Green Belt for new housing development with immediate effect as part of the emerging local plan is considered to be fully justified with due regard for paragraphs 134 to 139 of the NPPF.





Safeguarded land

4.14 The Submission Draft Local Plan 2019 identifies the northern half of our client's site as being safeguarded land and the southern half being 'white land'. This is illustrated through the plan below, which shows the safeguarded land in hatched brown with hatching and the southern half in purple being land consequently removed from the Green Belt:



- 4.15 In addition to the points already made through Section 4 in terms of the 'low' contribution that our client's site makes to the Green Belt, the Submission Draft Local Plan now proposes the following:
 - Housing allocation at 7HA (181 dwellings Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line).
 - Employment allocation at 8EA (Parkside West 79.57ha of new B2 and B8 development).
 - Safeguarded land at 4HS (Land East of Newlands Grange and West of West Coast Mainline).
 - Consequential removal of land at Newton-le-Willows Cemetery and Newton Brook.
- 4.16 This can be seen on the image provided below paragraph 4.14 of this Statement (above). Although our site currently performs poorly in relation to the wider Green Belt, it would have no role to play in the event that the plan is adopted to include these allocations and consequential alterations to the Green Belt boundaries. Notwithstanding housing needs, our

client's site should be removed from the Green Belt given that it would represent an anomaly in the Green Belt boundaries. This only serves the suitability of our client's site for removal from the Green Belt and identification as a housing allocation.

- 4.17 In case, we have set out through our strategic representations that additional sustainable Green Belt sites need to come forward as new housing allocations in order to meet identified needs. As such, we consider that our client's site is ideally placed to meet this need as a new housing allocation for the reasons discussed with this section of our Statement.
- 4.18 The northern half of our client's site has been identified as safeguarded land. Although we welcome this recognition of the development potential of the site, it is not clear from the evidence base why our client's site has been split into two separate entities in this way. All of the evidence base documents assess this site as a single parcel of land and it is continuously referred to as parcel '45A' e.g. it is assessed as a single parcel through the Green Belt Review 2018 and the Sustainability Appraisal process. There is no rationale provided that we are aware of for splitting the site into two separate parcels of land. As it stands, we do not consider that the northern half of the site serves a meaningful function as safeguarded land given that it would be surrounded by the urban area on all sides with a generous gap to the Green Belt boundaries. Paragraph 139(c) requires safeguarded land to fall between the urban area and the Green Belt:

"where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period."

4.19 With the above in mind, we consider that the site as a whole should be removed from the Green Belt as part of the 'consequential changes' applied by the Council for similar situations whereby land would no longer serve any Green Belt function as a result of other changes proposed through the emerging local plan. The site should consequently be allocated as a housing allocation as we have set out at Section 3 of this Statement.







Evidence base with regard to site constraints

- 6.1 Our client's site has been subject to the site selection process set out through the Green Belt Review 2018:
 - Step 1: All parcels assessed as having a high or high+ contribution to the Green Belt are excluded.
 - Step 2 All sites with 'prohibitive constraints' are excluded.
 - Step 3 The remaining parcels (69 in total) were then assessed as having 'good',
 'medium' or 'limited' development potential based on site constraints and
 deliverability.
- 6.2 In terms of the Green Belt contribution of the site:
 - The St Helens Green Belt Review concludes that the site performs poorly in relation to the main purposes of including land within the Green Belt. It is assessed as 'low' accordingly in this regard.
 - As a result of changes proposed through the emerging local plan, our client's site in its
 entirety should be consequentially removed from the Green Belt notwithstanding
 identified housing needs.
- 6.3 In terms of Step 3 as set out above, our client's site is assessed through the Green Belt Review 2018 as having 'medium' development potential. Pages 93 and 94 of the Green Belt Review sets out the basis for identifying our site in this way, and we copy extracts below:
 - "A suitable access can be obtained off the A49, subject to a 30mph speed limit zone being extended south to achieve the required junction separation distances. However, it is difficult to provide a secondary access into the site."
 - "The sub-parcel lies adjacent to a LWS (Newton Brook) to the west, alongside which a buffer would be needed to protect it from any potential development. A historic landfill site lies within the southern part of the sub-parcel, which would require further investigation. The NDA has been significantly reduced to remove the need for a secondary access and due to the unknown nature of any contamination within the landfill site. As there is a busy railway line to the east of the subparcel noise attenuation measures would have to be incorporated into any development."
 - "The sub-parcel is considered suitable for removal from the Green Belt. However, as set out above there are a number of constraints which require further investigation to help achieve a development which can make efficient use of the land within the parcel."
- 6.4 In terms of access, SCP consider that there is no requirement for a secondary access:



- Firstly There is no essential need for a secondary access. A development of 250 houses can be development, without the need for a secondary access. Former guidance (that has been withdrawn but not directly replaced), stated that up to 300 dwellings could be served by a single point of access.
- Secondly The internal layout could be designed in a way to provide two routes of
 access to every dwelling, after an initial short section of road leading to the access; i.e.
 a short section of road from the access leading to a loop road within the site.
- Thirdly There are three access roads that almost abut the site to the northern boundary. Any one of these could potentially be negotiated for providing an emergency access. This wouldn't necessarily be open for use by anyone else and could be gated or fenced, and only available for emergency services use.
- 6.5 Turning to the ecology, Tyler Grange undertook a site-specific assessment in this regard and it is not clear whether it has been taken into account by the Council for the purposes of informing their comments above. Tyler Grange's assessment at EP2 of this Statement concludes that an appropriate buffer should be provided between any development and Newton Brook (or otherwise investigation further whether all of Newton Brook qualifies as a Local Wildlife Site in the first instance with the potential for replacement habitat being provided elsewhere or a management plan for the retained area). There is no basis for identifying ecology as a significant constraint to development on this site.
- 6.6 Other issues raised include reference to a historic landfill site and the potential for contamination and the potential for noise from the adjacent railway line. In terms of the former, this would be subject to intrusive site investigations in the usual manner via a planning application and there is no evidence to suggest that it represents a fundamental constraint or that it may reduce the developable area. In any event, we are not aware of what information the Council is reliant upon in terms of concluding that the southern half of the site was formerly a landfill site. Turning to noise, suitable attenuation would be provided at the planning application stage subject to a detailed noise assessment; it may be that no mitigation measures is required or otherwise it may be necessary for measures such as acoustic fencing to be implemented. It is commonplace for residential development to adjoin the railway in this part of the Borough and there is no evidence to suggest that it should be considered to be a major constraint to development.
- 6.7 We consider therefore that the site should be assessed as having 'good development potential' for the purposes of the site selection process, and this supports the allocation of the site for housing development accordingly.

6.8 Further to the above, the SA scores our client's site as performing well:



Table: SA scoring for our client's site (GBP_45A)

Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3.Improve air quality	SA4. Sustainably manage water resources	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritage	SA9a, Access to open space and green space	SABb. Public Rights of Way	SA12a, Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA*9. Reduce need to travel	SA20. Access to services
35	GBP 038	Land east of M6 and south of Southworth Road	Haydock	Discard					1													1		
37	GBP 040	Land west of M6 and south of A572 Southworth Road	Haydock	Discard	100				17													1		
39	GBP_042	Land west of the A49 Mill Lane and to the east of the West Coast Mainline railway line	Newton / Earlstown	Site 7HA															I			1		
40	GBP_043	Land east of the West Coast Mainline railway line and west of Newton Brook	Haydock	Discard								14								Д	1	1		
41	GBP_044	Land west of the West Coast Mainline and East of Newlands Grange	Newton / Earlstown	Site 4HS		3														1		1		
42	GBP 045 a	Land west of Winwick Road and south and east of Wayfarers Drive	Newton / Carlstown	Site 5HS								2										1		
43	GBP_046	Land south of Tyer Road and west of the West Coast Mainline railway line	Newton	Discard																		1		
44	GBP_048	Land at Newton Cottage Hospital, Newton-le-Willows	Newton	Discard								11				1				風	_	1		
45	GBP_049	Land north of Southward Road, Newton-le-Willows	Newton	Discard														100			_	1		-
46	GBP_051_a	Land north-east of Newton-le-Willows, adjacent to M6	Earlestown	Discard											-						_	1		
47	GBP_051_c	Land north-east of Newton-le-Willows, adjacent to M6	Newton	Discard																		1		
48	GBP_051_d	Land north-east of Newton-le-Willows, adjacent to M6	Newton	Discard		1												19		17		1		
49	GBP_053_a	Land east of Haydock, north of Newton-le-Willows	Newton	Site 2HS		11		16								П					_	1		
50	GBP_053_c	Land east of Haydock, north of Newton-le-Willows	Earlestown	Discard					200											-		1		
51	GBP 056	Land rear of Tesco Superstore, Haydock Change	Haydock	Discard			100					0								1	F	1		

- 6.9 The only red scores applied relate to biodiversity and landscape impact. However, these points have been addressed through the work undertaken by Tyler Grange at **EP2** of this Statement.
- 6.10 In terms of ecology, it has been demonstrated that this does not represent a significant constraint and there is no reason to allege that there would be harm arising to Newton Brook Wildlife Site; any harm could be mitigated as set out by Tyler Grange. Turning to landscape impact, the red score applied appears to be on the basis that the site falls within a 'medium-high landscape sensitivity area', although this relates to a 2006 Landscape Study that is very high level and takes no account of site-specific issues and the potential for mitigation. In the case of our client's site, Tyler Grange have demonstrated that the site is suitable for residential development in landscape terms given how heavily influenced it is by existing urban features and screened from views.
- 6.11 Indeed, the Green Belt Review undertaken by the Council in 2016 concluded as follows for our client's site (our client's site was then referenced as 'GBS_141):



"Very limited public views into the site as it is well screened. Low landscape contribution, except for trees on site edge."

- 6.12 We do not consider that there is any basis for identifying any negative impacts (red scores) for our client's site through the SA process. This again only serves to emphasise the suitability of our client's site as a new housing allocation.
- 6.13 With due regard for the above points, our client's site should be assessed as follows and included as a draft housing allocation through the emerging local plan accordingly:
 - · Green Belt Impact (Stage 1B): Low Impact.
 - Development Potential (Stage 2B): Good Development Potential.

7. Local infrastructure

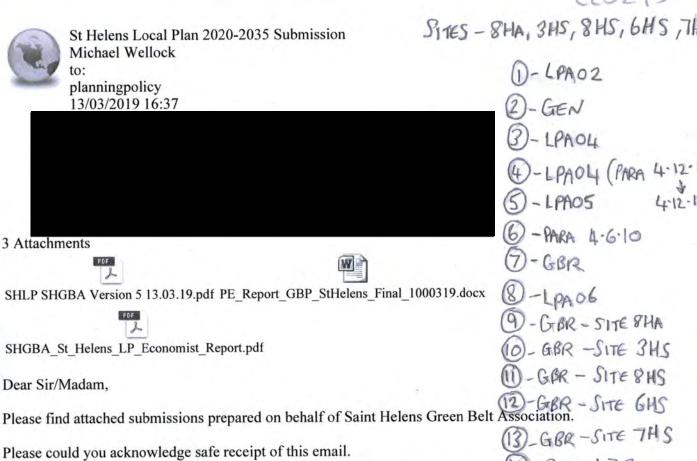
7.1 The site is located to the edge of the existing built-up area of Newton-le-Willows with no fundamental constraints in terms of utilities and surface and foul water connections. It is in close proximity to existing key services such as schools and health facilities. Any planning application could secure the provision of developer contributions to local services such as education and health facilities where appropriate and in accordance with planning policy requirements and the tests set out through the Community Infrastructure Levy Regulations 2010.



PO3809

- PARA 1-7-2

CL0243



We have also been alerted to the fact that the consultation period may be extended - if so, we reserve the right to make further submissions during this period should the need arise.

The Association will be seeking to appear at any future examination.

Yours faithfully,

Michael

Michael Wellock Managing Director

Kirkwells
Lancashire Digital Technology Centre
Bancroft Road
Burnley
Lancashire
BB10 2TP

St. Helens Borough Local Plan 2020-2035 Submission Draft - SHGBA Response, March 2019

St. Helens Borough Local Plan 2020-2035 Submission Draft Response on behalf of St. Helens Green Belt Association (SHGBA)

March 2019



The Planning People

5.0 Green Belt

National Planning Policy

- 68. The essential characteristic of Green Belts "are their openness and their permanence" (NPPF, paragraph 133). Government attaches great importance to Green Belts (op. cit.) and for plan-making identifies Green Belt as one of the policies in the NPPF that provides a strong reason for restricting the overall scale, type or distribution of development in the plan area:
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶;

Footnote 6: "The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change. (my emphasis)

69. Once established Green Belt boundaries should "only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans" (NPPF, paragraph 136). In preparing Local Plans "Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period." (op. cit.).

Exceptional Circumstances

70. The Submission Draft sets out no "exceptional circumstances" for the changing of the Green Belt boundary. This the first test to pass before concluding the need for a Green Belt review. The Council have undertaken such a review that does referto "exceptional circumstances", the *Green Belt Review*, but these are not included or referred to in the Submission Draft. Paragraph 4.6.10 of the Submission Draft betrays a fundamental flaw in the Council's approach to Green Belt. This states:

"This [the *Green Belt Review*] has identified sites on the basis of their scope to be developed whilst minimising harm to the overall function of the Green Belt, and their suitability for development in other respects. The criteria used have included their physical suitability for development, accessibility by sustainable transport modes to services and facilities, levels of existing or potential future infrastructure provision, their economic viability for development, and the impact that their development would have on the environment. Further details of this process are set out in the *St. Helens Green Belt Review 2018*.

Green Belt policy does not have a function, it has fundamental characteristics, an aim of Green Belt policy and purposes. Reference to the function of the Green Belt should be replaced with wording consistent with national planning policy.

71. Paragraph 137 of the NPPF then goes on to provide important guidance for planmakers when considering "exceptional circumstances":

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."
- 72. Paragraphs 138 and 139 set out how plan-makers should draw up Green Belt boundaries:

"138. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

- 139. When defining Green Belt boundaries, plans should:
- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;

- b) not include land which it is unnecessary to keep permanently open;
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."
- 73. The Submission Draft makes no reference to "exceptional circumstances" when considering Green Belt. This is a significant flaw in the preparation of the plan. Green Belt boundaries should only be changed in "exceptional circumstances" the Council have failed to conclude within the plan that "exceptional circumstances" exist, this is not consistent with national planning policy and, therefore, fails one of the tests of soundness.
- 74. Before concluding that "exceptional circumstances" exist to change Green Belt boundaries the Council should also, based on guidance in paragraph 137 of the NPPF, be able to "demonstrate that it has examined fully all other reasonable options for meeting its identified need for development." Perhaps unsurprisingly, given the Council have not demonstrated "exceptional circumstances" in the Submission Draft, this point has also not been addressed. Alternatives were set out in the Preferred Option Draft, but this work is not updated. We have set out how the Council should have considered not allocating the full amount of land and adopting a pre-cautionary approach by allocating for the earlier years of the plan and committing to an early review of the plan. The Council have not considered this option. Again, the Submission Draft is not consistent with the NPPF and fails this test of soundness. This is a reasonable option based on the uncertainty surrounding the housing figures and demographics and the future of the SM.

- 75. Nor does the Submission Draft address the key issue for plan-makers set out in NPPF of how the implications of paragraph 11bi and the specific identification of Green Belt has been addressed to "protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area". The Council have not concluded in the Submission Draft that "exceptional circumstances" exist and, even if this conclusion has been reached, they have not, as part of any assessment of reasonable alternatives, set out why the policy in paragraph 11bi of NPPF should not apply. The Submission Draft is not consistent with national planning policy and fails this test of soundness.
 - 76. The *Green Belt Review* (December 2018, paragraph 1.11) does set out the Council's consideration of "exceptional circumstances" to change Green Belt boundaries, namely:
 - The Core Strategy identified a need for Green Belt release from 2022 onwards (paragraph 1.12);
 - The Core Strategy did not identify a need for Green Belt release for employment uses (paragraph 1.13);
 - The Local Plan will have to plan for development needs further into the future than the Core Strategy (paragraph 1.14).
 - More housing is needed than in the standard method to support economic growth (paragraph 1.15)
 - There is insufficient capacity to meet need for housing on urban sites (paragraph 1.16);
 - Slow take-up of employment land is due to restrictions on the availability of sites not lack of market demand (paragraph 1.17)
 - The need for at least 215.4 hectares of employment land over the plan period (paragraph 1.18); and
 - The inability or desirability of neighbouring local authorities meeting St Helens development requirements (paragraph 1.19 and 1.20).

- 77. But in deciding that "exceptional circumstances" exist the *Green Belt Review* only deals with paragraph 11 of NPPF in part. Paragraph 1.11 of the *Green Belt Review* quotes paragraph 11a and part of 11b of NPPF:
 - "11. Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas,

But does not reference paragraph 11bi which goes ones to state: "unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area;
- 78. The *Green Belt Review* only partially applies national planning policy. The Council, if it holds to the conclusion that exceptional circumstances exist for a Green Belt review, should set the exceptional circumstances out in the Submission Draft and how the Council have considered the implications of NPPF, paragraph 11bi.
- 79. Allowing for the fact that the Council has not fully applied national planning policy contained in paragraph 11bi, when examining the reasons set out in the *Green Belt Review* does not lead to the conclusion that "exceptional circumstances" pertain:

- The Core Strategy identified a need for Green Belt release from 2022 onwards (paragraph 1.12) this is no longer relevant the Core Strategy was prepared under a different evidence base and one plan cannot hold its successor to a certain course of action. The Submission Draft needs to be prepared within the contemporary planning framework (NPPF, February 2019) and evidence base. Core Strategy Policy CSS1 Overall Spatial Strategy included the following development plan policy "The general extent of the Green Belt as indicated on the Core Strategy Key Diagram will be maintained in the short to medium term. The detailed Green Belt boundary is shown on the Proposals Map. Any strategic review of the Green Belt will be dependent on work carried out at the subregional level". This work has not been undertaken;
- The Core Strategy did not identify a need for Green Belt release for employment uses (paragraph 1.13) – this is not relevant, the Core Strategy did not allocate such land, because there was no evidence to support such a course of action;
- The Local Plan will have to plan for development needs further into the future than the Core Strategy (paragraph 1.14) – this is not "exceptional" <u>all</u> successor plans have to plan for a new time period;
- More housing is needed than in the standard method to support economic growth (paragraph 1.15) the Council's evidence produces a marginal uplift from the Standard Method (468 dwellings per annum as opposed to 486 dwellings per annum). We have set out elsewhere how this figure has limited credibility and it is impossible to agree with the Council's conclusion that an additional 342 dwellings over the plan period "is needed to achieve economic growth at a level that is more typical of the country as a whole". The Council's link between housing growth and economic growth is no longer evidenced and should be discounted:

- There is insufficient capacity to meet need for housing on urban sites
 (paragraph 1.16) there is sufficient capacity, only by discounting
 sites can an under-supply be achieved;
- Slow take-up of employment land is due to restrictions on the availability of sites not lack of market demand (paragraph 1.17) – this of itself does not need to trigger a comprehensive Green Belt review a selective review can be carried out to identify strategic sites;
- The need for at least 215.4 hectares of employment land over the plan period (paragraph 1.18) – this figure is not a need it is an aspirational target; and
- The inability or desirability of neighbouring local authorities meeting St Helens development requirements (paragraph 1.19 and 1.20) – the inability of neighbours to meet St Helens needs is a matter of assertion. No statement on how the Council has fulfilled the "Duty to Co-operate" or evidential Statement of Common Ground has been produced. This statement has to be qualified by the fact that St Helens are not using the Standard Method and have an aspirational economic growth target rather than objectively assessed need.
- 80. Singly, or in combination, the reasons set out in the *Green Belt Review*, and we note not contained within the Submission Draft, do not constitute "exceptional circumstances".
- 81. The *Green Belt Review* employs a fairly standard methodology for such studies with individual parcels of land being assessed against the 5 purposes of Green Belt. We deal with site specific assessments later in this document, but one feature of the Review's overall methodology needs to be set out and addressed.
- 82. At paragraph 2.14 of the *Green Belt Review* it is set out how the fifth Green Belt purpose "to assist in urban regeneration by encouraging the recycling of derelict and other urban land" has been assessed. Paragraph 2.14 acknowledges that

the Green Belt in St Helens "plays an important role where it will recycle derelict and other urban land". But then goes on to state that "there is no firm evidence to establish that the contributions that individual parcels or sub-parcels make in this regard can be reliably differentiated". A Planning Advisory Service (PAS) study is then used to justify such an approach. This conclusion may well hold for individual parcels or sub-parcels, but it does not hold for the Green Belt in its totality or for large releases of Green Belt parcels simultaneously. In such circumstances, the Submission Draft Plan provides a working example of how Green Belt release of a sufficient scale will act to discourage recycling of derelict and other open land, this will:



- Act as a disincentive to bring forward the 794 units identified in Table
 4.6 in the SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18);
- It will act as a disincentive to bring forward identified large sites, 52.5% of which have no planning permission;
- It will act as disincentive to bring forward contaminated land of which the Borough has a considerable stock; and
- It will act as a disincentive to bringing forward some of the 5,818 dwellings on the Council's Brownfield Register.
- 83. A further issue with the *Green Belt Review's* methodology is parcelling and inconsistent scoring. Different conclusions e.g. on the importance of agricultural land are employed in different ways for different sites. For some sites these are reason for a higher scores than on others. This is inconsistent and produces inconsistent results. We deal with some of these in the site-specific section of this submission.



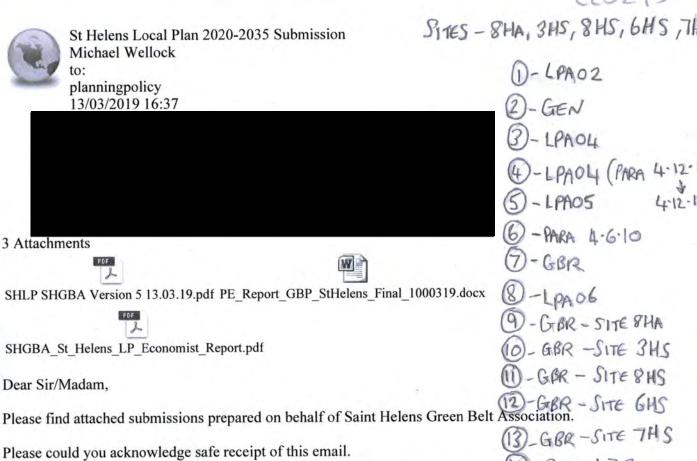
Safeguarded Land

- 84. In drawing up new Green Belt boundaries plan-makers should also:
 - "c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

PO3810

- PARA 1-7-2

CL0243



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Yours faithfully,

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March 2019



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6.0 Site-specific Comments

Land south of Higher Lane and east of Rookery Lane, Rainford

- 87. This site (*Green Belt Review* Parcel GBP_019a) is removed from the Green Belt and allocated for housing, Site 8HA.
- 88. Stage 1B of the *Green Belt Review* concludes that sub-parcel (GBP_019a) scores low on all of the four Green Belt purposes against which it is assessed. In the Stage 1B assessment the site is assessed alongside sub-parcel GBP_019b. Despite the geographical and physical congruity of the two sub-parcels a different conclusion is reached for each parcel (Figure 3). Performing a "moderate contribution to the purposes of Green Belt (*Green Belt Review*, page 216). There is a clear inconsistency of approach in scoring. Both parcels should have been scored in the same way.

Dear GBP_019 A Militopus Farm

CBP_019 B

Charment Bounds Fary

Mill Plantation

Full ecod House

GBP_011_C

Rainford Industrial Estate

Figure 3. GBP_019a and GBP_019b

Source: Green Belt Review, page 214.

- 89. There are further inconsistencies when it comes to Stage 3 of the *Green Belt Review*:
 - a) Site GBP_019a is allocated when close to Rainford Industrial Estate, for this site noise and other potential pollution and amenity issues can be overcome by mitigation, but for other sites e.g. GBP_011c, GBP_013b, and GBP_019b this is an issue for not allocating the sites because of acknowledged noise and air pollution issues. This is inconsistent;
 - b) The site is high quality (Grade 1) agricultural land as are other sites in Rainford, including adjoining sub-parcel GBP_019b. Again, there is inconsistency.
- 90. There is a clear issue regarding the need for separation of the employment and potential housing site in relation to the Rainford Industrial Estate. This is highlighted by an incident on 28th May 2018 when there was a major explosion at one of the industrial units on the site https://www.sthelensstar.co.uk/news/16252575.blaze-at-rainford-industrial-estate/
- 91. The two main areas for road traffic accidents in Rainford are at the junction of Mill Lane and the Rainford By-Pass, and at the top of Mill Lane at the junction with Higher Lane. Both of these already dangerous junctions will suffer increased traffic if 259 houses were to be built on as Site 8HA. Any additional road traffic journey would have to use one or other of these two junctions when travelling to St Helens.
- 92. The site is reasonably well accessed by bus two services running hourly to St Helens and Ormskirk. But poorly served by rail, Rainford Junction with very limited car parking is two miles away. Where Green Belt is to be released first consideration should be given to "previously developed land and/or is well served by public transport". This site is neither. The site should remain in the Green Belt.

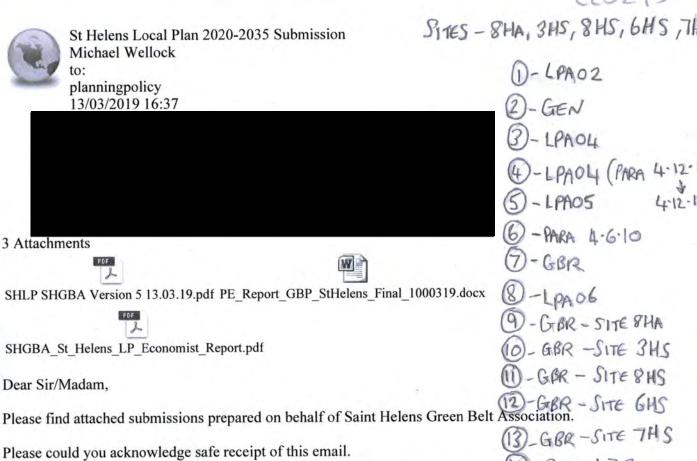




PO3811

- PARA 1-7-2

CL0243



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The Planning People

Eccleston Park Golf Club

- 93. This site is removed from Green Belt and identified as safeguarded land for housing (Site 3HS) with an indicative development capacity of 956 dwellings. This follows consideration as two separate sub-parcels in the *Green Belt Review*, namely:
 - a) GBP 086 Land north of Elton Head Road, Nutgrove; and
 - b) GBP_087 Eccleston Park Golf Club.
- 94. Both sites form part of a much larger area of Green Belt that runs north west/south east and performs significantly, in Green Belt policy terms, in separating St Helens from Rainhill and Prescot, in Knowsley Borough. This strategic area of Green Belt runs from Eccleston Golf Club in the north east, through St Helens, washing over Bold Heath and continuing to the south east. This strategic nature of this area Green Belt is contiguous with Green Belt in neighbouring local planning authorities. Occupying the north-eastern apex of this significant, strategic area of Green Belt, removal of Eccleston Golf Course (Sub-Parcel GBP_7 and a small area of sub-parcel GBP_086) from the Green Belt would significantly undermine this whole area of Green Belt and lead to the further coalescence of settlements in St Helens (Eccleston and Rainhill) with Prescot in Knowsley.
- 95. The Stage 1B *Green Belt Review* in its conclusions acknowledges this to a degree, but draws inconsistent, and in our opinion, erroneous conclusions. Sub Parcel GBP_086 is considered to score high in terms of performance when considered against Green Belt purpose 2 "To prevent neighbouring towns from merging into one another". In this regard, this sub-parcel plays "a key role in forming a strategic gap and the perception of a gap between Rainhill and Thatto Heath (St Helens core area)" (*Green Belt Review*, page 381). The *Green Belt Review* overall conclusion is that sub-parcel GBP_086 "plays a strong role in maintaining a separation between "Rainhill and Thatto Heath", it should be borne in mind that the latter is St Helens core area, so this is a significant contribution to Green Belt purposes. It can be added that given the strategic gap the site



occupies it maintains separation of a number of smaller settlements: Whiston, Portico, Eccleston Park and Nutgrove.



96. Despite being a much larger area of Green Belt at the apex of this large area of north-east south-west running Green Belt separating St Helens from Rainhill and Prescot a whole set of different, inconsistent conclusions are reached about Eccleston Park Golf Club.



97. This sub-parcel scores low on all 4 Green Belt purposes in the *Green Belt Review*. With the following conclusion drawn on purpose two "To prevent neighbouring town from merging into one another":



"The parcel currently lies in a Green Belt "gap" between Eccleston Park, West Park, Rainhill and Whiston. However, the gap has already been significantly reduced, due to the merging of Eccleston Park, Rainhill and Whiston on the north western and southern sides. As such there is no longer any visual/perceptual separation of these settlements on the ground. Given the strong boundaries around the parcel which obscure the golf course from any public highway, the parcel provides only a moderate to weak role in preventing further merging. Therefore it s considered that there is no longer a strategic gap between Eccleston Park, Rainhill and Whiston in this location." (Green Belt Review, page 383).

98. These conclusions are inconsistent with those reached on other sub-parcels in this area and erroneous. The Golf Course forms a strategic gap in Green Belt and is part of the wider north-east south-west Green Belt referred to earlier.



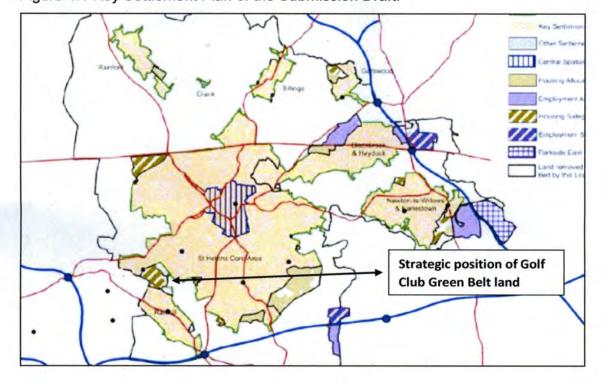
99. The Green Belt Review refers to visual/perceptual separation, this is not a characteristic of Green Belt. It is the open nature of the land. This factor should not have influenced the Council's conclusions.



100. The fact that the Council consider the gap to have been significantly reduced leads to two conclusions. Firstly, that this is acknowledged as a gap, in our view a "strategic gap" that provide a significant area of open land separating and

preventing the coalescence of the various settlements in this area. Secondly, the gap has not been reduced. The Green Belt in this area remains unchanged from its original designation in 1983. This area of Green Belt was always a strategic gap and remains a strategic gap. The broader point, of course, is that, if the Council views holds, which it does not, and that the gap has been eroded, then the gap becomes even more significant than when first designated Green Belt.

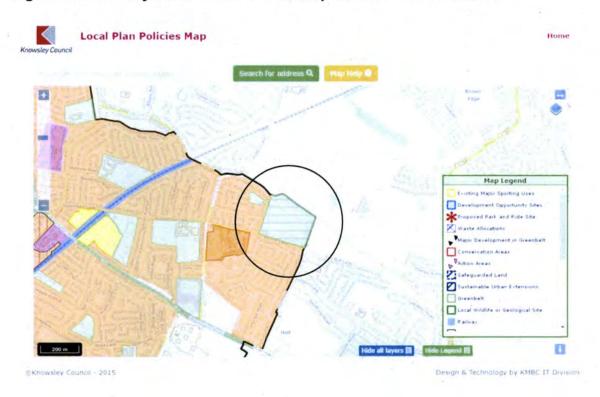
101. The removal of the Golf Club from the Green Belt will also have implications for — the wider integrity of the Green Belt in this area. All that will remain as a "strategic gap" in this key location is sub parcel GBP_088 Land to the north-east of Eccleston Park Golf Club. This sub-parcel is considered to score a "moderate" on purpose 2. Whereas the physically and geographically linked Golf Club a "low". By introducing such inconsistency, the Submission Draft has reduced this strategic gap to this small parcel of Green Belt. Leaving the Golf Club in the Green Belt will maintain the integrity of this strategic gap. As part of the wider north west/south east strategic Green Belt in this area. Albeit only diagrammatically, this significant change if the Golf Club were to be removed from the Green Belt can be seen on Figure 4.1 Key Settlement Plan of the Submission Draft.



102. A further issue arises with the integrity of the Green Belt in this area in that it impacts on the Green Belt that overlaps the Borough boundary into Knowsley Metropolitan Borough Council. This includes a playing field at Two Butts Lane, Figure 4. As well as undermining the integrity of the Green Belt by leaving only sub-parcel GBP_088 in the Green Belt the Submission Draft undermines the integrity of this area of the Green Belt. There is no evidence to show that this issue has been addressed with Knowsley. Knowsley have not embarked on preparation of their Local Plan: Site Allocations and Development Policies and the Local Development Scheme dating from 2013 is to be updated. The Two Butts Lane site will remain in the Green Belt.

10

Figure 4. Knowsley Local Plan Policies Map Extract – Two Butts Lane



103. In addition, from the Council's own Green Belt Review the following can be highlighted:

- a) Until recently the site was in recreation use. As such it is protected by Core Strategy policy;
- b) Sport England have previously objected to the allocation of this site and the Council acknowledge that "further evidence is

required to meet the requirements of Sport England" (Green Belt Review, page 118). The *Green Belt Review* goes on to state "This further evidence has not been obtained" and that at present "the allocation of the site would conflict with national planning policy". From what is in the public domain it would appear no further evidence has been obtained;



c) The site has numerous physical constraints, including electricity pylons, noise issues, various sewers, a trunk water main, The North Prescot Aqueduct and the Vrynwy Aqueduct/pumping station.

104. This site should remain in the Green Belt.

Land south of A580 between Houghtons Lane and Crantock Grove, Windle

- 105. This site is removed from Green Belt and identified as safeguarded land for housing (Site 8HS) with an indicative development capacity of 1,027 dwellings.
- 106. In the Green Belt Review this is sub parcel GBP_098. The Council scores it low on all of the Green Belt purposes assessed. Whilst the geographical location of the sub parcel does mean it will have a lower score in terms of Green Belt purpose 2 "merging". The Council's conclusions on purposes 1 and 3 are inconsistent and erroneous. The release of this parcel will see the built-up area sprawl up to the boundary with the A580 and will see the loss of a large area of open countryside, this is particularly evident in views across the site of open agricultural land. Release of this area conflicts with Green Belt policy.

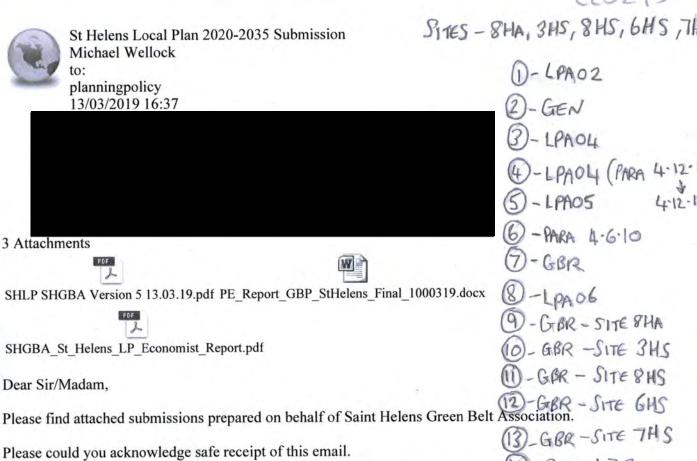


- 107. In the Green Belt Review Main Report, the Council acknowledge the following:
 - a. The site is high quality (Grade 1 and 2) agricultural land;
 - The development of this area would form a "sizeable outward extension of the urban area into the countryside, beyond a well-defined urban edge.";

PO3812

- PARA 1-7-2

CL0243



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- 107. In the Green Belt Review Main Report, the Council acknowledge the following:
 - a. The site is high quality (Grade 1 and 2) agricultural land;
 - The development of this area would form a "sizeable outward extension of the urban area into the countryside, beyond a well-defined urban edge.";

- c. Significant improvements to highways infrastructure would be required;
- d. A new bus route would be required; and
- e. The site is likely to provide functionally linked habitat for bird species.
- 108. The site is reasonably well served by bus with a half hourly service during the day, but poorly served by rail. Where Green Belt is to be released first consideration should be given to "previously developed land and/or is well served by public transport". This site is neither.
- 109. It is clear from the Council's own Green Belt Review that the site continues to perform well as Green Belt it would if released sizeable outward extension of the urban area into the countryside, beyond a well-defined urban edge." In a nutshell sprawl. The site should remain in the Green Belt.



110. This site should remain in the Green Belt.

Land east of Chapel Lane and south of Walkers Lane, Sutton Manor

- 111. This site is identified as safeguarded land as 6HS. Assessed as Green Belt parcel GBP_082 the site is considered by the Council to score low against all the assessed Green Belt purposes.
- 112. The site is part of the north west/south east line of Green Belt previously described. Its removal from the Green Belt would undermine this strategic area of Green Belt. The Council also consider in the Green Belt Review that the three sub parcels forming GBP_082 are "party of a larger strategic gap between Sutton Manor (St Helens core area) and Rainhill."

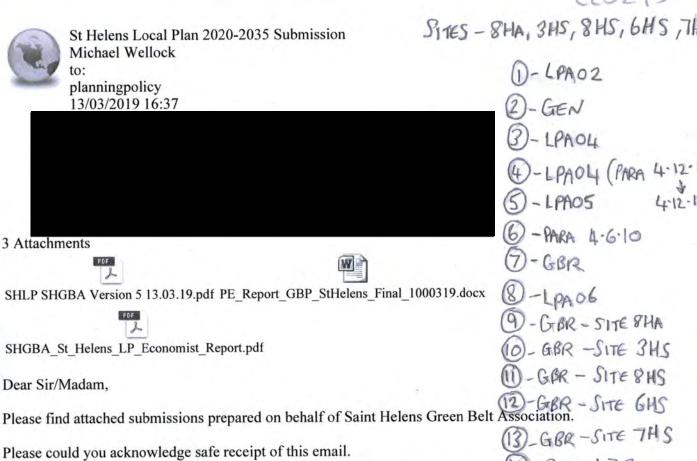


113. This site should remain in the Green Belt.

PO3813

- PARA 1-7-2

CL0243



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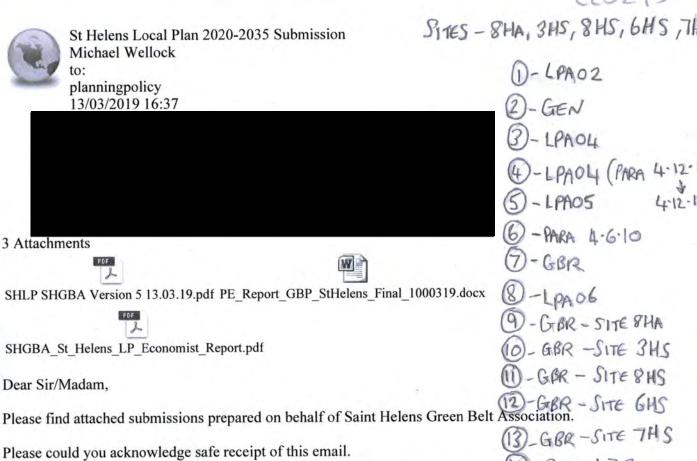


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PO3814

- PARA 1-7-2

CL0243



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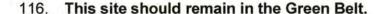
March 2019



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Land south of Elton Head Road (adjacent to St John Vianney Primary School), Thatto Heath

- 114. This site is identified as safeguarded land as 7HS. Assessed as Green Belt parcel GBP_085c the site is considered by the Council to score low against all the assessed Green Belt purposes.
- 115. This is one area where the Council's parcelling of sites influences results. By stripping out GBP_085c as a small part of the wider GBP_085 parcel, GBP_085c is considered to only make a minor contribution to the strategic purposes of Green Belt. This is self-fulfilling, Different boundaries, of which there are many in this area, would produce different results. As the Council concede on page 378 of the *Green Belt Review*, GBP_085c "sub-parcel forms part of the larger strategic gap between Sutton Heath/Thatto Heath (St Helens core area) and Rainhill". This area should remain in the Green Belt.



PO3815

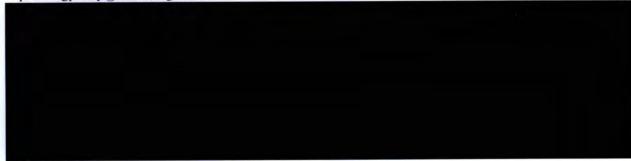
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St Helens Borough Local Plan 2020-2035 (Submission Draft) - Representations Nellist, Paul (Avison Young - UK) 13/03/2019 16:47

To:

planningpolicy@sthelens.gov.uk



2 Attachments





Response Form 13.03.19.pdf Final Chapel Lane Representations 13.03.19.pdf

Dear Sir or Madam

I attach a response form and representations made on behalf of Seddon Construction Limited to the St Helens Borough Local Plan 2020-2035 (Submission Draft) consultation.

Please let me know if you have any issues downloading or opening the attached files.

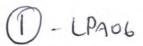
Hard copies will follow in the post.

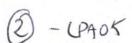
Kind regards

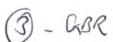
Paul Nellist

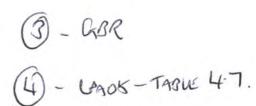
Principal Planner

Avison Young Norfolk House 7 Norfolk Street Manchester M2 1DW **United Kingdom**













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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.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> 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: Paul
Last Name:	Last Name: Nellist
Organisation/company: Seddon Construction Ltd	Organisation/company: Avison Young
Address: c/o Agent Postcode:	Address: Norfolk House 7 Norfolk Street Manchester United Kingdom
	Postcode: M2 1DW
	Y OSTEODE: WZ IDW
Signature:	Date: 13/3/2019

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

Would you like to be kept updated Plan 2020-2035? (namely submission Inspector's recommendations and ad	d of future stages of the St Helens Borough Local on of the Plan for examination, publication of the doption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Council's address is provided, we will contact	preferred method of communication. If no e-mail you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than <u>5pm on Wednesday 13th March</u> 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. If you still need assistance, you can contact us via:

Email:

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.

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

Now please complete <u>PART B</u> 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.

Policy Paragraph / diagram / table	Policies Map SEE ATTACHED REPRODULT	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please na document and relevant part/section)	Please see	attached representations	S
4. Do you consider the St He			
Please read the Guidance note		egal Compliance and the I	ests of Soundness
Legally Compliant? Sound?	Yes C	No 🗆	
Complies with the Duty to	Yes C	No []	
Cooperate			
Please tick as appropriate			
5. If you consider the Local I	Plan is unsound, is it	because it is not:	
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Justified?			
Effective?			
Consistent with National Pol	icy?		
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Please give details of why or fails to comply with the du			
If you wish to support the leg		undness of the Local Pla	an, please also use th
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suggested revised wording of any policy	y or text. Please be as precise as possible.
Please see attached representations	
	Please continue on a separate sheet if necessar
Please note your representation should	d cover succinctly all the information, evidence and
supporting information necessary to support normally	pport / justify the representation and suggested be a subsequent opportunity to make further
representations based on the original re	epresentation at the publication stage.
After this stage, further submissions	s will be only at the request of the inspector, based
on matters and issues he/she identif	fies for examination.
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8. If your representation is seeking a m	earings in public)
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the oral part of the examination? (the h	
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o set out the merits of the Chapel	Lane site and provide additional comments on any Matters
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lease note the Inspector will detend the have indicated that they wish to	rmine the most appropriate procedure to adopt to hear thos to participate at the oral part of the examination
Thank you for taking the Please	e time to complete and return this response form. keep a copy for future reference.



Representations to the St. Helens Submission Draft Local Plan

Land at Chapel Lane

March 2019

Green Belt Review (December 2018)

- 4.1 A Review of the Green Belt was undertaken as the Council had identified a shortfall of suitable land within its existing urban areas. The Review assesses the relative contribution that different parts of St. Helens make to the purposes of Green Belt. The Review splits all Green Belt areas in the Borough into parcels then assesses the potential for development in those areas that contribute least to the purposes of the Green Belt, taking into account site-specific constraints such as flood risk, ecology and access. The Review provided a key input into the selection of sites to be allocated for development, as identified in the Submission Draft.
- 4.2 Within the Green Belt Review, the site (Parcel Ref: GBP_082a Land East of Chapel Lane and South of Walkers Lane, Sutton Manor) was considered at Stage 3 for residential use and was given an overall score of 5 (just one point below the sites that were allocated). The commentary in Table 5.4 at page 111 provides comments on the Council's decision to safeguard the site and states that:
 - "The sub-parcel was proposed by the Council as an allocated housing site at LPPO stage. However, its characteristics, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to it."
- 4.3 The commentary then goes on to state that the site is:

"further from the nearest local centre than is the case for example for the nearby parcel GBP_080. It is now seen as being more suitable to form a longer term extension of the urban area, which could contribute to meeting housing needs after the end of the Plan period."

5. Seddon's Comments on the Submission Draft Local

Removal of the Site from the Green Belt and Safeguarding

- 5.1 The Chapel Lane site is proposed to be removed from the Green Belt and allocated as a 'safeguarded housing site' (Site 6HS) to meet longer term housing needs well beyond the plan period.
- 5.2 Seddon **fully supports** the removal of the site from the Green Belt given that the site represents a logical extension to the existing settlement, is sustainably located, is not required to meet the five purposes of the Green Belt and is wholly suitable for release from the Green Belt. The Council's decision to propose a safeguarding allocation, and the assessment in the Green Belt Review confirm that the site does not make a contribution to the five purposes of the Green Belt and is wholly suitable for release from the Green Belt.
- 5.3 Seddon also **supports** the proposed safeguarding of the site in the Submission Draft Local Plan.

Housing Requirement

5.4 However, the site has been effectively downgraded to a safeguarded site form the previous proposed allocation in the Preferred Options Local Plan. The only justification for this downgrading appears to be that

Page: 8

in the Green Belt Review, which in summary is a result of the reduced housing requirement for the Borough, and the site's proximity to the nearest Local Centre when compared to site 5HA.



- 5.5 Central to the NPPF is a presumption in favour of sustainable development, set out at Paragraph 11. For planmaking this means that plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change; and strategic policies should, as a minimum, provide for objectively assessed needs for housing.
- 5.6 The Planning Practice Guidance ("PPG") (Housing and Economic Needs Assessment) makes it clear that the standard method uses a formula to identify the *minimum* number of homes expected to be planned for and does not produce a housing requirement figure.²
- 5.7 As set out at Section 4 of these representations, the Submission Draft sets a housing requirement of 486 dwellings per annum based on 'Economic Scenario 2', Sensitivity Option 3 in the SHMA Update 2018. This figure is only just above the minimum number of homes expected to be planned for using the Government's standard method.
- 5.8 A key objective of the NPPF is to support the Government's objective of significantly boosting the supply of homes. Paragraph 67 states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 5.9 The NPPF sets out a number of measures to maintain the supply and delivery of housing including the Housing Delivery Test. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.
- 5.10 SHMBC's decision to plan for just above the minimum requirement presents a serious risk that the Local Plan will underdeliver on its housing requirements and that that Housing Delivery Test will not be passed, particularly in the early years following adoption of the plan.

The Need for an Appropriate Mix of Sites

5.11 The Submission Local Plan includes a significant change in strategy towards housing allocations when compared to the Preferred Options plan. SHMBC has chosen to allocate fewer (10 sites compared to the previous 16) but on the whole much larger sites in the Submission Local Plan. Whilst Seddon acknowledges the importance of prioritising brownfield sites before releasing land from the Green Belt, relying on fewer, larger sites increases the risk of the plan not delivering should one or more of the sites experience delays or issues with delivery, which is more likely for large, complex sites such as those now proposed for allocation. The large brownfield sites (e.g. 9HA and 10HA) will require substantial remediation and larger sites in general will require

Page: 9

² Reference ID: 2a-002-20190220

comprehensive masterplanning, including securing the provision of infrastructure improvements, before they can come forward.

- 5.12 Paragraph 68 of the NPPF highlights that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.
- 5.13 Due to the change in strategy, SHMBC will be relying on two large allocation 4HA and 5HA to deliver all of the housing in the south western part of the Borough (where the Chapel Lane site is located) over the plan period (1,000 dwellings estimated between the two sites over the plan period). For the reasons set out above, relying on just two large allocations presents a risk that delivery will fall short of the requirement, particularly in the early years following adoption whilst those large sites are mobilised. Furthermore, due to the scale of such large sites some of the homes proposed will be quite a distance from the nearest local centres and connections to public transport.
- 5.14 SHMBC should include a more appropriate mix of sites to meet its housing requirement and in particular in this part of the Borough. The allocation of the Chapel Lane site, in addition to the two large allocations (4HA and 5HA) would ensure an appropriate mix of sites in this part of the Borough and would help ensure delivery across all of the plan period, including the early years.
- 5.15 Alternatively, a slight reduction in the number of dwellings to be delivered within one or more of the large strategic allocations within the plan period, and the allocation of additional smaller sites (i.e. the Chapel Lane site) would ensure that the plan complies with the NPPF's objective to bring forward small and medium sites and offer greater certainty of delivery.
- As demonstrated in detail in the previous section, the site at Chapel Lane is in control of a major housing developer that is committed to delivering homes on the site. In addition, there are no physical, technical or environmental constraints that would preclude the development of the site early in the plan period. SHMBC should therefore re-introduce the site at Chapel Lane as a housing allocation in the Local Plan.

Location in Relation to Employment Sites

5.17 Paragraph 104 of the NPPF states that:

"Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;"
- 5.18 In this context, the Council is proposing two employment allocations (1EA and 10EA) and one safeguarded employment site (1ES) in this part of the Borough (See Figure 2 below). As demonstrated by the letter from LM6 (Appendix 2) both 1EA and 1ES will be required within the plan period and therefore the Council should consider allocating 1ES.
- 5.19 Of all of the proposed housing allocations and safeguarded sites in this part of the Borough, the Chapel Lane site is the best located for overall access road access to the proposed employment allocations (via Chapel Lane and the St Helens Linkway/Lea Green Road to 10EA; and, via Chapel Lane, the St. Helens Linkway and

Date: March 2019 Page: 10



the M62 to the Junction 8 access to Omega and 1EA and 1ES). Unlike any of the other proposed allocations in this part of the Borough, the development of the Chapel Lane site would not require residents to make car journeys to the nearest employment sites through built up residential areas.



Figure 2 – Location of employment and housing proposed allocations and safeguarded sites (including indicative vehicle route from Chapel Lane site to employment sites)

- 5.20 Whilst the Local Plan and the Green Belt Review appear to demonstrate that the Council has taken into account access to shopping, leisure, education and other activities when deciding on proposed allocations, it would appear that the important consideration of access to employment opportunities has not been fully considered.
- 5.21 The relationship of the Chapel Lane site with the nearest proposed employment sites is another reason that the Council should consider allocating the site for residential development in the Local Plan.

Housing Trajectory

5.22 Table 4.7 of the Submission Draft identifies at what stages delivery of new housing required over the plan period can be anticipated. It is not clear from our review of both the Submission Draft and associated evidence base where the numbers forming the 'other supply' at Table 4.7 are derived from. In order for the Local Plan to be found sound and adoptable, this trajectory needs to be based upon clear and robust evidence. Seddon therefore respectfully request clarification on how the 'other supply' in Table 4.7 has been calculated.

Date: March 2019

6. Summary and Conclusions

- These representations have demonstrated that the site is in an appropriate and sustainable location for residential development and that it represents a highly sustainable solution to meeting St. Helens' housing needs in accordance with Government guidance and the NPPF. The site will meet the economic, social and environmental objectives set out in Paragraph 8 of the NPPF and will deliver the type, quality and quantity of new homes that will support the growth of St. Helens over the plan period.
- 6.2 Seddon fully supports the removal of the site from the Green Belt and supports its allocation as Safeguarded Land for Housing.
- 6.3 However, Seddon also considers that SHMBC's strategy of relying on a few large housing allocations to deliver the housing requirement over the plan period presents a significant risk that delivery could fall below the level needed. To mitigate this risk and ensure that the Local Plan is flexible and effective, the Council should therefore allocate the Chapel Lane site as a smaller site that has been proven to be deliverable in the early years of the plan period and which is suitably located in relation to the nearest proposed employment sites.
- This is particularly important in the south western part of the Borough where the Chapel Lane site is located, as the currently proposed strategy in the Submission Local Plan relies on just 2 very large allocations to deliver 1,000 houses between them over the plan period.
- 6.5 Seddon therefore considers that the Chapel Lane site should be re-introduced as a housing allocation in the Local Plan.

Date: March 2019

SECTION 3 CASE FOR GREEN BELT RELEASE

Summary of Planning Policy/Guidance

National Planning Guidance

In July 2018, The Government published a revised National Planning Policy Framework ("NPPF") which replaces the previous guidance published in 2012 and provides the overarching planning framework for England. Central to the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking (Paragraph 11). The NPPF also seeks to boost the supply of housing and requires local authorities to plan positively for objectively assessed needs and maintain a sufficient supply of housing land.

Paragraph 136 of the NPPF states that once the general extent of a Green Belt has been approved, it should only be altered in 'exceptional circumstances' through the plan-making process and that the amended Green Belt boundary should be "capable of enduring beyond the plan period". In the case of St. Helens, there are exceptional circumstances which justify alteration to the Green Belt boundary and the site at Chapel Lane offers an opportunity to release Green Belt in a sensitive manner, without harming its purposes and functions, as set out at paragraph 134 of the NPPF.

Paragraph 8 of the NPPF sets out that sustainable development has three overarching objectives: economic, social and environmental. The proposed development would accord with each of these objectives, contributing to building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities and continuing to protect and enhance the natural, built and historic environment.

Sustainable transport is another important theme within the NPPF (Paragraphs 102-111); and has a critical role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The site offers a highly sustainable location on the edge of the existing built up urban area and has access to high quality public transport facilities. Other vital community facilities including shops, schools and parks are also within walking distance.



Chapter 5 of the NPPF sets out how local authorities should boost significantly the supply of housing in order to deliver sufficient supply of homes. The Land at Chapel Lane represents a deliverable site that is available, achievable and viable and its development with up to 120 homes would boost the supply of housing in the Borough.

Chapter 15 of the NPPF highlights how the planning system should contribute to and enhance the natural and local environment. The Land at Chapel Lane does not have particularly high environmental or amenity value and its development for housing would not have any adverse impact upon valued and important landscapes or biodiversity and geodiversity. Furthermore, there are opportunities to provide ecological enhancements and connect the green spaces on the site to surrounding green infrastructure, including the Bold Forest Park.

Development Plan

The current Development Plan for the Land at Chapel Lane comprises:

- The Core Strategy Local Plan (adopted October 2012);
- Saved Policies of the 1998 Unitary Development Plan;
- The Joint Merseyside and Halton Waste Local Plan (adopted July 2013); and,
- The Bold Forest Park Area Action Plan (adopted July 2017).

The Core Strategy ("CS") established the exceptional circumstances to release Green Belt land 2022 onwards (i.e. in years 11-15 of the CS plan period) to meet the longer-term housing needs of St. Helens.

The CS only allows for a strategic review of the Green Belt following evidence base work at a sub-regional level. This was largely reflective of the Regional Spatial Strategy ("RSS") which was in force at the time of adoption. The RSS has now been revoked and therefore its policies, and those reflective of them are out-of-date. In any case, a sub-regional Green Belt Review has not taken place and instead other authorities (e.g. Halton, Knowsley and Sefton) have undertaken their own local Green Belt reviews.

In July 2013, as part of the next stage of preparation of a local plan following the adoption of the Core Strategy, SHMBC published its Allocations and Sustainable Development Local Plan ("ASDLP") Scoping Document, which included a methodology for a Green Belt Review. The Scoping Document set out that 53.3ha of Green Belt land was required for employment, and 299ha of Green Belt land was required for housing. The total draft indicative Green Belt land requirement was therefore 352.3ha which included 5 years' worth of safeguarded land beyond the CS period.

However, the Draft Mid-Mersey SHMA (October 2015) ("SHMA") and St. Helens Employment Land Needs Study 2015 ("ELNS") found that the Borough's objectively assessed needs ("OAN") for housing and employment land are significantly higher than those set out in the CS. The Council received legal advice that if the ASDLP were to be pursued, there was a significant risk that it would be open to legal challenge or would not be found sound at the examination stage.

At the meeting of the SHMBC Cabinet meeting on 18th November 2015, the decision was made to abandon the preparation of the ASDLP and begin preparing a new Local Plan for St. Helens.

The Council therefore began preparing a new local plan to plan for significantly higher levels of economic growth than currently supported under the existing Core Strategy. A consultation into the scope of the St. Helens Local Plan ("SHLP") ran for six weeks between January and March 2016 and a Preferred Options consultation ran for eight weeks between December 2016 and January 2017.

The Need for Housing Land and Exceptional Circumstances

In the SHLP 2018-2033 Preferred Options document (December 2016), SHMBC sets out its preferred spatial strategy for meeting development needs including how the Borough's housing and employment targets will be met (Policy LPA02).

Policy LP04 and LP05 set out the housing and employment targets for the Borough respectively and allocate a minimum of 306 ha of employment land up to 2038 and a minimum of 10,830 net additional dwellings to 2033 in the Borough. This equates to an indicative annual average of 570 dwellings.

Given the need to accommodate an increased amount of housing and employment land in the Green Belt and sooner than the Core Strategy envisages, SHMBC considers that exceptional circumstances exist for targeted release of Green Belt land in order to meet identified needs. The SHLP will therefore remove land from the Green Belt and allocate for development to enable the housing and employment land targets to be met in full over the plan period. Furthermore, the SHLP will identify safeguarded land to be removed from the Green Belt to meet housing and employment development needs for the following 15 years in order to establish a robust Green Belt boundary that will endure beyond the plan period and accord with the NPPE.

Five Purposes of the Green Belt

Paragraph 134 of the NPPF sets out five purposes of the Green Belt. The development of the Land at Chapel Lane for residential development would not prevent the Green Belt from functioning effectively against these five purposes, as demonstrated on the following pages.

15 | SECTION 3 | CASE FOR GREEN BELT RELEASE



Looking towards eastern boundary from centre of site. The vegetation and sloped ground between the site and the Pendlebury Brook create a strong boundary which contains the site physically and visually.



Looking north from the centre of the site.

To Check the Unrestricted Sprawl of Large Built-up Areas

The site forms a logical extension to the existing urban area and would provide for the natural expansion of the settlement. The site is bounded to the north by residential properties. Chapel Lane forms a strong, permanent defensible boundary to the west of the site and the area of woodland to the south of the site would be retained as part of the development, providing a strong, permanent and long term defensible boundary to prevent encroachment into the Green Belt to the south. The Pendlebury Brook, drain and sloping vegetated ground inbetween provide a strong physical boundary to the east of the site (see image above).

The Land at Chapel Lane has defensible boundaries on all sides and would form a natural extension to the existing urban area. As such, the site is not required to check the unrestricted sprawl of the existing built-up area.

To Prevent Neighbouring Towns from Merging into One Another

The removal of the site from the Green Belt would not reduce the separation distances between the built up urban area and the nearest neighbouring settlement of Rainhill. The resultant gap between the site and Rainhill would be around 760m, which is further than the current narrowest separation distance of 685m between the two areas.

Development of the site would not result in the merging of neighbouring towns and would maintain the functions and separation of the Green Belt in this location. Furthermore, the two areas are physically separated by the St. Helens Linkway Road which is a strong, permanent defensible boundary.

To Assist in Safeguarding the Countryside from Encroachment

The Land at Chapel Lane is well related to the existing urban area and benefits from strong existing boundaries in all directions. Whilst a limited amount of encroachment into the countryside is inevitable if St. Helens is to meet its long-term

housing needs through Green Belt release, developing this site will be such that any further encroachment into the countryside would be prevented.

The sensitive development of the site will not affect the purpose of safeguarding the countryside from encroachment in this location.

To Preserve the Setting and Special Character of Historic Towns

The sensitive development of the site would not impact on the character or setting of any Listed Buildings or Conservation Areas. St. Helens is not a nationally recognised historic town and there are none within the vicinity of the site.

The removal of the site from the Green Belt does not affect the purpose of preserving the setting and special character of a historic town.

To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and other Urban Land

The Council have acknowledged in the St. Helens Core Strategy (2012) and the SHLP 2018-2033 Preferred Options document that was consulted on in December 2016 that the supply of deliverable brownfield sites is not sufficient and, consequently, Green Belt release is required to meet the Borough's housing needs over the plan period. As such, all sites in the Green Belt should be considered equally and neutrally when assessed against this purpose.

The release of the Land at Chapel Lane from the Green Belt and allocation for housing development would not prevent the recycling of derelict land and other urban land because insufficient brownfield sites are available to meet the future housing needs of the Borough. Furthermore, the fact that the former Pilkington Glass site is being developed relatively close by, indicates that derelict land, where available and suitable will indeed be delivered in the borough. The Land at Chapel Lane is well placed to deliver urban regeneration by meeting the housing needs of the borough whilst contributing environmental and ecological benefits.







Dual Carriageway / Main Roads

Secondary Roads serving the Proposed Site



Woodland forms Strong, Permanent Defensible



Pendlebury Brook, Drain, and Vegetated Slope form Strong Physical and Visual Boundary



PO3816

EL0258



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

SITE GBP 093-A

Graham Lamb

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



4 Attachments



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



LPAOZHPARA 3



Appendix 4a- Interim Housing Neeeds Assessment.pdf

PA02- PARA 4 1 PAO3

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.

l look forward to receiving receipt of these representations in due course and please can نططة ensured that these are formally considered as part of this consultation. CPC02

Thanks and kind regards,

Graham Lamb

Associate Planner

Pegasus Group

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

107- PARA S, J

PCIO-PARA 6

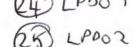
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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)

Graham Lamb

planningpolicy@sthelens.gov.uk

13/03/2019 17:03



1 Attachment



Appendix 1- Delivery Statement.pdf

Email 2

Graham Lamb Associate Planner

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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

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From: Graham Lamb Sent: 13 March 2019 17:01

Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

Graham Lamb

Associate Planner

Pegasus Group

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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)

Graham Lamb

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

Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

× ×

Graham Lamb

Associate Planner

Pegasus Group

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KW/GL/P17-0098/L004



13 March 2019

Planning Policy Team
Development Plans Section
St Helens Council
Place Services
Town Hall Annexe
Victoria Square
St Helens
Merseyside
WA10 1HP

Sent via email to: planningpolicy@sthelens.gov.uk

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: 13th March 2019

Pegasus Reference: GL/KW/P17-0098/R005v4

Pegasus Group

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3. SITE SPECIFIC ASSESSMENT OF BURROWS LANE SITE

As part of the submission draft consultation, the Council have provided an updated Green Belt Assessment (December 2018), as well as commissioning AECOM to produce a Sustainability Appraisal Report (January 2019). Both reports provide a site-specific assessment of the Burrows Lane site, as well as the other allocated and omission sites. We raise several concerns about the overall methodology adopted in these two reports, which we consider in detail in Section 7. However, to illustrate how the Burrows Lane site remains a highly suitable site which the Local Plan should re-allocate, in this chapter we outline a site-specific Green Belt and Suitability Assessment for Burrows Lane.





3.2 Please note that we have produced a detailed assessment of the Burrows Lane site, as well as the 10 proposed housing allocations and 8 safeguarded sites, which are contained at Appendix 6. These detailed assessments outline the Council's conclusions on all of these sites, as well as our own assessment conclusions utilising the Council's criteria. The Burrows Lane detailed assessment should be cross-referenced and read in conjunction with this section, whilst the proposed allocations and overall site selection methodology are considered in more detail in section 7.

Green Belt Assessment

- 3.3 To establish whether it would be appropriate to release a site from the Green Belt, it is relevant to examine how its development would impact on the five purposes of the Green Belt which are listed at paragraph 134 of the 2019 NPPF:
 - To check the unrestricted sprawl of large built up areas;
 - · To prevent neighbouring towns from merging into one another;
 - · To assist in safeguarding the countryside from encroachment;
 - · To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other land.
- 3.1 The Council's updated Green Belt Review (December 2018) contains a 3-stage process in its adopted methodology. A number of Green Belt sites are assessed at Stage 1b, against the first 3 purposes of the Green Belt. At this stage, the Council's Green Belt Review screens out the last two purposes on the basis that there are no historic towns in St Helens, and because of the difficulty of justifying the case that one parcel of land would make a greater contribution to urban regeneration than another, particularly when it has already been established that there is insufficient brownfield land to meet development needs over the Local Plan period. We endorse this approach, which is both sensible and logical in the St Helens context.
- 3.2 However, the Green Belt Review then adopts a rather confusing approach in relation to sites which advance to stages 2 and 3 (on the basis that their contributions to the Green Belt are considered to be low or medium). At Stages 2 and 3 the Council then assess the development potential of the



remaining Green Belt sites, including commentary on numerous suitability considerations such as flood risk, land ownership, noise and heritage. This is a confusing and muddled methodology, because best practice dictates that green belt credentials and suitability/deliverability credentials of a site should be separately assessed. This is particularly the case for heritage matters, as the suitability of a site in heritage terms is distinctly different to how the site performs against purpose 4 of the Green Belt which relates to the preservation of historic towns. As we comment on in more detail in Chapter 7 of these Representations, we raise issues with this adopted methodology which is both confusing and not sufficiently robust.



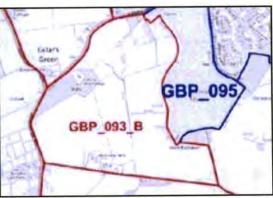
3.3 The Burrows Lane site (Reference: GBP_093_B) did not reach Stage 3 of the Green Belt Assessment, therefore in line with stage 1b of the Council's methodology, we focus below on the first three purposes of the Green Belt. We then focus on the suitability of the site, which as already explained, the Council confusingly explore in stage 3 of their Green Belt Assessment.

Will not result in unrestricted sprawl of large built up areas

- 3.4 The Council's 2018 Green Belt Review scores the site as having a high contribution against this purpose of the Green Belt. This is concluded on the basis that the Council consider the site to not have strong southern and eastern boundaries, as well as stating that the sub-parcel has very little built development within it.
- 3.5 We strongly disagree with this conclusion, as the site does not score a high contribution against purpose one of the Green Belt. Firstly, the green belt parcel (reference: GBP_093_B) assessed in the 2018 Assessment is larger and differs to the red line (parcel A) being promoted for allocation by Redrow. This therefore partly explains the difference in our conclusions compared to the Council's assessment.







- 3.6 Parcel A has strong boundaries to the north (Burrows Lane) and east (Eccleston Mere), which will prevent urban sprawl in these directions and leads to the site being well contained along these boundaries.
- 3.7 Whilst the northern and eastern site boundaries are very well defined and permanent in nature, it is acknowledged that the southern and western boundaries are less well defined, comprising of



established hedgerow and mature planting respectively. However, the existing mature hedgerow along the southern boundary will be retained as part of any future development proposals, and the western boundary can be strengthened by a landscape buffer. The Illustrative Masterplan contained at **Appendix 2** shows how this can be easily achieved.

- 3.8 In overall terms, it is considered that Parcel A would not constitute unrestricted sprawl on the basis of the presence of existing physical features along its boundaries, that can be reinforced and enhanced, such that the development envelope would instead provide a rounding off of the urban area to the south west of Eccleston.
- 3.9 In essence, there is sufficient capacity and opportunity within the site to provide a robust landscape and Green Infrastructure strategy that is consistent with local landscape character, to ensure enduring and defensible boundaries to the south and west going forward can be created preventing any further expansion.
- 3.10 Indeed, it is possible that these boundaries could be planted up (as an 'advanced planting scheme') as part of a first development phase to the north of Parcel A, so that they have matured by the time the site is fully developed.
- 3.11 We therefore strongly disagree that the parcel scores high against this purpose and consider it to score medium against this purpose of the Green Belt.

Will not cause neighbouring towns to merge into one another

- 3.12 The Council's 2018 Green Belt Assessment notes how the sub-parcel falls within a Green Belt gap between Eccleston and Eccleston Park. As both areas are considered part of the larger St. Helens core area, the Council consider the parcel to play no part in the prevention of neighbouring settlements or towns merging and score the site as low against this Green Belt purpose.
- 3.13 We agree with the Council's Assessment that the site scores low against purpose 2 of the Green Belt. Both Eccleston and Eccleston Park form neighbourhoods within the wider built up area of St Helens and are not towns in themselves. As this is classed as one settlement area, there are therefore no merger issues in this location.
- 3.14 As such, the site is of low significance in respect of the merging of towns and scores a low contribution against this purpose of the Green Belt.

Will not cause unacceptable encroachment into the countryside

3.15 The Council's Green Belt Review scores the site as having a high contribution against this purpose of the Green Belt. Their assessment states that the site is characteristic of the countryside, is only affected to a limited degree by urban features when viewed out to the north and has open views out the west and south.





- 3.16 We do not deny that the development of the site will cause a level of encroachment, as this is inevitable on all Green Belt release sites. However, we strongly disagree that the site scores a high contribution against this purpose of the Green Belt.
- (3)
- 3.17 Firstly, the site is affected by urban features along its northern boundary, by virtue of Burrows Lane, Pilkington Sailing Club and the existing residential development present in the area. Eccleston Mere borders the site to the east, which reduces openness/landscape sensitivity along this boundary. These strong boundaries will prevent encroachment to the north and east.



3.18 Secondly, it is acknowledged that the western and southern site boundaries are more sensitive in terms of open views. However, views to the south and west are not long line views because of the tree coverage and shrubbery which populates the site, which reduces openness sensitivity. Furthermore, landscape strategies could be implemented along these boundaries to further strengthen these boundaries and reduce sensitivity.



- 3.19 Thirdly, any views across the site are from the local road network as opposed to a local public right of way network. Views from public rights of way are considered to be more sensitive, therefore the Burrows Lane site is less sensitive in this regard.
- 3
- 3.20 Overall, given the strong boundaries on two sides, the absence of long-line views and the ability to provide a robust planting/landscaping strategy on site, the site is of medium significance in terms of its encroachment.

To preserve the setting and special character of historic towns

- 3.21 Whilst the Council have not assessed any green belt sites against purpose 4 of the Green Belt, for robustness, we have. The Burrows Lane site is not located near to any historic towns, conservation areas or listed buildings.
- 3.22 Accordingly, the site scores a low contribution against this purpose of the Green Belt.

Green Belt Weighting System and Overall Assessment/Conclusions

- 3.23 Paragraph 2.30 of the 2018 Green Belt Assessment notes how the Council came to their overall conclusions in their Stage 1B assessments. It is confirmed that the score 'High+' is given to parcels that score high against more than one purpose of the Green Belt.
- 3.24 We raise concerns with the robustness and validity of this weighting system. In the Burrows Lane example, the Council score the site as having two high contributions and one low. It appears to be fundamentally flawed to suggest that a site scores a 'high+' contribution to the Green Belt when it scores low against one of the fundamental purposes of the Green Belt. A site can not be deemed to perform a high+ contribution to the green belt if it scores so lowly against one of the core principles and purposes of the Green Belt.





- 3.25 In any event, for the reasons we set out above, we strongly disagree with the Council's conclusions against purposes 1 and 3, and score the site as having medium contributions against these Green Belt purposes.
- 3.26 Therefore, as the site scores an overall medium contribution to the Green Belt, the site should not have been screened out at Stage 1b of the Green Belt. Instead, the site should have advanced to stages 2 and 3 of the Green Belt Assessment.
- 3.27 In addition to the site's suitability for Green Belt release from a Green Belt contribution perspective, the site is also highly suitable and deliverable, as explained below.

Deliverability Assessment

- 3.28 The 2019 NPPF and NPPG specify that local planning authorities supply sufficient specific deliverable sites to deliver housing in the first 5 years. To be considered deliverable, sites should, at the point of adoption of the relevant local development document:
 - Be available there is confidence that there are no legal or ownership problems.
 - Be suitable it offers a suitable location for development and would contribute to the development of sustainable and mixed communities.
 - Be achievable there is a reasonable prospect that housing will be developed on the site at a particular point in time.
- 3.29 This is a judgement about the economic viability of a site and the capability of a developer to provide housing within a defined period, taking into account marketing, cost and deliverability factors.

Available

- 3.30 Redrow have legal control of the whole site, through a development option with the landowner, and are seeking to promote the site for residential development at the earliest opportunity. Furthermore, there are no ransom strips, tenancies or other ownership problems which could prevent or delay this.
- 3.31 As such, the site in the control of a nationally recognised house builder, with a proven track record, and must be regarded as wholly available.

Suitable

3.32 The NPPG requires that the suitability of sites should be guided by the development plan, emerging plan and national policy; as well as the market and industry requirements in the housing market area (Ref: 3-019-20140306).



Planning Policy & Market Requirements

- 3.33 As noted above, Policy LPA02 of Local Plan confirms that there are exceptional circumstances to support the release of Green Belt land, a position which Redrow wholly support, and Eccleston has been identified as an area where development should be directed.
- 3.34 In terms of market and industry requirements, Redrow's interest confirms that this is a suitable location for residential development from a commercial perspective.

Location and Accessibility

- 3.35 Whilst not specifically listed in the NPPG, access to services is a consideration of suitability. In this instance the site is in a highly accessible and sustainable location with numerous facilities within walking distance in Eccleston and public transport links to the larger urban area of St Helens.
- 3.36 In terms of retail uses, a Sainsbury's Local convenience store is located within 1.1 km of the site, and Eccleston Local Centre contains a pharmacy, Post Office and other unit shops. Beyond that there are Morrison and Asda Superstores located within 3km of the site, along with a range of other national multiples, in St Helens Town Centre.
- 3.37 In respect of community facilities, Eccleston contains two primary schools, a secondary school, medical surgery, pub, and churches; whilst the urban area of St Helens contains 11 primary schools and 2 secondary schools. In addition, Eccleston Mere provides a key recreation facility, which is directly adjacent to the site, offering sailing and angling. There are several other sport and leisure facilities within the vicinity including Burrows Riding School, Prescot and Odyssey Cricket Club, Taylor Park and Grange Park Golf Club.
- 3.38 There are bus stops within 110m and 200m of the site with regular services to Eccleston and other higher order centres including Sutton Oak and St Helens. In addition, Eccleston Park train station is approximately 3km to the south, which links to Wigan and Liverpool. The site takes access from the B5201 Burrows Lane, which links up to the A58 and the national road network.
- 3.39 As such, the site is a sustainably located development opportunity located within easy access of a range of local services, employment opportunities and public transport routes.

Constraints and Impacts

3.40 The NPPG goes on to list several further criteria for assessing suitability which we address in turn below:

Physical limitations and constraints (access, ground conditions, flood risk, etc.)

3.41 There are no physical constraints preventing development of the site as it largely comprises flat open fields, and is directly adjacent to Eccleston Mere, it falls within Flood Zone 1.



- 3.42 The site can take direct vehicular access Burrows Lane, to the north of the site, and there are also opportunities for footpath or cycle links with the Golf Club to the south east and Mere View to the south east (which would also improve accessibility to the services in Thatto Heath).
- 3.43 An initial assessment suggests that the development can utilise existing infrastructure surrounding the site without generating utilities or drainage issues.

Landscape impacts (including nature and heritage)

- 3.44 Although the site currently falls within the Green Belt, it is not subject of any other landscape, ecological or heritage designations. Landscape impacts have been largely addressed within the Green Belt Assessment above, which concluded that the site was reasonably well contained and screened, and that development of the site would round off the urban edge to the south west of Eccleston, with sufficient opportunities and capacity to strengthen landscape buffers, to ensure the scheme would be sympathetically integrated with the Mere and surrounding land.
- 3.45 In heritage terms, the site is not located near any conservation areas, and the nearest listed building is over 600m from the site, with minimal long-range views, so the development is highly unlikely to have any impact on its setting.
- 3.46 A large part of the site is located in a Mineral Safeguarding Area (MSA); however, this covers much of the authority and does not prohibit development subject to the criteria of Policy LPC 14.
- 3.47 There are no other environmental or ecological designations or constraints that would prevent the development of this site. The scheme would be sympathetically integrated with the open land to the west and south of the site and the mere to the east, through planting and large open space buffers.
- 3.48 The site is not located in or near to a conservation area, with the nearest listed building over 600m from the site, ensuring that there are no heritage impacts as a result of this development.

Market attractiveness

3.49 As noted above, Redrow's land interest suggests that the site is in an attractive market location, which it is, as it falls on the edge of Eccleston, with views onto the Mere, whilst also being in close proximity to St Helens, which is the Principal Town in the Borough for retail and employment opportunities.

Contribution to regeneration priority areas

3.50 Development in this area is not a regeneration priority, but new development here will generate additional household spending which will help to support additional shops and services in Eccleston and St Helens.



Amenity impacts on occupiers and neighbouring areas

- 3.51 The proposed development will have minimal impacts on the surrounding area as the proposed scheme will be sympathetically integrate into the open countryside that lies to the west and south of the site. The development will be well screened by the Mere to the east and the small number of residential properties to the south west of the site. In addition, the development will deliver areas of open space for use by residents and the local community.
- 3.52 The site is therefore suitable in accordance with the NPPF and the NPPG.

Achievable

3.53 The delivery of 210 dwellings would make a significant contribution towards meeting the housing needs of the Borough. An initial assessment of the site constraints has been undertaken which illustrates that delivery of the entire site is achievable and deliverable, and a professional team of technical experts has been appointed to underpin this assessment and support the delivery of the site moving forward.



- 3.54 These assessments have informed the Delivery Statement provided at Appendix 2, with the following technical reports also provided:
 - · Accessibility Statement (Appendix 3);
 - · Phase 1 Ecology Survey (Appendix 4); and
 - · Agricultural Land Assessment (Appendix 5).
- 3.55 Redrow has reviewed the economic viability of the proposal in terms of the land value, attractiveness of the locality, potential market demand; as well as the cost factors associated with the site including preparation costs and site constraints. Where potential constraints have been identified; Redrow has considered the necessary mitigation measures and will use investment in order to overcome any deliverability barriers.
- 3.56 Redrow can, therefore, confirm that the development of the site is economically viable in accordance with the NPPF and NPPG. As a consequence, the company is committed to investing in the site and is confident that residential development can be achieved within 5 years.

Deliverability Conclusions

3.57 This assessment has confirmed that the Burrows lane site is available, suitable and achievable in accordance with the latest national guidance and should therefore be allocated for residential development.



Economic Investment

- 3.58 It is also worth noting that the development of up to 300 homes will create a number of economic benefits, including:
 - **Employment opportunities:** Around 42 full-time equivalent jobs could be directly supported per annum during the construction phase (circa 6 years), with a further 78 jobs per annum supported in the wider supply chain.
 - Contribution of construction phase to economic output: The construction of the new homes could contribute an additional £40.5 million of gross value added (GVA) annually to the local economy during the construction period.
 - Household spend: Once fully built and occupied, the households are estimated to generate expenditure in the region of £5.4 million per annum.
 - New Homes Bonus: The proposed development also has the potential to generate in the region of £1.4 million in New Homes Bonus revenue for St Helens Council.
 - Increased Council Tax income: The construction of the new homes could generate around £351,000 per annum in additional Council Tax revenue, once fully developed and occupied.

Site Specific Assessment Conclusions

3.59 Therefore, this section confirms that the Burrows Lane site does not fulfil the 5 purposes for including land in the Green Belt, and is sustainable and accessible site, with no obvious technical constraints preventing its development for residential purposes. As such, it is recommended that Parcel A is allocated for immediate development.

noo

Commentary on Site Sustainability Assessment

- 3.60 This section has explored at length the suitability and sustainability credentials of the site. We have undertaken a detailed assessment of the Burrows Lane site, in the form of a pro-forma, which is contained at **Appendix 6.** We provide the following headline comments on the Council's SA assessment of the Burrows Lane site:
 - The Burrows Lane land parcel assessed in the Council's SA differs to the final red line boundary for Parcel A which Redrow are promoting. There are therefore some errors we have picked up on, which we address in our detailed pro-forma.
 - When converting the Council's SA scoring methodology to a numerical scoring system, the site scores a sustainability scoring of 44.5. This does not differ greatly at all from the sustainability scorings of many of the Council's allocated and safeguarded sites. Indeed, The Burrows Lane site actually scores higher than one of the proposed housing allocations (4HA) and safeguarded sites (8HS).







- 3.61 We provide our own sustainability scoring of the site, where we picked up incorrect statements made in the AECOM SA such as the site containing a TPO and Local Wildlife Site, landscape sensitivity and deliverability matters. Our assessment concludes that the site has a sustainability score of 51, which is the 4th highest sustainability score of all sites against our methodology.
- 9
- 3.62 Overall, our detailed assessment confirms that the Burrows Lane site is sustainable and highlight several issues with the Council's scoring methodology. Please refer to Section 7 of this report where we provided detailed commentary on the Council's Green Belt Assessment and site selection methodology.



- Safeguarded housing sites 6,365
- TOTAL = 8,608
- Safeguarded employment sites additional sites to provide choice and flexibility

Site Selection Methodology

7.26 In respect of distribution and site selection, the supporting text at paragraph 4.18.12 of the plan confirms that:

"In accordance with Policy LPA2 housing land supply will be distributed across the Borough, albeit with a concentration in existing urban areas and the major urban extension planned at Bold... The location of sites that have been released from the Green Belt has been determined by the St Helens Green Belt review... Whilst this process has constrained the ability to identify suitable sites in some key settlements, all settlements will have opportunities for housing development either within them or nearby."

- 7.27 This text supports an approach where allocated sites will be evenly distributed amongst the key settlements, where practicable, guided by the Green Belt Review and SHLAA. To clarify the key settlements are as follows:
 - St Helens Core Area- including St Helens Central Spatial Area, Moss Bank in the North, Clock Face to the South, Eccleston to the West and Parr and Sutton to the East (also includes Bold and Thatto Heath).
 - · Blackbrook and Haydock,
 - Newton-le-Willows and Earlestown,
 - · Rainford,
 - · Billinge,
 - · Garswood, and
 - · Rainhill.
- 7.28 We fully support the need for a robust Green Belt Review as this is clearly important to demonstrate the exceptional circumstances required to amend Green Belt boundaries and identify sites.
- 7.29 That said, the 2019 NPPF is clear that when 'reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account' (para 138) and that 'when defining Green Belt boundaries plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development' (para 139).
- 7.30 Therefore, it is our strong view that the Green Belt Review should support rather than constrain the Council's ability to deliver growth to the key settlements.





Site Distribution

- 7.31 In the case of St Helens the findings of the Green Belt Review and SHLAA have led to an uneven distribution of sites, with very little proposed development in Billinge, Rainhill, and only moderate development within Rainford. Furthermore, whilst the Core Area will receive a large amount of development this is again unevenly distributed within the different sub areas within it, with Eccleston, Sutton and Parr in particular receiving very low growth; with the Town Centre and Thatto Heath wards attracting over 50% of the development.
- 7.32 This uneven distribution is shown on the plans and table below (with a full version of the main plan contained at **Appendix 10**):

Figure 7.2 - Plan (Extract) showing Local Plan Distribution (SHLAA sites, Allocations and Safeguarded Land)

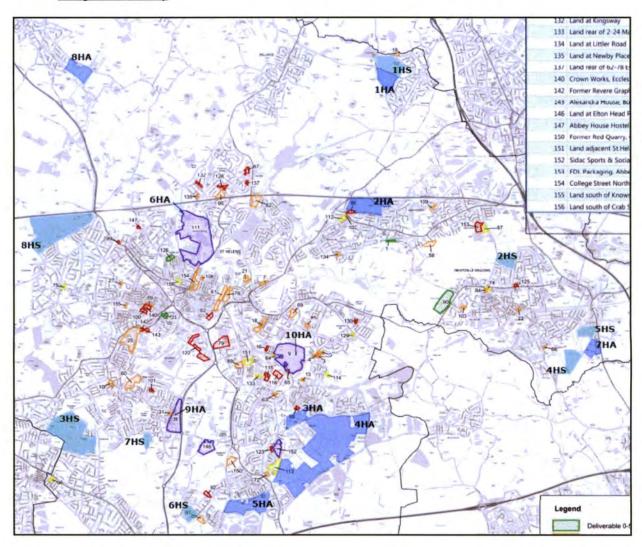




Figure 7.3 - Key Settlements Plan

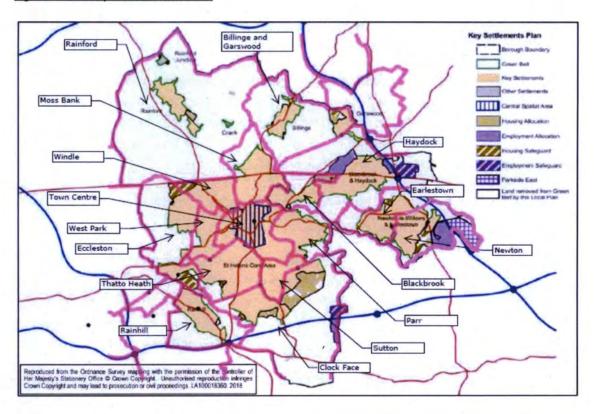


Figure 7.4 - Table showing Local Plan Distribution

AREA	SUB AREA	Total	Percentage	% of Core Area
	Town Centre	1,947	12.6%	17.9%
	Moss Bank	1,147	7.4%	10.6%
	Clock Face (Bold)	4,415	28.7%	40.7%
	Eccleston	1,241	8.1%	11.4%
St Helens Core Area	Parr	290	1.9%	2.7%
	Thatto Heath	1,519	9.9%	14.0%
	Sutton	295	1.9%	2.7%
	CORE AREA SUB TOTAL	10,854	70.4%	100.0%
	Blackbrook and Haydock	711	4.6%	
	Newton Le Willows & Earlestown	1,805	11.7%	
Key Settlements	Rainford	314	2.0%	
	Billinge including Garswood	514	3.3%	General Land
	Rainhill	29	0.2%	
Other Settlements	Windle	1,180	7.7%	
TOTAL		15,407	1/2011/10/10	

7.33 Based on the above, we suggest the distribution strategy should be reconsidered as it will not deliver the balanced sustainable development required by policy LPA02, and we suggest that additional allocations focus on boosting supply in the areas that are underserved within the Submission Plan including Eccleston.





Green Belt Review

- 7.34 In addition to the imbalance in housing distribution proposed within the plan, there are also concerns with the structure and methodology of the Green Belt Review.
- 7.35 Whilst there is no firm methodological guidance on how to undertake a Green Belt Review, beyond the requirement to consider the five purposes of the Green Belt (as set out at NPPF paragraph 134), and to use define clear parcel boundaries using physical features that are readily recognisable (para 139); certain independent practitioners (including Arup and LUC) have established standardised approaches which are accepted as good practice.
- 7.36 In this instance, the Council have undertaken the review themselves and their approach raises a number of issues.
- 7.37 Firstly, whilst the Review has been undertaken over multiple stages, the final site ratings are based on 3 criteria (Green Belt Purposes a, b and c) with 4 different ratings (Low/ Medium/ High/ High +), meaning there are only 12 possible scores. This provides only limited scope for differentiation in the site ranking. This is particularly relevant where there were 99 parcels, with many more sub parcels considered within the settlement. It is an overly broad-brush approach.
- 7.38 That said, we understand and endorse the Council's decision to screen out purposes d and e, on the basis that there are no historic towns in St Helens, and because of the difficulty of justifying that one parcel of land would make a greater contribution to urban regeneration than another, when it has already been established there is insufficient brownfield land to meet future needs.
- 7.39 Secondly, in respect of the historic towns issue (Green belt purpose d) there has been some conflation of the issues, as the Stage 3 assessment of the individual sites considers heritage matters and indeed discounts some parcels based on heritage impacts.
- 7.40 This ties into a wider point highlighted in section 3 as to whether such an analysis of site constraints and sustainability credentials should be conducted separately or subsequent to the Green Belt Review process. In our view it should, as in this case it is clear the Council has mixed the two processes, which has led to a conflation of issues (including heritage) and led the Council to advocate retention of sites in the green belt for reasons unrelated to their contribution to green belt principles.
- 7.41 Thirdly, this is an update to the previous Review, also undertaken by the Council, that sought to allocate and safeguard a very different suite of sites, even though overall development needs have not changed significantly (even by the Council's reckoning they have dropped by 15%) and the distribution strategy is unchanged. The Green Belt Review is at odds with the Council's previous work, and its own reduction in housing need (which we dispute) does not provide justification for such a wholescale change in approach.



7.42 In addition to the need to provide Green Belt boundaries that endure, paragraph 138 of the 2019 NPPF also notes that:

"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."

- 7.43 However, it does not appear that accessibility or the ability to make compensatory improvements have been properly considered within this review and have certainly not been given any elevated importance which is a flaw.
- 7.44 In the case of Burrows Lane the site is well served by public transport with bus stops offering high frequency services directly adjacent to the site, whilst the large landholding and relatively low density proposed ensures there are sufficient opportunities for compensatory improvements.
- 7.45 Finally, our analysis noted that some of the proposed allocations and safeguarded sites have been considered in the Green Belt Review on the basis of parcels that were different and generally larger to that actually proposed for development (see **Appendix 6** assessments of sites 7HA, 1HS, 2HS, 4HS, 5HS and 6HS). Indeed, these parcel boundaries were often extended towards more logical physical boundaries as they would in a general GB parcel assessment, however this is likely to have generated more positive scoring for these sites and represents another flaw in the methodology.
- 7.46 Taking into account the concerns and issue regarding the Green Belt Assessment, we present our own assessment of the 18 proposed allocations and the Burrows Lane site. For ease of reference these are set with the findings from the Council's Green Belt Review:





Figure 7.5 - Green Belt Contribution Assessment of Proposed Allocations against Burrows Lane site

Site Reference	Council GB Conclusion	Pegasus GB Conclusion				
1HA	Low	Low-medium				
2HA	Low	Low				
ЗНА	N/A	N/A				
4HA	Low	Low				
5HA	Low	Low-medium				
6НА	N/A	N/A				
7HA	Low	Low				
8HA	Low	Low				
9HA	N/A	N/A				
10HA	N/A	N/A				
1HS	Medium	Medium				
2HS	Medium	Medium				
3HS	Low	Low				
4HS	Low	Medium				
5HS	Low	Medium				
6HS	Low	Low				
7HS	Low	Medium				
8HS	Low	Low				
Burrows Lane	High +	Medium				

7.47 It is our view, that the proposed site at Burrows Lane makes a medium contribution to the Green Belt, meaning it is of a similar standing to several of the chosen sites and should therefore be considered for allocation.



- 7.48 We now move on to the Council's Sustainability Appraisal and how it has considered the proposed allocations and the Burrows Lane site.
- 7.49 The Sustainability Appraisal has been undertaken on behalf of the Council by AECOM. Whilst the methodology is generally considered sound; we do disagree with some of the scoring and have provided our own comparable assessment. Furthermore, to allow direct comparison we have applied the scoring system as set out below, with the scores for each indicator tallied up, and the highest considered most sustainable.

Fig 7.6 - Pegasus Sustainability Appraisal Scoring

Key of Council's SA Scoring:	Key of Pegasus scoring:			
Likely to generate negative effects	1			
Potentially negative effects which could be mitigated	2			
Unlikely to have significant effects	3			
Likely to promote positive effects	4			



PO3817



ECRA Response to SHLPSD(2018) barton su to: planningpolicy



1 Attachment



ECRA Final Submission May19.docx

On behalf of Eccleston Community Residents Association, together with Windle (ECRA), I am attaching a copy of our Response to the SHLPSD (2018) for the attention of the Planning Inspectorate. ECRA have worked hard to ensure our report represents the facts as we know them.

The question was asked, during the Council Information Sessions, as to whether the SHLPSD (2018) can be changed and we were given a variety of responses. We would hope that some small changes could be made, such as reducing the aspirational number of housing units and building on more Brownfield and Contaminated land. The reasoning and support for this is detailed in our report, the consequence would be to eliminate much, if not all, of the Green Belt land required by the plan, which, I am sure you agree, would be beneficial for St. Helens Council, Councillors and Residents alike.

ECRA would like to participate at the Oral Examination. We would also request an acknowledgement for the receipt of this comprehensive report.

A hard copy of this response will be posted by hand later today

regards

Su Barton

ECRA Communication Lead

c/o 19 Brooklands Road, WA10 5HE

2-LAAOT 3-GANGRAL 4-LAAO6 5-ARA 1.72 DEC 6-LPAO4 7-GBR 8-10P 9-TABLE 4-6 10-SA



Response to
ST HELENS LOCAL PLAN
SUBMISSION DRAFT (SHLPSD)
December 2018

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ECRA ultimately demonstrate that these factors, combined with a high level of community concern, with regard to non-compliance with NPPF, regional strategies and SHMBC's own policies indicates that the safeguarding provisions in the SHLPSD are absolutely unnecessary and as such should be withdrawn completely.

9

Green Belt Review

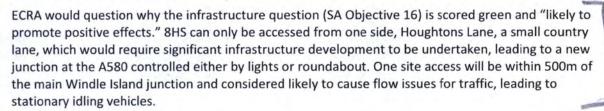
No precise methodology is laid down for assessing which sites should be removed from the Green Belt, and St Helens has chosen to assess against the first three "Green Belt purposes", it omitted the fourth and fifth purposes on the basis that it applied equally to all the sites as a whole. They also omitted 'to preserve the setting and character of historic towns' (NPPF 134)



The Green Belt Review (GBR) outlines the justification for removing sites from the Green Belt LPSD para 4.6.

The case for removing 8HS from the Green Belt is made in the Green Belt Reviews (2016 and 2018) and the associated Appendix B part 6. Despite acknowledging the issues below and as discussed further (see Appendices 4 and 5), the parcel has been designated for safeguarding. This does not meet the requirements of "exceptional circumstances" hence the plan is unsound.

8HS has a gross area of 52.69 ha and has a net developable area ratio of 65 % to reflect development constraint on the site. A nominal capacity of 1027 with a nominal dph of 30. Development constraints are related to United Utilities water mains crossing the site and flood risk from Windle Brook. Pipelines should also be considered and whether an easement for them would restrict development. We know this to be true with a main sewer and two United Utilities pipelines running across the centre of the site.



In short, this constraint question is asking would the development be constrained by infrastructure issues and the answer is "yes", given the notional development capacity is only 65% and lower than all other sites identified.

The St Helens Borough Landscape Assessment (2006) (referenced in the Green Belt Review (2018)) identifies the agricultural land in Eccleston and Windle as having high landscape sensitivity and additionally a medium visual sensitivity. It goes on to further state the strategy in this area should be one of 'Conserve and Restore'. (Appendix 5)

Further discussion in Appendices 4 and 5 would suggest that the Green Belt Reviews (2016, 2018) have not followed due procedure and parcels have been selected to meet pre-determined criteria that are not entirely commensurate with the objective scoring process.



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Appendix 4 - Green Belt Review

As part of the LPSD, a complete review was undertaken of the Green Belt.

This was a subjective review, with mixed results in terms of findings and scores applied.

Stage-1B

At this stage of the process, the purposes of Green Belt were reviewed, and scores assigned.

The following are extracts from "Purpose 3 – To assist in safeguarding the countryside from encroachment"

GBP_010 (Medium)

The sub-parcel contains little inappropriate development within it. It is enclosed to extent along the eastern boundary although retains a sense of openness to the west.

It lies on the edge of the settlement in between residential development to the east and the By-Pass to the west affecting the countryside character to a moderate extent.

The By-Pass would also form a hard barrier containing any level of countryside encroachment.

GBP 023 (Medium)

The parcel has a semi-rural character due to encroachment from existing urban development on three of its four sides. The perception of open countryside is only obtained when looking westward.

The parcel itself is fairly small in area, with residential development clearly visible when viewed from the north, south and west.

GBP_025 (Medium)

The south eastern corner of the sub-parcel contains some existing built development.

The parcel is enclosed to the east and south and is in-part open to the north and largely to the west.

Overall Significance

The sub-parcel does not perform a significant role in preventing sprawl and in maintaining a gap between identified settlements; although it maintains a moderate level of countryside characteristics and openness.

Overall Significance

The parcel plays a very limited role in both checking the outward expansion of Billinge into the countryside and maintaining the physical and visual/perceptual separation between any built up area.

Overall Significance

The sub-parcel has strong boundaries to the east, south and west and in-part to the north and is therefore partially well contained. A strategic gap between Billinge and Garswood could be maintained if this sub-parcel was released from the Green Belt.

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GBP_051 (Medium)

The sub-parcel has a semi-rural character due to encroachment from existing urban development on three of its four sides. The perception of open countryside is only obtained when looking northwards.

The sub-parcel itself is reasonably small in area, with residential development clearly visible when viewed from the north, west and east.

Overall Significance

The sub-parcel plays a limited role in both checking the outward expansion of Newton-le-Willows into the countryside and moderate role in maintaining the physical and visual/perceptual separation between Newton-le-Willows and Haydock. The site is well contained with strong boundaries on all sides.

Regarding 8HS the following findings were documented:

GBP_098 (Low)

The parcel has very little inappropriate development and retains some open views to the west. The A580 to the north and the residential development to the south and east impact on countryside character, but parts of the parcel do retain a sense of openness when looking westwards.

Overall Significance

The parcel is well contained. The A580 to the north and the residential development to the south and east impact on countryside character.

Summary

Key points to note for 8HS are:

- · very little inappropriate development
- · retains open views to the west
- A580 and the residential development impact on countryside character
- · retains a sense of openness when looking westwards
- well contained/ strong boundaries

Those same key factors are detailed throughout the findings for the other example parcels listed above.

If the review has found all those other parcels worthy of being scored Medium in this part of the assessment, then it must follow that <u>8HS is equally a medium.</u>

With 8HS scoring medium at this stage, when it is then subsequently found to be medium for Developability, it should be discounted as all other parcels have been.

The Developability score of Medium is also questioned, as detailed below.



Stage-2B

The pro-formas for this stage are not included in the Green Belt Review document; only the template is in Appendix F.

The stage was used to determine the developability of the site, following a series of questions and factors.

The conclusion for 8HS (GBP_098) was medium on a scale of good, medium and limited.

SUITABILITY

The first section of this stage is regarding suitability and commences with "Landscape and Visual Character"

- the St Helens Borough Landscape Assessment (2006) (referenced in the Green Belt Review (2018)) identifies the agricultural land in Eccleston as having high landscape sensitivity and additionally a medium visual sensitivity. It goes on to further state the strategy in this area should be one of 'Conserve and Restore'.
- The judgement of Land Use Consultants (LUC) is that given the unique landscape character, further development should be avoided.

Site ID	GB ref	Site Name	Broad Location	Status	SA1. Protect and enhance biodiversity	SA2. Protect and improve land quality	SA3.Improve air quality	SAA. Sustainably manage water resource	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridgeline	SA8. Protect and enhance cultural heritag	SA9a. Access to open space and green spa	SA9b. Public Rights of Way	SA12b. Access to Leisure	SA13b Access to Secondary School	SA14. Access to employment opportunitie	SA15. Support local economy	SA16, Access to housing	SA17. Reduce poverty and social exclusio	SA19. Reduce need to travel	SAZ0. Access to services
_		SA13a- cant find it	-			-				100							10						
52	GBP 058	Land South of Station Road	Haydock	Discard																100	1		
53	GBP 060	Land at Florida Farm, Sing Lane, Haydock, WA11 0UZ	Blackbrook	Site 2HA			20						=				т	100			1		
54	GBP 070	Land west of Parr and Sutton	Parr	Discard		100										- 8		100			1		
55- 59	GBP_073	Land west of Neills Road, and south of Bold, north of Gorsey Lane	Bold	Sile 4HA						A											1		
64	GBP_074_b	Land south of Clock Face, north of the M62	Bold	Discard											8			1			1		
65	GBP_074_c	Land south of Gartons Lane, Clockface	Bold	Site 5HA			100		100							1					I		
66	GBP_074_d	Land south of Sutton Manor	Sutton Manor	Site 6HS																	1		
67	GBP_082_b	Land South of Sutton Manor	Sutton Manor	Discard			100		200				273								1		
68	GBP_082_c	Land south of Sutton Manor	Sutton Manor	Discard			200												100		1		
69	GBP_085_b	Land at hanging Bridge Farm, Elton Head Road	Rainhill	Discard		13		100													I		
70	GBS_085_C	land south of Elton Head Road, adjacent to St. John Vianney Catholic Primary School	Thatto Heath	Site 7HS		7	1														1		
71	GBP_087	Eccleston Park Golf Club, Rainhill Road	Eccleston	Site 3HS	1											68					1		
72	GBP_088	Land North East of Eccleston Park Golf Club	Eccleston	Discard			10	1													1		
73	GBP_089	Land north of the M62 and south of Mill Lane	Rainhill	Discard																100	1		
75	GBP_098	Land south of A580 East Lancashire Road and east of Houghtons Lane, Windle	Windle	Site 8HS	į.		H				Ų,						1				t		

St Helens Borough Local Plan - Sustainability Appraisal (SA, 2019), Table 6.2

Agricultural Land quality is given consideration at this stage and with 8HS being mostly Grade 1, it should be a significant consideration.

- appendix-5-sa-scoping-report.pdf" document prepared by LUC states in Para-4.28 that the Local Plan should avoid development on the best and most versatile (BMV) agricultural land
- NPPF states:
 - LPA (Local Planning Authority) should make decisions that contribute to and enhance the natural and local environment by:

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TRANSPORT ACCESSIBILITY

Following on from the suitability questions, transport accessibility was then reviewed, with SA Objectives 12, 13, 14, 19 and 20 being applicable.

Those objectives being scored: Green, Neutral, Neutral, Green and Green.

Walking

Is the parcel within 800 metres safe and convenient walking distance of a district or local centre?

- The closest part of 8HS to a local centre is over 1km but much of the site would be far greater than that.
- SA20 is marked green as there is a convenience store 45m from the site, but the assessment is against local centres and not simply a convenience store.
- Th convenience store (East Lancashire Service Station) is sited on the opposite carriageway of the A580 and is not accessible from 8HS.

ECRA would question why SA Objective 20 can be considered green?

Is the parcel within 400 metres, 400-1200 metres or 1200 metres+ safe and convenient walking distance of a primary school? (marked Neutral on SA13)

- The nearest point of 8HS is around 500m from Bleak Hill Primary School, but the majority of the site would be in excess of 1200m.
- There is no capacity in Eccleston/ Windle primary schools, and the nearest school has plans
 to expand for existing over subscription. Given the scale of the parcel it is likely that a new
 primary school will be required and potentially upgrades to other social infrastructure and
 amenities.

ECRA would question why is SA Objective 13 considered Neutral?

Public Transport

May 3rd 2019

Is the parcel/sub-parcel within 400 metres safe and convenient walking distance of a bus stop with a reasonable range of services to different destinations?

- The "st-helens-tia-sustainable-transport-assessment-v2.pdf" supports answers to this section
- Strategic Housing Site 8HS is not within the maximum threshold travel distance of any of the proposed Strategic Employment Sites;
- Most of the borough is within a 60-minute travel time by bus to the proposed Strategic Employment Sites, with <u>the north-western areas of Eccleston</u> and Rainford <u>being the notable</u> exceptions;
- Proposed Strategic Housing Site 8HS is located on the periphery of the St Helens urban area, providing immediate strategic transport connections via the A580 East Lancashire Road to Liverpool, Manchester, and the SRN via the M6. However, the location is less suitable for sustainable and active travel modes, being beyond the desirable maximum travel distance on foot to the town centre and on the outskirts of the existing bus network

In the appendices to the assessment regarding 8HS:

Currently served by the no 38 and 37 nearby, but most of the site is likely to be beyond a
desirable distance to a bus stop. Potential for an extension to no 37 service, but difficulty in
creating a desirable route with constraints on access points.

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 Potential for site to contribute toward additional services, but difficulty obtaining revenue funding as opposed to infrastructure improvements.

Is the parcel/sub-parcel within 800 metres safe and convenient walking distance of a train station?

The site has no train station within 800 metres

Is the parcel/ sub-parcel within a 40-minute journey by public transport to a secondary school?

 The answer to this question would be yes, but again the issue of capacity should be considered in conjunction with that question and local secondary education cannot accommodate pupils from an additional 1000 homes

Vehicular Traffic

Can safe and convenient access be provided for all vehicles that are likely to use the parcel/sub-parcel to and from (a) the public highway and (b) the strategic road network?

- The summary section in Stage-3 provides an insight into the answers to this question
- Significant improvements to highways infrastructure would also be required to support the successful development of the parcel.
- It would not be possible to provide vehicular access (except for potentially a very limited number of dwellings) directly from the estate roads from the south due to existing capacity issues along small estate roads and junctions
- As a result, access is likely to be primarily from Houghtons Lane, which is currently a narrow country lane which would require a substantial upgrade and realignment through the parcel and a new junction to link with the A580.

Given all of the above negative factors ECRA question the determination of <u>medium</u> as the resulting score.

Additionally, the parcel is already at only 65% net developable capacity for the current cumulative constraints and could be reduced further if a new primary school is deemed necessary.

ECRA would suggest that 8HS should have been scored as 'Limited' during the Stage-2B review.

If the SHC assessment at Stage-1B stood as Low, this Limited assessment would discount the parcel. In actual fact the parcel can be scored as Medium for its contribution to Green Belt and Limited for its developability and therefore is a clear candidate to be discounted.

Stage-3

The Stage-3 section of the GBR process ranked and reviewed the results of previous sections.

Keywords/ phrases to note for 8HS are:

- Number of constraints
- Grade 1 agricultural land
- Primary schools
- LWS
- Pipelines

0







- Sewer
- Buffer
- Air pollution
- Landscape sensitivity

Despite all of the above factors, 8HS has been deemed to be Safeguarded. The cumulative effect of all those issues question that 8HS should be discounted, as has been done with many other parcels with fewer of those factors identified as constraints.

Number of constraints

There appears to be only one parcel allocated having this finding recorded but has the following justification:

"...in a sustainable location within a convenient walking distance of a local centre, various employment areas (and the proposed strategic employment sites at Parkside), a railway station and other public transport facilities. The parcel has good highway connections."

There are more than a dozen parcels which have been discounted for the cumulative effect of the number of constraints.

Grade 1 Agricultural land

It appears again that a dozen parcels which include mention of Grade 1 ALC have been discounted.

Primary schools

Nine sites have been discounted which make reference to Primary schools, with the rationale being "...not within safe walking distance to a primary school". 8HS is safeguarded despite, by the Councils own admission, Bleak Hill Primary School not having capacity.

Local wildlife site

There are more than a dozen sites which have been discounted with reference to a Local Wildlife Site. There are two which have been allocated but they promote significant positive effects and are commented as:

"....in a sustainable location within a convenient walking distance of a local centre, various employment areas (and the proposed strategic employment sites at Parkside), a railway station and other public transport facilities. The parcel has good highway connections."

8HS has multiple constraints, cannot satisfy the convenient walking distance, nor employment area or local railway station and it certainly does not have good highway connections given that substantial highways infrastructure would be necessary.

Pipelines

Besides 8HS, one other site has been safeguarded which has a pipeline issue. That other has been justified by a reduced NDA as the pipe only crosses one corner whereas 8HS has the pipelines running across its centre. There appears to be <u>ten other parcels</u> which have been discounted due to having pipelines affecting their development.

Sewer

Those sites which have been discounted with reference to sewers (of which there appears to be several), use the following justification:

"When all constraints associated with the parcel are considered cumulatively it is clear that it would not be suitable as a potential development site to be released from Green Belt."

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However, 8HS, despite all those constraints listed so far has the following rationale:

"However, having regard to all the factors described above, it is now recommended that the parcel be safeguarded (in order to meet potential housing needs beyond the Plan period) rather than allocated for development."

ECRA demonstrate that there is no consistency in approach.

Buffer

There are a significant number of parcels which reference various buffers, the majority of which have been Discounted. There are three sites which have been allocated, but those sites require a buffer for a sole reason; be that Flood, Proximity to A-Road or Pylons.

8HS on the other hand requires a buffer for noise/ pollution (40m) due to its proximity to A580 plus an additional buffer (20m) for the LWS and finally further buffering for the UU pipelines.

Air pollution

More than a dozen sites have been discounted, with reference to air pollution, leaving only 8HS as a Safeguarded site. ECRA question this decision.

Landscape sensitivity

There appear to be three Allocated sites which all have the same rationale for being progressed, that being:

"The 2018 SA concluded that development of the parcel would have a mixed impact on the achievement of SA objectives, with a high number of impacts resulting in positive effects. New residents would have access to high quality open spaces/natural greenspace and the parcel is located in a sustainable location with good access to public transport and employment opportunities".

Landscape negativity is the single negative aspect on those three allocated parcels and even with development, they still retain access to high quality open/ green space. There appears to be at least ten other sites that have been discounted with this finding.

8HS has multiple negative impacts and following development, the closest open/ green space would mean crossing the (even busier) A580.

Summary

ECRA dispute the cumulative findings for 8HS which allow it to be Safeguarded when multiple other sites have been Discounted for only having 'some' of those findings.

An additional comment within the Stage-3 section for 8HS is the following:

"Its development would form a sizeable outward extension of the urban area into the countryside, beyond a currently well-defined urban edge."

That statement could be simplified significantly to:

"Its development would form 'urban-sprawl"

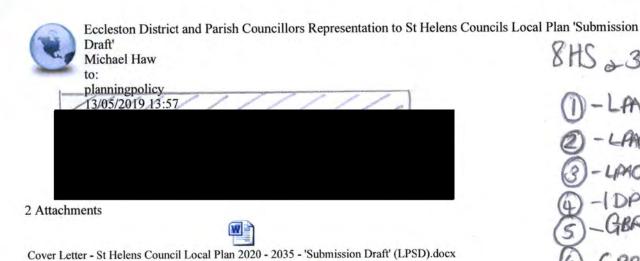
In other words, Green Belt purpose 1 - To check the unrestricted sprawl of large built-up areas.

The development in Bold is somewhat unique in this Local Plan. The council are looking to create an entirely new 'garden suburb', which would be sufficiently large to include new social infrastructure, such as a new primary school, local retail centre and potentially health facilities. Hence, it needs to be considered differently to the other Green Belt parcels.

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PO3818



Eccleston District & Parish Councillors Representation - St Helens Council Local Plan 2020 - 2035 'Submission Draft' (LPSD).pdf

Dear Sir or Madam,

Please find attached the Eccleston District and Parish councillors representation to St Helens Council's Local Plan 'Submission Draft'.

If you could please confirm receipt that would be appreciated.

Kind regards,

Michael

Cllr Michael Haw
Eccleston District and Parish Councillor
St Helens Metropolitan Borough Council & Eccleston Parish Council

St Helens Council Local Plan 2020 – 2035 'Submission Draft' (LPSD) Planning Department Victoria Square St Helens WA10 1HP

Date: 13 May 2019

Dear Sir or Madam,

RE: Representation to the St Helens Local Plan 2020 – 2035 'Submission Draft' (LPSD)

Please find enclosed our detailed representation to the St Helens Local Plan 2020 – 2035 'Submission Draft' (LPSD).

We understand and support the production of a Local Plan in coordinating future investment across St Helens, however, we do not support the LPSD in its current form. There has been a great deal of public backlash against the proposals and site allocations (and "safeguarding") and we strongly urge St Helens Council to review its evidence base and forecasts which has led to the encroachment into Green Belt land.



- We are not anti-development and recognise the need for and support the development of a Local Plan, to provide long term planning on employment, housing, transport and public service infrastructure across Eccleston, Eccleston Park and St Helens;
- The evidence base for housing growth supports an aggressive growth strategy which St Helens Council may feel desirable, but is not essential to meet housing demand and is unlikely to deliver balanced sustainable growth;
- We strongly object to the inclusion of the so-called "safeguarded" sites within the LPSD, including
 the former Eccleston Park Golf Course site (3HS) and Land South of the A580 between Houghtons
 Lane and Crantock Grove (8HS);
- There is an absence of meaningful proposals to redevelop previously developed brownfield sites and remediate contaminated land for housing development;
- Whilst we welcome the proposed reduction of Green Belt land to be released within the Local Plan, it
 remains our view that a brownfield first approach must be fully adopted, and that there should be no
 development on Green Belt land until every available brownfield site has been identified and built
 upon. This includes any contaminated land, which we feel should be cleaned up and paid for entirely
 by those developers and house builders that have land interests within the Borough;
- We have major concerns about the scale of growth being aspired to within the Local Plan and the
 infrastructure required to support it. The IDP highlights quite well the projects currently underway in
 the Borough to try to alleviate the problems of today, however seems to lack any substance on what
 will be done to solve the issues of the future. This needs to be urgently addressed;
- The proposals represent a significant over development of Eccleston and Eccleston Park, which will change the very character of our local area forever.

Yours sincerely,

Michael Haw, Teresa Sims and Geoff Pearl

Eccleston District & parish councillors
St Helens Metropolitan Borough Council & Eccleston Parish Council

St Helens Council Local Plan 2020 – 2035 *'Submission Draft'* (LPSD)

Representation by Eccleston
District and Parish councillors Michael Haw, Teresa Sims and
Geoff Pearl

13 May 2019

Green Belt Review (2018) - Site specific comments

Former Eccleston Park Golf Course site (3HS)

We **STRONGLY OBJECT** to the former Eccleston Park Golf Course site (3HS) being so-called "safeguarded" for potential future development. Our reasons are listed below:

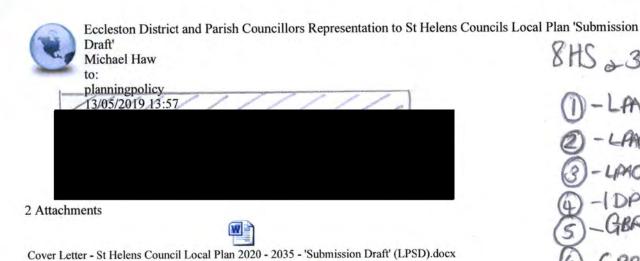
- In Green Belt terms, 3HS separates St Helens, Rainhill and Prescot which resides within Knowsley.
 The purpose of Green Belt (point 2) states: "To prevent neighbouring towns from merging into
 one another". In this regard, the sub-parcel plays a "key role in forming a strategic gap and the
 perception of a gap between Rainhill and Thatto Heath (St Helens Core Area)". If the site was
 removed from the Green Belt, this would significantly undermine this whole area of Green Belt
 and lead to further calescence of settlements in St Helens (Eccleston and Rainhill) with Thatto
 Heath and Prescot in Knowsley;
- Until recently the site was in recreation use. As such it is protected by Core Strategy Policy (CP2)
 and Policy of the Submission Draft (LPA11). Identification as "safeguarded" land conflicts with
 development plan and emerging development plan policy;
- Sport England have previously objected to the allocation of this site and the Council acknowledge
 that "further evidence is required to meet the requirements of Sport England" (Green Belt Review,
 page 118). The Green Belt Review goes on to state "This further evidence has not been obtained"
 and that at present "the allocation of the site would conflict with national planning policy";
- The site has numerous physical constraints, including: Substantial highways issues surrounding
 the site; electricity pylons; noise issues; various sewers; a trunk water main; the North Prescot
 Aqueduct; and the Vrynwy Aqueduct/pumping station.

Land south of A580 between Houghtons Lane and Crantock Grove (8HS)

We also **STRONGLY OBJECT** to Land south of A580 between Houghtons Lane and Crantock Grove (8HS) being so-called "safeguarded" for potential future development. Our reasons are listed below:

- In the Green Belt Review, SHMBC scores it low on all of the Green Belt purposes assessed. Whilst
 the geographical location of the sub parcel does mean it will have a low score in terms of Green
 Belt purpose 1 "merging". The Council's own conclusions on purposes 1 and 3 within the Green
 Belt Review are both inconsistent and erroneous. The release of this parcel will see the built-up
 area sprawl up to the boundary with the A580 and will see the loss of a large area of countryside.
 Release of this area conflicts with Green Belt policy.
- 2. In the Green Belt Review, the Council acknowledge the following:
 - The site is high quality agricultural land;
 - The development of this area would form a "sizeable outward extension of the urban area into the countryside, beyond a well-defined urban edge".;
 - "Significant" improvements to highways infrastructure would be required, despite the most recent highways works at Windle Island;
 - 4. A new bus route would be required;
 - 5. The site is likely to provide functionally linked habitat for a number of bird species.

PO3819



Eccleston District & Parish Councillors Representation - St Helens Council Local Plan 2020 - 2035 'Submission Draft' (LPSD).pdf

Dear Sir or Madam,

Please find attached the Eccleston District and Parish councillors representation to St Helens Council's Local Plan 'Submission Draft'.

If you could please confirm receipt that would be appreciated.

Kind regards,

Michael

Cllr Michael Haw
Eccleston District and Parish Councillor
St Helens Metropolitan Borough Council & Eccleston Parish Council

St Helens Council Local Plan 2020 – 2035 'Submission Draft' (LPSD) Planning Department Victoria Square St Helens WA10 1HP

Date: 13 May 2019

Dear Sir or Madam,

RE: Representation to the St Helens Local Plan 2020 – 2035 'Submission Draft' (LPSD)

Please find enclosed our detailed representation to the St Helens Local Plan 2020 – 2035 'Submission Draft' (LPSD).

We understand and support the production of a Local Plan in coordinating future investment across St Helens, however, we do not support the LPSD in its current form. There has been a great deal of public backlash against the proposals and site allocations (and "safeguarding") and we strongly urge St Helens Council to review its evidence base and forecasts which has led to the encroachment into Green Belt land.



- We are not anti-development and recognise the need for and support the development of a Local Plan, to provide long term planning on employment, housing, transport and public service infrastructure across Eccleston, Eccleston Park and St Helens;
- The evidence base for housing growth supports an aggressive growth strategy which St Helens Council may feel desirable, but is not essential to meet housing demand and is unlikely to deliver balanced sustainable growth;
- We strongly object to the inclusion of the so-called "safeguarded" sites within the LPSD, including
 the former Eccleston Park Golf Course site (3HS) and Land South of the A580 between Houghtons
 Lane and Crantock Grove (8HS);
- There is an absence of meaningful proposals to redevelop previously developed brownfield sites and remediate contaminated land for housing development;
- Whilst we welcome the proposed reduction of Green Belt land to be released within the Local Plan, it
 remains our view that a brownfield first approach must be fully adopted, and that there should be no
 development on Green Belt land until every available brownfield site has been identified and built
 upon. This includes any contaminated land, which we feel should be cleaned up and paid for entirely
 by those developers and house builders that have land interests within the Borough;
- We have major concerns about the scale of growth being aspired to within the Local Plan and the
 infrastructure required to support it. The IDP highlights quite well the projects currently underway in
 the Borough to try to alleviate the problems of today, however seems to lack any substance on what
 will be done to solve the issues of the future. This needs to be urgently addressed;
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Yours sincerely,

Michael Haw, Teresa Sims and Geoff Pearl

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St Helens Council Local Plan 2020 – 2035 *'Submission Draft'* (LPSD)

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District and Parish councillors Michael Haw, Teresa Sims and
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- In Green Belt terms, 3HS separates St Helens, Rainhill and Prescot which resides within Knowsley.
 The purpose of Green Belt (point 2) states: "To prevent neighbouring towns from merging into
 one another". In this regard, the sub-parcel plays a "key role in forming a strategic gap and the
 perception of a gap between Rainhill and Thatto Heath (St Helens Core Area)". If the site was
 removed from the Green Belt, this would significantly undermine this whole area of Green Belt
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 and Policy of the Submission Draft (LPA11). Identification as "safeguarded" land conflicts with
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- The site has numerous physical constraints, including: Substantial highways issues surrounding
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 the geographical location of the sub parcel does mean it will have a low score in terms of Green
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 Belt Review are both inconsistent and erroneous. The release of this parcel will see the built-up
 area sprawl up to the boundary with the A580 and will see the loss of a large area of countryside.
 Release of this area conflicts with Green Belt policy.
- 2. In the Green Belt Review, the Council acknowledge the following:
 - The site is high quality agricultural land;
 - The development of this area would form a "sizeable outward extension of the urban area into the countryside, beyond a well-defined urban edge".;
 - "Significant" improvements to highways infrastructure would be required, despite the most recent highways works at Windle Island;
 - 4. A new bus route would be required;
 - 5. The site is likely to provide functionally linked habitat for a number of bird species.

The very fact that it is high quality agricultural land should be enough of a reason NOT to develop
this site, especially given the amount of previously developed brownfield land available in St
Helens. Indeed, St Helens has a legacy of land contamination arising from industrial development
and other related operational practices. Instead of being viewed as a hindrance to future
development, this land should be viewed as an opportunity to assist in regenerating our Borough,
to help revitalise our Town Centre, to improve our local environment and protect our Green Belt.

For example, when the Local Plan process began, we were told that there wasn't enough brownfield land to cater for our development needs, yet, two new brownfield sites have since been put forward for housing development, land at the Cowley Hill Works near the town centre (816 new homes) and the former Suttons distribution centre (350 new homes), thus reducing the need for Green Belt release.

By releasing land from the Green Belt now, this Council will merely be inviting pressure from developers to expedite the development of this much easier and more profitable option, which could see the regeneration of further viable brownfield sites kicked further down the road;

- Development on this land would be a sizeable outward extension of the urban area into the countryside, beyond a well-defined urban edge, which is not acceptable. Eccleston is a semi-rural community and this development would change the very character of the area in which we represent;
- 3. Despite the recent "improvements" to Windle Island to quote SHMBC, to cater for upwards of 1000 new homes, there would have to be substantial highway improvements to cater for the hundreds, if not thousands extra vehicles. The so-called improvements to Windle Island are to enable greater levels of traffic on the A580 between the Liverpool SuperPort and the logistics hubs as you head towards Haydock and Golborne and the M6 motorway.

The junction with Bleak Hill Road and Rainford Road is one of, it not the worst junction in St Helens, with a number of accidents occurring in recent years. The junction cannot cope with the levels of traffic now and the idea, that we as a local community can cater for that level of housing (1,027 referenced within the LPSD), without clearly defined infrastructure improvements at that junction, is quite frankly ridiculous and any proposals to "safeguard" the site for development should be refused;

4. Concerning the proposed new bus route. Over the last 5 years, Eccleston and Windle has seen local bus services decimated, with a number of key bus routes taken out of service by Merseytravel due to "budgetary pressures". For example, the much used 137/138 & 194/195 hourly bus service that provided a vital link between Eccleston and Whiston Hospital and other key settlements was taken out of service. As local councillors, we oversaw a local community campaign calling on Merseytravel to reinstate the bus service. Despite a petition being submitted to the Liverpool City Region Combined Authority Transport Committee, signed by 825 residents, our request was ignored and refused, again, due to so-called budgetary pressures. Any proposals for a new bus route must be considered within this context.

St Helens Star article: https://www.sthelensstar.co.uk/news/16835268.hundreds-sign-petition-for-return-of-137138-and-194195-hourly-bus-services-to-hospital/

Merseytravel response to petition: "Merseytravel is aware of the difficulties in travelling between the Eccleston area and Whiston Hospital/Prescot since the withdrawal of the 137/138. As part of this review,



and continually before that, we have tried to find ways of using existing resource to reinstate a direct link that comes at a minimal cost, but unfortunately this is not possible at this time. There is insufficient money in the supported bus services budget to cover the cost that even a reduced service would require. We will continue to explore ways and look for opportunities to reinstate this important link".

5. The 8HS site is a functionally linked habitat for a number of bird species, and on this fact alone, any proposed development of the site should be refused out of hand. The 8HS site is enjoyed by a large number of residents (including school children), many of which enjoy the tranquility and local wildlife of what is a beautiful piece of Eccleston. Too often when it comes to planning and development, the environmental concerns get overshadowed by other factors, but, in this instance the environmental issues cannot be ignored. Whilst previously developed brownfield sites sit idle, it would be inexcusable, reprehensible in fact for any potential development to take place on this piece of land. It should be taken out of the LPSD altogether and protected from any potential future development.

Overall conclusion & submission findings

- We are not anti-development and recognise the need for and support the development of a Local Plan, to provide long term planning on employment, housing, transport and public service infrastructure across Eccleston, Eccleston Park and St Helens;
- The evidence base for housing growth supports an aggressive growth strategy which St Helens
 Council may feel desirable, but is not essential to meet housing demand and is unlikely to deliver
 balanced sustainable growth;
- We strongly object to the inclusion of the so-called "safeguarded" sites within the LPSD, including
 the former Eccleston Park Golf Course site (3HS) and Land South of the A580 between Houghtons
 Lane and Crantock Grove (8HS);
- The presumption for Green Belt development needs to change to reflect current planning guidance, that is, it should only be used in 'exceptional circumstances';
- It is our view that a brownfield first approach must be fully adopted, and that there should be no
 development on Green Belt land until every available brownfield site has been identified and built
 upon. This includes any contaminated land, which we feel should be cleaned up and paid for
 entirely by those developers and house builders that have land interests within the Borough;
- There is an absence of meaningful proposals to redevelop previously developed brownfield sites
 and remediate contaminated land for housing development. More needs to be done by St Helens
 Council to remove obstacles for developers to commit to brownfield and Town Centre
 regeneration and development, including decontaminating land that can be used for housing
 development;
- St Helens Council must give more regard to the availability and capacity of local infrastructure in
 those areas where potential developments are being proposed. We have major concerns about
 the scale of growth being aspired to within the Local Plan and the infrastructure required to
 support it. The IDP highlights quite well the projects currently underway in the Borough to try to
 alleviate the problems of today, however seems to lack any substance on what will be done to
 solve the issues of the future. This needs to be urgently addressed;

PO3820

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Dear Sir/N	Madam,		(10) - LPAO4
represent	ation (R005) to the Local Plan Submissi	v Homes North West, to submit the attache on Draft Consultation. Redrow have land in sed in detail in the attached representation	terests in relation to
The repre	sentation includes the following appen	dices which, owing to file size, will be email	led separately:
	pendix 1 - Site Location Plan (attached t		(1) - LPAOK-PARA3
	pendix 2 - Delivery Statement (Part 1 at		9
 App 	pendix 3 - Accessibility Statement		(12) - LPAOS - PARA 4
 Apj 	pendix 4 - Phase 1 Ecology Survey		(13) - APPENDIX 4
 Apj 	pendix 5 - Agricultural Land Assessment		(13) - APPENDIX 4
	pendix 6 - Detailed Site Pro Formas		× .
	pendix 7 - Review of Employment-Led L	ocal Plan Housing Requirement	(4) - TABUC 4.6
	pendix 8 - Council's Housing Trajectory		(B) - UPAD&5.1
7.0	pendix 9 - Pegasus Housing Trajectory		() anos.1
• Ap	pendix 10 - Spatial Distribution of Sites		(16) - LPAOG
We will fo	llow up this submission by sending a CI	o in the post which contains the entirety of	0
to the Loc	al Plan consultation.		B-LPCOI
We look f	orward to receiving receipt of these rep	presentations in due course and please can	it be ensured that
	formally considered as part of this cons		(8) - LPCO2
		63) - LPC13-PARA 4	
Many tha	nks and kind regards,		(19) - 4004
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\sim www.pegasusgroup.co.uk

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-Email 2 of 4 Rebecca Dennis

planningpolicy@sthelens.gov.uk 13/05/2019 16:06







Appendix 2 Part 2-Delivery Statement-Redrow.pdf Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-Email 3 of 4 Rebecca Dennis

planningpolicy@sthelens.gov.uk

13/05/2019 16:07







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

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.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13th May 2019</u>. Any comments received after this deadline <u>cannot</u> 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	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
Postcode:	Postcode: M1 6DW
Signature:	Date: 13/05/19

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

Would you like to be kept updated	of future stages of the St Helens Borough Local
Plan 2020-2035? (namely submissio	n of the Plan for examination, publication of the
Inspector's recommendations and ad	option 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 13th 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. If you still need assistance, you can contact us via:

Email:

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.

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

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

Now please complete <u>PART B</u> 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.

2 To which	part of the Local P	lan does this renr	esentation relate?	Charles of Carlot
Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
	iments (please nam and relevant n)	e DECEMBEF	R 2018 GREEN BELT F	REVIEW
4. Do you o	consider the St Hele	ens Borough Loca or explanations of L	I Plan 2020-2035 is: egal Compliance and the	Tests of Soundness
Legally Co		Yes	No L	
Sound?		Yes 🗆	No x	
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5. If you co	onsider the Local Pl	an is <u>unsound</u> , is	he Tests of Soundness	
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Justified?	repareu:	X		
Effective?		X		
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PLEASE F	REFER TO ACCOM	IPANYING REPR	ESENTATIONS REPO	RT FOR FULL DETAILS

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 GREEN BELT REVIEW REPORT NEEDS TO BE UPDATED TO BE IN LINE WITH BEST PRACTICE.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

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

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

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

Yes, I wish to participate at the oral examination

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

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

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 REDROW HOMES NORTH WEST

Date: 13th May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

Pegasus Group

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3. SITE SPECIFIC ASSESSMENT OF BURROWS LANE SITE

- As part of the submission draft consultation, the Council have provided an updated Green Belt Assessment (December 2018), as well as commissioning AECOM to produce a Sustainability Appraisal Report (January 2019). Both reports provide a site-specific assessment of the Burrows Lane site, as well as the other allocated and omission sites. We raise several concerns about the overall methodology adopted in these two reports, which we consider in detail in Section 7.
- 3.2 In this section, we provide our own site-specific Green Belt and Deliverability Assessment for Burrows Lane to demonstrate that it is still suitable for allocation. We have also produced a detailed comparative assessment of the Burrows Lane site, as well as the 10 proposed housing allocations and 8 safeguarded sites, which are contained at **Appendix 6**. This sets out the Council's conclusions on all of these sites, as well as our own assessment conclusions utilising the Council's criteria. The Burrows Lane detailed assessment should be cross-referenced and read in conjunction with this section, whilst the proposed allocations and overall site selection methodology are considered in more detail in section 7.

Green Belt Assessment

- 3.3 To establish whether it would be appropriate to release a site from the Green Belt, it is relevant to examine how its development would impact on the five purposes of the Green Belt which are listed at paragraph 134 of the 2019 NPPF:
 - To check the unrestricted sprawl of large built up areas;
 - · To prevent neighbouring towns from merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - · To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other land.
- 3.4 The Council's updated Green Belt Review (December 2018) followed a 3-stage process as set out below:
 - Stage 1A Identification of Green Belt parcels and sub-parcels;
 - Stage 1B Assessment of parcels and sub-parcels against Green Belt Purposes;
 - Stage 2A Identification of parcels and sub-parcels with 'prohibitive' constraints;
 - Stage 2B Assessment of development potential within remaining parcels and subparcels; and
 - Stage 3 Ranking and review of results.



- 3.5 So the Green Belt purposes are assessed at Stage 1B, although only the first three NPPF purposes (a-c) are actually considered with the last two (d and e) screened out. This is justified on the basis that there are no designated 'historic towns' within St Helens, and because of the difficulty of making the case that one parcel of land would make a greater contribution to urban regeneration than another, particularly when it has already been established that there is insufficient brownfield land to meet development needs over the Local Plan period. We endorse this approach, which is both sensible and logical in the St Helens context.
- 3.6 Green belt sites considered to make a 'high' contribution to more than one of the three NPPF purposes assessed were discounted at this point (unless there were site specific reasons to include them). The Burrows Lane Site (Ref: GBP_093_B) was assessed as making a high contribution to purposes a and c so was not taken forward for consideration in Stages 2 and 3.
- 3.7 We strongly disagree with the Council's assessment in relation to Burrows Lane site and provide our own assessment against the Green Belt purposes below, along with a deliverability assessment in line with the NPPF.
- 3.8 Before doing this, and notwithstanding the fact that the Burrows Lane site was discounted at Stage 1B of the Green Belt Review, we highlight concerns with the methodology of Stages 2 and 3 of the Review, which assess and rank the development potential of the remaining Green Belt sites, including commentary on numerous suitability considerations such as flood risk, land ownership, noise and heritage. This is a confusing and muddled methodology, as there is nothing in national guidance to suggest that suitability/deliverability credentials should be considered within a Green Belt Review; indeed these are generally considered separately to avoid any conflation of issues, with the Green Belt Review being an objective assessment of sites against the 5 Green Belt purposes, to consider those most suitable for release; followed by a separate assessment of suitability and deliverability as part of a site selection process/ topic paper to filter down to those most suitable for allocation. These concerns are addressed in more detail in Section 7.
- 3.9 In respect of the Green Belt purposes we note the following:

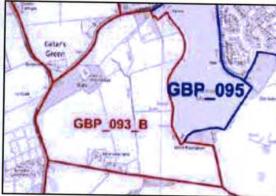
Will not result in unrestricted sprawl of large built up areas (Purpose a)

- 3.10 The Council's 2018 Green Belt Review scores the site as having a high contribution against this purpose of the Green Belt. This is concluded on the basis that the Council consider the site to not have strong southern and eastern boundaries, as well as stating that the sub-parcel has very little built development within it.
- 3.11 We strongly disagree with this conclusion, although at the outset we must highlight that the green belt parcel (reference: GBP_093_B) assessed in the Councils Green Belt Review is larger and differs to the red line (parcel A) being promoted for allocation by Redrow and therefore the assessments are not directly comparable.









- 3.12 Parcel A has strong boundaries to the north (Burrows Lane) and east (Eccleston Mere), which will prevent urban sprawl in these directions and leads to the site being well contained along these boundaries.
- 3.13 Whilst the northern and eastern site boundaries are very well defined and permanent in nature, it is acknowledged that the southern and western boundaries are less well defined, comprising of established hedgerow and mature planting respectively. However, the existing mature hedgerow along the southern boundary will be retained as part of any future development proposals, and the western boundary can be strengthened by a landscape buffer. The Illustrative Masterplan contained at **Appendix 2** shows how this can be easily achieved.
- 3.14 In overall terms, it is considered that Parcel A would not constitute unrestricted sprawl on the basis of the presence of existing physical features along its boundaries, that can be reinforced and enhanced, such that the development envelope would instead provide a rounding off of the urban area to the south west of Eccleston.
- 3.15 In essence, there is sufficient capacity and opportunity within the site to provide a robust landscape and Green Infrastructure strategy that is consistent with local landscape character, to ensure enduring and defensible boundaries to the south and west going forward can be created preventing any further expansion.
- 3.16 Indeed, it is possible that these boundaries could be planted up (as an 'advanced planting scheme') as part of a first development phase to the north of Parcel A, so that they have matured by the time the site is fully developed.
- 3.17 We therefore strongly disagree that the parcel scores high against this purpose and consider it to score medium against this purpose of the Green Belt.

Will not cause neighbouring towns to merge into one another (Purpose b)

3.18 The Council's 2018 Green Belt Assessment notes how the sub-parcel falls within a Green Belt gap between Eccleston and Eccleston Park. As both areas are considered part of the larger St. Helens



core area, the Council consider the parcel to play no part in the prevention of neighbouring settlements or towns merging and score the site as low against this Green Belt purpose.



- 3.19 We agree with this as both Eccleston and Eccleston Park form neighbourhoods within the wider town of St Helens and are not towns in themselves ensuring a low contribution to this purpose.
- 3.20 Notwithstanding this, the development of the site would not actually close the existing gap between the settlements anyway and would instead maintain the 700m gap that currently exists between Pinfold Drive in Eccleston and Carmel College in Eccleston Park, confirming that coalescence is simply not an issue here.



Will not cause unacceptable encroachment into the countryside (Purpose c)

- 3.21 The Council's Green Belt Review scores the site as having a high contribution against this purpose of the Green Belt. Their assessment states that the site is characteristic of the countryside, is only affected to a limited degree by urban features when viewed out to the north and has open views out the west and south.
- 3.22 We do not deny that the development of the site will cause a level of encroachment, as this is inevitable on all Green Belt release sites. However, we strongly disagree that the site scores a high contribution against this purpose of the Green Belt.
- 3.23 Firstly, the site is affected by urban features along its northern boundary, by virtue of Burrows Lane, Pilkington Sailing Club and the existing residential development present in the area. Eccleston Mere borders the site to the east, which reduces openness/landscape sensitivity along this boundary. These strong boundaries will prevent encroachment to the north and east.



- 3.24 Secondly, it is acknowledged that the western and southern site boundaries are more sensitive in terms of open views. However, views to the south and west are not long line views because of the tree coverage and shrubbery which populates the site, which reduces openness sensitivity. Furthermore, landscape strategies could be implemented along these boundaries to further strengthen these boundaries and reduce sensitivity.
- 3.25 Thirdly, views across the site are generally from the local road network with limited views from the public rights of way network. Given that views from public rights of way are considered to be more important, the Burrows Lane site can be considered less sensitive in this regard.
- 3.26 Overall, given the strong boundaries on two sides, the absence of long-line views and the ability to provide a robust planting/landscaping strategy on site, the site is of medium significance in terms of its encroachment into the countryside.





To preserve the setting and special character of historic towns (Purpose d)

- 3.27 Whilst the Council have not assessed any green belt sites against purpose 4 of the Green Belt, we have for the purposes for robustness.
- 3.28 As acknowledged in the Council's Green Belt Review, St Helens does not contain any historic towns as defined by the NPPF meaning this purpose is not explicitly applicable to the Borough. In more local heritage terms, the site is not located within or near any Conservation Areas with the nearest Listed Building over 600m away from the site.
- 3.29 Accordingly, the site scores a low (or no) 'contribution against this purpose of the Green Belt.

Green Belt Scoring and Overall Assessment/Conclusions

- 3.30 Paragraph 2.30 of the 2018 Green Belt Assessment notes how the Council came to their overall conclusions in their Stage 1B assessments. It is confirmed that the score 'High+' is given to parcels that score high against more than one purpose of the Green Belt.
- 3.31 We raise concerns with the robustness and validity of this weighting system. In the Burrows Lane example, the Council score the site as having two high contributions and one low. It appears to be fundamentally flawed to suggest that a site scores a 'high+' contribution to the Green Belt when it scores low against one of the fundamental purposes of the Green Belt. A site should not be deemed to perform a high+ contribution to the green belt if it scores so lowly against one of the core principles and purposes of the Green Belt.



- 3.32 Notwithstanding this, for the reasons we set out above, we strongly disagree with the Council's conclusions against purposes 1 and 3, and score the site as making a medium contribution to these Green Belt purposes.
- 3.33 Therefore, as the site scores an overall medium contribution to the Green Belt, the site should not have been screened out at Stage 1b of the Green Belt. Instead, the site should have advanced to stages 2 and 3 of the Green Belt Assessment.
- 3.34 In addition to the site's modest contribution to the Green Belt, the site is also highly suitable and deliverable, as demonstrated below (suggesting that, had it been considered, it would have ranked highly in Stages 2 and 3 of the Green Belt Review):

Deliverability Assessment

- 3.35 The 2019 NPPF and NPPG specify that local planning authorities supply sufficient specific deliverable sites to deliver housing in the first 5 years. To be considered deliverable, sites should, at the point of adoption of the relevant local development document:
 - Be available there is confidence that there are no legal or ownership problems.



- Be suitable it offers a suitable location for development and would contribute to the development of sustainable and mixed communities.
- Be achievable there is a reasonable prospect that housing will be developed on the site at a particular point in time.
- 3.36 This is a judgement about the economic viability of a site and the capability of a developer to provide housing within a defined period, taking into account marketing, cost and deliverability factors.

Available

- 3.37 Redrow have legal control of the whole site, through a development option with the landowner, and are seeking to promote the site for residential development at the earliest opportunity. Furthermore, there are no ransom strips, tenancies or other ownership problems which could prevent or delay this.
- 3.38 As such, the site in the control of a nationally recognised house builder, with a proven track record, and must be regarded as wholly available.

Suitable

3.39 The NPPG requires that the suitability of sites should be guided by the development plan, emerging plan and national policy; as well as the market and industry requirements in the housing market area (Ref: 3-019-20140306).

Planning Policy & Market Requirements

- 3.40 As noted above, Policy LPA02 of Local Plan confirms that there are exceptional circumstances to support the release of Green Belt land, a position which Redrow wholly support, and Eccleston has been identified as an area where development should be directed.
- 3.41 In terms of market and industry requirements, Redrow's interest confirms that this is a suitable location for residential development from a commercial perspective.

Location and Accessibility

- 3.42 Whilst not specifically listed in the NPPG, access to services is a consideration of suitability. In this instance the site is in a highly accessible and sustainable location with numerous facilities within walking distance in Eccleston and public transport links to the larger urban area of St Helens.
- 3.43 In terms of retail uses, a Sainsbury's Local convenience store is located within 1.1 km of the site, and Eccleston Local Centre contains a pharmacy, Post Office and other unit shops. Beyond that there are Morrison and Asda Superstores located within 3km of the site, along with a range of other national multiples, in St Helens Town Centre.





- 3.44 In respect of community facilities, Eccleston contains two primary schools, a secondary school, medical surgery, pub, and churches; whilst the urban area of St Helens contains 11 primary schools and 2 secondary schools. In addition, Eccleston Mere provides a key recreation facility, which is directly adjacent to the site, offering sailing and angling. There are several other sport and leisure facilities within the vicinity including Burrows Riding School, Prescot and Odyssey Cricket Club, Taylor Park and Grange Park Golf Club.
- 3.45 There are bus stops within 110m and 200m of the site with regular services to Eccleston and other higher order centres including Sutton Oak and St Helens. In addition, Eccleston Park train station is approximately 3km to the south, which links to Wigan and Liverpool. The site takes access from the B5201 Burrows Lane, which links up to the A58 and the national road network.
- 3.46 As such, the site is a sustainably located development opportunity located within easy access of a range of local services, employment opportunities and public transport routes.

Constraints and Impacts

3.47 The NPPG goes on to list several further criteria for assessing suitability which we address in turn below:

Physical limitations and constraints (access, ground conditions, flood risk, etc.)

- 3.48 There are no physical constraints preventing development of the site as it largely comprises flat open fields, and is directly adjacent to Eccleston Mere, it falls within Flood Zone 1.
- 3.49 The site can take direct vehicular access Burrows Lane, to the north of the site, and there are also opportunities for footpath or cycle links with the Golf Club to the south east and Mere View to the south east (which would also improve accessibility to the services in Thatto Heath).
- 3.50 The Accessibility Statement (November 2018) prepared by AT Transport Planning and attached at Appendix 3, confirms that there is sufficient capacity within the existing strategic highway network to accommodate a development of 210 homes, with minimal highway improvements required within the highway boundary. This included consideration of an adjacent allocation north of Burrows Lane proposed as part of the Preferred Options consultation.
- 3.51 An initial assessment suggests that the development can utilise existing infrastructure surrounding the site without generating utilities or drainage issues.

Landscape impacts (including nature and heritage)

3.52 Although the site currently falls within the Green Belt, it is not subject of any other landscape, ecological or heritage designations. Landscape impacts have been largely addressed within the Green Belt Assessment above, which concluded that the site was reasonably well contained and screened, and that development of the site would round off the urban edge to the south west of



Eccleston, with sufficient opportunities and capacity to strengthen landscape buffers, to ensure the scheme would be sympathetically integrated with the Mere and surrounding land.

- 3.53 In heritage terms, the site is not located near any conservation areas, and the nearest listed building is over 600m from the site, with minimal long-range views, so the development is highly unlikely to have any impact on its setting.
- 3.54 A large part of the site is located in a Mineral Safeguarding Area (MSA); however, this covers much of the authority and does not prohibit development subject to the criteria of Policy LPC 14.
- 3.55 There are no other environmental or ecological designations or constraints that would prevent the development of this site. The scheme would be sympathetically integrated with the open land to the west and south of the site and the mere to the east, through planting and large open space buffers.
- 3.56 In terms of Ecology, an initial Phase 1 Habitat Survey (November 2018) prepared by REC and attached at **Appendix 4** confirms that the site does not contain any ponds or other key habitat features and is instead characterised by habitats of low ecological value including arable fields species poor hedgerows and semi-improved grasslands. That said, these survey does indicate that the site offers potential habitats for bats, breeding birds, reptiles and other species and recommends that further survey work is undertaken to support any application.
- 3.57 In respect of agricultural land classification, the Agricultural Land Assessment (October 2018), prepared by ADAS and attached at **Appendix 5** confirms that the site is predominantly Grade 3b or non-agricultural. There is an area of Grade 3a land to the north of the parcel fronting Burrows Lane, albeit this shows evidence of historical disturbance and includes areas of Grade 3b where there is evidence of landfill or old mining activity.
- 3.58 As such this is not considered to be a significant constraint, particularly given that much of the land surrounding St Helens is Grade 3 or higher, and therefore agricultural land issues will not prevent development of this site.
- 3.59 In heritage terms, the site is not located in or near to a conservation area, with the nearest listed building over 600m from the site, ensuring that there are no heritage impacts as a result of this development.

Market attractiveness

3.60 As noted above, Redrow's land interest suggests that the site is in an attractive market location, which it is, as it falls on the edge of Eccleston, with views onto the Mere, whilst also being in close proximity to St Helens, which is the Principal Town in the Borough for retail and employment opportunities.



Contribution to regeneration priority areas

3.61 Development in this area is not a regeneration priority, but new development here will generate additional household spending which will help to support additional shops and services in Eccleston and St Helens.

Amenity impacts on occupiers and neighbouring areas

- 3.62 The proposed development will have minimal impacts on the surrounding area as the proposed scheme will be sympathetically integrate into the open countryside that lies to the west and south of the site. The development will be well screened by the Mere to the east and the small number of residential properties to the south west of the site. In addition, the development will deliver areas of open space for use by residents and the local community.
- 3.63 The site is therefore suitable in accordance with the NPPF and the NPPG.

Achievable

- 3.64 The delivery of 210 dwellings would make a significant contribution towards meeting the housing needs of the Borough. An initial assessment of the site constraints has been undertaken which illustrates that delivery of the entire site is achievable and deliverable, and a professional team of technical experts has been appointed to underpin this assessment and support the delivery of the site moving forward.
- These assessments (including the technical reports referred to above and attached at Appendices3-5) have informed the Delivery Statement provided at Appendix 2.
- 3.66 Redrow has reviewed the economic viability of the proposal in terms of the land value, attractiveness of the locality, potential market demand; as well as the cost factors associated with the site including preparation costs and site constraints. Where potential constraints have been identified; Redrow has considered the necessary mitigation measures and will use investment in order to overcome any deliverability barriers.
- 3.67 Redrow can, therefore, confirm that the development of the site is economically viable in accordance with the NPPF and NPPG. As a consequence, the company is committed to investing in the site and is confident that residential development can be achieved within 5 years.

Deliverability Conclusions

3.68 This assessment has confirmed that the Burrows lane site is available, suitable and achievable in accordance with the latest national guidance and should therefore be allocated for residential development.



Economic Investment

- 3.69 It is also worth noting that the development of up to 210 homes will create a number of economic benefits, including:
 - Employment opportunities: Around 42 full-time equivalent jobs could be directly supported per annum during the construction phase (circa 6 years), with a further 78 jobs per annum supported in the wider supply chain.
 - Contribution of construction phase to economic output: The construction of the new homes could contribute an additional £40.5 million of gross value added (GVA) annually to the local economy during the construction period.
 - Household spend: Once fully built and occupied, the households are estimated to generate expenditure in the region of £5.4 million per annum.
 - New Homes Bonus: The proposed development also has the potential to generate in the region of £1.4 million in New Homes Bonus revenue for St Helens Council.
 - Increased Council Tax income: The construction of the new homes could generate around £351,000 per annum in additional Council Tax revenue, once fully developed and occupied.

Site Specific Assessment Conclusions

3.70 Therefore, this section confirms that the Burrows Lane site does not fulfil the 5 purposes for including land in the Green Belt, and is sustainable and accessible site, with no obvious technical constraints preventing its development for residential purposes. As such, it is recommended that Parcel A is allocated for immediate development.

Commentary on Council's Site Sustainability Assessment

- 3.71 This section has explored at length the suitability and sustainability credentials of the site. We have undertaken a detailed assessment of the Burrows Lane site, in the form of a pro-forma, which is contained at Appendix 6. We provide the following headline comments on the Council's SA assessment of the Burrows Lane site:
 - The Burrows Lane land parcel assessed in the Council's SA differs to the final red line boundary for Parcel A which Redrow are promoting. There are therefore some errors we have picked up on, which we address in our detailed pro-forma.
 - When converting the Council's SA scoring methodology to a numerical scoring system, the
 site scores a sustainability scoring of 44.5. This does not differ greatly at all from the
 sustainability scorings of many of the Council's allocated and safeguarded sites. <u>Indeed,
 The Burrows Lane site actually scores higher than one of the proposed housing allocations
 (4HA) and one of the safeguarded sites (8HS).
 </u>







3.72 We provide our own sustainability scoring of the site, where we picked up incorrect statements made in the AECOM SA such as the site containing a TPO and Local Wildlife Site, landscape sensitivity and deliverability matters. Our assessment concludes that the site has a sustainability score of 51, which is the 4th highest sustainability score of all sites against our methodology.



3.73 Overall, our detailed assessment confirms that the Burrows Lane site is sustainable and highlights several issues with the Council's scoring methodology. Please refer to Section 7 of this report where we provided detailed commentary on the Council's Green Belt Assessment and site selection methodology.



- Safeguarded housing sites 6,365
- TOTAL = 8,608

Safeguarded employment sites - additional sites to provide choice and flexibility

Site Selection Methodology

7.26 In respect of distribution and site selection, the supporting text at paragraph 4.18.12 of the plan confirms that:

> "In accordance with Policy LPA2 housing land supply will be distributed across the Borough, albeit with a concentration in existing urban areas and the major urban extension planned at Bold... The location of sites that have been released from the Green Belt has been determined by the St Helens Green Belt review... Whilst this process has constrained the ability to identify suitable sites in some key settlements, all settlements will have opportunities for housing development either within them or nearby."

- 7.27 This text supports an approach where allocated sites will be evenly distributed amongst the key settlements, where practicable, guided by the Green Belt Review and SHLAA. To clarify the key settlements are as follows:
 - St Helens Core Area- including St Helens Central Spatial Area, Moss Bank in the North, Clock Face to the South, Eccleston to the West and Parr and Sutton to the East (also includes Bold and Thatto Heath).
 - Blackbrook and Haydock,
 - Newton-le-Willows and Earlestown,
 - Rainford,
 - Billinge,
 - Garswood, and
 - Rainhill.
- 7.28 We fully support the need for a robust Green Belt Review as this is clearly important to demonstrate the exceptional circumstances required to amend Green Belt boundaries and identify sites.
- 7.29 That said, the 2019 NPPF is clear that when 'reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account' (para 138) and that 'when defining Green Belt boundaries plans should - ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development' (para 139).
- 7.30 Therefore, it is our strong view that the Green Belt Review should support rather than constrain the Council's ability to deliver growth to the key settlements.

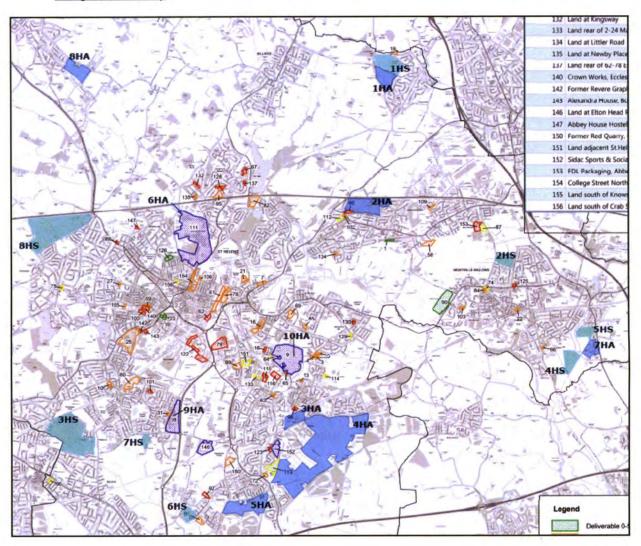




Site Distribution

- 7.31 In the case of St Helens the findings of the Green Belt Review and SHLAA have led to an uneven distribution of sites, with very little proposed development in Billinge and Rainhill, and only moderate development within Rainford. Furthermore, whilst the Core Area will receive a large amount of development this is again unevenly distributed within the different sub areas within it, with Eccleston, Sutton and Parr in particular receiving very low growth; with the Town Centre and Thatto Heath wards attracting over 50% of the development.
- 7.32 This uneven distribution is shown on the plans and table below (with a full version of the main plan contained at **Appendix 10**):

Figure 7.2 - Plan (Extract) showing Local Plan Distribution (SHLAA sites, Allocations and Safequarded Land)





Green Belt Review

- 7.34 In addition to the imbalance in housing distribution proposed within the plan, there are also concerns with the structure and methodology of the Green Belt Review.
- 7.35 Whilst there is no firm methodological guidance on how to undertake a Green Belt Review, beyond the requirement to consider the five purposes of the Green Belt (as set out at NPPF paragraph 134), and to use define clear parcel boundaries using physical features that are readily recognisable (para 139); certain independent practitioners (including Arup and LUC) have established standardised approaches which are accepted as good practice.
- 7.36 In this instance, the Council have undertaken the review themselves and their approach raises a number of issues.
- 7.37 Firstly, whilst the Review has been undertaken over multiple stages, the final site ratings are based on 3 criteria (Green Belt Purposes a, b and c) with 4 different ratings (Low/ Medium/ High/ High +), meaning there are only 12 possible scores. This provides only limited scope for differentiation in the site ranking. This is particularly relevant where there were 99 parcels, with many more sub parcels considered within the settlement. It is an overly broad-brush approach.
- 7.38 That said, we understand and endorse the Council's decision to screen out purposes d and e, on the basis that there are no historic towns in St Helens, and because of the difficulty of justifying that one parcel of land would make a greater contribution to urban regeneration than another, when it has already been established there is insufficient brownfield land to meet future needs.
- 7.39 Secondly, in respect of the historic towns issue (Green belt purpose d) there has been some conflation of the issues, as the Stage 3 assessment of the individual sites considers heritage matters and indeed discounts some parcels based on heritage impacts.
- 7.40 This ties into a wider point highlighted in section 3 as to whether such an analysis of site constraints and sustainability credentials should be conducted separately or subsequent to the Green Belt Review process. In our view it should, as in this case it is clear the Council has mixed the two processes, which has led to a conflation of issues (including heritage) and led the Council to advocate retention of sites in the green belt for reasons unrelated to their contribution to the 5 green belt purposes.
- 7.41 Thirdly, this is an update to the previous Green Belt Review, also undertaken by the Council, that sought to allocate and safeguard a very different suite of sites, even though overall development needs have not changed significantly (even by the Council's reckoning they have dropped by 15%) and the distribution strategy is unchanged. The Green Belt Review is at odds with the Council's previous work, and its own reduction in housing need (which we dispute) does not provide justification for such a wholescale change in approach.



7.42 In addition to the need to provide Green Belt boundaries that endure, paragraph 138 of the 2019 NPPF also notes that:

"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."

- 7.43 However, it does not appear that accessibility or the ability to make compensatory improvements have been properly considered within this review and have certainly not been given any elevated importance which is a flaw.
- 7.44 In the case of Burrows Lane the site is well served by public transport with bus stops offering high frequency services directly adjacent to the site, whilst the large landholding and relatively low density proposed ensures there are sufficient opportunities for compensatory improvements.
- 7.45 Finally, our analysis noted that some of the proposed allocations and safeguarded sites have been considered in the Green Belt Review on the basis of parcels that were different and generally larger to that actually proposed for development (see **Appendix 6** assessments of sites 7HA, 1HS, 2HS, 4HS, 5HS and 6HS). Indeed, these parcel boundaries were often extended towards more logical physical boundaries as they would in a general GB parcel assessment, however this is likely to have generated more positive scoring for these sites and represents another flaw in the methodology.
- 7.46 Taking into account the concerns and issue regarding the Green Belt Assessment, we present our own assessment of the 18 proposed allocations and the Burrows Lane site. For ease of reference these are set with the findings from the Council's Green Belt Review:



Figure 7.5 - Green Belt Contribution Assessment of Proposed Allocations against Burrows Lane site

Site Reference	Council GB Conclusion	Pegasus GB Conclusion	
1HA	Low	Low-medium	
2HA	Low	Low	
ЗНА	N/A	N/A	
4HA	Low	Low	
5HA	Low	Low-medium	
6HA	N/A	N/A	
7HA	Low	Low	
8HA	Low	Low	
9HA	N/A	N/A	
10HA	N/A	N/A	
1HS	Medium	Medium	
2HS	Medium	Medium	
3HS	Low	Low	
4HS	Low	Medium	
5HS	Low	Medium	
6HS	Low	Low	
7HS	Low	Medium	
8HS	Low	Low	
Burrows Lane	High +	Medium	

7.47 It is our view, that the proposed site at Burrows Lane makes a medium contribution to the Green Belt, meaning it is of a similar standing to several of the chosen sites and should therefore be considered for allocation.

Sustainability Appraisal

- 7.48 We now move on to the Council's Sustainability Appraisal and how it has considered the proposed allocations and the Burrows Lane site.
- 7.49 The Sustainability Appraisal has been undertaken on behalf of the Council by AECOM. Whilst the methodology is generally considered sound; we do disagree with some of the scoring and have provided our own comparable assessment. Furthermore, to allow direct comparison we have applied the scoring system as set out below, with the scores for each indicator tallied up, and the highest considered most sustainable.

Fig 7.6 - Pegasus Sustainability Appraisal Scoring

Key of Council's SA Scoring:	Key of Pegasus scoring:
Likely to generate negative effects	1
Potentially negative effects which could be mitigated	2
Unlikely to have significant effects	3



APPENDIX 6 - DETALED SITE PRO FORMAS



Site Reference	Council's SA Score
5HA	53
9HA	52
2HA	51
3HS	51
10HA	50.5
ЗНА	50
2HS	49.5
6HS	49
7HS	48
LHA	47
5НА	47
4HS	47
7НА	45.5
1HS	45.5
5HS	45
ЗНА	44.5
Burrows Lane	44.5
4HA	43.5
3HS	43.5

Site Reference	Pegasus SA Score
5HA	53
9НА	52
2HA	51
Burrows Lane	51
ЗНА	50
10HA	49.5
3HS	49.5
6HS	49.5
2HS	48.5
7HS	48
1HA	47
4HS	47
7HA	45.5
6НА	45
5HS	45
1HS	44.5
8HA	43.5
4HA	43
8HS	42.5

Site Reference	Council GB Conclusion	Pegasus GB Conclusion
1HA	Low	Low-medium
2HA	Low	Low
ЗНА	N/A	N/A
4HA	Low	Low
5HA	Low	Low-medium
6HA	N/A	N/A
7HA	Low	Low
8HA	Low	Low
9HA	N/A	N/A
10HA	N/A	N/A
1HS	Medium	Medium
2HS	Medium	Medium
3HS	Low	Low
4HS	Low	Medium
5HS	Low	Medium
6HS	Low	Low
7HS	Low	Medium
8HS	Low	Low
Burrows Lane	High +	Medium

Site Ref	Deliverability Comments
1HA	Persimmon Development Option. Reserve the right to comment on detailed delivery rates at later stage.
2HA	Barratt Development Option. Reserve the right to comment on detailed delivery rates and site capacity at later stage given noise and flood risk issues.
ЗНА	No comment- planning permission in place.
4HA	11 landowners, 9 of which are private with no affiliation or development options with housebuilders or land promoters. No evidence that these are willing landowners or that there is market interest in this very large site.
5HA	Taylor Wimpey Development Option. Reserve the right to comment on detailed delivery rates at later stage.
6НА	Concern that there is likely contamination on this site given former factory use. Other site constraints, leading to concerns that delivery of houses could be delayed beyond the early years of the plan period.
7HA	Unclear land owner details. Reserve the right to comment on detailed delivery rates at later stage.
8HA	Miller Homes Development Option. Reserve the right to comment on detailed delivery rates at later stage.
9НА	Outline planning permission in place, albeit no Reserved Matters applications submitted yet.
10HA	Planning permission in place but land remediation conditions attached and elongated reserved matters timescales (7 years). Leads to concern about delivery of houses in the early years of the plan period.
1HS	One Landowner with no affiliation with Developer or Land Promoter, therefore concerns regarding market interest and deliverability. SA also flags up presence of mine shafts on site.
2HS	Taylor Wimpey Development Option. Reserve the right to comment on detailed delivery rates at later stage.
3HS	Site constraints relating to pylons, noise and highways capacity leads to concerns about housing delivery in early years of plan period.
4HS	Owned by Key Property Investments Ltd and Jones Homes North West Ltd have Development Option on remainder of site. Reserve the right to comment on detailed delivery rates at later stage.
5HS	Wainhomes Development Option. Reserve the right to comment on detailed delivery rates at later stage.
6HS	Kingsland Strategic Estates Ltd have Development Option. Reserve the right to comment on detailed delivery rates at later stage.
7HS	One Landowner with no affiliation with Developer or Land Promoter, therefore concerns regarding market interest and deliverability.
8HS	Story Homes Development Option. Reserve the right to comment on detailed delivery rates and site capacity at later stage given noise, flood risk and ecology issues.
Burrows Lane	Redrow have Development Option on the whole site. Due diligence and technical work confirms no deliverability issues.





Land Diam Defendance	4114	Cita Lasatian.	Dillings Dood Commend	Allo saka di au Cafa muanda da	A 11 4 4
Local Plan Reference:	1HA	Site Location:	Billinge Road, Garswood	Allocated or Safeguarded?	Allocated



Council Assumptions	<u>Pegasus Comments</u>
<u>Site Size:</u> 9.58ha	Accurate, no comments
Indicative Site Capacity: 216	No comments, albeit reserve the right to comment on assumed delivery rates at a later stage.
Assumed Net Developable Area: 75% (therefore 7.19 ha)	Realistic, no comments
Assumed Density: minimum 30 units per hectare	Realistic, no comments
Planning History: None	•

<u>Land Ownership/Availability:</u> 1 Landowner (Anne Hunt-) Persimmon have land option.

Green Belt Parcel Reference: GBP_025b

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The sub-parcel is triangular is shape and is bounded by strong physical boundaries to the north by Billinge Road, to the west by Garswood Road, to the east and south by Smock Lane and the built development of Garswood. Residential properties run along Garswood Road to the north west and a significant pocket to	Low	Agreed and no comments
To prevent neighbouring town merging into one another	Low	the south, the remaining of the sub-parcel is agricultural field. The sub-parcel contributes broadly, along with other parcels (GBP_026), to the physical and visual separation of Billinge and Garswood. A strategic gap between Billinge and Garswood could be maintained if this sub-parcel was released from the Green Belt.	Medium	The gap between Billinge and Garswood is already narrow (circa 1.7 km in this location). The development of this site would reduce the gap further, to circa 1.4 km). We therefore consider this parcel provides a medium contribution to preventing neighbouring towns from merging.
3. To assist in safeguarding the countryside from encroachment	Low	The parcel is very well enclosed on all sides by highway and residential properties.	Medium	Whilst the land parcel is very well enclosed, this is only one aspect that the Council's own methodology explores in relation to purpose 3 (urbanising features, sense of openness, characteristics of the countryside etc). The site is affected by surrounding urbanising features, however it is also very open. There is no vegetation on the site, including none along its northern boundary. This means that longline views are present when looking northwards and to the open Green Belt beyond. It's open nature also means it bears many characteristics of the countryside. We therefore score the site as having a medium contribution to purpose 3 of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	No heritage concerns likely to arise given no listed buildings, conservation areas nearby.
Overall Assessment	Low	All sides of the sub-parcel have strong boundaries and therefore the sub-parcel is well contained. The parcel is enclosed to the east and south. A strategic gap between Billinge and Garswood could be maintained if this sub- parcel was released from the Green Belt.	Low-	Whilst the site scores low against purposes 1 and 4, it scores medium against purpose 3 due to its very open nature and because it bears many characteristics of the countryside. It also scores medium against purpose 2, given that the gap between Billinge and Garswood is already quite narrow.
Key -Low Contribution - LC	Mediun	n Contribution - MC High Contribution - HC		



Suitability/Site Constraints

Access	Site is bounded by the B5207 to the north which has two bus stops. Garswood Road and Smock lame bounds the west and east of the site. Garswood station is within 1km from the site at	
Heritage	nere are no listed buildings, scheduled monuments or conservation areas near to or within the site.	
Flood Risk	Flood zone 1	
Landscape	The site is flat with some dwellings to the north western part of the parcel.	
Ecology/Trees	Some hedgerows surrounding the field.	
Agricultural Land	Grade 3 (good to moderate)	

Sustainability Appraisal

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Effects on biodiversity unlikely		No comment
SA2: To protect and improve land quality in St Helens	in St Helens Site contains 100% Grade 3 agricultural land. The size of the site however (10.88ha) does meet the site criteria threshold for potential effects.			No comment
SA3: To improve air quality in St Helens				No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 3.9km from nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network ad increased tree cover.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 100% in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the 95% of the site is within a Medium-High or High Landscape Sensitivity area. Site is or			The site is very open with long-line views, making it sensitive from a landscape perspective.	
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		No heritage assets within 500m. Effects unlikely.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Over 1.6km to open space. Site contains a Public Right of Way (severance possible if not designed inclusively)		No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount of waste, and in order of priority, the proportion of			
	N/A	Council not assessed this	
SA12: To improve health and reduce health inequalities		Access to GP: 430m of Garswood GP Surgery, Dr B W O'Brien & Partners Access to Leisure: Within 1.2km of 2 Children's Play Areas	No comment
SA13: To improve the education and skills levels of the population overall		Primary : 364m from Garswood Primary School Secondary : 2.29km from Cansfield High Specialist Language College	No comment
SA14: To ensure local residents have access to employment opportunities		844m from, Liverpool Rd Industrial Estate	No comment
SA15: To support a strong, diverse, vibrant and sustainable local economy to			
foster balanced economic		Housing site on land not suitable/attractive for employment.	No comment
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the		Potential to deliver 215 units over 0-15 years.	Agreed as the site benefits from few constraints, but reserve the right to comment on this at a later date when further details regarding deliverability are provided.
Jocial Caciasion	N/A	Council not assessed this	
SA18: To reduce crime, disorder and the fear of crime	N/A	Council not assessed this	
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use			
of existing transport infrastructure		11m from bus stop with 1-2 services per hour.	No comment
SA20: To improve access to and use of basic goods, services and amenities in		Residential site is located 692m from the nearest convenience store (The Store) or su	No comment
town and local centres		The state of the s	110 001111110111

Total Score:	47		47
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Key of Council's SA Scoring:

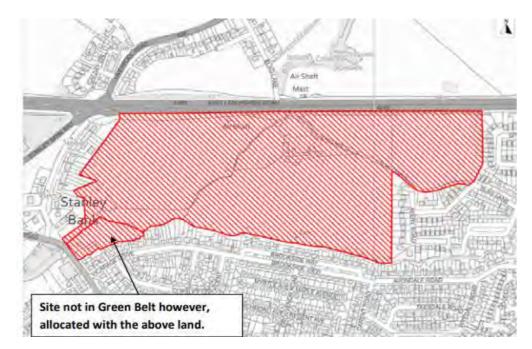
Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 2HA Site Location: Land at Florida Farm, Blackbrook Allocated or Safeguarded? Allocated



80 East Lancs Road to the north, it is likely that a required to alleviate concerns about noise. There are also hich may also reduce overall site capacity and final numbers.
required to alleviate concerns about noise. There are also
nt to comment on the likelihood of the site delivering 522 at a
e matters we refer to above, the net developable area may be d by the Council.

<u>Land Ownership/Availability:</u> 2 Landowners (John and Christine Jaundrill and David Charles Moore)- Barratt have land option on both.

Green Belt Parcel Reference: GBP_060

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
To check the unrestricted sprawl of large built up area	Low	The parcel is bounded to the north by the A580 East Lancashire Road and residential development to the south, east and west. The parcel is very well contained and therefore development of this parcel would not lead to unrestricted sprawl.	Low	Agreed and no comments
2. To prevent neighbouring town merging into one another	Low	The parcel does not fall within a strategic gap between two towns. The nearest towns are: Haydock and Blackbrook that adjoins the parcel and St. Helens which lies approximately 1.2km south west of the parcel, but Blackbrook and Haydock have already merged with St. Helens in part to the south.	Low	Agreed and no comments
To assist in safeguarding the countryside from encroachment	Low	The parcel contains some built development along the western boundary. The parcel has strong permanent boundaries and is surrounded by residential development on three sides, so therefore does not have a sense of openness or countryside character.	Low	Whilst we would agree that the overall score of the site is low against this purpose of the Green Belt, we do not agree that the site has no openness or countryside character becase there are some open views of the site from Slag Lane.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	No heritage concerns likely to arise when looking at location of nearest Listed Building (Vicarage Road)
Overall Assessment	Low	The parcel has strong permanent boundaries and does not have a sense of openness or countryside character.	Low	Agree that overall contribution is low
Key -Low Contribution - LC	Mediun	n Contribution - MC High Contribution - HC		



Suitability/Site Constraints

Access	The site has a lane access off the A580 (East Lancashire Road) which connects to Haydock Lane. The East Lancashire Road connects Greater Manchester to North Liverpool and provides a
Heritage	There is one Grade II listed building within 500m of the site: Pear Tree Farmhouse
Flood Risk	Some of the site is in Flood 2 with a smaller proportion being in Flood Zone 3 due to main river running along the south of the site. The main proportion of the site is within Flood Zone 1.
Landscape	The site is flat fields which are enclosed by the East Lancs Road with the east, west and south part of the site being enclosed by the rear of dwellings. Florida farm is situated in the middle
Ecology/Trees	Deciduous woodland is present in the south west corner of the site. The north part of the site along the East Lancs is lined with trees.
Agricultural Land	Grade 3 (good to moderate)

Sustainability Appraisal

	I a	T		Τ
SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance		Effects on his discount would be be		No. and and a second se
biodiversity		Effects on biodiversity unlikely. Site does not contain any agricultural land Grade 1-2. There is 100% (24.4ha)		No comment
SA2: To protect and improve		overlap with agricultural land Grade 3, which exceeds 20Ha, resulting in potential		
land quality in St Helens	negative effects.			No comment
SA3: To improve air quality in St Helens		Large sized development (500 units) over 2.1km from AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 2.3km from nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network and increased tree cover.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 94.7% in Flood Zone 1, and 5.3% in Flood Zone 2.		Agreed and highlight that this may be a constraint which reduces the overall site capacity of 522 dwellings.
SA7: To protect, enhance and		•		
make accessible for enjoyment, landscapes, townscapes and the		91.2% of the site is within a Medium-High or High landscape sensitivity area. Over 2.4km from a prominent ridge line.		No comment
countryside SA8: To protect, enhance and		over 2.4km nom a prominent nage inte.		INO COMMINENC
make accessible for				
enjoyment, the cultural		Site is 143m from an Archaeological Interest (Pear Tree Farmhouse) and 179m from		
heritage and historic		a listed building.		
environment		Effects unlikely due to urban setting and screening		No comment
SA9: Ensure access to and				
protection and enhancement				
of high quality public open				
space and natural greenspace		Within 224m of open space and PROW on site (severance possible if not designed inclusively)		No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
composted or recovered N/A	Council not assessed this		
SA12: To improve health and			
reduce health inequalities	Access to GP: Within 828m distance from DR H M RAHIL GP		
·	Access to Leisure: Within 1.2km of 2 childrens play spaces		Agreed and no comments
SA13: To improve the	process of account the second process of the		
education and skills levels of			No. as respectively.
the population overall	Primary: 617m from Legh Vale Primary School		No comment
	Secondary: 774m from Haydock High School		
SA14: To ensure local			
residents have access to	531m from Haydock Lane Industrial Estate/Old Boston Trading		No comment
employment opportunities SA15: To support a strong,	33111 Hoff Haydock Laffe Industrial Estate/ Old Bostoff Hading		No comment
diverse, vibrant and			
sustainable local economy to			
foster balanced economic			
growth	Housing site on land not suitable/attractive for employment.		No comment
SA16: To improve access to a			
range of good quality and			Agreed as the site benefits from few constraints, but reserve the right to comment on this at
affordable housing that meets			a later date when further details regarding deliverability are provided.
the diverse needs of the	Potential to deliver an estimated 500 units over 0-15 years.		
SA17: To reduce poverty and	·		
social exclusion N/A	Non-employment site	N/A	
SA18: To reduce crime,			
disorder and the fear of crime N/A	Council not assessed this		
SA19: To reduce the need to			
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway			
safety and make the best use			
of existing transport			
infrastructure	11m from Bus Stop. Regular frequency service. 2.6km to nearest train station.		No comment
SA20: To improve access to	· · · · ·		
and use of basic goods,	Decidential site in F20m from a companion of the state and 240 m from the		
services and amenities in	Residential site is 529m from a convenience store and 349m from the nearest		No. according to
town and local centres	supermarket		No comment

Total Score: 51 51

Key of Council's SA Scoring:

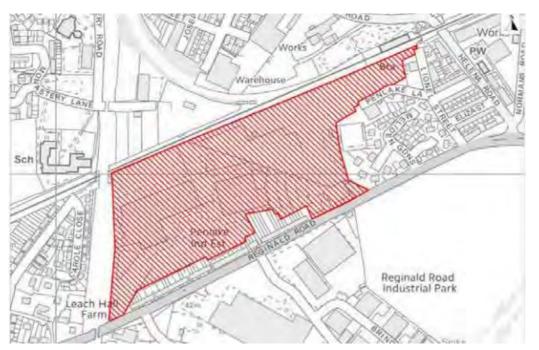
Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 3HA Site Location: Reginald Road, Bold Allocated or Safeguarded? Allocated (with planning permission in place)



Council Assumptions	Pegasus Comments
Site Size: 10.66 ha	No comment
Indicative Site Capacity: 337	No comment
Assumed Net Developable Area: 75% (therefore 8ha)	No comment
Assumed Density: minimum 42 units per hectare	No comment

Planning History: P/2015/0130- Approved

Hybrid Application - Full planning permission for demolition of existing metal recycling facility and structures and remediation of the site. Outline planning permission for re-profiling of the former railway embankment, residential development zone (**up to 358 dwellings**) and mixed use development zone to include 390sq m of open use development (A1, A2, A3 and/or D1) and/or up to 12 dwellings, with associated areas of open space /green infrastructure and main vehicular access from Reginald Road. All other matters reserved.

P/2018/0251/RES- Approved

Application for the approval of access, appearance, landscaping, layout and scale for the erection of **337 dwellings**, public open space (including play areas) and other associated works pursuant to outline planning permission P/2015/0130

Land Ownership/Availability: 1 Landowner (Countryside Properties)

Green Belt Parcel Reference: N/A (Brownfield Site)

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments	
1. To check the unrestricted sprawl of large built up area	N/A		N/A		
2. To prevent neighbouring town merging into one another	N/A		N/A		
To assist in safeguarding the countryside from encroachment	N/A		N/A		
4. To preserve the setting and special character of historic towns	N/A		N/A		
Overall Assessment	N/A		N/A		
Key -Low Contribution - LC	Key -Low Contribution - LC Medium Contribution - MC High Contribution - HC				



Suitability/Site Constraints

Access	The site can be accessed from the B5204 which have bus routes towards St Helens and Rainhill. Access could be gained from Penlake Lane. St Helens Junction railway station is 400m awa
Heritage	There are 3 Grade II listings within 500m of the site but not within the site itself. To the west is the Wheatsheaf and to the east are St Helens Junction Station and 2 Lionel Street.
Flood Risk	The whole site is within Flood Zone 1.
Landscape	The site is a former metal recycling facility area which has since been cleared for housing developments which have been granted planning permission. It is a flat site which is enclosed by
Ecology/Trees	The site contains some trees mainly to the edges e.g. along the railway track and there is a small pond in the south western part of the site.
Agricultural Land	Originally the site was brownfield- Land predominantly in urban use.

Sustainability Appraisal

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		22m from a local wildlife site and TPO on site therefore likely to generate negative eff		No comment as planning permission already granted.
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-3. Therefore effects are neutral.		No comment as planning permission already granted.
SA3: To improve air quality in St Helens		The site is 2.72km from AQMA therefore effects unlikely		No comment as planning permission already granted.
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 1.7km from nearest ground water source protection zone		No comment as planning permission already granted.
SA5: To mitigate and adapt to the impacts of climate change		Site is 6m from Bold Forest Park, and may present the potential to enhance to and / or link to existing green infrastructure networks.		No comment as planning permission already granted.
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site is located in Flood Zone 1 therefore effects unlikely		No comment as planning permission already granted.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of the site is within an area classified as being low sensitivity. Over 2.9km from a prominent ridge line, and effects therefore unlikely. Development could potentially enhance a currently derelict site.		No comment as planning permission already granted.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		archaeological interest, 3.4km from a registered park and 1.8km distance to ancient monument. Possible for effects given the close proximity of listed building. However, the site does not add to the setting of the asset, so significant effects unlikely.		No comment as planning permission already granted.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		173m to Open Space. Within 11m from a PROW, which could enable good accessibilit		No comment as planning permission already granted.
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
	I/A	Council not assessed this	
-	N/A	Access to GP: 538m from, Dr D.O Edwards & Partners (within 7 minute walk)	
SA12: To improve health and		Access to Leisure: Within 1.2km of 1 Childrens Play Areas and 0 allotments. New	
reduce health inequalities		development may not be well located with regards to existing recreational facilities.	No comment as planning permission already granted.
CA12: To improve the		development may not be well located with regards to existing recreational facilities.	No comment as planning permission arready granted.
SA13: To improve the		Primary: 825m from Sherdley Primary School	No comment as planning permission already granted.
education and skills levels of		Secondary: 2.29km from St Cuthberts Catholic Community College	No comment as planning permission arready granted.
the population overall SA14: To ensure local		Secondary : 2.25km from St eathberts eathblic community conlege	
			No comment as planning permission already granted.
residents have access to employment opportunities		2m from the Reginald Road industrial estate and Abbotsfield road	no comment as planning permission already granted.
SA15: To support a strong,			
diverse, vibrant and			
sustainable local economy to		Housing site on land not suitable/attractive for employment (former industrial estate	No comment as planning permission already granted.
foster balanced economic		in need of	5 to 5 to 6 to 6 to 6 to 6 to 6 to 6 to
growth		regeneration).	
SA16: To improve access to a			
range of good quality and			
affordable housing that meets			No comment as planning permission already granted.
the diverse needs of the		Deboutied to deliver in the plan province 1 Column according Chall minuting	
CA17. To advance		Potential to deliver in the plan period .1.59km away from Shell pipeline	
SA17: To reduce poverty and	N/A	Non-employment site	
social exclusion SA18: To reduce crime,	1/ /\	Non-employment site	
disorder and the fear of crime			
disorder and the rear of crime	I/A	Council not assessed this	
SA19: To reduce the need to			
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway		84m from a bus stop and 495m from a train station	No comment as planning permission already granted.
safety and make the best use		o mi nom a sas stop and 155m nom a train station	The comment as planning permission an easy granteen
of existing transport			
infrastructure			
SA20: To improve access to			
and use of basic goods,		Residential site within 230m to the nearest convenience store (Best One) and 1.2km	
services and amenities in		from a supermarket	No comment as planning permission already granted.
town and local centres			
Town and local centres			

Total Score: 50 50

Key of Council's SA Scoring:

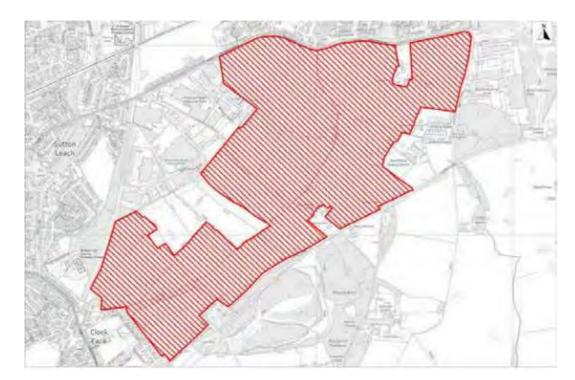
Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 4HA Site Location: Bold Forest Garden Suburb Allocated or Safeguarded? Allocated



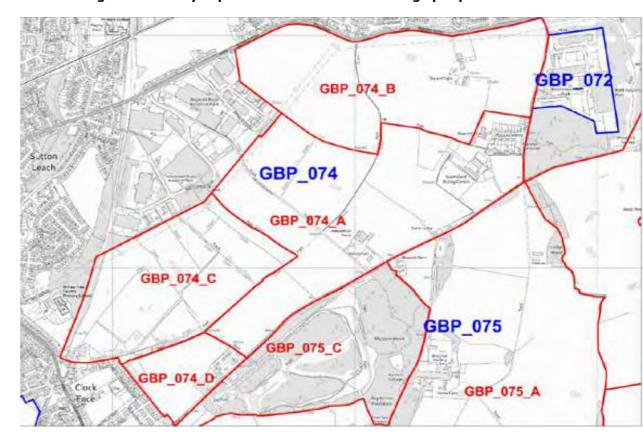
Council Assumptions	Pegasus Comments
Site Size: Total:_132.86 ha	Accurate, no comments.
Indicative Site Capacity: 2988	We raise questions about the total 2,988 figure because it is unclear from the evidence at this stage whether all landowners are willing to develop the site (9 private landowners appear to have no affiliation with housebuilders or land promoters). We therefore reserve the right to comment on this matter further, as although it is to be expected that a site of this scale would come forward in phases, we still have concerns about the availability of a number of land parcels within the 4HA allocation.
Assumed Net Developable Area: 75% (therefore 99.6 ha)	
Assumed Density: minimum 30 units per hectare	

<u>Planning History:</u> None of note- planning history relates to minor applications.

Land Ownership/Availability: 11 Landowners: St Helens Council are the main landowner, followed by Taylor Wimpey and Margaret and Bernard Grace. The other 8 landowners are all private owners who are not affiliated with a housebuilder or developer.

The site has been assessed as 4 separate Green Belt Parcels (GBP_074A, GBP_074B, GBP_074C and GBP_074D). For ease of reading we have only copied the overall Council ratings per parcel.

Green Belt Purpose	Council Rating for GBP_074A	Council Rating for GBP- 074B	Council Rating for GBP-074C	Council Rating for GBP-074D
1. To check the unrestricted sprawl of large built up area	Medium	Medium	Low	Low
2. To prevent neighbouring town merging into one another	Low	Low	Low	Low
3. To assist in safeguarding the countryside from encroachment	Low	Low	Low	Low
Overall Assessment	Medium	Medium	Low	Low
Council's concluding comments	The sub-parcel plays a moderate role in checking the outward expansion of Sutton (Bold) into the countryside, and plays no real part in a strategic gap.	The sub-parcel makes little to moderate contribution to the 3 purposes assessed as part of the review. The site is fairly well contained and does not significantly contribute to the wider strategic Green Belt gap.	a limited role in checking the outward expansion of Clock Face (Bold)	The sub-parcel plays a limited role in checking the outward expansion of Clock Face (Bold) into the countryside, and plays no real part in a strategic gap.





Pegasus Comments on whole 4HA Allocation

Green Belt Purpose	Pegasus Rating	Pegasus Comments			
To check the unrestricted sprawl of large built up area	Low	The combined 4HA land parcel benefits from strong and permanent boundaries on all sides, albeit part of the northern boundary is not due to its irregular boundary. This area is a Local Wildlife Site, so again provides a strong boundary.			
To prevent neighbouring town merging into one another	Low	Whilst the release of green belt land is significant, it would not reduce the large gap present between Bold and Warrington. Gorsey Lane and Clock Face Country Park are boundaries which could prevent any further merging or development to the south.			
To assist in safeguarding the countryside from encroachment	Medium	Whilst the site is well contained and has a landscape character which has been effected be existing urban features to the north, there are some very open view over the site. Views from Bold Lane looking southwards, as well as views from Neills Road looking westwards are very open and long-line in nature. Furthermore because there is very limited vegetation within the main land parcel, the site bears many characteristics of the open countryside. We therefore score the site a medium against purpose 3 of the Green Belt.			
4. To preserve the setting and special character of historic towns. The site is not located near to any historic towns, nor the Green Belt.		The site is not located near to any historic towns, nor next to any conservation Areas or Listed Buildings. Therefore, it provides a low contribution to this purpose of the Green Belt.			
		Overall, the site has a low contribution to the purposes of the Green Belt, given its strong boundaries and the fact that it does not cause merger issues. That said, the site is still open in nature and bears many characteristics of the open countryside.			

Suitability/Site Constraints

Access	Bold Road in the north, Neils Road to the east and Gorsey Lane to the south all allow for access. The west part of the site is enclosed by Reginald Road Industrial Estate and existing dwellings. There are existing bus stops which provide routes to St Helens. St Helens Junction railway station is around 500m away which provides services to Liverpool and Manchester.
Heritage	The are no listed buildings or scheduled monuments within the site. The Old Moat House Medieval Moat, Scheduled Monument is within 1km of the site and 3 other Grade II listed building
Flood Risk	Flood zone 1
Landscape	Flat fields which are open in nature. There are pylons running through the north of the site.
Ecology/Trees	There are some trees within the site. Clock Face Country Park is to the south of the site.
Agricultural Land	Mainly made up of Grade 3 (good to moderate)

Sustainability Appraisal

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Parcel GBP-74-b (56) overlaps with a TPO and parcel 070 (55) is 5m from a TPO. Parcel 070_A and 070_C both overlap a Local Wildlife Site and Local Site (Field north of Gorsey Lane). Effects considered likely.		The red line boundary does not contain a Local Wildlife Site. We are unaware of the TPO position on site, therefore score the site as amber in this category.
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-2. On average over 95% of the parcels contain ALC Grade 3, totalling 157.8Ha. Effects considered likely.		No comment
SA3: To improve air quality in St Helens		Potentially large-scale site (up to 2,900 units) located between 1529m - 19		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 705m from nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site overlaps with Bold Forest Park (0m) and the site presents opportunities for enhancement of GI network.		No comment



SA6: To minimise the risk of			
flooding from all potential			
sources and ensure there is			
no residual risk to people and			
_ = =			
properties		100% of site is located in Flood Zone 1	No comment
SA7: To protect, enhance and			
make accessible for			
enjoyment, landscapes,			
townscapes and the		Over 95% within a Low landscape sensitivity area and over 2.8km from pro	No comment, albeit note that the site is very open in nature.
SA8: To protect, enhance and			, ,
make accessible for			
		Parcel 074_B is located 180m to a listed building and Parcel 074_A is	
enjoyment, the cultural		located 49m from a listed building. No other heritage assets within 500m.	
heritage and historic		Effects considered unlikely.	No comment
SA9: Ensure access to and		,	-
protection and enhancement		Sub-parcel GBP_074_B (55) is within 4m of Open Space with sub-parcel	
1 -		GBP_074_C (58) being 198m from Open Space. PROW intersect the site	
of high quality public open		as various points (severance likely)	No comment
SA10: To minimise energy			
use and increase the			
proportion of energy both			
purchased and generated			
, -			
from renewable and	N/A	Council not assessed this	
SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
_ = ==================================			
waste reused recycled and			
waste reused, recycled and			
waste reused, recycled and composted or recovered	N/A	Council not assessed this	
	-	Council not assessed this Access to GP: Majority of the site is within 1.1km of a health centre,	
composted or recovered	-	Access to GP: Majority of the site is within 1.1km of a health centre,	Overall, due to the size of the site, we would state that the site is not the most sustainable
composted or recovered SA12: To improve health and	-	Access to GP: Majority of the site is within 1.1km of a health centre, however Parcel 074_A & D are within 1.7km and 074_C is 0.4km from DR	Overall, due to the size of the site, we would state that the site is not the most sustainable in relation to existing health facilities (especially the southern parcels)
composted or recovered SA12: To improve health and	-	Access to GP: Majority of the site is within 1.1km of a health centre, however Parcel 074_A & D are within 1.7km and 074_C is 0.4km from DR D O EDWARDS & PARTNER GP surgery.	Overall, due to the size of the site, we would state that the site is not the most sustainable in relation to existing health facilities (especially the southern parcels)
composted or recovered SA12: To improve health and reduce health inequalities	-	Access to GP: Majority of the site is within 1.1km of a health centre, however Parcel 074_A & D are within 1.7km and 074_C is 0.4km from DR	· · · · · · · · · · · · · · · · · · ·
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SA19: To reduce the need to		
travel, encourage alternatives		
to the car and other motor		
vehicles, improve highway		
safety and make the best use		
of existing transport		
infrastructure	Within 159m of Bus Stop. Regular frequency service.	No comment
SA20: To improve access to		
and use of basic goods,	Majority of the site is within 500m from a convenience store or	Generally agree, but again note that due to the size of the site some areas are more
services and amenities in	supermarket	sustainably located than others.
town and local centres		

Note: Land parcel assessed in SA is larger and differs to final red line proposed for 4ha allocation.

Total Score: 43.5

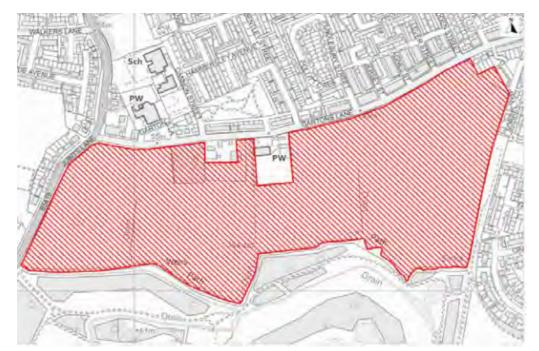
Key of Council's SA Scoring:

Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects





Local Plan Reference: 5HA Site Location: Gartons Lane, Bold



Allocated or Safeguarded? Allocated

Council Assumptions	Pegasus Comments
Site Size: 21.67 ha	Accurate, no comments.
Indicative Site Capacity: 569	No comment, albeit reserve the right to comment on assumed delivery rates at a later date.
Assumed Net Developable Area: 75% (therefore 16.25 ha)	No Comment
Assumed Density: minimum 35 units per hectare	No comment

Planning History:

None

<u>Land Ownership/Availability:</u> 3 Landowners- St Helens Council, Malcolm and Stuart Sumner (Taylor Wimpey have land option on this land) and Bromilow Holdings.

Green Belt Parcel Reference: GBP_080

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The parcel bounders Gartons Lane to the north, the urban edge of Clock Face to the east, Jubits Lane to the West and the protected Sutton Manor Woodland makes the southern boundary. The parcel adjoins Clock Face to the north and has strong boundaries, therefore is well contained and should not lead to unrestricted sprawl.	Low	We agree with the overall low score, albeit would note that the southern boundary is not strong or as well-defined as the other boundaries. Whilst this is protected open space and a dense tree area, this is still not as strong as a road or building boundary.
2. To prevent neighbouring town merging into one another	Low	Although the parcel prevents the merging of Sutton Manor with Clock Face, these two settlements are not considered as large built up areas in the context of this Green Belt Review and have already merged to some degree to the north-west.	Low	Agreed and no comment
3. To assist in safeguarding the countryside from encroachment	Low	The parcel has a semi-rural character due to encroachment from existing urban development. Although the site has an open aspect, the perception of open countryside is only gained when looking out to the south and over Sutton Manor Woodland. The parcel itself is only small in area and residential development is clearly visible when viewed from the south, east and west.	Medium	Whilst the site has been effected by surrounding urbanised features, there is limited tree coverage and shrubbery within the land parcel itself. This leads to the site having a rural and open character. Views from Gartons Lane towards Suton Manor Woodland are very open and not hidden by trees or shrubbery along this boundary. We therefore score the site as medium against this purpose of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	No heritage concerns likely to arise given no listed buildings, conservation areas nearby.
Overall Assessment	Low	This parcel makes little or no contribution to the 3 purposes assessed as part of the review. The site is well contained with strong boundaries and does not form part of the wider strategic gap.	Low-	Whilst the site is well contained with strong boundaries on 3 sides, it has a countryside and open character due to limited urbanising and natural features within the site boundary. Views are particularly sensitive from Gartons Lane, due their openness. We therefore score the site as providing a low-moderate contribution overall.
Key -Low Contribution - LC	Mediun	n Contribution - MC High Contribution - HC		



Access	The site can be accessed off Gartons Lane to the north and the B5419 to the west but there is limited access to the south as this borders onto Sutton Manor Woodland. There are many bu				
Heritage	There are no listed buildings, scheduled monuments or conservation areas within or near to the site.				
Flood Risk	Flood Zone 1				
Landscape	Protected open space to immediate south (Sutton Manor Woodland)				
Ecology/Trees	Sparse tree coverage on site, albeit tree bund to immediate south.				
Agricultural Land	Grade 3 (good to moderate)				

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Effects considered unlikely. Site is 292m from Local Wildlife site.		No comment
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-2. There is 100% (22.32ha) overlap with ALC Grade 3. Potential adverse effects.		No comment
SA3: To improve air quality in St Helens		Large sized development (520 units) over 2.7km from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 2.2km from nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site overlaps with Bold Forest Park and presents opportunities for enhancement of GI		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site is located in Flood Zone 1.		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the		99.8% of the site is within Low- Medium or Medium landscape sensitivity area. Over 1.7km from a prominent ridge line.		Agreed, albeit as previously discussed this land parcel is quite open and therefore sensitive from a landscape perspective
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Effects considered unlikely.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site overlaps with Open Space. PROW intersects centre of the site (severance may be likely)		No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered	N/A	Council not assessed this	
SA12: To improve health and reduce health inequalities		Access to GP: Within 485 m distance from Four Acre Health Centre (within 10minutes walk) Access to Leisure: Within 1.2km of 4 children's play areas and 2 allotment areas	Ageed and no comments
SA13: To improve the education and skills levels of the population overall		Primary: 111m from St Theresa's Catholic Primary School Secondary: Over 1.5km from The Sutton Academy	No comment
SA14: To ensure local residents have access to employment opportunities SA15: To support a strong,		609m to Lea Green Industrial Estate	No comment
diverse, vibrant and sustainable local economy to foster balanced economic		Housing site on land not suitable/attractive for employment	No comment
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the		Potential to deliver 520 units over 0-15 years.	Agreed as site does not have many constraints.
SA17: To reduce poverty and social exclusion	N/A	Non-employment site	
SA18: To reduce crime, disorder and the fear of crime	N/A	Council not assessed this	
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure		Site contains is adjacent to several Bus Stops with frequent service.	No comment
SA20: To improve access to and use of basic goods, services and amenities in town and local centres		Residential site within 400m of a convenience store (SKS Late Shop) or supermarket	No comment

Total Score: 53

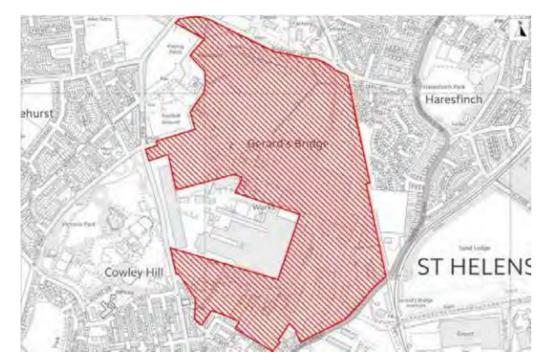
Key of Council's SA Scoring:

Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects





Local Plan Reference: 6НА **Site Location:** Land at Cowley Street, Town Centre Allocated or Safeguarded? **Allocated**



Council Assumptions	Pegasus Comments
Site Size: 31.09ha	Accurate, no comments.
Indicative Site Capacity: 816	We would question this number and highlight that this could in reality be lower, due to the flood risk constraints as well as potential land contamination issues which may reduce overall site capacity. Noise will also be a key consideration which could influence overall site capacity and reduce numbers. We therefore reserve the right to comment on the likelihood of the site delivering 816 at a later date.
Assumed Net Developable Area: 75% (therefore 23.32 ha)	As above- this could in reality be lower due to flood zone areas and potential contamination issues. There will also likely be a need for a development set backs to alleviate concerns about noise with the railway line to the east and the employment development to the north. The wooded area to the north also poses as a constraint.
Assumed Density: minimum 35 units per hectare	This may differ given the site constraint concerns we raise above.

Planning History:
P/2006/1147 (Mixed use development comprising residential (210 units), B1, B2 & B8 employment units, bowling green, environmental improvements and new access arrangements.)- Approved

Bellway housing estate located directly adjacent to red line boundary.

Land Ownership/Availability: 1 landowner (Pilkington Flat Glass Ltd)

Green Belt Parcel Reference: N/A (Brownfield)

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments	
To check the unrestricted sprawl of large built up area	N/A		N/A		
2. To prevent neighbouring town merging into one another	N/A		N/A		
To assist in safeguarding the countryside from encroachment	N/A		N/A		
4. To preserve the setting and special character of historic towns	N/A		N/A		
Overall Assessment	N/A		N/A		
Key -Low Contribution - LC	Key -Low Contribution - LC Medium Contribution - MC High Contribution - HC				



Access	Access to the site is available via Windle City to the west. St Helen's Railway Station is within an approximate 20 minute walk from the southern extremity of the site. Regular bus services run along City Road to the immediate west of the site.
Heritage	No Listed Buildings, Ancient Scheduled Monuments or Conservation Areas are located within or adjacent to the site.
Flood Risk	The majority of the site is located within Flood Zone 1, but a small portion of the site is located within Flood Zones 2 and 3.
Landscape	Brownfield site surrounded by built form, therefore not particularly sensitive albeit the wooded tree area to the north would need to be carefully considered.
Ecology/Trees	A large woodland/tree area is located within the northern section of the site. There are also trees along the eastern site boundary. The SA indicates there are protected trees on site.
Agricultural Land	N/A- brownfield
Contamination	It is likely that there could be contamination issues on site, given that a factory is still located on site.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Negative effects likely due to the presence of a local wildlife and protected trees on si		No comment
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-3. Therefore neutral effects are predicted.		No comment
SA3: To improve air quality in St Helens		The site is 880m from an AQMA and will generate increased car traffic.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 2.5km from nearest groundwater source protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		95.87% of site is located in Flood Zone 1, 4.13% located in Flood Zone 2 and 2.86% located in Flood Zone 3 therefore effects are unlikely. The scale of the site means it should be possible to avoid flood zones 2/3.		Agreed that the presence of flood zone 2 and 3 is a constraint that will need to be considered at the detailed design stage.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		98% of the site is within a Low sensitivity , 0.01%Low- Medium and 1.81% Medium landscape sensitivity area. Therefore effects are unlikely as landscape will not be effected. 119m from a prominent ridge line though.		No comment No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		535m to a conservation area, 61m to a listed building, 1.38km from an archaeological interest, 802m from a registered park and 837m distance to ancient monument effects are unlikely due to the being over 50m from heritage assets.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		13m to Open Space. The site is adjacent to a PROW (severance unlikely)		No comment No comment



SA10: To minimise energy use and increase the			
proportion of energy both			
purchased and generated			
from renewable and	NI/A	Council not assessed this	
SA11: To reduce the amount	N/A	Council flot assessed this	
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
composted or recovered			
_	N/A	Council not assessed this	
SA12: To improve health and			No comment
reduce health inequalities		Access to GP: 498m from, Dr D.O Edwards & Partners (within 6 minute walk)	
		Access to Leisure: Within 1.2km of 7 Children's Play Areas and 1 Allotments	No comment
SA13: To improve the			
education and skills levels of		Primary : 548m from Parish CofE Primary School	No comment
the population overall		Secondary: 2.32km from St Augustine of Canterbury Catholic High School	No comment
SA14: To ensure local			
residents have access to			l.,
employment opportunities		1.2km from the Pilkingtons Cowley Hill Works	No comment
SA15: To support a strong,			
diverse, vibrant and			We agree that residential development on this site would lead to the loss of a site suitable
sustainable local economy to			for employment purposes. Although the site is currently vacant since the Pilkington Factory
foster balanced economic		Housing site on land suitable for employment	closed, it is still in a location highly suitable for alternative employment uses.
SA16: To improve access to a			
range of good quality and			contamination issues. As a brownfield site which is home to former but now vacant factory
affordable housing that meets			buildings, not only would the demolition of these and site assembly delay delivery
the diverse needs of the			timescales, there may also be contamination issues. We reserve the right to comment on
borough		Determination of the plan mental 40 Ft.	this matter further at a later stage, when the deliverability of this site is covered in more
6417. 7		Potential to deliver in the plan period. 10.5km away from Shell pipeline.	detail.
SA17: To reduce poverty and	N/A		
social exclusion SA18: To reduce crime,			
disorder and the fear of crime			
and the real of clinic	N/A	Council not assessed this	
SA19: To reduce the need to			
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway			
safety and make the best use			
of existing transport			
infrastructure		26m from a bus stop and 1.2km from a train station	No comment
SA20: To improve access to			
and use of basic goods,		Residential site within 208m to the nearest convenience store (LT convenience Store	
services and amenities in) and 752m from a supermarket (Iceland frozen food)	No commant
town and local centres) and 752m nom a supermarket (Iceland 1702en 1000)	No comment
		-	•

Total Score:	47		45
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Key of Council's SA Scoring:

Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects





Local Plan Reference: 7HA Site Location: Land west of Mill Lane, Newton-le-Willows Allocated



Council Assumptions	Pegasus Comments
Site Size: 8.03ha	Accurate, no comments.
Indicative Site Capacity: 181	We raise concerns over the overall assumed capacity of 181 dwellings. There are noise and heritage issues to consider on this site, both of which will reduce the overall number of housing to be delivered. We reserve the right to comment on this at a later date.
Assumed Net Developable Area: 75% (therefore 6.02 ha)	As above- the NDA may be lower due to noise and heritage constraints.
Assumed Density: Minimum 30 dwellings per hectare	No comment

Planning History:

P/2010/0855-(Demolition of existing residential, administration and staff accommodation buildings and erection of 32.no bed secure childrens home with reception, admissions and management area and associated secure perimeter wall / fence, external areas, landscaping and access / road layout proposals.) **APPROVED AND CONSTRUCTED BUT NOW CLOSED**

Land Ownership/Availability: No Land Title on Land Registry Website

Green Belt Parcel Reference: GBP 42

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	Low the restricted sprawl.		Agree that the site benefits from an overall low contribution to this purpose of the Green Belt, albeit would highlight that the southern boundary is not strong or permanent.
2. To prevent neighbouring town merging into one another	Low	The parcel does not fall within a strategic gap between two towns. The nearest towns that are not "washed over" by Green Belt are: Newton-le-Willows which lies 80m north of the parcel and Winwick, Warrington which lies approximately 1.2km south of the parcel. A strategic gap could be maintained between Winwick and Newton-le- Willows if this parcel was developed.	Low	Agreed, no comment
3. To assist in safeguarding the countryside from encroachment	Low	The parcel has strong permanent boundaries to the north, east and west and is well contained. A large amount of the parcel (approximately 30%) consists of built development. Given the high level of enclosure and the presence of the existing development, it is considered that the parcel does not have a strong sense of openness or countryside character.	Low	Agreed, no comment
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	The site immediately borders a registered battlefield (Battle of Winwick), which although is a key heritage asset is not strictly related to the setting or special character of Newton-le-Willows.
Overall Assessment	Low	Given the high level of enclosure and the brownfield nature of part of the site, it is considered that development of the parcel would not lead to unrestricted sprawl and it does not have a strong sense of openness or countryside character.	Low	Overall the site benefits from being well-contained (other than the southern boundary) and is already home to built-form, which limits openness.
Key -Low Contribution - LC	Mediur	Contribution - MC High Contribution - HC		

Note: The GB parcel assessed in the Council's assessment is larger and differs to the final red line of the proposed site allocation.



Access	Access options are available via the A49 to the east. The nearest railway station (Newton-le-Willows) is approximately 1.6 miles to the north-west. Low frequency bus services to the immediate east of the site.			
Heritage	Heritage Registered battlefield (Battle of Winwick) immediately borders the site to the south-east			
Flood Risk	The site is located within Flood zone 1.			
Landscape	Part brownfield, views from Mill Lane screened due to shrubbery and hedgerow.			
Ecology/Trees	Ecology/Trees The SA states the site contains a Local Wildlife Site and a TPO, therefore is sensitive in terms of ecology and tree matters.			
Agricultural Land	Agricultural Land Grade 3 (Good to Moderate)			

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site contains a Local Wildlife Site (Newton Brook) and a TPO		No comment
SA2: To protect and improve land quality in St Helens		Site contains a 100% overlap with Grade 3 agricultural Land (13.72Ha), but less that the criteria considered to lead to likely effects.		No comment
SA3: To improve air quality in St Helens		Medium size site (180 units) located 827m from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Within a ground water protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 91% in Flood Zone 1, 9% in Flood zone 2 and 8% in Flood Zone 3.		The SA Site Area differs to the red line boundary of the proposed allocation. The allocation looks like it has excluded the flood zone area and therefore is located entirely within flood zone 1.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		90% of site within a Medium-High or High Landscape Sensitivity area and 10% in Low/Medium landscape sensitivity area. Site is over 6.4km from prominent ridgelines		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Site of Archaeological Interest is 19m from the site and 313m to the nearest listed building. Effects possible.		Registered Battlefield (Battle of Winwick) immediately borders the site to the south-east and poses a constraint to development on site.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		28m from open space. There is a Public Right of Way on site (severance possible if not designed inclusively)		No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		

Likely to promote positive effects



SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
composted or recovered N/A	Α	Council not assessed this	
SA12: To improve health and			A second collections would blob light that the city is not the country or the land of the light of
reduce health inequalities		Access to GP: 1.2 km from Dr M Rahman & Partners	Agreed, albeit we would highlight that the site is not the most sustainable location in
		Access to Leisure: Within 1200m of 3 Children's Play Areas and 2 Parks/Gardens	relation to the main services in Newton-le-Willows.
SA13: To improve the			
education and skills levels of			No comment
the population overall		Primary: 1.08km from St Peter's CofE Primary School	No comment
		Secondary: 2.05km from Hope Academy	
SA14: To ensure local			
residents have access to		962m from Vulcan Industrial Estate	No comment
SA15: To support a strong,			
diverse, vibrant and			
sustainable local economy to			
foster balanced economic		Housing site on land not suitable/attractive for employment.	No comment
SA16: To improve access to a		Trousing site of failu flot suitable/attractive for employment.	No comment
range of good quality and			Agree that the site could deliver early on in the plan period, albeit raise some concerns
affordable housing that meets			about the overall amount of dwellings that could be delivered given the heritage, flood risk
the diverse needs of the			and noise issues.
horough		Potential to deliver 180 units over 0-15 years.	
SA17: To reduce poverty and	/Δ	Non-employment site	
CA19. To reduce crime		Hon employment site	
disorder and the fear of crime			
	A	Council not assessed this	
SA19: To reduce the need to			
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway		7m from bus stop. Low frequency service	
safety and make the best use			
of existing transport			
infrastructure			No comment
SA20: To improve access to			The Esso petrol station on Mill Lane is located 850m from the northern section of the site.
and use of basic goods,			The site is thereore not sustainably located in relation to local shops, and falls within the
services and amenities in		Residential site 609m from nearest convenience store (Rontec) or supermarket.	800-1200m category of the Council's methodology (therefore yellow).
town and local centres		the state of the s	

^{*}Note: The SA Assessment covers a larger land area than the proposed red line area for the allocated site.

Total Score: 45.5	45.5
Key of Council's SA Scoring:	Key of Pegasus scoring:
Unlikely to have significant effects	1
Likely to generate negative effects Potentially negative effects which	2
could be mitigated	3



ocal Plan Reference:	8НА	Site Location:	Land south of Hi
e Hint	Ann.		1
		\ /	110
	Dial	House	17/
			The oftage
Rookery Farm			Tobal a
King George's Field Diamo Busine Park	nd S	19	7
Park			
ure Lane Bridge (Greater)		Shka	Sha
MIII		West Hazel	way

Land south of Higher Lane and East of Rookery Lane, Rainford Allocated or Safeguarded? Allocated

Council Assumptions	Pegasus Comments
Site Size: 11.49 hectares	Accurate, no comments.
Indicative Site Capacity: 259 dwellings	No comment, albeit reserve the right to provide detailed comments on assumed delivery rates at a later date.
Assumed Net Developable Area: 8.6 hectares (75%)	Realistic, no comments
Assumed Density: 30 dwellings per hectare	Realistic, no comments

Planning History: No planning history for the site

Land Ownership/Availability: The site has one landowner (MS522607). The landowner is The Right Honourable Edward Richard William Earl of Derby c/o the Estate Office. Miller Homes have an option on this land.

Green Belt Parcel Reference: GBP_098

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The sub-parcel is well contained by the strong physical boundaries of Higher Lane to the north-east; woodland belt (protected) to the south-east; Rainford Industrial Estate and Rainford Linear Park to the south-west; and Rookery Lane to the north-west. It does not directly adjoin or lie in close proximity to an identified large built-up area.	Low	The site benefits from strong and defensible boundaries on all sides.
To prevent neighbouring town merging into one another	Low	The sub-parcel lies adjacent to the identified settlement of Rainford, although its role in preserving the integrity of a strategic gap between Rainford and other identified settlements is limited.	Low	The site does not play an important role in terms of preventing the merging of Rainford and other settlements.
3. To assist in safeguarding the countryside from encroachment	Low	The sub-parcel contains little inappropriate development; however it is well enclosed on all sides. Existing development of an urban nature lies directly adjacent to the north-west (housing) and south-west (industrial estate).	Low-	The site has been effected by existing urbanising features to the south, north-west and west. Whilst the site is relatively well enclosed, it's most sensitive views are from Rookery Lane looking eastwards because there is relatively limited shrubbery on site. Due to the open views from Rookery Lane we score the site as low-medium, albeit overall the site has lower sensitivity because of the urbanised features and strong boundary hedgerow.
4. To preserve the setting and special character of historic towns	N/A		Low	The site is located opposite two listed buildings, however strictly speaking this purpose of the Green Belt relates to historic towns, which is not applicable in this location.
Overall Assessment	Low	The sub-parcel's role in preventing sprawl and the merger or settlements is limited; and its development would not result in significant countryside encroachment.	Low	Overall the site benefits from strong boundaries and is well enclosed, however we do note that the site does appear very open in nature when looking eastwards from Rookery Lane.
Key -Low Contribution - LC	Mediun	Contribution - MC High Contribution - HC		



There are two options to gain access to the site: Rookery lane to the west of the site and Higher Lane to the north of the site. There are bus stops both on Higher Lane and Rookery Lane which offer regular services to Ormskirk, Rainford, Ashton, St Helens, Rainford. There is a rail station in Rainford which is located 2.9km to the north of the site. The M58 is located approximately 6km to the north of the site.
On the northern boundary of the site, there are two listed buildings: Barn to north of Dial House (Grade II) and Dial House. These heritage assets look directly onto this parcel and therefore these would need to be taken into consideration for development to come forward on site.
Flood Zone 1
SA notes how the site is located in a medium-high landscape sensitivity area.
A tree lined hedgerow runs through the site from north to south. Along the northern boundary of the site, there is a dense wooded area however this is not included within the red line boundary. The eastern boundary of the site is made up of a dense wooded hedgerow. The Rainford Linear Park tracks forms the southern boundary of the parcel and this is tree lined on either side of the footpath.
The majority of the site is made up of Grade 1 agricultural land which is considered to be best and most versatile. There is a very minute percentage of the land which is Grade 2 agricultural land.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site contains TPO, effects likely.		No comment
SA2: To protect and improve land quality in St Helens		Site is made up of 93% Grade 1 Agricultural Land (12.25ha)		We disagree with the SA's methodology for scoring in this category. Grade 1 Agricultural Land has the highest level of protection given it is the best quality, therefore its loss should be seen as a negative factor in sustainability scoring, regardless of the site size.
SA3: To improve air quality in St Helens		Medium size site (260 units) located over 4.8km from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 5km from nearest protection zone.		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network and increased tree cover.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 100% in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of site within Medium-High or High Landscape Sensitivity area and 787m from prominent ridge		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		Listed building within 12m (Dial House). Development is likely to have a significant effect on the heritage asset unless screening is adopted.		Agreed that the nearby Listed Buildings pose as a constraint which needs to be carefully considered.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site sites within 0m of open space (with negligible overlap), but Public Right of Way on site (severance possible if not designed inclusively)		No comment

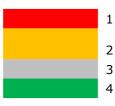




Total Score: 44.5 43.5

Key of Council's SA Scoring:

Likely to generate negative effects
Potentially negative effects which
could be mitigated
Unlikely to have significant effects
Likely to promote positive effects





Local Plan Reference: 9HA Site Location: Land at former Linkway Distribution Park, Elton Head Road, Thatto Heath Allocated or Safeguarded? Allocated



Council Assumptions	Pegasus Comments
Site Size: 12.39 hectares	Accurate, no comment.
Indicative Site Capacity: 350 units	The application on the site, approved in June 2018, approved 350 units so this site capacity is considered acceptable. Reserve the right to comment on housing trajectory and assumed delivery rates for the site, given that Reserved Matters consent is not yet in place.
Assumed Net Developable Area: 9.29 hectares (75%)	Accurate given planning permision in place.
Assumed Density: 38 hectares	Accurate given planning permision in place.

<u>Planning History:</u> P/2018/0060/FUL - Hybrid Planning application comprising of a full planning permission for demolition of existing buildings and structures and outline application all matters reserved except for access for residential development (up to 352 dwellings) and associated open space / green infrastructure. The application was granted on the 20th June 2018.

<u>Land Ownership/Availability:</u> There are two landowners within this parcel: Project Properties Ltd and St Helens Borough Council. St Helens BC only own one small parcel (MS512130). The rest is owned by Project Properties Ltd. MS452308, LA279049, LA161627, LA212902, MS599808.

Green Belt Parcel Reference: N/A (Brownfield Land)

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
To check the unrestricted sprawl of large built up area	N/A		N/A	
2. To prevent neighbouring town merging into one another	N/A		N/A	
To assist in safeguarding the countryside from encroachment	N/A		N/A	
4. To preserve the setting and special character of historic towns	N/A		N/A	



Overall Assessment					
	N/A			N/A	
Key -Low Contribution - LC	Mediun	n Contribution - MC	High Contribution - HC	l .	

Access	Access to the site will be taken off Sherdley Road which forms the western boundary of the site. The existing site includes two vehicular access points along Sherdley Road and these will be retained and used as the access to a site. Thatto Heath rail station is located 1.2km to the west and Lea Green is located 1km to the east. Between them they have good rail links to Wigan, Liverpool and Formby. There are bus stopes on Sherdley Road (the western boundary) offering regular services to St Helens, Sutton Heath and Parr.		
Heritage	he closest listed building to the site is Sherdley Hall Farmhorse. This is a Grade II listed building and is located 210m to the east of north eastern corner of the site. The development of the site is n		
Flood Risk	Flood Zone 1		
Landscape	Not sensitive from a landscape perspective given brownfield nature and proximity to large built up area.		
Ecology/Trees	An ecological appraisal was carried out as part of the hybrid application and confirmed that a residential development at the site is acceptable.		
Agricultural Land	The site is within urban use and is not agricultural land.		
Contamination	Site remediation and clearance works will be required given there are existing buildings on site as part of Linkway Distribution Park. Ground contamination works were carried out as part of the approved application. EHO advised that no development will take place until a supplementary phase 2 site investigation and assessment shall be carried out and a remediation strategy is agreed.		

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Potentially adverse effects due to the site being 46m from a local wildlife site		No comment as planning permission already granted.
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-3. Therefore effects are neutral.		No comment as planning permission already granted.
SA3: To improve air quality in St Helens		The site is 1.5km from AQMA and proposed for housing use.		No comment as planning permission already granted.
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 1.6km from nearest ground water protection zone.		No comment as planning permission already granted.
SA5: To mitigate and adapt to the impacts of climate change		Site is 655m from Bold Forest Park. Potential to enhance green infrastructure links.		No comment as planning permission already granted.
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site is located in Flood Zone 1 therefore effects unlikely.		No comment as planning permission already granted.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of the site is within an area identified as being of low landscape sensitivity. Therefore effects are less likely. The site is 478m from a prominent ridge line.		No comment as planning permission already granted.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		1.73m to a conservation area, 229m to a listed building, 2.49km from an archaeological interest, 1.37km from a registered park and 1.33km distance to ancient monument. Given the distance from designated heritage assets, effects are unlikely. Furthermore, the site is currently a depot, and does not contribute positively to the cultural heritage of the area.		No comment as planning permission already granted.
SA9: Ensure access to and protection and enhancement		18m to Open Space. The site is adjacent to / intersected by a PROW (severance should be possible to avoid though)		



of high quality public open space and natural greenspace		No comment as planning permission already granted.
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and		No comment as planning permission already granted.
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered		
SA12: To improve health and reduce health inequalities	Access to GP: 386m from Dr D.B Brainbridge & Partners (within 4 minute walk) Access to Leisure: Within 1.2km of 4 Children's py Areas and 1 Allotment.	No comment as planning permission already granted.
SA13: To improve the education and skills levels of the population overall	Primary: 282m from St John Viannery Catholic Primary School Secondary: 732m from The Sutton Academy	No comment as planning permission already granted.
SA14: To ensure local residents have access to employment opportunities	1.2km from Suttons Transportation Depot	No comment as planning permission already granted.
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing proposed on land currently used for employment	No comment as planning permission already granted.
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential for delivery within the plan period .1.39km away from Shell pipeline	No comment as planning permission already granted.
SA17: To reduce poverty and social exclusion SA18: To reduce crime, disorder and the fear of crime		
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	1m from a bus stop and 1.3km from a train station	No comment as planning permission already granted.
SA20: To improve access to and use of basic goods, services and amenities in town and local centres	Residential site within 253m to the nearest convenience store (Everydayz) and 2km from a supermarket (Tesco)	No comment as planning permission already granted.

Total Score: 52

Key of Council's SA Scoring:

Likely to generate negative effects Potentially negative effects which could be mitigated Unlikely to have significant effects Likely to promote positive effects





Local Plan Reference: 10HA Site Location: Moss Nook Urban Village, Watery Lane Allocated or Safeguarded? Allocated



Council Assumptions	<u>Pegasus Comments</u>
Site Size: 26.74 hectares	Accurate, no comment.
Indicative Site Capacity: 802 dwellings	Whilst there is a live planning consent on site which has established that up to 1,200 dwellings could be delivered, we raise concerns about potential delivery rates. It is notable that the planning consent on the site has an elongated reserved matters timescale of 7
Assumed Net Developable Area: 20. 05 hectares (75%)	years. Furthermore, there are a number of remediation conditions attached to the permission given the former industrial use of the site. We therefore reserve the right to comment on detailed delivery rates at a later date and would raise potential concerns about the site delivering within the first 5 years of the plan period.
Assumed Density: 40 dwellings per hectare	No comment.

Planning History:

<u>P/2003/219/22 (Hybrid):</u> Demolition of existing buildings, provision of sports and recreational facilities, access roads, assosciated infrastructure and drainage works, open space and erection of new residential (up to 1,200 dwellings) and retail development (**Allowed at Appeal and by SoS: 23/05/2007**)

<u>P/2011/0058</u>: Section 73 application to vary conditions 4,33,34, 35 and 36 and remove conditions 31 and 32 of P/2003/219/22 (approved 22/05/2017)

<u>Land Ownership/Availability:</u> There are two landowners within this parcel: the Haworth Estate Investments and William Rainford Holdings. Haworth Estates own the majority of the land: MS547518, MS213675 and MS648371). William Rainford Holdings owns a small portion (MS180258).

Green Belt Parcel Reference (N/A- Brownfield)

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	N/A	N/A	N/A	N/A
2. To prevent neighbouring town merging into one another	N/A	N/A	N/A	N/A
3. To assist in safeguarding the countryside from encroachment	N/A	N/A	N/A	N/A
4. To preserve the setting and special character of historic towns	N/A	N/A	N/A	N/A
Overall Assessment	N/A	N/A	N/A	N/A
Key -Low Contribution - LC	Medium	Contribution - MC High Contribution - HC	!	



Access	The site can be accessed via Watery Lane, which runs along the eastern boundary of the site. There are two bus stops on Sutton Road (on either side of the road) offering irregular services to Newton-le-Willows, Earlstown, St Helens, Rainhill and Blackbrook. The nearest train station is St Helens Junction which is located 1.2km (walking distance) to the south of the site.	
Heritage	Sutton Oak Welsh Chapel is a Grade II listed building, located on Sutton Road. This forms the southern/western boundary of the site.	
Flood Risk	All the site is within Flood Zone 1. Around the northern boundary of the site is Sutton Brook and around this brook is Flood Zone 3 however this is not within the site boundary.	
Landscape	Not particularly sensitive given brownfield nature and surrounding urban form.	
Ecology/Trees	here are some large established trees on the site boundaries which would need to be retained where possible. There is very little tree growth and vegetation within the parcel.	
Agricultural Land	Land is non-agricultural land and land is predominantley in urban use.	
Contamination	Site remediation and clearance will be required on this site as a former works was located on this site.	

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site contains is 288m Local Wildlife site and is 89m to the nearest TPO.	_	No comment.
SA2: To protect and improve land quality in St Helens		Site includes 0% grade 1-2 agricultural land.		No comment.
SA3: To improve air quality in St Helens		Located 1.8km from AQMA. Could generate additional car traffic in the urban area.		No comment.
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Site is over 2km from ground water source protection zone.		No comment.
SA5: To mitigate and adapt to the impacts of climate change		Site is 285m from Bold forest Park. There is a brook nearby that could present opportunities for green infrastructure enhancement.		No comment.
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 100% in Flood Zone 1		No comment.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		Over 100% of the site is within an area classified as being of low landscape sensitivity. It is also 3.07 km from prominent ridgelines. Development will lead to enhancement of a currently derelict site		No comment.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Site is 19 m from a listed building		No comment.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Within 0m of public open space and a 148m from a Public Right of Way		No comment.
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and				



SA11: To reduce the amount		
of waste, and in order of		
priority, the proportion of		
waste reused, recycled and		
composted or recovered		
SA12: To improve health and	Access to GP : Site is 386m from Dr J r D'arcy and Partners	
reduce health inequalities	Access to Leisure: Within 1.2km of 4 Ch Play Areas, 1 allotment and 3 parks and	
Tourse mountain moquanties	gardens.	No comment
SA13: To improve the	Primary: 578m from Sutton Oak CofE Primary school	
education and skills levels of	Secondary: 246m St Cuthberts Catholic Community College for Busines	
the population overall		No comment
SA14: To ensure local	Within 1m of Sutton Road Industrial Area	
residents have access to		No comment
employment opportunities	Hereiten ette en Communication et land out telete te transport for a	No comment
SA15: To support a strong,	Housing site on former employment land, which is in need of regeneration.	
diverse, vibrant and	Alternative sites nearby that are suitable to accomodate employment uses in the	No comment
sustainable local economy to	area	No comment
foster balanced economic		
SA16: To improve access to a	Potential to deliver over the plan period. Within 250m of landfill site, 4 mineshafts	
range of good quality and	which may reduce development capacity over 5.1km to Shell pipeline buffer zone	We raise concerns about this site delivering houses within the first five years of the plan
affordable housing that meets		period, given the remediation conditions attached to the permission as well as elongated
the diverse needs of the		timescales (7 years) for Reserved Matters.
SA17: To reduce poverty and		
social exclusion		
SA18: To reduce crime,		
disorder and the fear of crime		
SA19: To reduce the need to	11m from bus stop. Low frequency service	
travel, encourage alternatives		
to the car and other motor		
vehicles, improve highway		
safety and make the best use		
of existing transport		
infrastructure		No comment.
SA20: To improve access to	Residential site is located 68m to the nearest convenience store (Morrisons Petrol	
and use of basic goods,	Station) and 146m from nearest Supermarket (Morrisons).	
services and amenities in		Agreed
town and local centres		ngiccu

Total Score: 50.5 49.5

Key of Council's SA Scoring:

Likely to generate negative effects
Potentially negative effects which
could be mitigated
Unlikely to have significant effects
Likely to promote positive effects





Local Plan Reference: 1HS Site Location: Land south of Leyland Green Road, Garswood Safeguarded



Council Assumptions	<u>Pegasus Comments</u>
Site Size: 12.92 ha	Realistic, no comment.
Indicative Site Capacity: 291	We raise concerns over this total figure, given that the SA flags up that there are 7 mine shafts located on site. This could reduce overall capacity and dwelling numbers. We reserve the right to comment on this matter at a later date once more detailed information has been provided.
Assumed Net Developable Area: 75% (therefore 9.69 ha)	As above- may be lower due to presence of mine shafts.
Assumed Density: Minimum 30 dwellings per hectare	No comments, realistic.

Planning History: None

<u>Land Ownership/Availability:</u> 1 Landowner (private landowner with no affiliation with housebuilder or developer)

Green Belt Parcel Reference: GBP_025a

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Medium	The sub-parcel is bounded to the west by Garswood Road, to the east by the western boundary of the settlement of Garswood, to the north by a belt of trees and agricultural land and to the south by Billinge Road. The south eastern corner of the sub-parcel contains a 5ha area of open space and playing fields (Birch Grove), a community centre and a primary care centre. Other than these buildings, the sub-parcel has very limited development and has a relatively open character to the west and south and in-part to the north. The parcel is not adjacent to a large built-up area but does adjoin the settlement of Garswood and does help prevent ribbon development along parts of Leyland Green Road and Billinge Road. The sub-parcel has strong boundaries to the east, south and west and in-part to the north and is	Medium	Firstly, it is important to note that the Council's GB Assessment assessed a larger land parcel extending to Garswood's settlement boundary to the east, therefore does not correlate with the final red line boundary for the safeguarded site. We agree that the overall score against this green belt purpose is medium, because the site benefits from strong boundaries to the north, south and west. It's eastern boundary is very poorly defined, with no hedgerow or strong boundary, which instead comprises of a low lying wired fence. This could lead to concerns about sprawl to the east, hence why the site scores medium against this purpose of the Green Belt.
2. To prevent neighbouring town merging into one another	Low	therefore partially well contained. The sub-parcel contributes broadly, along with other parcels (GBP_026), to the physical and visual separation of Billinge and Garswood. A strategic gap between Billinge and Garswood could be maintained if this sub-parcel was released from the Green Belt.	Medium	The gap between Billinge and Garswood is already narrow (circa 2km in this location). The development of this site would reduce the gap further, to circa 1.3km). We therefore consider this parcel provides a medium contribution to preventing neighbouring towns from merging.
3. To assist in safeguarding the countryside from encroachment	Medium	The south eastern corner of the sub-parcel contains some existing built development. The parcel is enclosed to the east and south and is in-part open to the north and largely to the west.	Medium	The site does not contain any built form. The site also contains no shrubbery/hedgerow, except for some low lying hedgerow along its southern boundary. This leads to the site being very open, particularly from Billinge Road looking northwards to the site and surrounding countryside. Despite being effected by some surrounding urbanising influences, the sparsity of vegetation and open views lead to the site bearing many characteristics of the countryside. The site therefore scores medium against this purpose of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A		Low	The site is not located near to any historic towns, conservation areas or listed buildings and therefore scores a low contribution against this purpose of the Green Belt.
Overall Assessment	Medium	The sub-parcel has strong boundaries to the east, south and west and in-part to the north and is therefore partially well contained. A strategic gap between Billinge and Garswood could be maintained if this sub-parcel was released from the Green Belt.	Medium	Whilst the site is contained by three strong boundaries, the eastern site boundary is very poorly defined leading to concerns about urban sprawl in this direction. The site is also open in nature due to a lack of vegetation and built form. The site therefore provides a medium contribution against the purposes of the Green Belt.
Key -Low Contribution - LC	Mediun	1 Contribution - MC High Contribution - HC	· · · · · ·	

Note: The GB parcel assessed in the Council's assessment is larger and differs to the final red line of the proposed safeguarded land allocation.



Access	Access could be taken either via Leyland Green Road to the north or Billinge Road to the south. Nearest Railway Station (Garswood) circa 1.1 miles to the south-east. Low frequency bus s		
Heritage	No Listed Buildings, Scheduled Monuments or Conservations are located within or adjacent to the site boundary		
Flood Risk	Flood Zone 1		
Landscape	The SA notes how the site is located in a Medium-High sensitivity area. The site is also very open due to limited tree coverage on site/low lying hedgerows.		
Ecology/Trees	There are very limited trees on site.		
Agricultural Land	Grade 3 (good to moderate)		
Other	The SA notes how there are 7 mine shafts located on site, which could have implications on site capacity and delivery.		

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Effects on biodiversity not likely		No comment
SA2: To protect and improve land quality in St Helens		Site is 100% Grade 3 agricultural land (10.51Ha)		No comment
SA3: To improve air quality in St Helens		Medium sized site (280 units) located over 796m from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water				
SA5: To mitigate and adapt to		Over 3.9km from nearest protection zone		No comment
the impacts of climate change		Site presents opportunities for enhancement of GI network and increased tree cover.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 100% in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		84% of the site is within a Medium-High or High Landscape Sensitivity area, 16% of the site is located in a low-medium or medium Landscape Sensitivity area and is situated on a prominent ridge.		Agreed, the site is also very open which heightens landscape sensitivity.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		No heritage assets within 300m. Effects unlikely.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Over 1.6km from open space. Site includes a Public Right of Way (severance could be mitigated against).		No comment No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount		
of waste, and in order of		
priority, the proportion of		
waste reused, recycled and		
composted or recovered N/A	Council not assessed this	
IN/A	Council flot assessed tills	
SA12: To improve health and		No comment
reduce health inequalities	Access to GP: 716m of Garswood GP Surgery, Dr B W O'Brien & Partners	
	Access to Leisure: Within 1200m of 2 Children's Play Areas.	No comment
SA13: To improve the		
education and skills levels of		No comment
the population overall	Primary: 453m from Rectory CofE Primary School	
шо рориния от отогии	Secondary: 1.96km from Cansfield High Specialist Language College	No comment
SA14: To ensure local		
residents have access to		
employment opportunities	992m of Liverpool Rd Industrial Estate	No comment
SA15: To support a strong,		
diverse, vibrant and		
sustainable local economy to		
foster balanced economic	Haveing site on land not suitable (attuactive for engle week	No commont
arouth	Housing site on land not suitable/attractive for employment.	No comment
SA16: To improve access to a		
range of good quality and	Potential to deliver 280 units over 15-30 years, however there are 7 mine shafts are	re leading to the control of the con
affordable housing that meets	present on site and likely to reduce development capacity.	
the diverse needs of the		No comment
SA17: To reduce poverty and		No comment
social exclusion N/A	A	
SA18: To reduce crime		
disorder and the fear of crime		
N/A	Council not assessed this	
SA19: To reduce the need to		
travel, encourage alternatives		
to the car and other motor		
vehicles, improve highway		
safety and make the best use		
of existing transport		
infrastructure	Om from hus stop. Low froquency consise	No commont
	9m from bus stop. Low frequency service.	No comment
SA20: To improve access to		The pearest convenience store (The Store) is approximately 750m from the contemp
and use of basic goods,	Residential site is 370m from the nearest convenience store (The Store) or	The nearest convenience store (The Store) is approximately 750m from the eastern
services and amenities in	supermarket.	extremity of the site.
town and local centres	Supermarket.	

^{*}Note: The SA Assessment covers a larger land area than the proposed red line area for the safeguarded site.

Total Score:

Key of Council's SA Scoring:

Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which could be mitigated
Likely to promote positive effects

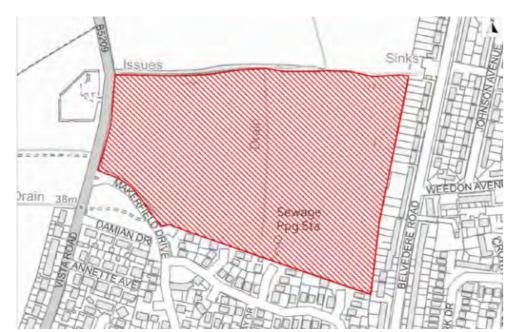
44.5

Key of Pegasus scoring:

1
2
3
Likely to promote positive effects
4



Local Plan Reference: 2HS Site Location: Land at Vista Road, Earlestown Allocated or Safeguarded? Safeguarded



Council Assumptions	Pegasus Comments
Site Size: 7.92 ha	Accurate, no comments.
Indicative Site Capacity: 178	No comment, albeit reserve the right to comment on assumed delivery rates at a later date.
Assumed Net Developable Area: 75% (therefore 5.94 ha)	Realistic, no comments.
Assumed Density: minimum 30 units per hectare	Realistic, no comments.
Planning History: None	•

<u>Land Ownership/Availability:</u> 1 Land Title (private landowner- Taylor Wimpey have a land option on whole site)

Green Belt Parcel Reference: GBP_053_C

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Medium	The sub-parcel is bounded to the south by the urban edge of Newton-le-Willows, to the west by Vista Road and to the east by Ashton Road, the northern boundary (with sub-parcel GBP_053b) is a single temporary private highway. The sub-parcel adjoins the urban edge of Newton-le- Willows and a certain amount of development could be accommodated here without it leading to unrestricted sprawl. The site also prevents ribbon development along Ashton Road and Vista Road.	Medium	Firstly, it is important to note that the Council's GB Assessment assessed a larger land parcel extending to the access track to the north, therefore does not correlate with the final red line boundary for the safeguarded site. Whilst the eastern, southern and western site boundaries are permanent and well-defined, the northern boundary is not. This comprises of hedgerow, which provides a weaker boundary leading to concerns about urban sprawl.
2. To prevent neighbouring town merging into one another	Medium	The sub-parcel forms part of a strategic gap, along with subparcels GBP_053a and GBP_053b to the physical and visual separation of Haydock and Newton-le- Willows/Earlestown. However a strategic gap could still be maintained (via sub-parcels GBP_053a and GBP_053b) if parts of this sub-plot were released from Green Belt, especially the south-western corner, which would be viewed as a natural extension to Newton-le-Willows/Earlestown.	Medium	The gap between Newton-le-Willows and Haydock is approximately 930m in this location, which is a narrow separation distance. If this site was developed, this reduces the gap to circa 760m. We therefore consider this site to have a medium contribution to merger issues, albeit note that the existing settlement boundary of Newton-le-Willows already extends further north than this site.
3. To assist in safeguarding the countryside from encroachment	Medium	There is no built development within the sub-parcel, which has a semi-rural character when viewed from the south, east and western viewpoints due to existing urban fringe.	Medium- High	The site is very open in nature, due to a lack of vegetation cover and any built form. This leads to the site bearing many characteristics of the open countryside. Furthermore, the views are long-line in nature from Makerfield Drive, where landscape views looking northwards are particularly sensitive. We therefore score the site as medium to high against purpose 3.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	The site is not located near to any historic towns, conservation areas or listed buildings and therefore scores a low contribution against this purpose of the Green Belt.
Overall Assessment	Medium	The sub-parcel moderately meets the purposes considered. It has very little built development and plays a moderate role in checking unrestricted sprawl and preventing the two settlements from merging.	Medium	The northern site boundary is poorly defined and the gap between Haydock and Newton-le-Willows is already narrow. The site is very open due to a sparsity of vegetation and built form, therefore the overall contribution of the site to the Green Belt purposes is medium.
Key -Low Contribution - LC	Mediun	1 Contribution - MC High Contribution - HC		

^{*}Note: The GB parcel assessed in the Council's assessment is larger and differs to the final red line of the proposed safeguarded land allocation.



Access	Access could be taken via Vista Road to the west. The nearest railway station (Earlestown) is circa 0.9 miles to the south. Nearest bus stop circa 170m to north, provide bi-hourly access to		
Heritage	An Archaeological Interest (Lodge Lane) intersects with the east of the site. There are no Listed Buildings, scheduled monuments or conservation areas nearby.		
Flood Risk	The site is located within Flood Zone 1		
Landscape	Site is very open due to limited tree coverage on site/low lying hedgerows.		
Ecology/Trees	There are very limited trees on site.		
Agricultural Land	Grade 3 (Good to Moderate)		

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site is 206m to nearest Local Wildlife Site and 159m to nearest TPO. Effects considered unlikely.		No comment
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-2. There is 75.2% (17.17ha) overlap with ALC Grade 3. Potential impacts.		No comment
SA3: To improve air quality in St Helens		Medium sized development (180 units) located 223m from AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Site overlaps with nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site is located in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		90% of the site is within a Low-Medium or Medium landscape sensitivity area. 9% is located in a Medium- High or High sensitivity area. Over 3.8km from prominent ridge		Agreed and highlight that the site is very open in nature, leading to landscape sensitivities.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		An Archaeological Interest (Lodge Lane) intersects with the east of the site. Effects considered unlikely if inclusively designed.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		238m from area of open space. Site overlaps with a Public Right of Way (potential to mitigate against should links to open space be provided).		No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



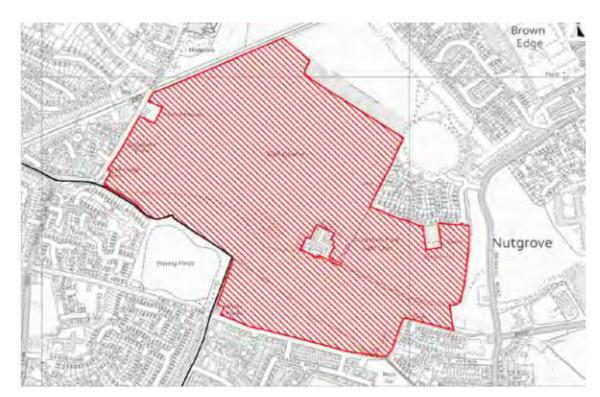
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered SA12: To improve health and reduce health inequalities Access to GP: 544m walk from Newton Clinic Access to Leisure: Within 1.2km of 5 Children's play areas and 2 allotments. No comment	
priority, the proportion of waste reused, recycled and composted or recovered N/A Council not assessed this SA12: To improve health and reduce health inequalities Access to GP: 544m walk from Newton Clinic Access to Leisure: Within 1.2km of 5 Children's play areas and 2 allotments. No comment	
priority, the proportion of waste reused, recycled and composted or recovered N/A Council not assessed this SA12: To improve health and reduce health inequalities Access to GP: 544m walk from Newton Clinic Access to Leisure: Within 1.2km of 5 Children's play areas and 2 allotments. No comment	
waste reused, recycled and composted or recovered N/A Council not assessed this SA12: To improve health and reduce health inequalities Access to GP: 544m walk from Newton Clinic Access to Leisure: Within 1.2km of 5 Children's play areas and 2 allotments. No comment	
composted or recovered N/A Council not assessed this SA12: To improve health and reduce health inequalities Access to GP: 544m walk from Newton Clinic Access to Leisure: Within 1.2km of 5 Children's play areas and 2 allotments. No comment	
SA12: To improve health and reduce health inequalities Access to GP: 544m walk from Newton Clinic Access to Leisure: Within 1.2km of 5 Children's play areas and 2 allotments. No comment	
reduce health inequalities Access to GP: 544m walk from Newton Clinic Access to Leisure: Within 1.2km of 5 Children's play areas and 2 allotments. No comment	
Access to Leisure: Within 1.2km of 5 Children's play areas and 2 allotments. No comment	
SA13: To improve the	
education and skills levels of	
the population overall Primary: Over 727m from St Mary's Catholic Infant School	
Secondary: 508m from Hope Academy No comment	
SA14: To ensure local	
residents have access to	
employment opportunities 19m from Woodlands Industrial Estate No comment	
SA15: To support a strong,	
diverse, vibrant and	
sustainable local economy to	
foster balanced economic Housing site on land not suitable/attractive for employment No comment	
SA16: To improve access to a	
range of good quality and Given that the site is safeguarded, it should not score green as the SA method	ology states
affordable housing that meets that this relates to the site being considered to be available and/or achieavable	
the diverse peeds of the	
Potential to deliver 180 units over 15-30 years	
SA17: To reduce poverty and	
social exclusion N/A	
SA18: To reduce crime,	
disorder and the fear of crime N/A Council not assessed this	
SA19: To reduce the need to	
travel, encourage alternatives	
to the car and other motor	
vehicles, improve highway Bus stop is 19m away from the site. Regular fequency service.	
safety and make the best use	
of existing transport	
infrastructure No comment	
SA20: To improve access to	
and use of basic goods,	
services and amenities in Residential site is located 632m from the nearest convenience store (Newton Mini	
town and local centres Mart) or supermarket No comment	

^{*}Note: The SA Assessment covers a larger land area than the proposed red line area for the safeguarded site.

Total Score: 49.5		48.5
Key of Council's SA Scoring:	Key of Pegasus	scoring:
Unlikely to have significant effects Likely to generate negative effects Potentially negative effects which could be mitigated		1 2 3
could be mitigated Likely to promote positive effects		3 4



Safeguarded **Local Plan Reference:** 3HS Site Location: **Former Eccleston Park Golf Club** Allocated or Safeguarded?



<u>Council Assumptions</u>	<u>Pegasus Comments</u>
<u>Site Size:</u> 49 ha	Accurate, no comments.
Indicative Site Capacity: 956 (Council note how the capacity may be capped at 500 until highway capacity issues in the area are addressed)	We raise concern about this assumed capacity, which we consider is likely to be lower. Not only have the Council flagged highway capacity issues and therefore a need to potentially cap to 500, electricity pylons runs through the central- southern section of the site, which would pose as a development constraint and reduce numbers. A development setback is also likely to be required along the northern railway boundary, to overcome noise concerns.
Assumed Net Developable Area: 65% (therefore 31.85 ha)	Whilst this is lower than the 75% assumed for all other sites, this could still be potentially lower given the need to consider noise and the no development zone near the 3 electricity pylons.
Assumed Density: minimum 30 units per hectare Planning History:	Realistic, no comments.

No planning history since 2005 apart from minor applications which were in relation to the golf course e.g. Landscaping and redesigning.

<u>Land Ownership/Availability:</u> 1 Landowner<u>-</u>Mulbury (Warrington) Ltd

Green Belt Parcel Reference: GBP_087

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The parcel bounders the Liverpool to Manchester Northern Railway line to the north, a substantial protected woodland belt and residential dwellings to the north-east. Rainhill Road runs the length of the eastern boundary, with Two Butt Lane and the urban fringe of Rainhill on the southern boundary and the built-up area of Eccleston Park on the western boundary. There is very little development within the parcel (that encompasses the whole of Eccleston Park Golf Club and course) other than the clubhouse and associated structures almost central of the parcel, and a small number of dwellings dotted along its boundary. The parcel has strong boundaries and as such is considered to be well contained, and therefore would not lead to unrestricted sprawl.	Low	Agreed, albeit would highlight that the eastern boundary is not strong, comprising of a footpath.
2. To prevent neighbouring town merging into one another	Low	The parcel currently lies in a Green Belt 'gap' between Eccleston Park, West Park, Rainhill and Whiston. However, this gap has already been significantly reduced, due to the merging of Eccleston Park, Rainhill and Whiston on the north-western and southern sides. As such there is no longer any visual/perceptual separation of these settlements on the ground. Given the strong boundaries around the parcel which obscure the golf course from any public highway, the parcel provides only a moderate to weak role in preventing further merging. Therefore it is considered that there is no longer a strategic gap between Eccleston Park, Rainhill and Whiston in this location.	Low	Agreed, given that Eccleston Park, Rainhill and Whiston have effectively already merged in this location.
3. To assist in safeguarding the countryside from encroachment	Low	Although the parcel has an open aspect, it has strong permanent boundaries and is surrounded by residential development on three sides, so therefore lacks a sense of openness. The parcel is quite clearly a golf course and as such has a more recreational appearance than countryside character.	Low	Agreed and note that the site does resemble a recreational golf facility as opposed to countryside.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	The site is not located near to any historic towns, conservation areas or listed buildings and therefore scores a low contribution against this purpose of the Green Belt.



Overall Assessment	Low	The parcel benefits from strong boundaries, and is encroached on almost all sides by urban development. The parcel plays a limited role in the prevention of merging any two settlements or built up areas.	Low	No comment
Key -Low Contribution - LC	Mediur	Contribution - MC High Contribution - HC		

Access	Access could be taken via Two Butt Lane to the south or Portico Lane to the west. Eccleston Park Railway Station is located immediately adjacent to the site boundary. Regular bus services serve stops located directly adjacent to the site boundary.
Heritage	No Listed Buildings, Scheduled Monuments or Conservation Areas within or adjacent to the site boundary.
Flood Risk	The site is located within Flood Zone 1.
Landscape	The SA states that the site is of high landscape sensitivity.
Ecology/Trees	There is a TPO present on site. There are also ponds on site, therefore there could be potential for great crested newts.
Agricultural Land	Classed as other land primarily in non-agricultural use.
Other	Noise will need to be carefully considered along the northern boundary with the railway line. 3 large electricity pylons runs through the central- southern section of the site.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		198m to Local Wildlife Site and Local Site (Former Rainhill Hospital Site), and TPO present on site. Effects considered likely.		Sensitive from a tree perspective, also potential for great crested newts given the ponds located on site.
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-3.		No comment
SA3: To improve air quality in St Helens		Large scale developemnt (potentially 900+ units) located over 2.2km from AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		472m to nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		94% of the site is within Low-Medium of Medium landscape sensitivity area. 6% is considered to be of Medium-High sensitivity. Site overlaps with a prominent ridge line.		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Site is 116m from a Listed Building (Greenshouse Farmhouse). Effects considered unlikely due to existing screening.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site contains an area of open space. PROW exists along the southern border of the site (severance unlikely).		No comment



SA10: To minimise energy			
use and increase the			
proportion of energy both			
purchased and generated			
from renewable and	N/A	Council not assessed this	
SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
composted or recovered			
composted of recovered	N/A	Council not assessed this	
SA12: To improve health and			
reduce health inequalities		Access to GP: Within 1.1km of DR L V Chana & Partner	
•			No comment
		Access to Leisure: Within 1.2km of 5 children's play areas and 1 allotment	No comment
SA13: To improve the			Landard Lang Drivery, Cabactia argumentarabah, 450m George Herritara Herritara G. H. 1911, 11
education and skills levels of		Drimany, 201m from London Lang Community, Drimany Cohool	London Lane Primary School is approximately 450m from the site, therefore falls within the
the population overall		Primary: 384m from London Lane Community Primary School	SA's 400-800m category.
		Secondary: Over 1.2km from St Edmund Arrowsmith Catholic Centre for Learning	
SA14: To ensure local			
residents have access to			
employment opportunities		Site 865m from Stoney Lane employment site.	No comment
SA15: To support a strong,			
diverse, vibrant and			
sustainable local economy to			
foster balanced economic			
arouth		Housing site on land not suitable/attractive for development.	No comment
SA16: To improve access to a			Given that the site is safeguarded, it should not score green as the SA methodology states
range of good quality and		Potential to deliver 900 units over 15-30 years. Likely to be at 65% developable	that this relates to the site being considered to be available and/or achieavable in the first 5
affordable housing that meets		area. Potential highway issues that could further reduce the potential yield, as well	years.
the diverse needs of the		as underground pipelines.	
horough			We raise concerns about overall site capacity earlier on in this assessment.
SA17: To reduce poverty and			
SOCIAL CACIAGION	N/A		
SA18: To reduce crime,			
disorder and the fear of crime			
	N/A	Council not assessed this	
SA19: To reduce the need to			
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway			
safety and make the best use			
of existing transport			
			l
infrastructure		Site is 10m from the nearest Bus Stop. Regular frequent service.	No comment
SA20: To improve access to			
and use of basic goods,		Desidential site within 165m of a convenience store (MMC Late Charl) and	
services and amenities in		Residential site within 165m of a convenience store (MNS Late Shop) or	
town and local centres		supermarket.	No comment
	<u></u>		

Total Score: 51 49.5

Key of Council's SA Scoring:

Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects





Local Plan Reference: 4HS Site Location: Land East of Newlands Grange (former Vulcan works), Newton-le-Willows Allocated or Safeguarded? Safeguarded



Council Assumptions	<u>Pegasus Comments</u>
Site Size: 9.76 hectares	Accurate, no comments.
Indicative Site Capacity: 256 dwellings	Question whether the site will deliver this many houses, given the noise and heritage constraints. Access will also need to be carefully considered in terms of being upgraded and landscape is sensitive to the south. Reserve the right to comment on this at a later date.
Assumed Net Developable - 75% (therefore 7.32 hectares)	As above- could be lower due to noise, landscape and heritage considerations.
Assumed Density: 35 dwellings per hectare	Realistic, no comments.

Planning History: None

Land Ownership/Availability: There are two land owners within this parcel. MS546926 is the small land title and is owned by Key Property Investments (Number Nine) Ltd. Thomas Kenyon Drinkall owns the majority of the site (MS72105).

Green Belt Parcel Reference: GBP_044

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The parcel is bounded to the north by trees, Vulcan Park Way and Newton-le-Willows cemetery, to the west by Newlands Grange residential development, to the east by trees and the West Coast Mainline railway line and to the south by Alder Root Lane and Newton Brook. The parcel is therefore well contained to the west and the railway line provides a permanent boundary to the east.	Medium	It is important to note that the land parcel assessed in the Council's Green Belt Assessment is larger than, and differs to, the safeguarded allocation red line as it extends to Alder Root Lane to the south. Whilst we agree that the western and eastern site boundaries are permanent and well defined, the northern and southern boundaries are less so. In particular, the south of the site has no defined boundary whatsoever, which seems to consist of an arbitrarily drawn line. There is no hedgerow or field pattern boundary to define the extent of the safeguarded land allocation. This therefore raises concerns about urban sprawl to the remaining green belt parcel to the south.
2. To prevent neighbouring town merging into one another	Low	The parcel does not fall within a strategic gap between two towns. The nearest towns that are not "washed over" by Green Belt are: Newton-le-Willows which lies immediately to the west of the parcel and Winwick, Warrington, which lies approximately 1.4km south east of the parcel. A strategic gap could be maintained between Winwick and Newton-le- Willows if this parcel was developed.	Low	Agreed, no comment.
3. To assist in safeguarding the countryside from encroachment	Low	The parcel has strong permanent boundaries to the west and east. Some open eastward views are retained but the parcel and has limited openness to the north and south	Medium	Given the poorly defined southern boundary, open views looking towards the north of the site are present because the site is not well enclosed from the south. There is also a lack of vegetation in the land parcel, which makes the site bear many characteristics of the open countryside. The site has been effected by urbanising features to the north and west, so overall the site scores medium against this purpose of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A		Low	The southern section of the site is located circa 70m from the Vulcan Village Conservation Area. It is notable that The Vulcan Village Conservation Area Management Plan (October 2009) also mentioned a proposal to extend the Conservation Area further eastwards and closer to the safeguarded site, albeit this has not materialised. Whilst heritage will need to be carefully considered, the overall contribution of the site to this purpose is low given that only the southern section of the site is located adjacent to the CA.
Overall Assessment	Low	The parcel has strong permanent boundaries to the west and east. Some open eastward views are retained but the parcel and has limited openness to the north and south. The parcel does not fall within a strategic gap between two towns.	Medium	The site has no defined southern boundary, leading to concerns about urban sprawl to the south. The site is also open in nature to a sparsity of vegetation, therefore scores medium against purposes 1 and 3 of the Green Belt.
Overall Assessment Key -Low Contribution - LC		eastward views are retained but the parcel and has limited openness to the north and south. The parcel does not fall within a strategic gap between two	Medium	The site has no defined southern boundary, leading to concerns about urban sprawl to the south. also open in nature to a sparsity of vegetation, therefore scores medium against purposes 1 and 3

^{*}Note: The GB parcel assessed in the Council's assessment is larger and differs to the final red line of the proposed safeguarded land allocation.



Access	There is significant mixed-use development coming forward to the west of the site. Vulcan Park Way runs along the northern boundary of the site. At present, this does not seem to form an adopted highway, running along the entirety of the northern boundary however it appears that this could be extended to provide access to the site. The nearest bus stop to the site is located approximately 730m to the west on Wargrave Road. These stops offer services to Vulcan, St Helens, Ashton, Newton-le-Willows, Warrington. There is a bus stop in Vulcan Village however there is no access from this part of the site at present.
Heritage	The course of Roman Road runs through the site. It is not clear if this has historic significance and further historic work is required to understand if this would constrain development. A registered battlefield is located over 220m to the east of the site. This battlefield is from the Battle of Winwick (which is also known as the Battle of Red Bank). There are no listed buildings within or in close proximity to the site however Vulcan Village Conservation area is located circa 70m to the west of the site and this would need to be taken into consideration should development come forward on this site.
Flood Risk	Flood Zone 1
Landscape	The SA scores the site as being within a Medium-High landscape area and it is notable that the site is also quite open.
Ecology/Trees	Newton Brook runs parallel with the northern boundary however it is not located within this parcel. There are trees and hedgerows along the site boundaries and some trees clumped together in the centre of the site.
Agricultural Land	The site comprises a mixture of Grade 1, 2 and 3 agricultural land.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity	_	Site overlaps with a Local Wildlife Site (Newton Brook). Effects considered likely.		The site does not appear to overlap with the Local Wildlife Site. It is approximately 90m from the northern section of the site and should therefore score yellow in line with the Council's SA methodology.
SA2: To protect and improve land quality in St Helens		Site contains 2.5% ALC Grade 1-2. There is 14% (2.95ha) overlap with ALC Grade 3 however this does not exceed 20 ha.		No comment.
SA3: To improve air quality in St Helens		Medium sized development (250 units) located over 1.2km from AQMA		No comment.
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Site overlaps with nearest protection zone		No comment.
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment.
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and		96% of the site is located in Flood Zone 1, and 3.6% located in Flood Zone 2 and 2.69% in Flood zone 3.		The site is located within Flood Zone 1.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of the site is within a Medium-High or High landscape sensitivity area. Over 6.4km from a prominent ridge line		Agreed, site also open in nature.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Site is 6m from Conservation Area (Vulcan Village Conservation Area). Setting may be affected.		Until further details are provided about the potential archaeological implications of the Roman Road which runs through the site, we would flag this up as a site sensitive in heritage terms, especially given the adjacent Conservation Area.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site overlaps with an Open Space. North-east and south-west border overlap with a PROW (severance can be avoided)		No comment.



SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and		
of waste, and in order of priority, the proportion of waste reused, recycled and		
SA12: To improve health and reduce health inequalities	Access to GP: 1.74km distance from DR M RAZA (10 minutes journey by public transport) Access to Leisure: Within 1.2km of 4 children's play areas	No comment.
SA13: To improve the education and skills levels of the population overall	Primary: 1.17km from Wargrave C of E Primary School Secondary: Over 2.58km from Hope Academy	No comment.
SA14: To ensure local residents have access to employment opportunities	79m from Vulcan Industrial Estate.	No comment.
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing site on land not suitable/attractive for employment.	No comment.
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential to deliver 250 units over 15-30 years.	Agreed, albeit reserve the right to comment on detailed delivery rates and assumed dwelling numbers at a later date.
SA17: To reduce poverty and social exclusion		
SA18: To reduce crime, disorder and the fear of crime		
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	535m from Bus Stop. Regular frequency service.	Agreed, albeit would note the nearest bus stop is circa 730m away from the site.
SA20: To improve access to and use of basic goods, services and amenities in	Residential site is located 487m from the nearest convenience store or supermarket (Aldi). A is larger and differs to the red line of the proposed safeguarded	No comment.

Total Score:

Key of Council's SA Scoring:

Likely to generate negative effects
Potentially negative effects which could be mitigated

Unlikely to have significant effects
Likely to promote positive effects

47

Key of Pegasus scoring:

1

2

Unlikely to generate negative effects
3

Likely to promote positive effects
4



Local Plan Reference: 5HS Site Location: Land west of Winwick Road, Newton-le-Willows Allocated or Safeguarded? Safeguarded



Council Assumptions	Pegasus Comments
Site Size: 7.29 hectares	Accurate, no comment
Indicative Site Capacity: 191 dwellings	Noise mitigation and the likely need for a landscape buffer to the south may reduce overall site capacity, therefore we reserve the right to comment on this and assumed delivery rates in detail at a later date.
Assumed Net Developable - 3.78 hectares (75%)	As above- may be less due to noise and landscape considerations.
Assumed Density: 35 dwellings per hectare	Realistic, no comment

Planning History: None

Land Ownership/Availability: The parcel is within one land ownership (MS580987). The site is owned by a Roderick Leslie Hamilton Steen, Christoper John Whittles and Mark Stephen Eastburn c/o of messrs Ingham and Yorke, Huntroyde Estate Office. Wainhomes has option upon this land.

Green Belt Parcel Reference: GBP_045A

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The sub-parcel is bounded to the north by residential development at Wayfarers Drive and Newton Brook Greenway, to the west by Newton Brook Greenway, to the east by the West Coast Mainline railway line, to the south by agricultural land and to the south/west by Newton Brook Greenway leading to Newton-le-Willows Cemetery. The sub-parcel is therefore well contained to the north, east and relatively well contained to the south and west.	Medium	Whilst the site benefits from strong boundaries to the north and east, the west and south are not strong in nature. In particular, the south of the site has no defined boundary whatsoever, which seems to consist of an arbitrarily drawn line. There is no hedgerow or field pattern boundary to define the extent of the safeguarded land allocation. This therefore raises concerns about urban sprawl to the remaining green belt parcel to the south. *Note that we have identified an error in the Council's proposals map, which indicates that the land parcel to the south of the 5HS allocation is not located within the Green Belt. It is shown just as white land, which is incorrect as this land is not being proposed for green belt release.
2. To prevent neighbouring town merging into one another	Low	The sub-parcel does not fall within a strategic gap between two towns. The nearest towns that are not "washed over" by Green Belt are: Newton-le-Willows which adjoins the subparcel and Winwick, Warrington, which lies approximately 1.8km south east of the sub-parcel. A strategic gap could be maintained between Winwick and Newton-le-Willows if this sub-parcel was developed.	Low	Agreed, no comment.
3. To assist in safeguarding the countryside from encroachment	Low	The sub-parcel has strong permanent boundaries to the north and east. Given the high level of enclosure, it is considered that the sub-parcel does not have a strong sense of openness or countryside character	Medium	Whilst the site is well enclosed on 3 sides, the southern boundary is not. View from Mill Lane (A49) looking westwards over the site are very open, given the lack of vegetation within the land parcel. The site also bears charactersitics of the open countryside because of this. However, as the site has been influenced by the existing urbanised features to the north and east, the overall score against this purpose of the Green Belt is medium.
4. To preserve the setting and special character of historic towns	N/A		Low	There is a designated Registered Battlefield circa 190m to the south of the site, albeit overall the site is considered to score low against this purpose of the Green Belt.
Overall Assessment	Low	The sub-parcel has strong permanent boundaries to the north and east. Given the high level of enclosure, it is considered that the sub-parcel does not have a strong sense of openness or countryside character. A strategic gap could be maintained between Winwick and Newton-le- Willows if this sub-parcel was developed	Medium	The site has no defined southern boundary, leading to concerns about urban sprawl to the south. The site is also open in nature to a sparsity of vegetation, therefore scores medium against purposes 1 and 3 of the Green Belt.
Key -Low Contribution - LC	Mediur	m Contribution - MC High Contribution - HC		

^{*}Note: The GB parcel assessed in the Council's assessment is larger and differs to the final red line of the proposed safeguarded land allocation.



Access	The site will be accessed via Mill Lane, in the far north eastern corner of the site. Mill Lane continues on over the railway line and the railway line forms the eastern boundary of the site. This small section of Mill Lane appears to be able to serve access to the site although this would probably need to be fully confirmed by a transport consultant. There are two bus stops on the A49 Mill Lane which provide regular services to Warrington, Vulcan and Wigan. Newton-le-Willows rail station is located a 0.6km to the north of the site and offers regular services to Liverpool, Crewe, Llandudno, Manchester Airport, Newcastle. A public right of ways runs adjacent with the western boundary however it is not located within the red line boundary of this site.
Heritage	There is a designated battlefield located 190m to the south of the site. This battlefield dates back to the battle of Winwick (also known as the Battle of Red Bank). This forms a potential constraint to development in close proximity to this site. There are also two listed buildings located 400m to the east of the site (Newton Park Farmbouse (Grade II) and Barn to the east of Newton Park Farmbouse (Grade II)). There is no existing development in between this site and these listed buildings and therefore development on this site could impact on the setting of these buildings.
Flood Risk	The majority of the site is located within Flood Zone 1 however there are sections along the western boundary of the site which are Flood Zone 2 and 3. This is associated with Newton Brook which runs parallel with the western boundary of the parcel.
Landscape	The SA scores the site as being within a Medium-High landscape area and it is notable that the site is also quite open.
Ecology/Trees	Located immediately adjacent to the western boundary of the site is Newton Brook which is a Local Wildlife Site. There are hedgrows and vegetation around the site boundaries however there is very little within the site.
Agricultural Land	The site is Grade 3 agricultural land which is considered to be good to moderate.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site includes a Local Wildlife Site (Newton Brook).		The Local Wildlife is adjacent to the site boundary and not in it.
SA2: To protect and improve land quality in St Helens		Site is 97.1% agricultural land Grade 3 (13.20Ha).		No comment
SA3: To improve air quality in St Helens		Medium size site (170 units) located 368m from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Within a ground water protection zone.		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and		Site is 84% in Flood Zone 1, 16% in Flood Zone 2 and 14% in Flood Zone 3.		Agreed, flood risk matters will be a key matter to consider.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		Site is 100% within Medium-High or High Landscape Sensitivity area. Site is over 6km from prominent ridgelines		Agreed and notable that the site is also open in nature when looking westwards from Mill Lane (A49)
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Site is over 400m of a conservation area, 306m from the closest listed building. Effects unlikely.		There will be a need to consider the relationship of the site with the registered battlefield located to the east of the site. Until further information is provided, we would flag this up as a potential heritage sensitivity.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site borders open space and includes a Public Right of way (severance possible if not designed inclusively)		No comment



SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and		
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered		
SA12: To improve health and reduce health inequalities	Access to GP: Site is 1.43km from Dr M Rahman & Partners Access to Leisure: Within 1200m of 6 Children's Play Areas, 2 Parks/Gardens and 1 allotment	No comment
SA13: To improve the education and skills levels of the population overall	Primary: Within 1.06km of St Peter's CofE Primary School Secondary: 2km from Hope Academy	No comment
SA14: To ensure local residents have access to employment opportunities	908m from Vulcan Industrial Estate	No comment
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing site on land not suitable/attractive for employment.	No comment
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential to deliver 170 units over 15-30 years.	Agreed, albeit reserve the right to comment on detailed delivery rates and assumed dwelling numbers at a later date.
SA17: To reduce poverty and social exclusion SA18: To reduce crime, disorder and the fear of crime		
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	118m from bus stop. High frequency service.	No comment
SA20: To improve access to and use of basic goods, services and amenities in	Residential site is 571m from the nearest convenience store (Rontec) o supermarket d in the SA is larger and differs to the red line of the proposed safeguarded	No comment

^{*}Note: The land parcel assessed in the SA is larger and differs to the red line of the proposed safeguarded land allocation.

Total Score: 45

Key of Council's SA Scoring:

Likely to generate negative effects
Potentially negative effects which
could be mitigated
Unlikely to have significant effects
Likely to promote positive effects





Local Plan Reference: 6HS Site Location: Land east of Chapel Lane, Sutton Manor Allocated or Safeguarded? Safeguarded



Council Assumptions	Pegasus Comments
Site Size: 5.04 hectares	
Indicative Site Capacity: 113 dwellings	It is indicated that 113 dwellings could be achieved on this site although the pre- application request that was submitted suggested a site capacity of 95 dwellings.
Assumed Net Developable 3.78 hectares	
Assumed Density: 30 dwellings per hectare	

<u>Planning History:</u> PRE/2017/0066/PREC - A pre-application request was submitted in 2017 for the development of the site for 95 no dwellings however the details are not available on the website.

Land Ownership/Availability: The site has one landowner: MS370971. The site is owned by George Haslam and Beryl May Haslam. Kingsland Strategic Estates Ltd have an option on the land.

Green Belt Parcel Reference: GBP_082A

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The sub-parcel is bounded by the urban fringe of Sutton Manor to the north, with Chapel Lane to the west and a protected woodland to the south and further woodland to the east. The sub-parcel bounders the built up area of Sutton Manor to the north and a protected woodland to the west. The remaining parcel is farmland, with very little built development. The parcel is considered to be well contained.	Low	The site benefits from strong boundaries, which despite being irregular in shape, comprise of protected trees, Chapel Lane and residential development which will prevent further urban sprawl.
2. To prevent neighbouring town merging into one another	Low	The sub-parcel forms part of a larger strategic gap between Sutton Manor (St. Helens core area) and Rainhill. However, the sub-parcel itself provides little or no discernible contribution to the merging of these two settlements. If development were to take place on this sub- parcel there would still be a significant visual strategic gap between both settlements (approx. 0.75km).	Low	The site would decrease the gap between Sutton Manor and Rainhill, however, because of the strong vegetation place, it is not considered that this would have a significant merger impact in visual terms.
3. To assist in safeguarding the countryside from encroachment	Low	The parcel has only a semi-rural character due to encroachment from existing urban development to the north and partly to the east	Medium	The site has a small element of built-form in its southern section, and is influenced by existing urban features to the north. However, the land parcel has very limited vegetation in it's centre and the western boundary along Chapel Lane does not have hedgerow or tall shrubbery to protect views. This leads to very open views across the site from Chapel Lane. There are also open views from Wordsworth Avenue to the north. The site bears a number of characteristics of the countryside, therefore we score this site as having an overall medium contribution to this purpose of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A		Low	No Listed Buildings or Conservation Areas are located directly adjacent to the site, so the site does not provide a strong contribution to this purpose of the green belt.
Overall Assessment	Low	The sub-parcel makes little or no contribution to the 3 purposes assessed as part of the review. The site is well contained with strong boundaries and does not significantly contribute to the wider strategic gap.	Low	Overall, the site is well contained and enclosed, with the exception of open views from the west (Chapel Lane) and north (Wordsworth Avenue) which slightly heightens the site from a green belt perspective.
Key -Low Contribution - LC	y -Low Contribution - LC Medium Contribution - MC High Contribution - HC			

^{*}Note: The GB parcel assessed in the Council's assessment differs to the final red line of the proposed safeguarded land allocation.



Suitability/Site Constraints

Agricultural Land	The site is Grade 3 agricultural land which is considered to be good to moderate.			
Ecology/Trees	The southern and part of the eastern boundary of the site comprises of dense wooded areas. There is some hedgerows around the other site boundaries however these are less dense. There is also a pond in the centre of the site, meaning there could be potential for great crested newts. A brook runs through the wooded area to the south of the site however this is not included within the red line boundary of the site.			
Landscape	The SA indicates that the site is of medium sensitivity and we note that there are open views of the site from Chapel Lane.			
Flood Risk	Flood Zone 1			
Heritage	There is a scheduled ancient monument located 80m from the north eastern corner of the parcel (Micklehead Green Moated site). There is some ribbon development which sits in between the site and the monument however the development of this site could have an impact on the setting of this monument and would need to be taken into consideration. Wood's House Farmhouse (Grade II) is located approximately 160m to the south of the site.			
Access	The site can be accessed via Chapel Lane which runs along the western boundary of the site. There is a bus stop on Walkers Lane (which forms the northern boundary of the parcel where there is some existing ribbon development). There are very limited services from this bus stop and only 1 or 2 services a day to St Helens. Further along Walkers Lane, there is a bus stop which offers frequent services to Laffak however this is the only destination. The nearest train station is located in Rainhill which is located 2.6km to the west of the site. The M62 motorway is located 1.4km to the south of the site.			

Sustainability Appraisal

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site contains Local Wildlife Site (Pendlebury Brook) and TPO.		The site is located adjacent to the Pendlebury Brook Local Wildlife Site.
SA2: To protect and improve land quality in St Helens		There is 100% (7.33ha) overlap of the site with ALC Grade 3.		No comment
SA3: To improve air quality in St Helens		Small size site (105 units), located over 3.7km from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 1.7km from nearest protection zone.		No comment
SA5: To mitigate and adapt to the impacts of climate change		Within Bold Forest Park, site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		99% of site is Flood Zone 1, with 1% in Flood Zone 2. With careful/mitigation the zone 2 could be avoided.		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		97% of site within Low-Medium or Medium Landscape Sensitivity area. Over 950m from a prominent ridge line		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		Site is 157m from listed building (Wood's House Farmhouse) and 62m from Ancient Monument (Micklehead Green Moated Site).		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site is 333m from open space and 48m from PROW (severance unlikely)		No comment



SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and		
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered		
SA12: To improve health and reduce health inequalities	Access to GP: 1.61km distance from Four Acre Health Centre, Dr J Kurzeja & Partners. Access to Leisure: Within 1200m of 2 Children's Play Facilities and 2 allotments.	No comment
SA13: To improve the education and skills levels of the population overall	Primary: 326m from Sutton Manor Community Primary School. Secondary: 1.63km from The Sutton Academy.	The nearest primary school is approximately 535m from where the site would be accessed via Chapel Lane, therefore scores grey in accordance with the SA's methodology.
SA14: To ensure local residents have access to employment opportunities	75m from Lea Green Industrial Estate / St. Michaels Road.	No comment
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing site on land not suitable/attractive for employment.	No comment
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential to deliver 105 units over 15-30 years.	Agreed, albeit reserve the right to comment on detailed delivery rates and assumed dwelling numbers at a later date.
SA17: To reduce poverty and		
social exclusion SA18: To reduce crime,		
disorder and the fear of crime		
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	164m from Bus Stop. High frequency service.	No comment
SA20: To improve access to and use of basic goods, services and amenities in	Residential site is 695m to the nearest convenience store (SKS Late Shop) or supermarket. d in the SA is larger and differs to the red line of the proposed safeguarde	No comment

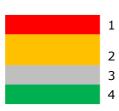
*Note: The land parcel assessed in the SA is larger and differs to the red line of the proposed safeguarded land allocation.

Total Score: 49 49.5

Key of Council's SA Scoring:

Likely to generate negative effects
Potentially negative effects which
could be mitigated
Unlikely to have significant effects
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 7HS Site Location: Land south of Elton Head Road, Thatto Heath Safeguarded



Council Assumptions	Pegasus Comments
Site Size: 3.72 ha	Realistic, no comment
Indicative Site Capacity: 84	No comment, albeit reserve the right to comment on detailed capacity assumptions at a later stage.
Assumed Net Developable Area: 75% (therefore 2.79 ha)	No comment
Assumed Density: Minimum 30 dwellings per hectare	No comment

Planning History: None

Adjacent to site: P/2012/0405- Residential development for 114 dwellings- Granted permission

Land Ownership/Availability: 1 Land Title (private landowner with no affiliation with housebuilder or developer).

Green Belt Parcel Reference: GBP_085C

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The sub-parcel comprises of St. John Vianney Catholic Primary School, agricultural fields and woodland. The subparcel is bounded to the north by Elton Head Road, to the south by woodland and newly approved residential development (Ref: P/2012/0405) to the west by a tree-lined field boundary and to the east by the primary school and further woodland. The woodland which is contained within this sub-parcel has been included as part of the landscaping scheme of Planning Approval P/2012/0405, and as such is both protected and will be retained as part of that scheme. The sub-parcel is only small with well contained boundaries, with planning consent for residential development on three sides of its boundary.	Medium	We agree that the site has strong boundaries on three sides, however the western boundary is less well defined. It comprises of hedgerow, which whilst providing some protection, leads to concerns about sprawl to the open fields and Green Belt to the west. We therefore score the site as scoring medium against this purpose of the Green Belt.
2. To prevent neighbouring town merging into one another	Low	The sub-parcel forms part of a larger strategic gap between Sutton Heath /Thatto Heath (St. Helens core area) and Rainhill along with sub-parcels GBP_085a and GBP_085b, however, due to its location further north, if development were to take place on this parcel there would still be a significant visual strategic gap between both settlements (approx. 0.82km at the narrowest point).	Low	Agreed, no comment.
3. To assist in safeguarding the countryside from encroachment	Low	The sub-parcel has a semi-rural character due to encroachment from existing urban development. The subparcel lacks open aspect due to its strong boundaries with woodland and residential development. The sub-parcel itself is only small in area with strong boundaries and residential development clearly visible when viewed from the south and west.	Medium	The site has no built form within its boundary, and vegetation is only present along it's boundaries. Due to the lack of built and natural form within the land parcel itself, it shares many characteristics of the countryside. Open views over the site are present when looking from Elton Head Road southwards. It therefore scores medium against this purpose of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	The site is not located near to any historic towns, conservation areas or listed buildings and therefore scores a low contribution against this purpose of the Green Belt.
Overall Assessment	Low	This sub-parcel makes a weak contribution to the 3 purposes assessed as part of the review. The site is well contained with strong boundaries and does not significantly contribute to the wider strategic gap.	Medium	Whilst the site benefits from strong boundaries to the north, east and south, its western boundary is not strong which leads to concerns about sprawl to the west. Furthermore, the site is open due to a lack of built form and vegetation within the land parcel itself (vegetation and hedgerow are only located along its boundaries). The site therefore has an overall score of medium against the purposes of the Green Belt.
(ey -Low Contribution - LC Medium Contribution - MC High Contribution - HC				



Suitability/Site Constraints

Access	Access can be taken via Elton Head Road to the north. Thatto Heath Railway Station approximately 0.9 miles to north. Nearby bus stops run low frequency service.
Heritage	No Listed Buildings or Conservation Areas located within or adjacent to the site.
Flood Risk	Located in Flood Zone 1
Landscape	The SA considers the site to be sensitive in landscape terms. Quite open views due to lack of vegetation and built form within main land area.
Ecology/Trees	Extensive tree belt and wooded area borders the site. Albeit limited coverage within land parcel.
Agricultural Land	Grade 3 (good to moderate)

Sustainability Appraisal

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site is located 364m from nearest Local Wildlife site and over 500m to nearest TPO. E		No comment
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-2. There is a 81.2% (3.94ha) overlap with ALC Grade 3, however this does not exceed 20ha.		No comment
SA3: To improve air quality in St Helens		Relatively small scale development located over 2.1km from an AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 1.3km from nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		843m from Bold Forest Park. Site too small to accommodate green infrastructure enh		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site is in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		16% of the site is within a Low landscape sensitivity area, whilst 83% of site is considered to have a Low- Medium or Medium landscape sensitivity. The site clips with an area of prominent ridge line.		Agreed, the site is also quite open due to lack of vegetation and built form within land parcel (only confined to boundaries)
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		No heritage assets within 200m of the site. Effects considered unlikely.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		150m from area of open space. PROW follows to the south of the site (severance unlikely),		No comment No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
composted or recovered	N/A	Council not assessed this	
SA12: To improve health and			No comment
reduce health inequalities		Access to GP: 1.3km distance from Bowery Medical Centre	no comment
·		Access to Leisure: Within 1.2km of 1 allotment and 2 parks/ gardens	No comment
SA13: To improve the		Access to Leibard' Within Tizkin of I unduring una 2 parks, gardens	THE COMMENT
education and skills levels of			No comment
the population overall		Primary: The site includes the St John Vianney Catholic Primary School	The comment
		Secondary: 1.13km from The Sutton Academy	No comment
SA14: To ensure local			
residents have access to		252m from Suttons Transportation Depot	No comment
employment opportunities SA15: To support a strong,		23211 Holli Sattolis Halisportation Depot	No confinenc
diverse, vibrant and			
sustainable local economy to			
foster balanced economic			
grouth		Site suitable and appropriate for housing	No comment
SA16: To improve access to a			
range of good quality and			
affordable housing that meets the diverse needs of the			
horough		Potential to deliver 84 units over 15-30 years	No comment
SA17: To reduce poverty and			
SOCIAL EXCLUSION	N/A	Non-employment site	
SA18: To reduce crime,			
disorder and the fear of crime	N/A	Council not assessed this	
SA19: To reduce the need to			
travel, encourage alternatives			
to the car and other motor		100m from Due Chan with law frequency comics and 450m from a horaster with	
vehicles, improve highway		182m from Bus Stop with low frequency service and 453m from a bus stop with	Agreed, site not well served by high frequency bus services.
safety and make the best use		hourly service.	
of existing transport			
infrastructure			
SA20: To improve access to			
and use of basic goods,		Residential site within 98m of a convenience store (The Co-operative Food) or	
services and amenities in		supermarket	No comment
town and local centres		Supermarket	No comment

Total Score:	48	48

Key of Council's SA Scoring:

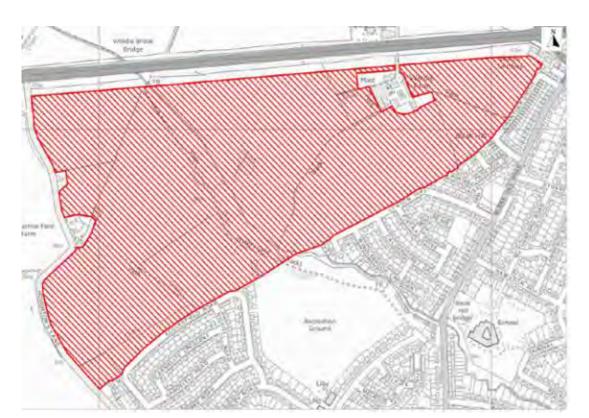
Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 8HS Site Location: Land south of A580 between Houghtons Lane and Crantock Grove Allocated or Safeguarded? Safeguarded



Council Assumptions	Pegasus Comments
<u>Site Size:</u> 52.69	Accurate, no comments
Indicative Site Capacity: 1,027 dwellings	We question whether this total site capacity is accurate, because there are a number of constraints including ecology (presence of a Local Wildlife Site), flood risk as well as noise from the A580 to the north. We therefore consider that total capacity could be lower than this and reserve the right to provide detailed comments at a later stage.
Assumed Net Developable Area: 34.24 hectares (65%)	Assumed 65% NDA seems realistic given the ecology, flood risk and noise constraints, albeit further detail needed to confirm.
Assumed Density: 30 dwellings per hectare	Realistic, no comments

Planning History: The relevant planning history for this site relates to a 54km buried pipeline connecting Prescot Reservoir, Knowsley to Woodgate Hill reservoir in Bury (16.58km is located in St Helens) (Application Ref: P/2008/0872). Application was granted in February 2009.

Land Ownership/Availability: 10 different titles within the parcel.

The largest land holding within the parcel is MS78462. MS280405 - Theodorus Constantinou. MS101141 - Nedgroup Trust (Jersey) LTd and Nedgroup Private Wealth Fiduciary Services Ltd. MS189679 - David Henry Cook and Joan Cook. MS284050 - Stephen David Brine and Frances Mary Harrap. MS538799 - Mark John Thomas and Pauline Thomas. MS78462 - Peter Swift. MS426083 - Craig Joseph Lee Pickavance. MS79325 - Anne Patricia Clarke. MS632437- Peter Swift. MS128499 - Calderbank and Fairhurst Ltd. MS280779 - Joseph Swift.

Although there are a number of different landowners within this parcel, Story Homes and Planet Properties Ltd have options on the whole of the parcel. Story Homes have an option on the majority of the parcel.

Green Belt Parcel Reference: GBP_098

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The south and east boundary of the parcel adjoin the large built-up area of St. Helens (Windle). The parcel is bounded to the north by the A580 East Lancashire Road, to the south and east by residential development and to the west by Houghtons Lane and agricultural land. The parcel is therefore well contained.	Low	The site benefits from strong boundaries on all sides.
2. To prevent neighbouring town merging into one another	Low	The parcel does not fall within a gap between towns.	Low	Agreed, site is located within St Helen's Core Area which has already effectively merged.
3. To assist in safeguarding the countryside from encroachment	Low	The parcel has very little inappropriate development and retains some open views to the west. The A580 to the north and the residential development to the south and east impact on countryside character, but parts of the parcel do retain a sense of openness when looking westwards	Medium	The site bears many characteristics of the open countryside, because it has sparse vegetation coverage leading to it being quite open. Long-line views are particularly present when looking from Houghtons Lane westwards, as well as from Ecclesfield Road looking northwards. Therefore, we would score the site as being of medium sensitivity against this purpose of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A		Low	No Listed Buildings or Conservation Areas are located directly adjacent to the site, so the site does not provide a strong contribution to this purpose of the green belt.
Overall Assessment	Low	The parcel is well contained. The A580 to the north and the residential development to the south and east impact on countryside character.	Low	The site benefits from strong boundaries and does not present any merger issues, albeit the open and long line views looking northwards and westwards do heighten green belt contribution and sensitivity.
Key -Low Contribution - LC	Mediun	Contribution - MC High Contribution - HC		



Suitability/Site Constraints

Access	There is a PROW running running through the site, running parallel with Windle Brook which runs from north to south. Access to the site would be taken via Houghton's Lane which runs along the western boundary of the site. There is a bus stop in the far north eastern corner of the site which offers services to Ormskirk, Park Hill, Rainford and St Helens. There is little in the way of bus provision in the south western corner of the site. The East Lancashire Road runs along the northern boundary of the site which runs from Manchester to Liverpool. The nearest train station is a
	7.5km drive away in the centre of St Helens.
	No listed buildings within or adjacent to the site. The nearest buildings are located over 430m to the south east of the site and substantial residential development sits in between the site and the
	listed buildings. Borough Cemetry is Grade II registered park and garden and is located approx 400m to the east. Similarly, existing residential development sits in between this site and the
Heritage	registered park/garden.
	The majority of the site is located within Flood Zone 1 however there is a small section of the site within the centre of the site which is flood zone 3 and flood zone 2. This is located around Windle
Flood Risk	Brook, which runs from north to south. There is also a pond in this location which is the focus of some of the flood risk.
Landscape	The SA scores the site as being in a Medium-High Landscape Sensitivty Area and we also note how the site is very open.
Ecology/Trees	Trees and hedgerows are located along the site boundaries and divide the individual field parcels. Within the parcels, there is a pond and Windle Brook running from north to south. Windle Brook is a Local Wildlife Site.
Agricultural Land	The site is made up of Grade 1 and Grade 2 agricultural land which is considered to be the best and most versatile agricultural land.

Sustainability Appraisal

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site includes a Local Wildlife Site (Windle Brook). Effects considered likely.		The site is sensitive from an ecology perspective due to the presence of the Local Wildlife Site.
SA2: To protect and improve land quality in St Helens		Site is 98% Grade 1 agricultural land (50ha), 16% Grade 2 agricultural land (9.7Ha), therefore effects considered likely.		Agreed, the loss of high quality agricultural land is a negative constraint for this site.
SA3: To improve air quality in St Helens		Large scale site (1,119 units) over 2.3km from AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 1.9km from nearest protection zone.		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network and increased tree cover.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 91% in Flood Zone 1, 9% Flood Zone 2 and 5.6% in Flood Zone 3.		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of site within a Medium-High or High Landscape Sensitivity area and includes a prominent ridge		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		Site on an archaeological interest area (field west of watery lane). Effects to the setting of this asset are considered likely		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		649m from open space, but Public Right of Way on site (severance possible if not designed inclusively)		No comment



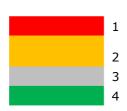
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and		
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered		
SA12: To improve health and reduce health inequalities	Access to GP: 529m from Eccleston Medical Centre, Dr K H T Mikhail & Partner Access to Leisure: Within 1.2km of 3 Children's Play Areas and 1 allotment.	No comment, albeit would note due to the size of the site that the sustainability of the northern section will be less favourable than the south.
SA13: To improve the education and skills levels of the population overall	Primary : 525m from Bleak Hill Primary School Secondary : 1.49km from De La Salle School	No comment
SA14: To ensure local residents have access to employment opportunities	1.56km from Catchdale Moss / Farming	No comment
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing site on land not suitable/attractive for employment	No comment
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential to deliver 1,119 units over 15-30 years	This scoring is not consistent with the SA's methodology. As this site is safeguarded land, the site will not be available and achievable in the first 5 years.
SA17: To reduce poverty and social exclusion SA18: To reduce crime, disorder and the fear of crime		
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	85m from bus stop. Low frequency service.	A site of this size will need to consider improvements to local bus services, given that large areas of the site are not well connected to existing bus services (particularly the south-western section of the site).
SA20: To improve access to and use of basic goods, services and amenities in town and local centres	Residential site within 45m of a convenience store (East Lancashire Service Station) or supermarket	No comment

Total Score: 43.5 42.5

Key of Council's SA Scoring:

Likely to generate negative effects Potentially negative effects which could be mitigated Unlikely to have significant effects Likely to promote positive effects

Key of Pegasus scoring:





Burrows Lane, Eccleston



<u>Pegasus Comments</u>				
<u>Site Size:</u> 11.45 ha				
Indicative Site Capacity: As shown on the previously submitted Masterplan, the site has capacity to accommodate 210 dwellings				
Assumed Net Developable Area 6.14 ha				
Assumed Density: 34 dwellings per hectare				
Planning History: None				
Land Ownership/Availability: 1 Landowner (Redrow have land option on the whole site)				

Green Belt Parcel Reference: GBP_093_B

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	High	The sub-parcel bounders Burrow's Lane to the north and west, Eccleston Mere to the east and a single access track, and line of trees to the south. The sub-parcel has very little built development within it other than three large dwellings on its southern boundary and one dwelling to the west. The sub-parcel is primarily open farmland with woodland to the west and north. The sub-parcel has fairly strong boundary to the west, rounding up to the north, however its southern and eastern boundaries are less so. The sub-parcel is adjacent to the urban edge of Eccleston at its most northern tip, and with no real strong boundaries within the sub-parcel, development of this site would lead to unrestricted sprawl.	Medium	As a starting point, we highlight that the green belt land parcel assessed in the Council's Assessment is larger than the red line area shown above, therefore some conclusons will differ. We disagree with the Council's findings that this land parcel scores a high contribution against purpose one of the green belt. The site has strong boundaries to the north (Burrows Lane) and east (Eccleston Mere), which will prevent urban sprawl in these directions and leads to the site being well contained along these boundaries. It is acknowledged that the southern and western boundaries are less well defined, comprising of established hedgerow and mature planting respectively. However, the existing mature hedgerow along the southern boundary will be retained as part of any future development proposals, and the western boundary can be strengthened by a landscape buffer. We therefore disagree that the parcel scores high against this purpose, and suggest that it scores medium.
2. To prevent neighbouring town merging into one another	Low	The sub-parcel falls within a Green Belt gap between Eccleston and Eccleston Park. However, as both these areas are considered part of the larger St. Helens core area, it is considered that this sub-parcel plays no part in the prevention of neighbouring settlements or towns from merging.	Low	We agree with the Council's Assessment that the site scores low against purpose 2. St Helen's Core Area comprises of one settlement, which both Eccleston and Eccleston Park form a part of. Therefore, there are no merger issues in this location.
3. To assist in safeguarding the countryside from encroachment	High	The sub-parcel is characteristic of the countryside, with open farmland and the odd coppice of trees. The sub-parcel is only affected to a limited degree by urban features when viewed out to the north, with open views out to the west and to the south over sub-parcel GBP_093a.	Medium	The site is affected by urban features along its northern boundary, with Eccleston Mere bordering the site to the east, which reduces openness/landscape sensitivity along these boundaries. It is acknowledged that the western and southern site boundaries are more sensitive in terms of open views. However, views to the south and west are not long line views because of the tree coverage and shrubbery which populates the site, which reduces openness sensitivity. Landscape strategies could be implemented along these boundaries to further strengthen these boundaries and reduce sensitivity. Accordingly, the site performs medium against purpose 3 of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	The site is not located near to any historic towns, conservation areas or listed buildings and therefore scores a low contribution against this purpose of the Green Belt.
Overall Assessment	High+	The sub-parcel plays a robust role in checking unrestricted sprawl of large built-up areas and safeguarding the countryside from encroachment. The sub-parcel plays no part in preventing the merging of two settlements.	Medium	The site provides a low contribution to purpose 2, merging of settlements. The site benefits from two defensible boundaries to the north and east, with landscape sensitivity also more limited along these boundaries. A proposed landscape strategy could be implemented to strengthen the western and southern boundaries, therefore the site provides a medium contribution to the purposes of the Green Belt.
Key -Low Contribution - LC	Mediur	n Contribution - MC High Contribution - HC		

Note: The GB parcel assessed in the Council's assessment is larger and differs to the red line of the Burrow's Lane site which is being promoted.



Suitability/Site Constraints

Access	Access options available via Burrows Lane to the north. There are bus stops within 110m and 200m of the site with regular services to Eccleston and other higher order centres including Sutton Oak and St Helens.
Heritage	There are no listed buildings, scheduled monuments or conservation areas within the site or in immediate proximity.
Flood Risk	The site is located entirely within Flood Zone 1.
Landscape	The site is not subject to any formal landscape designations, other than Green Belt. In terms of visual impacts, the combination of urban edges, lower lying undulations and wooded horizons limits the overall visibility of the site in the wider landscape and its contribution to openness. Whilst there is a perceived gap between settlements when travelling along Burrows Lane, these can be maintained and mitigated through sensitive masterplanning.
Ecology/Trees	The site contains no TPOs, albeit the tree area in the north of the site will be retained as part of proposals. No local wildlife sites located in the site boundary, contrary to findings of Council's evidence.
Agricultural Land	The ALC map indicates that the site is predominantly in urban use, and therefore not agricultural land. This differs from the Council's findings that this is Grade 3 Agricultural Land.

Sustainability Appraisal

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site contains Local Wildlife Site (Eccleston Mere) and a TPO.		The site does not contain the Local Wildife Site of Eccleston Mere, this borders the site to the east and is outside of the red line boundary. Furthermore, no TPOs are contained within or adjacent to the site boundary. The Council's findings are therefore incorrect and the site should score as unlikely to have significant effects.
SA2: To protect and improve land quality in St Helens		There is 94% (18ha) of the site is ALC Grade 3.		The high level regional map indicates that the site is predominantly in urban use and is therefore not active agricultural land.
SA3: To improve air quality in St Helens		Unknown delivery potential. Located over 1.8km from AQMA		Agreed
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		132m from nearest protection zone		Agreed
SA5: To mitigate and adapt to the impacts of climate change		Over 3.6km from Bold Forest Park		Agreed
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and		100% of the site is located in Flood Zone 1.		Agreed
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of site within Medium-High or High Landscape Sensitivity area. 147m from a prominent ridge line.		Detailed landscape analysis has been undertaken for the site (Please refer to accompanying Promotional Document for full details). The site is not subject to any formal landscape designations, other than Green Belt. In terms of visual impacts, the combination of urban edges, lower lying undulations and wooded horizons limits the overall visibility of the site in the wider landscape and its contribution to openness. Whilst there is a perceived gap between settlements when travelling along Burrows Lane, these can be maintained and mitigated through sensitive masterplanning. Our detailed landscape analysis concludes that it is not antincipated that the development of the site will have a significant impact on landscape character or visual amenity.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Effects considered unlikely		Agreed
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site is 284m from open space and 372 from PROW		The site is well located in relation to open space and would not impact on the PROW network, therefore should score green across the board.



SA10: To minimise energy		
use and increase the		
proportion of energy both		
purchased and generated		
	Council not account this	
IN/A	Council not assessed this	
SA11: To reduce the amount		
of waste, and in order of		
priority, the proportion of		
waste reused, recycled and N/A	Council not assessed this	
TIMINATELL IN TELLIVETELL	Access to GP: 1.5km distance from Eccleston Medical Centre, Dr K H T Mikhail &	
SA12: To improve health and	· · · · · · · · · · · · · · · · · · ·	
reduce health inequalities	Partners Communication (Communication)	A succession
	Access to Leisure: Within 1.2km of 3 or more facilities	Agreed
SA13: To improve the	Primary: 845m from Eccleston Mere Primary School	We name with the general opening albeit would doubt for the general of the best of the
education and skills levels of	Secondary : 1.5km from De La Salle School	We agree with the general scoring, albeit would clarify for the purposes of robustness that
the population overall	ottoma. , i ziokii iioni be La dane dendoi	Eccleston Mere Primary School is 640m from the site (within a 10-minute walk).
SA14: To ensure local		
residents have access to	1 Alive from Catabila Mass/Farmsing	Association
employment opportunities	1.4km from Catchdale Moss/Farming	Agreed
SA15: To support a strong,		
diverse, vibrant and		
sustainable local economy to		
foster balanced economic	Housing site on land not suitable/attractive for employment.	Agreed
SA16: To improve access to a	Trousing size on fand flot suitable/attractive for employment.	Redrow have undertaken significant due dilligence work and can confirm that the site is
range of good quality and		suitable and available for development. They have legal control of the site through a
affordable housing that meets		development option with the landowner.
the diverse needs of the	Site has potential deliverability issues. Site is open contributing to the Green Belt	de la spinent option men ene landomien
	Site has potential deliverability issues. Site is open contributing to the green beit	There are no deliverability issues and Redrow would seek to develop the site immediately
borough		once the site is released from the Green Belt. The site could therefore deliver housing early
		· · · · · · · · · · · · · · · · · · ·
0447.7		on in the plan period and contribute to 5-year housing land supply.
SA17: To reduce poverty and N/A	Council not assessed this	
CA10: To reduce evine	Council flot assessed tills	
SA18: To reduce crime,		
disorder and the fear of crime	Council not assessed this	
SA19: To reduce the need to		
travel, encourage alternatives		
to the car and other motor		
vehicles, improve highway		
safety and make the best use		
of existing transport		We agree that the site is excellently located in relation to bus services. The number 35 and
infrastructure	106m from Bus Stop. High frequency service.	35E services run along Burrow's Lane, providing high frequency services in to St Helens.
SA20: To improve access to		
and use of basic goods,		
services and amenities in		
town and local centres	Residential site is 930m from a convenience store or supermarket	Agreed

Total Score: 44.5 51

Key of Council's SA Scoring:

Unlikely to have significant effects Likely to generate negative effects Potentially negative effects which could be mitigated Likely to promote positive effects

Key of Pegasus scoring:



PO3821

Sinc: Former UPPO HSZ3 ELO290



	Representations to Local Plan Submission I	Draft Consultation-Wallace-l	Email 1 of 8
- T.	Rebecca Dennis to:		(1) LPAOS
-	planningpolicy@sthelens.gov.uk	1	6
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3 Attachme	The state of the s		
	2	200	(8) LPAOZ- PARA 4
Representati	on Form-Wallace-May 19.pdf R001v7- Reps to S	ubmission Local Plan-Wallace.pd	df S
	PEF		(G) LPA 03
Annandiy 1	Ulustrative Measure Well 16		(D) mail
Appendix 1-	Illustrative Masterplan-Wallace.pdf		(10) CPA04
Dear Sir/Ma	dam,		(1) LPAOK-PARA 3
We are instr	ucted on behalf of our client, Wallace Land Inve	stments to submit the attache	od form and
representati	on (R001) to the Local Plan Submission Draft Co	nsultation. Wallace have land i	nterests in relation to
the Mill Land	e, Rainhill site, which is discussed in detail in the	attached representation.	12 LPAOK - PARA 4
The represen	ntation includes the following appendices which	, owing to file size, will be ema	iled separately:
Apper	ndix 1 - Illustrative Masterplan (attached to this	email)	(13) APPENDIX 4
Apper Apper	ndix 2 - Previously Submitted Documents and Te ndix 3 - Additional Technical Documents (May 20	echnical Information	
Apper	ndix 4 - Detailed Site Pro Formas	019)	(4) LPAOS-TABLE
Apper	ndix 5 - Council's Stage 3 Green Belt Assessment	of Mill Lane Site	(B) LP905.1
Apper	ndix 6 - Review of Employment-Led Local Plan He	ousing Requirement	
	ndix 7 - Council's Housing Trajectory ndix 8 - Pegasus Housing Trajectory		(16) LPAO 6
	ndix 9 - Spatial Distribution of Sites		(17) LACOI
We will follo	w up this submission by sending a CD in the pos	t which contains the entirety of	f Wallace's submission
to the Local i	Plan consultation.		(18) LPCO2
We look forv	vard to receiving receipt of these representation	s in due course and please can	110
these are for	mally considered as part of this consultation.	(a)	
Many thanks	and kind regards,	(19) LPC 04	(23) UPC13-PARA4
ividity charks	and kind regards,	60 1000 7 ADD 2	129 LPDOT
Rebecca D	ennis	(20) LPAO7 ARA 30	1 69 1.101
Principal Pla		6DLPAOT-PAMA	(25) LPDO2
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		(22) LPC 10	CO 17007



Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8 Rebecca Dennis

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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1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

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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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1 Attachment



Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

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1 Attachment



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

Email 6 of 8 of Wallace representations.

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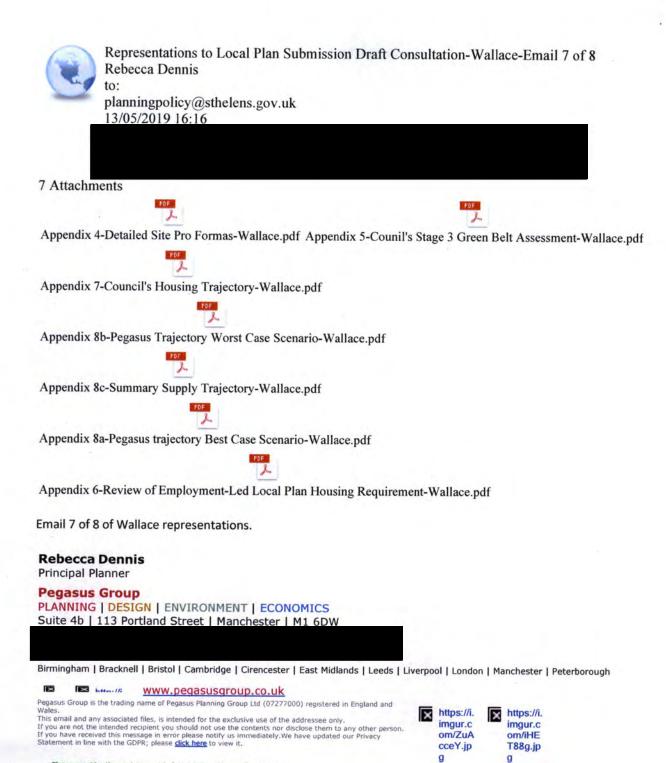
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Representations to Local Plan Submission Draft Consultation-Wallace-Email 8 of 8 Rebecca Dennis

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1 Attachment



Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

Rebecca Dennis

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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.

Please ensure the form is returned to us by no later than <u>5pm on Monday 13th May 2019</u>. Any comments received after this deadline <u>cannot</u> 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	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 13th 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. If you still need assistance, you can contact us via:

Email:

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.

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

Now please complete <u>PART B</u> 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.

Policy	2 To which	nart of the Local P	lan does this repr	resentation relate?			
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	Policy	Paragraph / diagram	Policies Map	Appraisal/ Strategic Environmenta Assessment	Regulation Assessment		
Please read the Guidance note for explanations of Legal Compliance and the Custom Sound? Sound? Yes	document	and relevant	e DECEMBE	DECEMBER 2018 GREEN BELT REVIEW			
Legally Compliant? Sound? Yes No X Complies with the Duty to Yes No No Cooperate 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? 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 WE HAVE CONCERNS ABOUT THE METHODOLOGY ADOPTED IN THE 2018 GREEN BELT REVIEW, WHICH DOES NOT ROBUSTLY ASSESS GREEN BELT SITES AND HAS A CONFUSING STAGE 3 METHODOLOGY NOT IN LINE WITH BEST PRACTICE. PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS	4. Do you	consider the St Hele	ens Borough Loca or explanations of	Legal Compliance an	d the rests of boardings		
Sound? Complies with the Duty to Cooperate 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? K Consistent with National Policy? 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 WE HAVE CONCERNS ABOUT THE METHODOLOGY ADOPTED IN THE 2018 GREEN BELT REVIEW, WHICH DOES NOT ROBUSTLY ASSESS GREEN BELT SITES AND HAS A CONFUSING STAGE 3 METHODOLOGY NOT IN LINE WITH BEST PRACTICE. PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS	Legally Co	mpliant?	Yes 🗆		VO		
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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 WE HAVE CONCERNS ABOUT THE METHODOLOGY ADOPTED IN THE 2018 GREEN BELT REVIEW, WHICH DOES NOT ROBUSTLY ASSESS GREEN BELT SITES AND HAS A CONFUSING STAGE 3 METHODOLOGY NOT IN LINE WITH BEST PRACTICE. PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS	Effective?						
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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 GREEN BELT REVIEW REPORT NEEDS TO BE UPDATED TO BE IN LINE WITH BEST PRACTICE.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public) No, I do not wish to participate at the X Yes, I wish to participate at the oral oral examination 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: 13th May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

Pegasus Group

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3. SITE SPECIFIC ASSESSMENT OF MILL LANE SITE

- 3.1 To support the current consultation, the Council have provided an updated Green Belt Assessment (December 2018), as well as commissioning AECOM to produce a Sustainability Appraisal Report (January 2019). Both of these reports provide a site-specific assessment of the Mill Lane site, as well as the other allocated and omitted sites. This representation identifies a number of concerns with the methodology adopted in these two evidence reports, which we consider in detail in Section 7.
- 3.2 In this section, we provide our own site-specific Green Belt and Deliverability Assessment for the site to demonstrate that it is still suitable for allocation. We have also produced a detailed comparative assessment of the Mill Lane site, as well as the 10 proposed housing allocations and 8 safeguarded sites which, is contained at **Appendix 4.** These detailed assessments outline the Council's conclusions on all of these sites, as well as our own assessment conclusions utilising the Council's criteria. The Mill Lane detailed assessment should be cross-referenced and read in conjunction with this section, whilst the proposed allocations and overall site selection methodology are considered in more detail in Section 7.

Green Belt Assessment

- 3.3 To establish whether it would be appropriate to release a site from the Green Belt, it is relevant to examine how its development would impact on the five purposes of the Green Belt which are listed at paragraph 134 of the 2019 NPPF:
 - a) To check the unrestricted sprawl of large built up areas;
 - b) To prevent neighbouring towns from merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - d) To preserve the setting and special character of historic towns; and
 - e) To assist in urban regeneration, by encouraging the recycling of derelict and other land.
- 3.4 The Council's updated Green Belt Review (December 2018) followed a 3-stage process as set out below:
 - Stage 1A Identification of Green Belt parcels and sub-parcels;
 - Stage 1B Assessment of parcels and sub-parcels against Green Belt Purposes;
 - Stage 2A Identification of parcels and sub-parcels with 'prohibitive' constraints;
 - Stage 2B Assessment of development potential within remaining parcels and subparcels; and
 - Stage 3 Ranking and review of results.





- 3.5 Whilst the Council has referred to the NPPF Green Belt Purposes in its assessment at Stage 1B, only the first three NPPF purposes (a-c) are actually considered, with the last two (d and e) screened out. The Council's justification for this approach is that there are no designated 'historic towns' within St Helens, and because of the difficulty of making the case that one parcel of land would make a greater contribution to urban regeneration than another, particularly when it has already been established that there is insufficient brownfield land to meet development needs over the Local Plan period. We endorse this approach in the context of St Helens on the basis that there are no historic towns within St Helens and the availability of previously developed land is limited. That said, there are clearly settlements within the Borough where there is more urban land available than in others. As such, we would have typically expected to see some settlement based assessment in this regard but it is not a significant factor in the case of Rainhill.
- 3.6 Green Belt sites considered to make a 'high' contribution to more than one of the three NPPF purposes assessed were discounted at this point (unless there were site specific reasons to include them). The Mill Lane site was assessed as making a low/medium (i.e. not high) contribution so was taken forward for consideration in Stages 2 and 3, which we also support.
- 3.7 However, Stages 2 and 3 of the Green Belt Review adopt a rather confusing approach. At Stage 2 and 3 the Council assess and rank the development potential of the remaining Green Belt sites, including commentary on a number of suitability considerations such as flood risk, land ownership, noise and heritage. This is a confusing and muddled methodology, as there is nothing in national guidance to suggest that suitability/deliverability credentials should be considered within a Green Belt Review; indeed these are generally considered separately to avoid any conflation of issues, with the Green Belt Review being an objective assessment of sites against the 5 Green Belt purposes, to consider those most suitable for release; followed by a separate assessment of suitability and deliverability as part of a site selection process/ topic paper to filter down to those most suitable for allocation.
- 3.8 It is notable that the Mill Lane Site (Reference: GBP_089) reached stage 3, the most advanced stage of the Council's Green Belt Review, before it was discounted for allocation. It can be taken from this that the Site was considered acceptable for release from the greenbelt (Stage 1) and suitable for development (Stage 2). It was only when the Council undertook its 'top slicing' of sites that the site was discounted. In this regard it is significant that the 'top slicing' exercise was undertaken by the Council, taking into account its position on the need for housing (Green Belt Review paragraph 2.57). That the Council's conclusions on the site were determined by its change in position on housing need is confirmed in its comments on its decision (page 119), where it is conceded that site constraints were "considered in the context of the reduced amount of new housing that is now identified as being required in the Borough".
- 3.9 In response to the change in the Council's position and conclusions, and in line with the Council's methodology at stage 1B, an assessment of the contribution that the Mill Lane site makes to the first three NPPF purposes of the Green Belt is provided with this submission:



Will not result in unrestricted sprawl of large built up areas (Purpose a)

3.10 At Stage 1B, the Council's 2018 Green Belt Review concludes that the site (GBP_089) is well contained and is unlikely to lead to unrestrictive sprawl. They score the site as making a low contribution to this purpose of the Green Belt.



3.11 We agree with this conclusion as the parcel is well contained on all four sides. Existing residential development, Mill Lane and the Tower College Independent School border the site to the north, residential development and road infrastructure border the site to the east, the M62 borders the site to the south and Hall Lane borders the site to the west. This leads to the site having permanent and defensible boundaries to stop further development on all sides, ensuring it makes a low contribution to this purpose of the Green Belt.

Will not cause neighbouring towns to merge into one another (Purpose b)

- 3.12 The Council's Green Belt Review concludes that the site falls within a 'partially strategic gap' between Rainhill and Town End. Whilst it states that a strategic gap could be maintained between these settlements if this parcel was developed, they score the site as making a medium contribution against this purpose of the Green Belt.
- 3.13 We disagree with this rating and consider the parcel to have a low contribution to this purpose of the Green Belt. The M62 motorway to the immediate south forms a robust boundary which would prevent the merging of Rainhill and Town End. As recognised in the Council's comments with regards to purpose 3, the parcel has permanent and defensible boundaries and is well contained.



- 3.14 From the edge of the M62 to Town End, there is a distance of over 1 km and therefore if this site was developed, it would not cause the merging of these two distinct settlements. The strategic gap would still exist and therefore we do not consider this to have a medium contribution to this purpose. The existing gap between Rainhill and Town End is 1.4 km so the development of this site would not cause the gap to significantly reduce.
- 3.15 Given the presence of the M62, this site is considered to have a low contribution to this purpose. Furthermore, the south-eastern urban extent of Rainhill already extends southwards so that it is parallel with Junction 7 of the M62. If this site was released from the Green Belt, this built line would be parallel with the existing built form to the immediate north-west of junction 7 of the M62.
- 3.16 It is not clear why the Council have come to the view that this is a 'partially strategic gap'. Table 2.4 of the 2018 Green Belt Assessment defines a Partially Strategic Gap (which falls within the medium contribution category) as follows:



"Parcel/sub-parcel is on the urban edge within a 'Partially Strategic Gap' i.e. a strategic gap with scope for limited development on one or both sides of the gap without harming its overall integrity (i.e. by 'rounding off')."



- Whilst it is correct that this site would represent a logical rounding off of the Rainhill settlement 3.17 edge, it is not clear why the site has been deemed to not fall with the low category which is defined as follows in Table 2.4:
 - "Parcel/sub-parcel does not fall within a gap between those settlements listed in paragraph 2.20 or is on the urban edge within a 'Less Strategic Gap' i.e. a wider gap where development within the parcel is not likely to impact on the integrity of the gap"
- Firstly, the gap between Rainhill and Town End is not listed as a gap which the Council are 3.18 concerned about in terms of potential merger issues (as set out at paragraph 2.20 of the Green Belt Review). Secondly, as already noted, the gap between Rainhill and Town End is wide in nature and the development of this site would not impact on the integrity of this gap.
- On this purpose, the Council has scored the site too high, by treating the Site as having strategic 3.19 value. This raises concerns about the Council's Green Belt methodology, which fails to explain how they have come to the view as to whether a site is in a less strategic gap, partially strategic gap or strategic gap.
- 3.20 Due to its permanent and defensible boundaries and the distance in between Rainhill and Town End, the Mill Lane site makes a low contribution against purpose b of the Green Belt.

Will not cause unacceptable encroachment into the countryside (Purpose c)

- 3.21 The Council's Green Belt Review concludes that the site provides a low contribution to this purpose of the Green Belt, given that the site has strong boundaries and is well contained.
- 3.22 We fully agree that the Mill Lane site provides a low contribution to purpose c of the Green Belt. The parcel has permanent and defensible boundaries and is well contained. Furthermore, these boundaries comprise urbanised features including the M62, school and a row of large scale pylons that run adjacent to the south west portion of the site. The site is not a tranquil rural location, which is typically associated with the countryside1.
- 3.23 There is also existing vegetation and tree growth along the site boundaries which prevent long distant views into the open countryside.
- 3.24 As such the site currently serves little function as countryside and it makes a low contribution to purpose c. Release of the site from the Green Belt is acceptable.

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¹ Refer to paragraph 3.5 of the Landscape and Visual Note (Appendix 3) for further details on this point



Conclusions on the contribution of the site to the purposes of the Green Belt

- 3.25 Applying the Council's own approach, the Mill Lane site provides an overall 'low' contribution to the purposes of the Green Belt. It is well contained, with permanent and defensible boundaries which prevent urban sprawl and merging.
- 3.26 The Council clearly agree that this site still remains a strong candidate for Green Belt release (despite dropping it as a previously safeguarded site), because they carried the site forward to stages 2 and 3 of their Green Belt Assessment, and we consider these stages below.

Stages 2 and 3 of Green Belt Review: A flawed methodology

- 3.27 Table 5.4 of the 2018 Green Belt Review presents the results of Stage 3 for housing and concludes whether sites should be allocated, safeguarded or discounted. The Mill Lane site (reference: GBP_089) reached this stage and is discussed in detail at pages 119-122. The Council ultimately conclude that the site should be discounted (see **Appendix 5** for full extract). As noted above, and as stated in table 5.4, the Council's findings were made in the context of their adjusted position on a reduced need for new housing. Given the context of the Council's comments, it must also be the case that any adjustment in the housing need position would impact on their conclusions on the Site. We summarise the Council's comments below:
 - The site's development would represent a substantial outward expansion of the urban area,
 in a location which is fairly distant from the Rainhill District Centre.
 - The development of the parcel could harm the setting of listed buildings in the area. The
 Council refer to a 'Heritage Impact Assessment' (although no such document has been
 made publicly available) which concluded that the development of this site would harm the
 setting of the Listed Buildings which could not be satisfactorily mitigated by reduced the
 net developable area of the parcel.
 - Highway and access issues. They consider at least two access points would be required and state that Mill Lane fails to meet modern highway design standards (due to its narrowness and lack of suitable pedestrian facilities). They state that there is severe capacity and junction layout issues at the Mill Lane/Warrington Road junction. The vehicular access points off Mill Lane could cause further harm to the settings of the Listed Buildings.
 - Noise concerns from the M62. Suggest a substantial development set back from the motorway would be required as well as significant noise attention measures. Engineer bunding or high fencing likely to cause further harm to the setting of the nearby heritage assets. Suggest that the noise issues would mean that if the parcel were to be released from the Green Belt, the boundary of the developable area would have no clear physical boundary on the ground (any boundary line would be artificial, based on noise mapping data, which could change over time). If the whole Green Belt parcel was released by running the boundary along the side of the motorway, this would result in a large area of land being





removed from the Green Belt compared to the number of dwellings which would be deliverable.

- The parcel is in more than one ownership, causing a further constraint on its ability to be developed to a suitable layout.
- 3.28 On this basis, the Council concluded that this parcel would not be suitable as a potential development site to be released from the Green Belt. These comments must, of course, be seen in the light of the Council's previous position that the site is suitable for development.
- 3.29 We address each of the above concerns in our deliverability and suitability assessment below. However, before doing so, we reiterate our concerns with the Council's Green Belt methodology.
- 3.30 Firstly, the combined approach of considering the Green Belt credentials and suitability credentials of a site under one Green Belt Review is confusing and not in line with national guidance or common practice. Indeed, when reviewing Green Belt boundaries paragraphs 138 and 139 of the NPPF need to be adhered to.
- 3.31 Paragraph 138 confirms 'sustainable patterns of development should be taken into account'. However, it goes on to confirm that this should relate to broad areas and locations for potential growth (i.e. within urban areas, towards towns and villages inset within the Green Belt, or towards locations beyond the Green Belt, rather than detailed suitability points. It then points to previously developed land firstly and also requires the Council to consider how the impacts of removing land from the Green Belt could be offset through compensatory improvements. In this case, we have demonstrated on the indicative masterplan how the existing PROW running through the site could be integrated into a wider footpath network providing access to the wider open countryside and would open up the opportunity for informal recreational activity within the area. The allocation of the site would also mean that Towers College would be removed from the Green Belt and the college could then seek to implement planned investment in new indoor and outdoor sporting facilities.
- 3.32 Paragraph 139 then defines a number of other considerations. None are directly related to the points, the Council pick up on in the Green Belt assessment when considering the suitability of the site.
- 3.33 Point A requires consistency with the development strategy for meeting identified requirements for sustainable development. The removal of the site would be consistent with the Council's strategy to remove Green Belt parcels adjacent to the principle settlements inset within the Green Belt.
- 3.34 Point B indicates that land that is not necessary to keep permanently open should be removed from the Green Belt. Irrespective of Wallace Land Investment's representations, this point should be applied to the existing developed land south of Mill Lane the Tower College Site and neighbouring listed building due to the scale of existing built form on both of these sites and the fact that they



- sit directly adjacent to the existing urban edge. However, the Council have not even considered this in defining a detailed boundary for the Green Belt.
- 3.35 Point C relates to the need to identify areas of Safeguarded Land, which we note the Council intends to do but as part of our representations, we have highlighted the need to allocate and safeguard more land.
- 3.36 Point D relates to the need to make sure safeguarded land is not allocated for development now, which can be controlled by suitable wording in the policy and defined areas on a proposals map. In this regard, we refer back to paragraphs 1.12 and 1.13 in Section 1 of our representations.
- 3.37 Point E relates to the need to define sufficient Green Belt release to ensure boundaries will not need to be altered again at the end of the plan period. Again, we highlight the need to allocate and safeguard more land to ensure this requirement is met.
- 3.38 Point F relates to the need to define readily recognisable boundaries, using physical features that are likely to be permanent. As noted within Section 1 of our representations, the land to be removed from the Green Belt would be defined by the M62 and Hall Lane which are highly recognisable and defensible boundaries which would offer permanence going forward.
- 3.39 There is no obvious assessment of the above considerations within the Council's Green Belt assessment other than a consideration of potential boundaries in Stage 1.
- 3.40 Instead, the Council's assessment focuses on the purposes of Green Belt as defined by paragraph 134 of the NPPF. An assessment against these purposes is a very common approach and one advocated by Pegasus Group. However, other than the other considerations we have raised above in relation to paragraphs 138 and 139 (and paragraph 140 which relates to the consideration of villages washed over by Green Belt, which is not relevant to our representations), that is where a Green Belt assessment would typically end.
- 3.41 However, the Council's Green Belt assessment goes on to argue that this is not a suitable Green Belt release site by focusing on distinctly separate suitability considerations. This approach is not advocated in the paragraphs in the NPPF.
- 3.42 This is not to say that the Council cannot consider such points but that has to be the role of the Sustainability Assessment supporting the Local Plan (or perhaps a more detailed Site Selection evidence-based document). Indeed, it is the SA that must consider all reasonable alternatives (including alternative sites) in light of all considerations and Sustainability Objectives. Bearing in mind, the land promoted by Wallace Land Investments was included as a Safeguarded Site in the Regulation 18 consultation draft, it must therefore be regarded as a reasonable alternative for the SA to assess.



- 3.43 In short, it is clear that the Council has conflated the assessment of a site's contribution to the Green Belt, with other matters of detail that can be easily addressed at the application stage and are not relevant to the site's contribution to Green Belt objectives.
- 3.44 Indeed, the Council's own assessment of the site against the NPPF Green Belt purposes (i.e. Stage 1 of the Green Belt Review) does not support the retention of the site in the Green Belt, as it is not considered to make a 'high' contribution.
- 3.45 Notwithstanding the concerns regarding the Council's methodology, we demonstrate below how the site remains a highly suitable and deliverable site for continued allocation in the emerging Local Plan.

Deliverability Assessment

- 3.46 The 2019 NPPF and NPPG specify that local planning authorities must supply sufficient specific deliverable sites to meet the housing requirement in the first 5 years of the plan period. To be considered deliverable, sites should, at the point of adoption of the relevant local development document:
 - Be available there is confidence that there are no legal or ownership problems.
 - Be suitable it offers a suitable location for development and would contribute to the development of sustainable and mixed communities.
 - Be achievable there is a reasonable prospect that housing will be developed on the site at a particular point in time.
- 3.47 This is a judgement about the economic viability of a site and the capability of a developer to provide housing within a defined period, taking into account marketing, cost and deliverability factors.

Available

- 3.48 Wallace have through contractual agreements the ability to deliver the proposed development. There is no reasonable basis for the Council to conclude that the land will not be made available for development, should it be allocated and subsequently granted planning permission.
- 3.49 Accordingly, the site is available in line with the provisions of the NPPF and NPPG.

Suitable

3.50 The NPPG requires that the suitability of sites should be guided by the development plan, emerging plan and national policy; as well as the market and industry requirements in the housing market area (Ref: 3-019-20140306).

Planning Policy & Market Requirements



- 3.51 As noted above, Policy LPA02 of the Local Plan confirms that there are exceptional circumstances to support the release of Green Belt land, a position which Wallace wholly support, and Rainhill has been identified as an area where development should be directed.
- 3.52 In terms of market and industry requirements, Wallace's interest confirms that this is a suitable location for residential development from a commercial perspective.

Location and Accessibility

- 3.53 Whilst not specifically listed in the NPPG, access to services is a consideration of suitability. In this instance the site is in an accessible and sustainable location with numerous facilities within walking distance in Rainhill and public transport links to the larger urban area of St Helens and Liverpool.
- 3.54 In terms of retail uses, Rainhill District Centre is located within an approximate 20-minute walk of the site. The District Centre includes a number of local facilities including a Co-op store, pubs, a pharmacy, a medical centre and a number of takeaways and restaurants. A pub is also located adjacent to the northern site boundary, on Mill Lane.
- 3.55 In respect of educational facilities, Rainhill contains 3 primary schools and one secondary school. The site is excellently located in relation to these, with the Saint Bartholomew's Primary School located just 200 m (within a 5-minute walk) from the proposed site access at Mill Lane. Rainhill High School is located 0.8 km to the north, which can be accessed within a 10-minute walk from the site.
- 3.56 There are bus stops located on the A57, approximately 100m to the east of the proposed site access. The number 61, 140 and 741 bus services operate at this stop and provide direct and frequent access to several destinations. These include Liverpool, St Helens, Runcorn and Halton.
- 3.57 Rainhill Railway Station is located approximately 1.7 km to the north-west of the site and can be accessed within an approximate 25-minute walk or 10-minute cycle journey. Rainhill is located on the Merseyrail City Line and provides direct access into Liverpool Lime Street via a 25-minute journey. Train services also provide access into St Helens, Wigan and Preston, with 2 services per hour running in each direction.
- 3.58 As such, the site is a sustainably located development opportunity located within easy access of a range of local services, employment opportunities and public transport routes.

Constraints and Impacts

- 3.59 The NPPG goes on to list several further criteria for assessing suitability which we address in turn below:
 - Physical limitations and constraints (access, ground conditions, flood risk, etc.)



3.60 There are no physical constraints preventing development on this site coming forward. We summarise the key matters as follows, with further details provided in the Promotion Documents contained at Appendix 2.

Access

- 3.61 A large amount of technical work has been undertaken in relation to access matters for the site, which has evolved since the proposals shown in the March 2016 promotional document. Please refer to the illustrative masterplan contained at **Appendix 1** for the latest details of the proposals.
- 3.62 Pegasus and Wallace have been in dialogue with planning officers at St Helens in relation to a proposed access solution for the site. In summary, Wallace are now proposing the primary access into the site via the existing petrol station on Warrington Road, which will result in the following benefits:
 - Closure of the Mill Lane/Warrington Road (A34 junction);
 - · Creation of new signalised junction with pedestrian crossings on to the A34;
 - · Removal of the petrol station; and
 - Improvement to the setting of the neighbouring listed building.
- 3.63 Wallace have also been in dialogue with the neighbouring school and have agreed to provide a principal means of access through their land to the school, resulting in the following benefits to the school:
 - Closure of three separate access points onto Mill Lane, thereby removing mini-buses and coaches from utilising and parking on Mill Lane;
 - Internal rationalisation of the School's internal road network creating space for improved facilities such as a new sports hall/pavilion;
 - Improved safety for pupils and better efficiency and management of 'home time' when students leave the premises; and
 - Potential pedestrian connections to Mill Lane.
- 3.64 A detailed Access Technical Note was produced by SWECO and submitted to the Council in August 2018, which is contained at **Appendix 2.** The technical note explores proposed access matters in detail, as well as undertaking detailed trip analysis and junction impact assessments. The headline conclusions from this detailed technical note are as follows:
 - The primary access to the site (via the petrol filling station on Mill Lane), in the form of a signalised junction, will operate within acceptable capacity thresholds.



- The closure of the existing access from the A57 to Mill Lane, and the diversion of this traffic through the new access arrangements proposed along the A57, is entirely acceptable from a transport and traffic perspective.
- The secondary access point, in the form of a priority junction at Mill Lane located between the existing pond and Manor Croft dwelling, is also acceptable from a highways perspective.
- 3.65 The Council's concerns about the capacity of the existing highway network and junctions to accommodate any additional traffic from the Wallace proposals are acknowledged. However SWECO's Access Technical Note demonstrates that the proposed access arrangements and highway upgrading delivers suitable access and highways solutions to the site.
- 3.66 Therefore, we strongly disagree with the Council's assertion in the Green Belt Review that no adequate mitigation is available to overcome the highway concerns in this area. SWECO'S detailed Access Technical Note (see **Appendix 2**) puts forward comprehensive trip generation analysis and detailed access design proposals which demonstrates that an acceptable access solution can be achieved for the Mill Lane site.
- 3.67 Furthermore, the proposed access arrangements will also provide many benefits to the existing access arrangements for the Tower Hill Independent School.
- 3.68 The Council in their Green Belt Review raise concerns about the proposed access arrangements having a negative impact on the setting of the nearby heritage assets. This matter is discussed in detail in paragraphs 3.75- 3.80 below.
- 3.69 In conclusion, the development of the Mill Lane site is entirely acceptable from a transport perspective, given the two proposed access points and associated highway improvements along Mill Lane and for the Tower Hill School.

Noise

3.70 The Council has raised noise related concerns within their Green Belt Review:

"A further issue affecting this parcel is noise from the M62. Existing noise map data shows that noise levels in this location are extremely high. In order to provide an acceptable noise level for new residents it is likely that any new housing would need to be substantially set back from the motorway and that further significant acoustic/noise attenuation measures would be needed. If for example engineered bunding or high fencing is required, this would be likely to cause further harm to the setting of the heritage assets and landscape. These points together with the need to maintain a buffer around a number of protected trees scattered throughout the parcel, are also likely to reduce the NDA.

The noise issues also mean that if the parcel were to be released from the Green Belt, the boundary of the developable area would have no clear physical boundary on the ground (any boundary line would be artificial, based on noise mapping data, which could change over time).



Setting the Green Belt boundary along this line would be contrary to paragraph 139 of the NPPF, which states that plans should "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent." If the whole parcel were removed from the Green Belt i.e. by running the new Green Belt boundary along the side of the motorway, this would result in a large area of land being removed from the Green Belt compared to the number of new dwellings which would be deliverable."

- 3.71 These comments are not accepted, and we would stress that this is an entirely new point from the Council. The Council did not raise any concerns regarding noise impacts in any of its previous assessments, and its new position is not supported by any technical data.
- 3.72 In light of the unsubstantiated criticisms from the Council, Wallace commissioned a Noise Impact Assessment, prepared by Red Acoustics in May 2019 (attached at **Appendix 3**).
- 3.73 Firstly, the Illustrative Masterplan shows a minimum set-back of approximately 45m from the motorways. In some locations, this landscape buffer to the M62 extends to beyond 100m. The NIA confirms that this will ensure that the developed area is outside the high risk noise zone during the daytime, meaning that acceptable noise levels will be achievable with suitable mitigation measures being provided at the detailed design stage (such as using built development for acoustic screening, and providing acoustically rated glazing and ventilation systems). The NIA also confirms that the impact of night time noise levels can also be suitably mitigated against. Indeed, very few of the proposed dwellings will within the high risk area based on night time noise levels and this area will reduce significantly with suitable noise mitigation measures put in place along the southern boundary of the site.
- 3.74 Secondly, the Council raise concerns about how noise mitigation measures, such as acoustic bunds or high fencing, could harm the setting of the heritage assets and landscape. This statement was made without reference to or with support from any technical material. In particular, there is no LVIA or Heritage Impact Assessment from the Council to say that landscape bunding or acoustic fencing on the southern periphery of the site would have an unacceptable impact on the setting of heritage assets located beyond the site's northern boundary. The NIA identifies bunding or fencing as two of a number of mitigation measures. However, it also notes that a suitable land buffer and intelligent site layout may provide sufficient mitigation, if bunding or fencing is not considered appropriate. Moreover, the Heritage Assessment and Landscape Impact Assessments submitted alongside our representations all confirm that no adverse harm on the setting of the heritage assets would occur by releasing the land from the Green Belt for residential development.
- 3.75 Notwithstanding this, any potential acoustic bund or fence would be over 200m from the nearest Listed Building (Rainhill Cottage) to the east and would be extensively screened by existing development on Norlands Lane; whilst the other Listed Buildings along the northern boundary of the site are over 250m away and would also be screened by the proposed development when constructed, and as therefore such a feature would have minimal heritage impact.



- 3.76 In landscape terms, such features can generally be integrated within the landscaping network in a sensitive and naturalistic manner, whilst also providing visual screening, and should therefore be seen as a positive feature, rather than a constraint. This is certainly the case here, with the Landscape Statement at Appendix 3 suggesting that the existing cutting on the southern boundary could be extended to create a bund, which would also provide visual screening from the M62, and this is considered a key landscape opportunity for the site.
- 3.77 Thirdly, the Council's concern regarding the permanence of the Green Belt boundaries is simply unfounded. There would be no logic whatsoever, or indeed any need to, define the Green Belt boundary based on noise contours. Instead, the Green Belt boundary should extend to the M62 boundary to the south, as this presents a strong, defensible and permanent Green Belt boundary in line with the requirements of the NPPF (paragraph 139), a position which the Council endorse in their Green Belt Review (with the site considered well contained and making a low contribution to purpose a.
- 3.78 The actual development line / developable area, can then be confirmed through the detailed design / planning application process, which is an entirely normal and correct approach.
- 3.79 The concern about this extended Green Belt boundary comprising an inefficient use of land is also unfounded, as this undeveloped area to the south will provide noise mitigation, landscaping and open space which will make a valuable contribution to the wider development and will allow elevated densities in the northern part of the site as a result. This is common master-planning practice and it is certainly not the case that this southern area of land cannot be released from the green belt because it is not developable.
- 3.80 Indeed, the Council have not raised this as an issue with other sites proposed for allocation, which are similarly in noise sensitive areas. For example, site allocation 2HA (Land at Florida Farm) is located to the immediate south of the A580 East Lancs Road. Although this will reduce the NDA on this site and render parts of the northern area undevelopable, the Council are still proposing to release this whole land parcel from the Green Belt. The Council's approach to the Wallace site is therefore inconsistent, and completely unjustified.
- 3.81 In conclusion, none of the noise issues raised by the Council prevent this site being considered for allocation, with the Noise Impact Assessment confirming that with suitable mitigation acceptable noise levels will be achievable on the site. These measures will be agreed at the detailed design stage.

Flood Risk

- 3.82 The site is located entirely within Flood Zone 1 (lowest probability of flood risk). The illustrative masterplan shows that SuDs can and will be provided on site to deal with surface water drainage matters.
- 3.83 Accordingly, the site is entirely acceptable from a flood risk perspective.



Topography

- 3.84 The site has a gentle gradient and generally slopes from north to south. The northern boundary of Mill Lane lies on higher ground, which slopes down towards the M62. The illustrative masterplan has carefully considered topography matters in detail and confirms that there are no issues.
- 3.85 Accordingly, the site's topography is entirely acceptable for development purposes.

Agricultural Land

3.86 In January 1995, St Helen's Council commissioned an agricultural land report (see Appendix 2) in connection with the preparation of the UDP. This included analysis of the agricultural quality of the site, shown in the image below.





3.87 This shows that the vast majority of the site is Grade 3b Agricultural Land (land coloured green), which is classed as moderate quality. Only a very small section is grade 3a (land coloured blue), which is considered best and most versatile. This area of land will remain largely undeveloped based on the illustrative masterplan but we accept that the current agricultural use would be lost following development of the wider site. Ultimately, this is not considered to be a constraint, particularly given that much of the land surrounding St Helens is Grade 3 or higher, and therefore agricultural land issues will not prevent development of this site.

Landscape impacts (including nature and heritage)

3.88 Although the site currently falls within the Green Belt, it is not subject to any other landscape or ecological designations.

Ecology



- 3.89 The site does not contain any protected trees which are subject to a TPO. An ecological assessment was prepared by TEP in January 2017 (contained at **Appendix 2**). This confirms that the habitats on site are considered to be of low ecological value due to being predominantly arable land. The relative lack of connectivity as a result of the M62 to the south and residential development to the north means opportunities for commuting by various species are limited.
- 3.90 There are some limited habitats of higher value such as ponds, hedges and mature broad-leaved-trees. Furthermore, the report recommends that five of the ponds will require Great Crested Newts Surveys.
- 3.91 Overall, there are no ecological or arboricultural constraints preventing the development of this site, and further survey work and appropriate mitigation will be provided where necessary.

Landscape

- 3.92 A detailed Landscape and Visual Appraisal was prepared by Bright & Associates in January 2017 (attached at Appendix 2), whilst an updated Landscape and Visual Note dated May 2019 (attached at Appendix 3), is also provided to summarise landscape matters and rebut the issues raised in the Council's latest evidence, which states that this parcel scores medium to high for landscape visual sensitivity and due to its elevated position, any development of the site would likely have a substantial visual impact including in views from the M62.
- 3.93 This statement is made without explanation or evidence and is at odds with the Council's previous position. No up to date landscape assessments have been produced by the Council. In light of its change in position, the Council should provide proper evidence to support these conclusions. We reserve our client's right to respond to any evidence provided by the Council.
- 3.94 Contrary to the Council's most recent position, the Landscape and Visual Note submitted with this representation concludes the following:
 - Whilst the site area contains landscape elements of interest such as the public footpath
 through the site, the ponds and associated vegetation, much of the site area is subject to
 arable cultivation. The key landscape features can be retained as part of the site proposals
 as shown in the Illustrative Masterplan.
 - Strong existing vegetation along the northern boundaries provides enclosure to the adjacent properties, (including listed buildings) and limits inter-visibility between the site and properties forming the southern edge of Rainhill.
 - Whilst the north western portion of the site is elevated and comprises of relatively steep ground, the majority of the site is relatively low lying and exhibits gentle falls.



- The visual envelope of the site area is relatively contained with views interrupted by built form and vegetation to the north and blocks of vegetation in the wider landscape to the south.
- The largest group of visual receptors gaining views over the site are drivers and passengers in vehicles using the M62. People using major transport routes are considered to be of low sensitivity in landscape and visual assessment terms.
- The landscape framework plan indicates how road noise could be mitigated using landform
 and how the existing well treed edge of the settlement could be replicated within the site
 area to provide a similar sympathetic edge to the proposed residential area. The southern
 boundary adjacent to the M62 could also form a robust revised Green Belt boundary.
- 3.95 The report concludes that development on this site is entirely acceptable from a landscape perspective.

Heritage

- 3.96 The Council outline their concerns about heritage impact on this site, with reference to a Heritage Impact Assessment that was carried out after the Preferred Options Consultation. This assessment was undertaken by or on behalf of the Council but has not been published as part of this consultation. The Council's reliance on a document which is not publicly available significantly undermines the consultation process. The Council should publish this assessment, and we reserve our client's right to provide a response as required.
- 3.97 The Council states that its assessment concludes that development on this site would harm the setting of the Listed Buildings and could not be satisfactorily mitigated against by reducing the site's net developable area, with the key issues considered to be the loss of openness around the listed farm buildings (Briars Hey, Manor Farmhouse, Old Hall Farmhouse and Rainhill Cottage) and the impact of new vehicular access route on Smithy Cottage.
- 3.98 We address these points in turn, with reference to the findings of the January 2017 Heritage Assessment, contained at **Appendix 2**. In terms of impacts on the listed farm buildings this assessment is clear that these will be minimal, and certainly less than substantial, as noted below:
 - Briars Hey "It is considered that the impact of the proposed development will be greater
 on the grounds than on the house and will, in either case, be 'less than substantial' under
 the guidelines of the NPPF."
 - Manor Farmhouse "this is an important building in architectural and historical terms but one whose setting has been considerably altered and diluted in heritage value in the recent past in order to meet its present needs as a public house and restaurant. The proposed structural planting to the south of the grounds will help to lessen any impact that the development could have on its much-altered setting."



- Old Hall Farmhouse "Overall, it is considered that there would be negligible impact or harm to the character, setting or significance of the scheduled ancient monument or to the listed buildings within it."
- Rainhill Cottage "Rainhill Cottage is physically not far from the eastern boundary of the
 proposed development site but there are two street of modern development in between.
 The proposed development site makes no contribution to the setting of the listed building
 or, therefore, to its significance. The proposals will therefore cause no harm to its character,
 setting or significance."
- 3.99 In terms of the impacts of the new access arrangements on the listed Smithy Cottage, it is considered that the proposed development will have a positive impact on the setting of this Listed Building, which is currently located between a petrol filling station / MOT garage (with its associated signage and paraphernalia) and an electricity substation, creating a highly urbanised and cluttered environment; but will become an attractive landscaped gateway into the site, with built development set back to minimise any impacts, as shown on the Illustrative Masterplan.
- 3.100 This position is endorsed in the Heritage Assessment which confirms:

"The proposals being developed for the main study area involve changes to the access into the site that will impact on the setting of Smithy Cottage. The most significant proposed change relates to the aspiration to remove the adjacent petrol filling station and the creation of the main access to the new development to the south by a road leading off the main road and passing directly next to Smithy Cottage. This is also linked to the blocking of Mill Lane from the main road immediately to the front of Smithy Cottage.

Whilst these changes will inevitably have an impact on the setting of the listed building it is evident that its setting is presently of very limited importance in contributing to its significance. It is considered that these changes will be of benefit to the setting of Smithy Cottage. The demolition of the garage and pressure -washer facilities, which presently dominate the house in views from virtually all directions, and their replacement by a road – which will not – can only enhance the building's setting.

This will also be improved by the blocking of the entry into Mill Lane which will reduce the traffic noise immediately in front of the house at the expense only of a small vision splay to the new access road. It seems highly likely that the removal of the garage will also allow the cottage to revert to a more conventional residential use which will further improve its setting because of the reversion of its immediate surroundings to a private garden again. It is therefore considered that the proposals have the opportunity to significantly enhance the setting of the listed building."

3.101 Furthermore, and as with the noise matters set out above, heritage mitigation measures such as set-backs and landscaping can be addressed at the design/planning application stage to ensure the scheme is sensitive to existing heritage assets.



3.102 Accordingly, the site is entirely acceptable from a heritage perspective, subject to appropriate mitigation.

Market attractiveness

3.103 As noted above, Rainhill is an affluent area within St Helen's and is attractive to the market for family housing. It is blessed with good schools and services and will be of interest to national and local housebuilders should the site be allocated. Wallace Land Investments can also confirm that this is a viable development proposal, as demonstrated by their on-going investment and commitment to promote this site for development.

Contribution to regeneration priority areas

3.104 Development in this area is not a regeneration priority, but new development here will generate additional household spending which will help to support additional shops and services in Rainhill and St Helens.

Amenity impacts on occupiers and neighbouring areas

- 3.105 The proposed development will have minimal impacts on surrounding area as the proposed scheme will be sympathetically integrated into the countryside that lies to the west and south of the site. In addition, the development will deliver areas of open space for use by residents and the local community.
- 3.106 The site is therefore suitable in accordance with the NPPF and the NPPG.

Achievable

- 3.107 The delivery of up to 750 dwellings would make a significant contribution towards meeting the housing needs of the Borough. An initial assessment of the site constraints has been undertaken which illustrates that delivery of the entire site is achievable and deliverable, and a professional team of technical experts has been appointed to underpin this assessment and support the delivery of the site moving forward.
- 3.108 Wallace has reviewed the economic viability of the proposal in terms of the land value, attractiveness of the locality, potential market demand; as well as the cost factors associated with the site including preparation costs and site constraints. Where potential constraints have been identified; Wallace has considered the necessary mitigation measures and will use investment in order to overcome any deliverability barriers.
- 3.109 Wallace can therefore confirm that the development of the site is economically viable in accordance with the NPPF and NPPG. As a consequence, the company is committed to investing in the site and is confident that residential development can be achieved within 5 years.

Deliverability Conclusions



3.110 This assessment has confirmed that the Mill Lane site is available, suitable and achievable in accordance with the latest national guidance and should therefore be allocated for residential development.

Site Specific Assessment Conclusions

- 3.111 This section has explored at length the deliverability and sustainability credentials of the site. We have undertaken a detailed assessment of the Mill Lane site and the 18 sites proposed by the Council for allocation and safeguarding, in the form of a pro-forma, which is contained at **Appendix**4. In relation to the Council's SA assessment of the Mill Lane site, we would comment that:
 - The Mill Lane land parcel assessed in the Council's SA differs to the final red line boundary which Wallace are promoting. There are therefore some errors we have picked up, which we address in our detailed pro-forma.
 - When converting the Council's SA scoring methodology to a numerical scoring system, the site scores a sustainability scoring of 42.5. This does not differ greatly from the sustainability scorings of many of the Council's allocated and safeguarded sites.
 - When the errors in the Council assessment are corrected (e.g. incorrect statements in the AECOM SA such as the site containing a TPO, landscape sensitivity and access to local services) the site achieves a sustainability score of 51, which is the 4th highest sustainability score (see section 7 for more detail).
- 3.112 Overall, our detailed assessment confirms that the Mill Lane site is sustainable and deliverable, and highlights several issues with the Council's scoring methodology. Please refer to Section 7 of this report where we provide detailed commentary on the Council's Green Belt Assessment and site selection methodology.
- 3.113 This section confirms that the Mill Lane site does not fulfil the 5 purposes for including land in the Green Belt, as set out in the NPPF and adopted by the Council. It is a sustainable and accessible site, with no technical constraints preventing its development for residential purposes. As such, it is recommended that the site is allocated for immediate development.

SUGGEST!



- Safeguarded housing sites 6,365
- TOTAL = 8,608
- Safeguarded employment sites additional sites to provide choice and flexibility

Site Selection Methodology

7.27 In respect of distribution and site selection, the supporting text at paragraph 4.18.12 of the plan confirms that:

"In accordance with Policy LPA2 housing land supply will be distributed across the Borough, albeit with a concentration in existing urban areas and the major urban extension planned at Bold... The location of sites that have been released from the Green Belt has been determined by the St Helens Green Belt review... Whilst this process has constrained the ability to identify suitable sites in some key settlements, all settlements will have opportunities for housing development either within them or nearby."

- 7.28 This text supports an approach where allocated sites will be evenly distributed amongst the key settlements, where practicable, guided by the Green Belt Review and SHLAA. To clarify the key settlements are as follows:
 - St Helens Core Area- including St Helens Central Spatial Area, Moss Bank in the North, Clock Face to the South, Eccleston to the West and Parr and Sutton to the East (also includes Bold and Thatto Heath).
 - Blackbrook and Haydock,
 - · Newton-le-Willows and Earlestown,
 - · Rainford,
 - · Billinge,
 - · Garswood, and
 - · Rainhill.
- 7.29 We fully support the need for a robust Green Belt Review, as this is clearly important to demonstrate the exceptional circumstances required to amend Green Belt boundaries and identify sites.
- 7.30 That said, the 2019 NPPF is clear that when 'reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account' (para 138) and that 'when defining Green Belt boundaries plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development' (para 139).
- 7.31 Therefore, it is our strong view that the Green Belt Review should support rather than constrain the Council's ability to deliver growth to the key settlements.





Site Distribution

- 7.32 In the case of St Helens the findings of the Green Belt Review and SHLAA have led to an uneven distribution of sites, with very little proposed development in Rainhill and Billinge, and only moderate development within Rainford. Furthermore, whilst the Core Area will receive a large amount of development this is again unevenly distributed within the different sub areas within it, with Eccleston, Sutton and Parr in particular receiving very low growth; with the Town Centre and Thatto Heath wards attracting over 50% of the development.
- 7.33 This uneven distribution is shown on the plans and table below (with a full version of the main plan contained at **Appendix 9**):

<u>Figure 7.2 - Plan (Extract) showing Local Plan Distribution (SHLAA sites, Allocations and Safeguarded Land)</u>

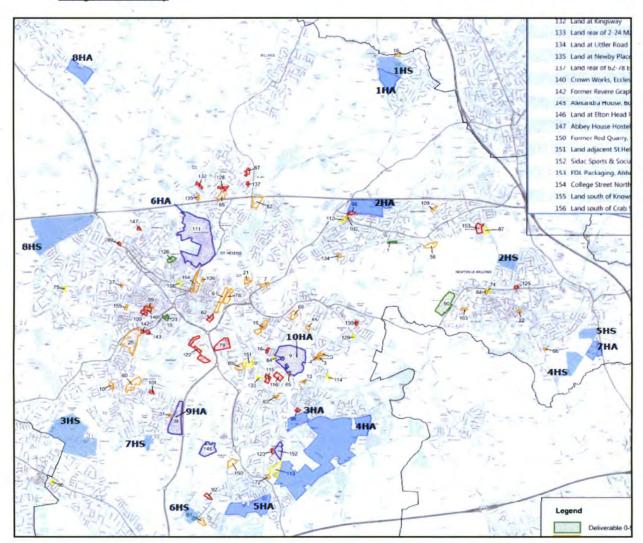


Figure 7.3 - Key Settlements Plan





Green Belt Review

- 7.35 In addition to the imbalance in housing distribution proposed within the plan, there are also concerns with the structure and methodology of the Green Belt Review.
- 7.36 Whilst there is no firm methodological guidance on how to undertake a Green Belt Review, certain independent practitioners (including Arup, LUC and Pegasus Group) have established standardised approaches which have been accepted as suitable evidence to support a Local Plan at various Local Plan Examinations in Public.
- 7.37 In this instance, the Council have undertaken the review themselves and their approach raises a number of issues and we have raised previous concerns in relation to the approach adopted in Section 3 of our representations
- 7.38 Whilst the Review has been undertaken over multiple stages, the final site ratings are based on 3 criteria (Green Belt Purposes a, b and c) with 4 different ratings (Low / Medium / High / High +), meaning there are only 12 possible scores. This provides only limited scope for differentiation in the site ranking. This is particularly relevant where there were 99 parcels, with many more sub parcels considered within the settlement. It is an overly broad-brush approach.
- 7.39 However, there has seemingly been some conflation of heritage / historic towns issues within the Council's Stage 3 assessment of the individual sites. We have also already pointed out in Section 3 that this ties into a wider point as to whether such an analysis of site constraints and sustainability credentials should be conducted separately or subsequent to the Green Belt Review process. It is our strong view that it should have been separated with the wider assessment conducted as part of the SA rather than an extended assessment in the Green Belt review.
- 7.40 Paragraph 138 of the 2019 NPPF also notes that:

"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."

- 7.41 However, it does not appear that accessibility or the ability to make compensatory improvements have been properly considered within this review and have certainly not been given any elevated importance which is a flaw.
- 7.42 In the case of Mill Lane Rainhill, the site is well served by public transport with bus stops offering high frequency services directly adjacent to the site, whilst the large landholding and relatively low density proposed ensures there are sufficient opportunities for compensatory improvements.
- 7.43 We have also raised pertinent points in relation to paragraph 139 of the NPPF in Section 3, which directly relate to the site and Green Belt parcel.





- 7.44 Finally, our analysis noted that some of the proposed allocations and safeguarded sites have been considered in the Green Belt Review on the basis of parcels that were different and generally larger to that actually proposed for development (see **Appendix 4** assessments of sites 7HA, 1HS, 2HS, 4HS, 5HS and 6HS). Indeed, these parcel boundaries were often extended towards more logical physical boundaries as they would in a general GB parcel assessment, however this is likely to have generated more positive scoring for these sites and represents another flaw in the methodology.
- 7.45 Taking into account the concerns and issues regarding the Green Belt Assessment, we present our own assessment of the 18 proposed allocations and the Mill Lane, Rainhill site. For ease of reference these are presented alongside the findings from the Council's Green Belt Review:

Figure 7.5 - Green Belt Contribution Assessment of Proposed Allocations against Mill Lane site

Site Reference	Council GB Conclusion	Pegasus GB Conclusion
1HA	Low	Low-medium
2HA	Low	Low
ЗНА	N/A	N/A
4HA	Low	Low
5HA	Low	Low-medium
6НА	N/A	N/A
7HA	Low	Low
8HA	Low	Low
9HA	N/A	N/A
10HA	N/A	N/A
1HS	Medium	Medium
2HS	Medium	Medium
3HS	Low	Low
4HS	Low	Medium
5HS	Low	Medium
6HS	Low	Low
7HS	Low	Medium
8HS	Low	Low
Mill Lane, Rainhill	Medium	Low

7.46 It is our view that the proposed site at Rainhill makes a low contribution to the Green Belt, and certainly lower than several of the chosen sites, and as such should be considered for allocation.

Sustainability Appraisal

- 7.47 We now move on to the Council's Sustainability Appraisal and how it has considered the proposed allocations and the Mill Lane site.
- 7.48 The Sustainability Appraisal has been undertaken on behalf of the Council by AECOM. Whilst the methodology is generally considered sound; we do disagree with some of the scoring and have provided our own comparable assessment.



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APPENDIX 4- DETAILED SITE PRO FORMAS	APPENDIX 4-	DETAILED	SITE PRO	FORMAS
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Site Reference	Council's SA Score
5HA	53
9HA	52
2HA	51
3HS	51
10HA	50.5
ЗНА	50
2HS	49.5
6HS	49
7HS	48
1HA	47
6НА	47
4HS	47
7HA	45.5
1HS	45.5
5HS	45
8HA	44.5
4HA	43.5
8HS	43.5
Rainhill	42.5

Site Reference	Pegasus SA Score
5HA	53
9НА	52
2HA	51
Rainhill	51
ЗНА	50
10HA	49.5
3HS	49.5
6HS	49.5
2HS	48.5
7HS	48
1HA	47
4HS	47
7HA	45.5
6НА	45
5HS	45
1HS	44.5
8HA	43.5
4HA	43
8HS	42.5

Site Reference	Council GB Conclusion	Pegasus GB Conclusion
1HA	Low	Low-medium
2HA	Low	Low
3HA	N/A	N/A
4HA	Low	Low
5HA	Low	Low-medium
6HA	N/A	N/A
7HA	Low	Low
8HA	Low	Low
9HA	N/A	N/A
10HA	N/A	N/A
1HS	Medium	Medium
2HS	Medium	Medium
3HS	Low	Low
4HS	Low	Medium
5HS	Low	Medium
6HS	Low	Low
7HS	Low	Medium
8HS	Low	Low
Rainhill	Medium	Low

Site Ref	Deliverability Comments				
1HA	Persimmon Development Option. Reserve the right to comment on detailed delivery rates at later stage.				
2HA	Barratt Development Option. Reserve the right to comment on detailed delivery rates and site capacity at later stage given noise and flood risk issues.				
3HA	No comment- planning permission in place.				
4HA	11 landowners, 9 of which are private with no affiliation or development options with housebuilders or land promoters. No evidence that these are willing landowners or that there is market interest in this very large site.				
5HA	Taylor Wimpey Development Option. Reserve the right to comment on detailed delivery rates at later stage.				
6НА	Concern that there is likely contamination on this site given former factory use. Other site constraints, leading to concerns that delivery of houses could be delayed beyond the early years of the plan period.				
7HA	Unclear land owner details. Reserve the right to comment on detailed delivery rates at later stage.				
8HA	Miller Homes Development Option. Reserve the right to comment on detailed delivery rates at later stage.				
9HA	Outline planning permission in place, albeit no Reserved Matters applications submitted yet.				
10HA	Planning permission in place but land remediation conditions attached and elongated reserved matters timescales (7 years). Leads to concern about delivery of houses in the early years of the plan period.				
1HS	One Landowner with no affiliation with Developer or Land Promoter, therefore concerns regarding market interest and deliverability. SA also flags up presence of mine shafts on site.				
2HS	Taylor Wimpey Development Option. Reserve the right to comment on detailed delivery rates at later stage.				
3HS	Site constraints relating to pylons, noise and highways capacity leads to concerns about housing delivery in early years of plan period.				
4HS	Owned by Key Property Investments Ltd and Jones Homes North West Ltd have Development Option on remainder of site. Reserve the right to comment on detailed delivery rates at later stage.				
5HS	Wainhomes Development Option. Reserve the right to comment on detailed delivery rates at later stage.				
6HS	Kingsland Strategic Estates Ltd have Development Option. Reserve the right to comment on detailed delivery rates at later stage.				
7HS	One Landowner with no affiliation with Developer or Land Promoter, therefore concerns regarding market interest and deliverability.				
8HS	Story Homes Development Option. Reserve the right to comment on detailed delivery rates and site capacity at later stage given noise, flood risk and ecology issues.				
Rainhill	Wallace have Development Option on the site. Due diligence and technical work confirms no deliverability issues.				

Sites with potential deliverability issues



Local Plan Reference:	1HA	Site Location:	Billinge Road, Garswood	Allocated or Safeguarded?	Allocated
Local Flan Reference.	TIIA	Site Location.	billinge Road, darswood	Anocated of Safeguarded:	Anocateu



Council Assumptions	Pegasus Comments
Site Size: 9.58ha	Accurate, no comments
Indicative Site Capacity: 216	No comments, albeit reserve the right to comment on assumed delivery rates at a later stage.
Assumed Net Developable Area: 75% (therefore 7.19 ha)	Realistic, no comments
Assumed Density: minimum 30 units per hectare	Realistic, no comments
Planning History: None	

<u>Land Ownership/Availability:</u> 1 Landowner (Anne Hunt-) Persimmon have land option.

Green Belt Parcel Reference: GBP_025b

Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
Low	The sub-parcel is triangular is shape and is bounded by strong physical boundaries to the north by Billinge Road, to the west by Garswood Road, to the east and south by Smock Lane and the built development of Garswood.	Low	Agreed and no comments
	Residential properties run along Garswood Road to the north west and a significant pocket to the south, the remaining of the sub-parcel is agricultural field.		
Low	The sub-parcel contributes broadly, along with other parcels (GBP_026), to the physical and visual separation of Billinge and Garswood. A strategic gap between Billinge and Garswood could be maintained if this sub-parcel was released from the Green Belt.	Medium	The gap between Billinge and Garswood is already narrow (circa 1.7 km in this location). The development of this site would reduce the gap further, to circa 1.4 km). We therefore consider this parcel provides a medium contribution to preventing neighbouring towns from merging.
Low	The parcel is very well enclosed on all sides by highway and residential properties.	Medium	Whilst the land parcel is very well enclosed, this is only one aspect that the Council's own methodology explores in relation to purpose 3 (urbanising features, sense of openness, characteristics of the countryside etc). The site is affected by surrounding urbanising features, however it is also very open. There is no vegetation on the site, including none along its northern boundary. This means that longline views are present when looking northwards and to the open Green Belt beyond. It's open nature also means it bears many characteristics of the countryside. We therefore score the site as having a medium contribution to purpose 3 of the Green Belt.
N/A	N/A	Low	No heritage concerns likely to arise given no listed buildings, conservation areas nearby.
Low	All sides of the sub-parcel have strong boundaries and therefore the sub-parcel is well contained. The parcel is enclosed to the east and south. A strategic gap between Billinge and Garswood could be maintained if this sub- parcel was released from the Green Belt.	Low-	Whilst the site scores low against purposes 1 and 4, it scores medium against purpose 3 due to its very open nature and because it bears many characteristics of the countryside. It also scores medium against purpose 2, given that the gap between Billinge and Garswood is already quite narrow.
	Low Low N/A	The sub-parcel is triangular is shape and is bounded by strong physical boundaries to the north by Billinge Road, to the west by Garswood Road, to the east and south by Smock Lane and the built development of Garswood. Residential properties run along Garswood Road to the north west and a significant pocket to the south, the remaining of the sub-parcel is agricultural field. The sub-parcel contributes broadly, along with other parcels (GBP_026), to the physical and visual separation of Billinge and Garswood. A strategic gap between Billinge and Garswood could be maintained if this sub-parcel was released from the Green Belt. The parcel is very well enclosed on all sides by highway and residential properties. N/A All sides of the sub-parcel have strong boundaries and therefore the sub-parcel is well contained. The parcel is enclosed to the east and south. A strategic gap between Billinge and Garswood could be maintained if this sub- parcel was released from the Green	Rating The sub-parcel is triangular is shape and is bounded by strong physical boundaries to the north by Billinge Road, to the west by Garswood Road, to the east and south by Smock Lane and the built development of Garswood. Residential properties run along Garswood Road to the north west and a significant pocket to the south, the remaining of the sub-parcel is agricultural field. The sub-parcel contributes broadly, along with other parcels (GBP_026), to the physical and visual separation of Billinge and Garswood. A strategic gap between Billinge and Garswood could be maintained if this sub-parcel was released from the Green Belt. The parcel is very well enclosed on all sides by highway and residential properties. Medium N/A All sides of the sub-parcel have strong boundaries and therefore the sub-parcel is well contained. The parcel is enclosed to the east and south. A strategic gap between Billinge and Garswood could be maintained if this sub- parcel was released from the Green Belt.



Suitability/Site Constraints

Access	Site is bounded by the B5207 to the north which has two bus stops. Garswood Road and Smock lame bounds the west and east of the site. Garswood station is within 1km from the site at		
Heritage	There are no listed buildings, scheduled monuments or conservation areas near to or within the site.		
Flood Risk	Flood zone 1		
Landscape	The site is flat with some dwellings to the north western part of the parcel.		
Ecology/Trees	Some hedgerows surrounding the field.		
Agricultural Land	Grade 3 (good to moderate)		

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Effects on biodiversity unlikely		No comment
SA2: To protect and improve land quality in St Helens		Site contains 100% Grade 3 agricultural land. The size of the site however (10.88ha) does meet the site criteria threshold for potential effects.		No comment
SA3: To improve air quality in St Helens		Medium sized site (215 units) located over 1km from AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 3.9km from nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network ad increased tree cover.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 100% in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the		95% of the site is within a Medium-High or High Landscape Sensitivity area. Site is or		The site is very open with long-line views, making it sensitive from a landscape perspective.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		No heritage assets within 500m. Effects unlikely.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Over 1.6km to open space. Site contains a Public Right of Way (severance possible if not designed inclusively)		No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
	N/A	Council not assessed this	
SA12: To improve health and		Access to GP: 430m of Garswood GP Surgery, Dr B W O'Brien & Partners	
reduce health inequalities			No. as
		Access to Leisure: Within 1.2km of 2 Children's Play Areas	No comment
SA13: To improve the			
education and skills levels of		Primary: 364m from Garswood Primary School	
the population overall		Secondary : 2.29km from Cansfield High Specialist Language College	No comment
SA14: To ensure local		Secondary 1 2.25km from earlished riigh specialist Earliguage conlege	No comment
residents have access to			
employment opportunities		844m from, Liverpool Rd Industrial Estate	No comment
SA15: To support a strong,		, · ·	
diverse, vibrant and			
sustainable local economy to			
foster balanced economic			
growth		Housing site on land not suitable/attractive for employment.	No comment
SA16: To improve access to a			
range of good quality and			Agreed as the site benefits from few constraints, but reserve the right to comment on this at
affordable housing that meets			a later date when further details regarding deliverability are provided.
the diverse needs of the		Determinal to deliver 215 white even 0 15 weeks	a later date when farmer decans regularly deliverability are provided.
horough .		Potential to deliver 215 units over 0-15 years.	
SA17: To reduce poverty and	N/A	Council not assessed this	
CA10. To vaduos ovins		Council not assessed this	
SA18: 10 reduce crime,			
disorder and the fear of crime	N/A	Council not assessed this	
SA19: To reduce the need to	,		
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway			
safety and make the best use			
of existing transport			
infrastructure		11m from hus stan with 1.2 sandage nor have	No commont
		11m from bus stop with 1-2 services per hour.	No comment
SA20: To improve access to			
and use of basic goods,			
services and amenities in		Residential site is located 692m from the nearest convenience store (The Store) or su	No comment
town and local centres		The state of the s	

Total Score: 47	47
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Key of Council's SA Scoring:

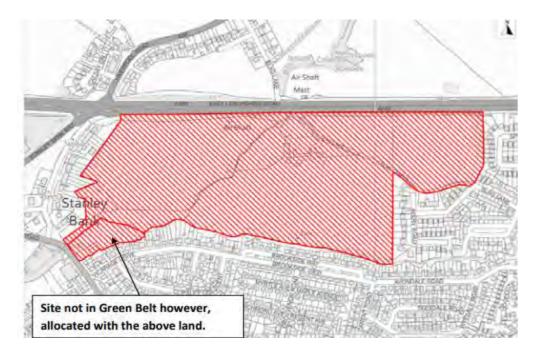
Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 2HA Site Location: Land at Florida Farm, Blackbrook Allocated or Safeguarded? Allocated



Council Assumptions	<u>Pegasus Comments</u>
Site Size: 23.19ha	Accurate, no comments.
Indicative Site Capacity: 522	Given the presence of the A580 East Lancs Road to the north, it is likely that a development setback will be required to alleviate concerns about noise. There are also small areas of flood zone 2 which may also reduce overall site capacity and final numbers. We therefore reserve the right to comment on the likelihood of the site delivering 522 at a later date.
Assumed Net Developable Area: 75% (therefore 17.4 ha)	Given the flood risk and noise matters we refer to above, the net developable area may be lower than the figure assumed by the Council.
Assumed Density: minimum 30 units per hectare	Realistic, no comments.
Planning History: None of note- planning history re	lates to minor applications.

<u>Land Ownership/Availability:</u> 2 Landowners (John and Christine Jaundrill and David Charles Moore)- Barratt have land option on both.

Green Belt Parcel Reference: GBP_060

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The parcel is bounded to the north by the A580 East Lancashire Road and residential development to the south, east and west. The parcel is very well contained and therefore development of this parcel would not lead to unrestricted sprawl.	Low	Agreed and no comments
2. To prevent neighbouring town merging into one another	Low	ne parcel does not fall within a strategic gap between two towns. The nearest towns are: aydock and Blackbrook that adjoins the parcel and St. Helens which lies approximately 1.2km buth west of the parcel, but Blackbrook and Haydock have already merged with St. Helens part to the south.		Agreed and no comments
3. To assist in safeguarding the countryside from encroachment	Low	The parcel contains some built development along the western boundary. The parcel has strong permanent boundaries and is surrounded by residential development on three sides, so therefore does not have a sense of openness or countryside character.	Low	Whilst we would agree that the overall score of the site is low against this purpose of the Green Belt, we do not agree that the site has no openness or countryside character becase there are some open views of the site from Slag Lane.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	No heritage concerns likely to arise when looking at location of nearest Listed Building (Vicarage Road)
Overall Assessment	Low	The parcel has strong permanent boundaries and does not have a sense of openness or countryside character.	Low	Agree that overall contribution is low
Key -Low Contribution - LC	Mediur	n Contribution - MC High Contribution - HC		



Suitability/Site Constraints

Access	The site has a lane access off the A580 (East Lancashire Road) which connects to Haydock Lane. The East Lancashire Road connects Greater Manchester to North Liverpool and provides a	
Heritage	There is one Grade II listed building within 500m of the site: Pear Tree Farmhouse	
Flood Risk	Some of the site is in Flood 2 with a smaller proportion being in Flood Zone 3 due to main river running along the south of the site. The main proportion of the site is within Flood Zone 1.	
Landscape	The site is flat fields which are enclosed by the East Lancs Road with the east, west and south part of the site being enclosed by the rear of dwellings. Florida farm is situated in the middle	
Ecology/Trees	Ecology/Trees Deciduous woodland is present in the south west corner of the site. The north part of the site along the East Lancs is lined with trees.	
Agricultural Land	Grade 3 (good to moderate)	

CA Taulia	Council	Councillo Bationalo fou como	Pegasus	Pegasus Comments
SA Topic	Rating	Council's Rationale for score	Rating	regasus comments
SA1: To protect and enhance				
biodiversity		Effects on biodiversity unlikely. Site does not contain any agricultural land Grade 1-2. There is 100% (24.4ha)		No comment
SA2: To protect and improve		overlap with agricultural land Grade 3, which exceeds 20Ha, resulting in potential		
land quality in St Helens		negative effects.		No comment
SA3: To improve air quality in St Helens		Large sized development (500 units) over 2.1km from AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 2.3km from nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network and increased tree cover.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 94.7% in Flood Zone 1, and 5.3% in Flood Zone 2.		Agreed and highlight that this may be a constraint which reduces the overall site capacity of 522 dwellings.
SA7: To protect, enhance and		·		ž
make accessible for enjoyment, landscapes, townscapes and the countryside		91.2% of the site is within a Medium-High or High landscape sensitivity area. Over 2.4km from a prominent ridge line.		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Site is 143m from an Archaeological Interest (Pear Tree Farmhouse) and 179m from a listed building. Effects unlikely due to urban setting and screening		No comment
SA9: Ensure access to and				
protection and enhancement				
of high quality public open				
space and natural greenspace		Within 224m of open space and PROW on site (severance possible if not designed inclusively)		No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
composted or recovered N/A	Council not assessed this		
SA12: To improve health and			
reduce health inequalities	Access to GP: Within 828m distance from DR H M RAHIL GP		
·	Access to Leisure: Within 1.2km of 2 childrens play spaces		Agreed and no comments
SA13: To improve the	process of account the same and profit operations		
education and skills levels of			No. as respectively.
the population overall	Primary: 617m from Legh Vale Primary School		No comment
	Secondary: 774m from Haydock High School		
SA14: To ensure local			
residents have access to	531m from Haydock Lane Industrial Estate/Old Boston Trading		No comment
employment opportunities SA15: To support a strong,	33111 Hoff Haydock Laffe Industrial Estate/ Old Bostoff Hading		No comment
diverse, vibrant and			
sustainable local economy to			
foster balanced economic			
growth	Housing site on land not suitable/attractive for employment.		No comment
SA16: To improve access to a			
range of good quality and			Agreed as the site benefits from few constraints, but reserve the right to comment on this at
affordable housing that meets			a later date when further details regarding deliverability are provided.
the diverse needs of the	Potential to deliver an estimated 500 units over 0-15 years.		
SA17: To reduce poverty and	·		
social exclusion N/A	Non-employment site	N/A	
SA18: To reduce crime,			
disorder and the fear of crime N/A	Council not assessed this		
SA19: To reduce the need to			
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway			
safety and make the best use			
of existing transport			
infrastructure	11m from Bus Stop. Regular frequency service. 2.6km to nearest train station.		No comment
SA20: To improve access to	· · · · ·		
and use of basic goods,	Decidential site in F20m from a companion of the state and 240 m from the		
services and amenities in	Residential site is 529m from a convenience store and 349m from the nearest		No. according to
town and local centres	supermarket		No comment

Total Score: 51 51

Key of Council's SA Scoring:

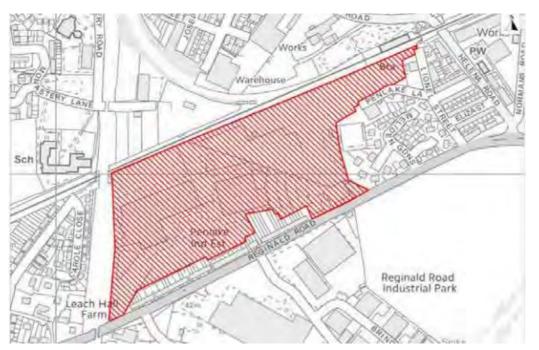
Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 3HA Site Location: Reginald Road, Bold Allocated or Safeguarded? Allocated (with planning permission in place)



Council Assumptions	Pegasus Comments
Site Size: 10.66 ha	No comment
Indicative Site Capacity: 337	No comment
Assumed Net Developable Area: 75% (therefore 8ha)	No comment
Assumed Density: minimum 42 units per hectare	No comment

Planning History: P/2015/0130- Approved

Hybrid Application - Full planning permission for demolition of existing metal recycling facility and structures and remediation of the site. Outline planning permission for re-profiling of the former railway embankment, residential development zone (**up to 358 dwellings**) and mixed use development zone to include 390sq m of open use development (A1, A2, A3 and/or D1) and/or up to 12 dwellings, with associated areas of open space /green infrastructure and main vehicular access from Reginald Road. All other matters reserved.

P/2018/0251/RES- Approved

Application for the approval of access, appearance, landscaping, layout and scale for the erection of **337 dwellings**, public open space (including play areas) and other associated works pursuant to outline planning permission P/2015/0130

Land Ownership/Availability: 1 Landowner (Countryside Properties)

Green Belt Parcel Reference: N/A (Brownfield Site)

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
To check the unrestricted sprawl of large built up area	N/A		N/A	
2. To prevent neighbouring town merging into one another	N/A		N/A	
To assist in safeguarding the countryside from encroachment	N/A		N/A	
4. To preserve the setting and special character of historic towns	N/A		N/A	
Overall Assessment	N/A		N/A	
Key -Low Contribution - LC	Medium	Contribution - MC High Contribution - HC	ı	



Suitability/Site Constraints

Access	The site can be accessed from the B5204 which have bus routes towards St Helens and Rainhill. Access could be gained from Penlake Lane. St Helens Junction railway station is 400m awa	
Heritage	Heritage There are 3 Grade II listings within 500m of the site but not within the site itself. To the west is the Wheatsheaf and to the east are St Helens Junction Station and 2 Lionel Street.	
Flood Risk	The whole site is within Flood Zone 1.	
Landscape	The site is a former metal recycling facility area which has since been cleared for housing developments which have been granted planning permission. It is a flat site which is enclosed by	
Ecology/Trees	The site contains some trees mainly to the edges e.g. along the railway track and there is a small pond in the south western part of the site.	
Agricultural Land	Originally the site was brownfield- Land predominantly in urban use.	

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		22m from a local wildlife site and TPO on site therefore likely to generate negative eff		No comment as planning permission already granted.
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-3. Therefore effects are neutral.		No comment as planning permission already granted.
SA3: To improve air quality in St Helens		The site is 2.72km from AQMA therefore effects unlikely		No comment as planning permission already granted.
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 1.7km from nearest ground water source protection zone		No comment as planning permission already granted.
SA5: To mitigate and adapt to the impacts of climate change		Site is 6m from Bold Forest Park, and may present the potential to enhance to and / or link to existing green infrastructure networks.		No comment as planning permission already granted.
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site is located in Flood Zone 1 therefore effects unlikely		No comment as planning permission already granted.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of the site is within an area classified as being low sensitivity. Over 2.9km from a prominent ridge line, and effects therefore unlikely. Development could potentially enhance a currently derelict site.		No comment as planning permission already granted.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		archaeological interest, 3.4km from a registered park and 1.8km distance to ancient monument. Possible for effects given the close proximity of listed building. However, the site does not add to the setting of the asset, so significant effects unlikely.		No comment as planning permission already granted.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		173m to Open Space. Within 11m from a PROW, which could enable good accessibilit		No comment as planning permission already granted.
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered		
· IN/A	Council not assessed this	
SA12: To improve health and reduce health inequalities	Access to GP: 538m from, Dr D.O Edwards & Partners (within 7 minute walk) Access to Leisure: Within 1.2km of 1 Childrens Play Areas and 0 allotments. New development may not be well located with regards to existing recreational facilities.	No comment as planning permission already granted.
SA13: To improve the		
education and skills levels of the population overall	Primary: 825m from Sherdley Primary School Secondary: 2.29km from St Cuthberts Catholic Community College	No comment as planning permission already granted.
SA14: To ensure local residents have access to employment opportunities	2m from the Reginald Road industrial estate and Abbotsfield road	No comment as planning permission already granted.
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing site on land not suitable/attractive for employment (former industrial estate in need of regeneration).	No comment as planning permission already granted.
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential to deliver in the plan period .1.59km away from Shell pipeline	No comment as planning permission already granted.
SA17: To reduce poverty and social exclusion N/A		
SA18: To reduce crime, disorder and the fear of crime N/A	Council not assessed this	
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	84m from a bus stop and 495m from a train station	No comment as planning permission already granted.
SA20: To improve access to and use of basic goods, services and amenities in	Residential site within 230m to the nearest convenience store (Best One) and 1.2km from a supermarket	No comment as planning permission already granted.

Total Score: 50 50

Key of Council's SA Scoring:

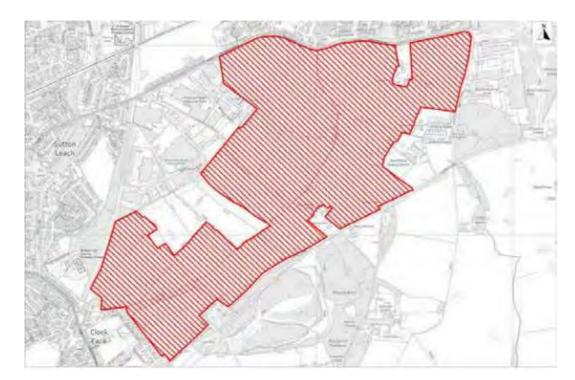
Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 4HA Site Location: Bold Forest Garden Suburb Allocated or Safeguarded? Allocated



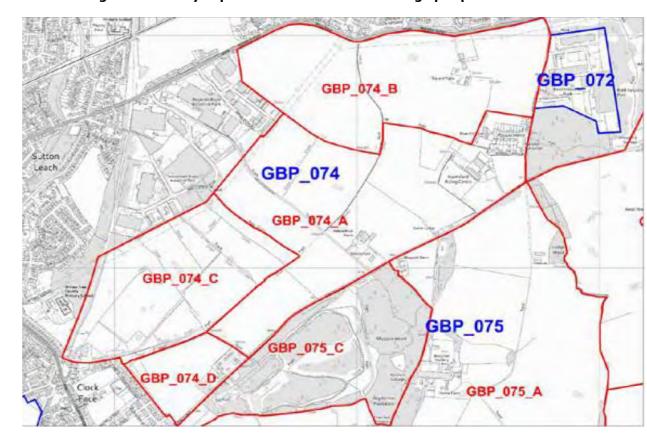
Council Assumptions	<u>Pegasus Comments</u>
Site Size: Total: 132.86 ha	Accurate, no comments.
Indicative Site Capacity: 2988	We raise questions about the total 2,988 figure because it is unclear from the evidence at this stage whether all landowners are willing to develop the site (9 private landowners appear to have no affiliation with housebuilders or land promoters). We therefore reserve the right to comment on this matter further, as although it is to be expected that a site of this scale would come forward in phases, we still have concerns about the availability of a number of land parcels within the 4HA allocation.
Assumed Net Developable Area: 75% (therefore 99.6 ha)	
Assumed Density: minimum 30 units per hectare	

Planning History: None of note- planning history relates to minor applications.

<u>Land Ownership/Availability:</u> 11 Landowners: St Helens Council are the main landowner, followed by Taylor Wimpey and Margaret and Bernard Grace. The other 8 landowners are all private owners who are not affiliated with a housebuilder or developer, nor are Margaret and Bernard Grace.

The site has been assessed as 4 separate Green Belt Parcels (GBP_074A, GBP_074B, GBP_074C and GBP_074D). For ease of reading we have only copied the overall Council ratings per parcel.

Green Belt Purpose	Council Rating for GBP_074A	Council Rating for GBP- 074B	Council Rating for GBP-074C	Council Rating for GBP-074D
1. To check the unrestricted sprawl of large built up area	Medium	Medium	Low	Low
To prevent neighbouring town merging into one another	Low	Low	Low	Low
3. To assist in safeguarding the countryside from encroachment	Low	Low	Low	Low
Overall Assessment	Medium	Medium	Low	Low
Council's concluding comments	moderate role in checking the outward expansion of Sutton (Bold) into the countryside,	the 3 purposes assessed as	a limited role in checking the outward expansion of Clock Face (Bold)	The sub-parcel plays a limited role in checking the outward expansion of Clock Face (Bold) into the countryside, and plays no real part in a strategic gap.





Pegasus Comments on whole 4HA Allocation

Green Belt Purpose	Pegasus Rating	Pegasus Comments
To check the unrestricted sprawl of large built up area	Low	The combined 4HA land parcel benefits from strong and permanent boundaries on all sides, albeit part of the northern boundary is not due to its irregular boundary. This area is a Local Wildlife Site, so again provides a strong boundary.
2. To prevent neighbouring town merging into one another	Low	Whilst the release of green belt land is significant, it would not reduce the large gap present between Bold and Warrington. Gorsey Lane and Clock Face Country Park are boundaries which could prevent any further merging or development to the south.
To assist in safeguarding the countryside from encroachment		Whilst the site is well contained and has a landscape character which has been effected be existing urban features to the north, there are some very open views over the site. Views from Bold Lane looking southwards, as well as views from Neills Road looking westwards are very open and long-line in nature. Furthermore, because there is very limited vegetation within the main land parcel, the site bears many characteristics of the open countryside. We therefore score the site as medium against purpose 3 of the Green Belt.
4. To preserve the setting and special character of historic towns.	Low	The site is not located near to any historic towns, nor next to any conservation Areas or Listed Buildings. Therefore, it provides a low contribution to this purpose of the Green Belt.
Overall Assessment	Low	Overall, the site has a low contribution to the purposes of the Green Belt, given its strong boundaries and the fact that it does not cause merger issues. That said, the site is still open in nature and bears many characteristics of the open countryside.

Suitability/Site Constraints

Access	Bold Road in the north, Neils Road to the east and Gorsey Lane to the south all allow for access. The west part of the site is enclosed by Reginald Road Industrial Estate and existing dwellings. There are existing bus stops which provide routes to St Helens. St Helens Junction railway station is around 500m away which provides services to Liverpool and Manchester.
Heritage	The are no listed buildings or scheduled monuments within the site. The Old Moat House Medieval Moat, Scheduled Monument is within 1km of the site and 3 other Grade II listed building
Flood Risk	Flood zone 1
Landscape	Flat fields which are open in nature. There are pylons running through the north of the site.
Ecology/Trees	There are some trees within the site. Clock Face Country Park is to the south of the site.
Agricultural Land	Mainly made up of Grade 3 (good to moderate)

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Parcel GBP-74-b (56) overlaps with a TPO and parcel 070 (55) is 5m from a TPO. Parcel 070_A and 070_C both overlap a Local Wildlife Site and Local Site (Field north of Gorsey Lane). Effects considered likely.		The red line boundary does not contain a Local Wildlife Site. We are unaware of the TPO position on site, therefore score the site as amber in this category.
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-2. On average over 95% of the parcels contain ALC Grade 3, totalling 157.8Ha. Effects considered likely.		No comment
SA3: To improve air quality in St Helens		Potentially large-scale site (up to 2,900 units) located between 1529m - 19		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 705m from nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site overlaps with Bold Forest Park (0m) and the site presents opportunities for enhancement of GI network.		No comment



SA6.1 To minimise the risk of flooding from all potential is no residuely risk to people and properties 103% of sets is located in Flood /one 1 No comment SA7.1 To protect, enhance and make accessed to residue the flood of the sets of the sets of the set of the sets					
no residual risk to people and properties SA7: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic societies an	SA6: To minimise the risk of				
no residual risk to people and properties SA7: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic societies an	flooding from all potential				
No comment. SAP: To protect, enhance and make access to enable the proportion of energy both purchased and generated from renewable and of salts. To improve health and connected or recovered with population overall except to the p	·				
Properties 10% of site is located in Flood Zone 1 No comment No					
SAP: To protect, enhance and make access to and institute energy proportion of energy both purchased and generated from renewable and SAI: To ensure health inequalities SAI: To improve the ability health inequalities SAI: To improve the enablity health inequalities SAI: To improve the enablity health inequalities SAI: To improve the enablity health inequalities SAI: To restrict prove a scores to and readled shall be access to employment steel, and all of the greated shall be access to employment as excess to and province of the population overall SAI: To restrict province and excess to employers a strong, divines and the steel is within 1.0 mm of 2 per 1.0	_ = =				
make accessible for enjoyment, landscapes, townscapes and the SAST 10 protects, enhance and make accessible for enjoyment, the cubural heritage and laheric SAST 20 protects, enhance and make accessible for enjoyment, the cubural heritage and laheric SAST 20 protects, enhance and protection and enhancement of high quality public open SAST 20 protects and enhancement of high quality public open SAS	properties		100% of site is located in Flood Zone 1		No comment
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disorder and the fear of crime N/A Council not assessed this	SA12: To improve health and reduce health inequalities SA13: To improve the education and skills levels of the population overall SA14: To ensure local residents have access to employment opportunities SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the		Access to GP: Majority of the site is within 1.1km of a health centre, however Parcel 074_A & D are within 1.7km and 074_C is 0.4km from DR D O EDWARDS & PARTNER GP surgery. Access to Leisure: Majority of the site is within 1.2km of 1 facility. Primary . Sub-parcels 0734_A and GBP_074_B are not within 1.2km of a primary school. Secondary: Site between 1.3km and 2.7km driving distance from The Sutton Academy and St Cuthbert's Catholic Community College Majority of the site is within 100m of an employment site, and all of the site is within 1.14km of an employment site. Housing site on land suitable for employment and housing. Potential to deliver 4805 units in 0-15 years, and 2,420 units in 15-30 years. Total estimates for the site are 1,135 units over various delivery periods.		As per the above, due to the size of the site it is not sustainable in all areas. The development of this site should seek to potentially provide a school on site. No comment No comment Agreed that the site is deliverable, but raise concerns about houses being delivered in the
N/A Council not assessed this	SA12: To improve health and reduce health inequalities SA13: To improve the education and skills levels of the population overall SA14: To ensure local residents have access to employment opportunities SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the horough SA17: To reduce poverty and social exclusion	N/A	Access to GP: Majority of the site is within 1.1km of a health centre, however Parcel 074_A & D are within 1.7km and 074_C is 0.4km from DR D O EDWARDS & PARTNER GP surgery. Access to Leisure: Majority of the site is within 1.2km of 1 facility. Primary . Sub-parcels 0734_A and GBP_074_B are not within 1.2km of a primary school. Secondary: Site between 1.3km and 2.7km driving distance from The Sutton Academy and St Cuthbert's Catholic Community College Majority of the site is within 100m of an employment site, and all of the site is within 1.14km of an employment site. Housing site on land suitable for employment and housing. Potential to deliver 4805 units in 0-15 years, and 2,420 units in 15-30 years. Total estimates for the site are 1,135 units over various delivery periods.		As per the above, due to the size of the site it is not sustainable in all areas. The development of this site should seek to potentially provide a school on site. No comment No comment Agreed that the site is deliverable, but raise concerns about houses being delivered in the
	SA12: To improve health and reduce health inequalities SA13: To improve the education and skills levels of the population overall SA14: To ensure local residents have access to employment opportunities SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the horough SA17: To reduce poverty and social exclusion	N/A	Access to GP: Majority of the site is within 1.1km of a health centre, however Parcel 074_A & D are within 1.7km and 074_C is 0.4km from DR D O EDWARDS & PARTNER GP surgery. Access to Leisure: Majority of the site is within 1.2km of 1 facility. Primary . Sub-parcels 0734_A and GBP_074_B are not within 1.2km of a primary school. Secondary: Site between 1.3km and 2.7km driving distance from The Sutton Academy and St Cuthbert's Catholic Community College Majority of the site is within 100m of an employment site, and all of the site is within 1.14km of an employment site. Housing site on land suitable for employment and housing. Potential to deliver 4805 units in 0-15 years, and 2,420 units in 15-30 years. Total estimates for the site are 1,135 units over various delivery periods.		As per the above, due to the size of the site it is not sustainable in all areas. The development of this site should seek to potentially provide a school on site. No comment No comment Agreed that the site is deliverable, but raise concerns about houses being delivered in the
	SA12: To improve health and reduce health inequalities SA13: To improve the education and skills levels of the population overall SA14: To ensure local residents have access to employment opportunities SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the horough SA17: To reduce poverty and social exclusion	N/A	Access to GP: Majority of the site is within 1.1km of a health centre, however Parcel 074_A & D are within 1.7km and 074_C is 0.4km from DR D O EDWARDS & PARTNER GP surgery. Access to Leisure: Majority of the site is within 1.2km of 1 facility. PITHINITY: SUD-PARCES 0754_A and GBP_074_B are not within 1.2km of a primary school. Secondary: Site between 1.3km and 2.7km driving distance from The Sutton Academy and St Cuthbert's Catholic Community College Majority of the site is within 100m of an employment site, and all of the site is within 1.14km of an employment site. Housing site on land suitable for employment and housing. Potential to deliver 4805 units in 0-15 years, and 2,420 units in 15-30 years. Total estimates for the site are 1,135 units over various delivery periods. Non-employment site		As per the above, due to the size of the site it is not sustainable in all areas. The development of this site should seek to potentially provide a school on site. No comment No comment Agreed that the site is deliverable, but raise concerns about houses being delivered in the



SA19: To reduce the need to		
travel, encourage alternatives		
to the car and other motor		
vehicles, improve highway		
safety and make the best use		
of existing transport		
infrastructure	Within 159m of Bus Stop. Regular frequency service.	No comment
SA20: To improve access to		
and use of basic goods,	Majority of the site is within 500m from a convenience store or	Generally agree, but again note that due to the size of the site some areas are more
services and amenities in	supermarket	sustainably located than others.
town and local centres		

Note: Land parcel assessed in SA is larger and differs to final red line proposed for 4ha allocation.

Total Score: 43.5 43

Key of Council's SA Scoring:

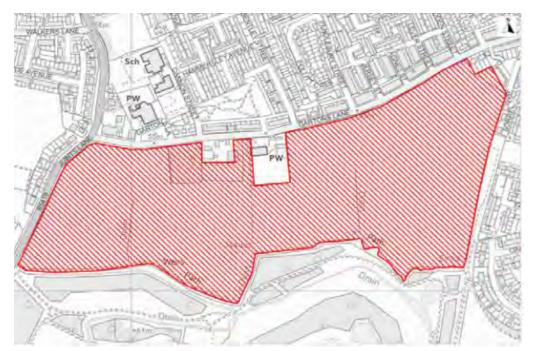
Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 5HA Site Location: Gartons Lane, Bold



Allocated or Safeguarded? Allocated

Council Assumptions	Pegasus Comments
Site Size: 21.67 ha	Accurate, no comments.
Indicative Site Capacity: 569	No comment, albeit reserve the right to comment on assumed delivery rates at a later date.
Assumed Net Developable Area: 75% (therefore 16.25 ha)	No Comment
Assumed Density: minimum 35 units per hectare	No comment

Planning History:

None

Land Ownership/Availability: 3 Landowners- St Helens Council, Malcolm and Stuart Sumner (Taylor Wimpey have land option on this land) and Bromilow Holdings.

Green Belt Parcel Reference: GBP_080

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The parcel bounders Gartons Lane to the north, the urban edge of Clock Face to the east, Jubits Lane to the West and the protected Sutton Manor Woodland makes the southern boundary. The parcel adjoins Clock Face to the north and has strong boundaries, therefore is well contained and should not lead to unrestricted sprawl.	Low	We agree with the overall low score, albeit would note that the southern boundary is not strong or as well-defined as the other boundaries. Whilst this is protected open space and a dense tree area, this is still not as strong as a road or building boundary.
To prevent neighbouring town merging into one another	Low	Although the parcel prevents the merging of Sutton Manor with Clock Face, these two settlements are not considered as large built up areas in the context of this Green Belt Review and have already merged to some degree to the north-west.	Low	Agreed and no comment
3. To assist in safeguarding the countryside from encroachment	Low	The parcel has a semi-rural character due to encroachment from existing urban development. Although the site has an open aspect, the perception of open countryside is only gained when looking out to the south and over Sutton Manor Woodland. The parcel itself is only small in area and residential development is clearly visible when viewed from the south, east and west.	Medium	Whilst the site has been effected by surrounding urbanised features, there is limited tree coverage and shrubbery within the land parcel itself. This leads to the site having a rural and open character. Views from Gartons Lane towards Suton Manor Woodland are very open and not hidden by trees or shrubbery along this boundary. We therefore score the site as medium against this purpose of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	No heritage concerns likely to arise given no listed buildings, conservation areas nearby.
Overall Assessment	Low	This parcel makes little or no contribution to the 3 purposes assessed as part of the review. The site is well contained with strong boundaries and does not form part of the wider strategic gap.	Low-	Whilst the site is well contained with strong boundaries on 3 sides, it has a countryside and open character due to limited urbanising and natural features within the site boundary. Views are particularly sensitive from Gartons Lane, due their openness. We therefore score the site as providing a low-moderate contribution overall.
Key -Low Contribution - LC	Mediun	n Contribution - MC High Contribution - HC		



Suitability/Site Constraints

Access	The site can be accessed off Gartons Lane to the north and the B5419 to the west but there is limited access to the south as this borders onto Sutton Manor Woodland. There are many bu	
Heritage	There are no listed buildings, scheduled monuments or conservation areas within or near to the site.	
Flood Risk	Flood Zone 1	
Landscape	Protected open space to immediate south (Sutton Manor Woodland)	
Ecology/Trees	Sparse tree coverage on site, albeit tree bund to immediate south.	
Agricultural Land	Grade 3 (good to moderate)	

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Effects considered unlikely. Site is 292m from Local Wildlife site.		No comment
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-2. There is 100% (22.32ha) overlap with ALC Grade 3. Potential adverse effects.		No comment
SA3: To improve air quality in St Helens		Large sized development (520 units) over 2.7km from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 2.2km from nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site overlaps with Bold Forest Park and presents opportunities for enhancement of GI		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site is located in Flood Zone 1.		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the		99.8% of the site is within Low- Medium or Medium landscape sensitivity area. Over 1.7km from a prominent ridge line.		Agreed, albeit as previously discussed this land parcel is quite open and therefore sensitive from a landscape perspective
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Effects considered unlikely.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site overlaps with Open Space. PROW intersects centre of the site (severance may be likely)		No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount of waste, and in order of priority, the proportion of			
waste reused, recycled and composted or recovered	N/A	Council not assessed this	
SA12: To improve health and reduce health inequalities		Access to GP: Within 485 m distance from Four Acre Health Centre (within 10minutes walk) Access to Leisure: Within 1.2km of 4 children's play areas and 2 allotment areas	Ageed and no comments
SA13: To improve the education and skills levels of the population overall		Primary: 111m from St Theresa's Catholic Primary School Secondary: Over 1.5km from The Sutton Academy	No comment
SA14: To ensure local residents have access to employee access to		609m to Lea Green Industrial Estate	No comment
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic		Housing site on land not suitable/attractive for employment	No comment
SA16: To improve access to a range of good quality and affordable housing that meets		riousing site on land not suitable/attractive for employment	No comment
the diverse needs of the SA17: To reduce poverty and		Potential to deliver 520 units over 0-15 years.	Agreed as site does not have many constraints.
social exclusion	N/A	Non-employment site	
SA18: To reduce crime, disorder and the fear of crime	N/A	Council not assessed this	
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport		Site contains is adjacent to several Bus Stops with frequent service.	
infrastructure SA20: To improve access to			No comment
and use of basic goods, services and amenities in		Residential site within 400m of a convenience store (SKS Late Shop) or supermarket	No comment
		_	•

Total Score: 53

Key of Council's SA Scoring:

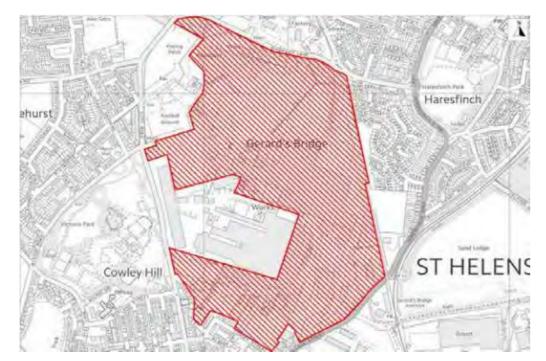
Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 6HA Site Location: Land at Cowley Street, Town Centre Allocated or Safeguarded? Allocated



Council Assumptions	Pegasus Comments
Site Size: 31.09ha	Accurate, no comments.
Indicative Site Capacity: 816	We would question this number and highlight that this could in reality be lower, due to the flood risk constraints as well as potential land contamination issues which may reduce overall site capacity. Noise will also be a key consideration which could influence overall site capacity and reduce numbers. We therefore reserve the right to comment on the likelihood of the site delivering 816 at a later date.
Assumed Net Developable Area: 75% (therefore 23.32 ha)	As above- this could in reality be lower due to flood zone areas and potential contamination issues. There will also likely be a need for a development set backs to alleviate concerns about noise with the railway line to the east and the employment development to the north. The wooded area to the north also poses as a constraint.
Assumed Density: minimum 35 units per hectare	This may differ given the site constraint concerns we raise above.

Planning History:

P/2006/1147 (Mixed use development comprising residential (210 units), B1, B2 & B8 employment units, bowling green, environmental improvements and new access arrangements.)- Approved

Bellway housing estate located directly adjacent to red line boundary.

Land Ownership/Availability: 1 landowner (Pilkington Flat Glass Ltd)

Green Belt Parcel Reference: N/A (Brownfield)

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments	
1. To check the unrestricted sprawl of large built up area	N/A		N/A		
2. To prevent neighbouring town merging into one another	N/A		N/A		
3. To assist in safeguarding the countryside from encroachment	N/A		N/A		
4. To preserve the setting and special character of historic towns	N/A		N/A		
Overall Assessment	N/A		N/A		
Key -Low Contribution - LC	Key -Low Contribution - LC Medium Contribution - MC High Contribution - HC				



Suitability/Site Constraints

Access	Access to the site is available via Windle City to the west. St Helen's Railway Station is within an approximate 20 minute walk from the southern extremity of the site. Regular bus services run along City Road to the immediate west of the site.
Heritage	No Listed Buildings, Ancient Scheduled Monuments or Conservation Areas are located within or adjacent to the site.
Flood Risk	The majority of the site is located within Flood Zone 1, but a small portion of the site is located within Flood Zones 2 and 3.
Landscape	Brownfield site surrounded by built form, therefore not particularly sensitive albeit the wooded tree area to the north would need to be carefully considered.
Ecology/Trees	A large woodland/tree area is located within the northern section of the site. There are also trees along the eastern site boundary. The SA indicates there are protected trees on site.
Agricultural Land	N/A- brownfield
Contamination	It is likely that there could be contamination issues on site, given that a factory is still located on site.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Negative effects likely due to the presence of a local wildlife and protected trees on si		No comment
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-3. Therefore neutral effects are predicted.		No comment
SA3: To improve air quality in St Helens		The site is 880m from an AQMA and will generate increased car traffic.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 2.5km from nearest groundwater source protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		95.87% of site is located in Flood Zone 1, 4.13% located in Flood Zone 2 and 2.86% located in Flood Zone 3 therefore effects are unlikely. The scale of the site means it should be possible to avoid flood zones 2/3.		Agreed that the presence of flood zone 2 and 3 is a constraint that will need to be considered at the detailed design stage.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		98% of the site is within a Low sensitivity , 0.01%Low- Medium and 1.81% Medium landscape sensitivity area. Therefore effects are unlikely as landscape will not be effected. 119m from a prominent ridge line though.		No comment No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		535m to a conservation area, 61m to a listed building, 1.38km from an archaeological interest, 802m from a registered park and 837m distance to ancient monument effects are unlikely due to the being over 50m from heritage assets.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		13m to Open Space. The site is adjacent to a PROW (severance unlikely)		No comment No comment

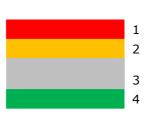


SA10: To minimise energy use and increase the				
proportion of energy both				
purchased and generated from renewable and				
	N/A	Council not assessed this		
SA11: To reduce the amount of waste, and in order of				
priority, the proportion of				
waste reused, recycled and				
composted or recovered	N/A	Council not assessed this		
SA12: To improve health and				No comment
reduce health inequalities		Access to GP: 498m from, Dr D.O Edwards & Partners (within 6 minute walk)		
6442. To investor the		Access to Leisure: Within 1.2km of 7 Children's Play Areas and 1 Allotments		No comment
SA13: To improve the education and skills levels of				No comment
the population overall		Primary: 548m from Parish CofE Primary School		NO COMMENT
		Secondary: 2.32km from St Augustine of Canterbury Catholic High School		No comment
SA14: To ensure local residents have access to				
employment opportunities		1.2km from the Pilkingtons Cowley Hill Works		No comment
SA15: To support a strong,				
diverse, vibrant and sustainable local economy to				We agree that residential development on this site would lead to the loss of a site suitable
foster balanced economic				for employment purposes. Although the site is currently vacant since the Pilkington Factory
growth		Housing site on land suitable for employment		closed, it is still in a location highly suitable for alternative employment uses. we would cast some doubt over the deliverability of this site, in terms of potential
SA16: To improve access to a				contamination issues. As a brownfield site which is home to former but now vacant factory
range of good quality and affordable housing that meets				buildings, not only would the demolition of these and site assembly delay delivery
the diverse needs of the				timescales, there may also be contamination issues. We reserve the right to comment on
borough		Potential to deliver in the plan period. 10.5km away from Shell pipeline.		this matter further at a later stage, when the deliverability of this site is covered in more detail.
SA17: To reduce poverty and		Toterida to deliver in the plan period. 10.5km away from Shell pipeline.		uctuii.
social exclusion	N/A			
SA18: To reduce crime,				
disorder and the fear of crime	N/A	Council not assessed this		
SA19: To reduce the need to				
travel, encourage alternatives				
to the car and other motor vehicles, improve highway				
safety and make the best use				
of existing transport				
infrastructure		26m from a bus stop and 1.2km from a train station		No comment
SA20: To improve access to				
and use of basic goods, services and amenities in		Residential site within 208m to the nearest convenience store (LT convenience Store		
town and local centres) and 752m from a supermarket (Iceland frozen food)		No comment
		<u> </u>		•
Total Score:	47		45	

Key of Council's SA Scoring:

Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects

Key of Pegasus scoring:





Local Plan Reference: 7HA Site Location: Land west of Mill Lane, Newton-le-Willows Allocated



Council Assumptions	Pegasus Comments
Site Size: 8.03ha	Accurate, no comments.
Indicative Site Capacity: 181	We raise concerns over the overall assumed capacity of 181 dwellings. There are noise and heritage issues to consider on this site, both of which will reduce the overall number of housing to be delivered. We reserve the right to comment on this at a later date.
Assumed Net Developable Area: 75% (therefore 6.02 ha)	As above- the NDA may be lower due to noise and heritage constraints.
Assumed Density: Minimum 30 dwellings per hectare	No comment

Planning History:

P/2010/0855-(Demolition of existing residential, administration and staff accommodation buildings and erection of 32.no bed secure childrens home with reception, admissions and management area and associated secure perimeter wall / fence, external areas, landscaping and access / road layout proposals.) **APPROVED AND CONSTRUCTED BUT NOW CLOSED**

Land Ownership/Availability: No Land Title on Land Registry Website

Green Belt Parcel Reference: GBP 42

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The parcel contains residential properties and the former Red Bank Community Home that radiate out southwards from the large built-up area of Newton-le-Willows. The parcel is bounded to the north by the West Coast Mainline that is in a cutting, leading to agricultural land and residential development, to the east by the A49 Mill Lane, to the south by Newton Brook and agricultural land and to the west by the West Coast Mainline railway line. The parcel is therefore well contained to the north, east and west. Given the level enclosure and the brownfield nature of part of the site, it is considered that development of the parcel would not lead to unrestricted sprawl.	Low	Agree that the site benefits from an overall low contribution to this purpose of the Green Belt, albeit would highlight that the southern boundary is not strong or permanent.
To prevent neighbouring town merging into one another	Low	The parcel does not fall within a strategic gap between two towns. The nearest towns that are not "washed over" by Green Belt are: Newton-le-Willows which lies 80m north of the parcel and Winwick, Warrington which lies approximately 1.2km south of the parcel. A strategic gap could be maintained between Winwick and Newton-le- Willows if this parcel was developed.	Low	Agreed, no comment
3. To assist in safeguarding the countryside from encroachment	Low	The parcel has strong permanent boundaries to the north, east and west and is well contained. A large amount of the parcel (approximately 30%) consists of built development. Given the high level of enclosure and the presence of the existing development, it is considered that the parcel does not have a strong sense of openness or countryside character.	Low	Agreed, no comment
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	The site immediately borders a registered battlefield (Battle of Winwick), which although is a key heritage asset is not strictly related to the setting or special character of Newton-le-Willows.
Overall Assessment	Low	Given the high level of enclosure and the brownfield nature of part of the site, it is considered that development of the parcel would not lead to unrestricted sprawl and it does not have a strong sense of openness or countryside character.	Low	Overall the site benefits from being well-contained (other than the southern boundary) and is already home to built-form, which limits openness.
Key -Low Contribution - LC	Mediur	n Contribution - MC High Contribution - HC		

Note: The GB parcel assessed in the Council's assessment is larger and differs to the final red line of the proposed site allocation.



Suitability/Site Constraints

Access	Access options are available via the A49 to the east. The nearest railway station (Newton-le-Willows) is approximately 1.6 miles to the north-west. Low frequency bus services to the immediate east of the site.	
Heritage	Registered battlefield (Battle of Winwick) immediately borders the site to the south-east	
Flood Risk	The site is located within Flood zone 1.	
Landscape	Part brownfield, views from Mill Lane screened due to shrubbery and hedgerow.	
Ecology/Trees	The SA states the site contains a Local Wildlife Site and a TPO, therefore is sensitive in terms of ecology and tree matters.	
Agricultural Land	Grade 3 (Good to Moderate)	

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site contains a Local Wildlife Site (Newton Brook) and a TPO		No comment
SA2: To protect and improve land quality in St Helens		Site contains a 100% overlap with Grade 3 agricultural Land (13.72Ha), but less that the criteria considered to lead to likely effects.		No comment
SA3: To improve air quality in St Helens		Medium size site (180 units) located 827m from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Within a ground water protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 91% in Flood Zone 1, 9% in Flood zone 2 and 8% in Flood Zone 3.		The SA Site Area differs to the red line boundary of the proposed allocation. The allocation looks like it has excluded the flood zone area and therefore is located entirely within flood zone 1.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		90% of site within a Medium-High or High Landscape Sensitivity area and 10% in Low/Medium landscape sensitivity area. Site is over 6.4km from prominent ridgelines		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Site of Archaeological Interest is 19m from the site and 313m to the nearest listed building. Effects possible.		Registered Battlefield (Battle of Winwick) immediately borders the site to the south-east and poses a constraint to development on site.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		28m from open space. There is a Public Right of Way on site (severance possible if not designed inclusively)		No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		

Likely to promote positive effects



SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
composted or recovered N/A	Α	Council not assessed this	
SA12: To improve health and			A considerable the state of the block that the sales are the considerable to sales a sales and the sales are the s
reduce health inequalities		Access to GP: 1.2 km from Dr M Rahman & Partners	Agreed, albeit we would highlight that the site is not the most sustainable location in
		Access to Leisure: Within 1200m of 3 Children's Play Areas and 2 Parks/Gardens	relation to the main services in Newton-le-Willows.
SA13: To improve the			
education and skills levels of			No comment
the population overall		Primary: 1.08km from St Peter's CofE Primary School	No comment
		Secondary: 2.05km from Hope Academy	
SA14: To ensure local			
residents have access to		962m from Vulcan Industrial Estate	No comment
SA15: To support a strong,			
diverse, vibrant and			
sustainable local economy to			
foster balanced economic		Housing site on land not suitable/attractive for employment.	No comment
SA16: To improve access to a		Trousing site of failu flot suitable/attractive for employment.	No comment
range of good quality and			Agree that the site could deliver early on in the plan period, albeit raise some concerns
affordable housing that meets			about the overall amount of dwellings that could be delivered given the heritage, flood risk
the diverse needs of the			and noise issues.
horough		Potential to deliver 180 units over 0-15 years.	
SA17: To reduce poverty and	/Δ	Non-employment site	
CA19. To reduce crime		Hon employment site	
disorder and the fear of crime			
	A	Council not assessed this	
SA19: To reduce the need to			
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway		7m from bus stop. Low frequency service	
safety and make the best use			
of existing transport			
infrastructure			No comment
SA20: To improve access to			The Esso petrol station on Mill Lane is located 850m from the northern section of the site.
and use of basic goods,			The site is thereore not sustainably located in relation to local shops, and falls within the
services and amenities in		Residential site 609m from nearest convenience store (Rontec) or supermarket.	800-1200m category of the Council's methodology (therefore yellow).
town and local centres		the state of the s	

^{*}Note: The SA Assessment covers a larger land area than the proposed red line area for the allocated site.

Total Score: 45.5	45.5
Key of Council's SA Scoring:	Key of Pegasus scoring:
Unlikely to have significant effects	1
Likely to generate negative effects Potentially negative effects which	2
could be mitigated	3



Local Plan Reference:	8HA	Site Location:	Land south of Hig	her Lane and East
	Harm		A	
			40	Site Size: 11.49
	Dia	Il House	1//	Indicative Site (
		Nood E	The Lage	Assumed Net De
Rookery Farm King George's			Volume 1	Assumed Densit
Diamond Business Park				Planning History
ure Lane Bridge (Greater)		Sinh4	Sha	Land Ownership c/o the Estate Offi
// MIII	34	Was Mazel	Way.	

ast of Rookery Lane, Rainford	Allocated or Safeguarded?	Allocated
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Council Assumptions	Pegasus Comments
Site Size: 11.49 hectares	Accurate, no comments.
<u>Indicative Site Capacity:</u> 259 dwellings	No comment, albeit reserve the right to provide detailed comments on assumed delivery rates at a later date.
Assumed Net Developable Area: 8.6 hectares (75%)	Realistic, no comments
Assumed Density: 30 dwellings per hectare	Realistic, no comments

Planning History: No planning history for the site

Land Ownership/Availability: The site has one landowner (MS522607). The landowner is The Right Honourable Edward Richard William Earl of Derby c/o the Estate Office. Miller Homes have an option on this land.

Green Belt Parcel Reference: GBP_098

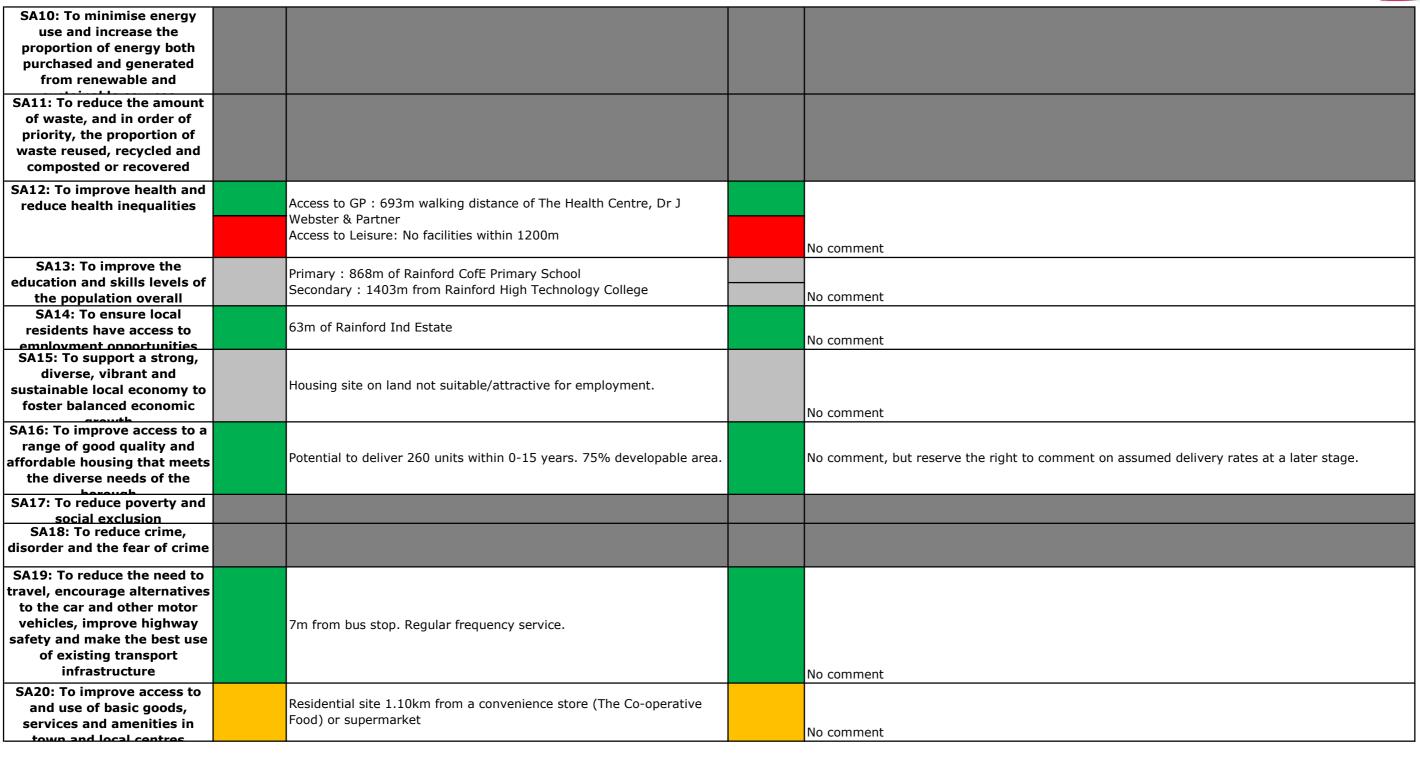
Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The sub-parcel is well contained by the strong physical boundaries of Higher Lane to the north-east; woodland belt (protected) to the south-east; Rainford Industrial Estate and Rainford Linear Park to the south-west; and Rookery Lane to the north-west. It does not directly adjoin or lie in close proximity to an identified large built-up area.	Low	The site benefits from strong and defensible boundaries on all sides.
To prevent neighbouring town merging into one another	Low	The sub-parcel lies adjacent to the identified settlement of Rainford, although its role in preserving the integrity of a strategic gap between Rainford and other identified settlements is limited.	Low	The site does not play an important role in terms of preventing the merging of Rainford and other settlements.
3. To assist in safeguarding the countryside from encroachment	Low	The sub-parcel contains little inappropriate development; however it is well enclosed on all sides. Existing development of an urban nature lies directly adjacent to the north-west (housing) and south-west (industrial estate).	Low-	The site has been effected by existing urbanising features to the south, north-west and west. Whilst the site is relatively well enclosed, it's most sensitive views are from Rookery Lane looking eastwards because there is relatively limited shrubbery on site. Due to the open views from Rookery Lane we score the site as low-medium, albeit overall the site has lower sensitivity because of the urbanised features and strong boundary hedgerow.
4. To preserve the setting and special character of historic towns	N/A		Low	The site is located opposite two listed buildings, however strictly speaking this purpose of the Green Belt relates to historic towns, which is not applicable in this location.
Overall Assessment	Low	The sub-parcel's role in preventing sprawl and the merger or settlements is limited; and its development would not result in significant countryside encroachment.	Low	Overall the site benefits from strong boundaries and is well enclosed, however we do note that the site does appear very open in nature when looking eastwards from Rookery Lane.
Key -Low Contribution - LC	Mediun	Contribution - MC High Contribution - HC		



Access	There are two options to gain access to the site: Rookery lane to the west of the site and Higher Lane to the north of the site. There are bus stops both on Higher Lane and Rookery Lane which offer regular services to Ormskirk, Rainford, Ashton, St Helens, Rainford. There is a rail station in Rainford which is located 2.9km to the north of the site. The M58 is located approximately 6km to the north of the site.
Heritage	On the northern boundary of the site, there are two listed buildings: Barn to north of Dial House (Grade II) and Dial House. These heritage assets look directly onto this parcel and therefore these would need to be taken into consideration for development to come forward on site.
Flood Risk	Flood Zone 1
Landscape	SA notes how the site is located in a medium-high landscape sensitivity area.
Ecology/Trees	A tree lined hedgerow runs through the site from north to south. Along the northern boundary of the site, there is a dense wooded area however this is not included within the red line boundary. The eastern boundary of the site is made up of a dense wooded hedgerow. The Rainford Linear Park tracks forms the southern boundary of the parcel and this is tree lined on either side of the footpath.
Agricultural Land	The majority of the site is made up of Grade 1 agricultural land which is considered to be best and most versatile. There is a very minute percentage of the land which is Grade 2 agricultural land.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site contains TPO, effects likely.		No comment
SA2: To protect and improve land quality in St Helens		Site is made up of 93% Grade 1 Agricultural Land (12.25ha)		We disagree with the SA's methodology for scoring in this category. Grade 1 Agricultural Land has the highest level of protection given it is the best quality, therefore its loss should be seen as a negative factor in sustainability scoring, regardless of the site size.
SA3: To improve air quality in St Helens		Medium size site (260 units) located over 4.8km from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 5km from nearest protection zone.		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network and increased tree cover.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 100% in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of site within Medium-High or High Landscape Sensitivity area and 787m from prominent ridge		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		Listed building within 12m (Dial House). Development is likely to have a significant effect on the heritage asset unless screening is adopted.		Agreed that the nearby Listed Buildings pose as a constraint which needs to be carefully considered.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site sites within 0m of open space (with negligible overlap), but Public Right of Way on site (severance possible if not designed inclusively)		No comment

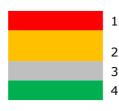




Total Score: 44.5 43.5

Key of Council's SA Scoring:

Likely to generate negative effects Potentially negative effects which could be mitigated Unlikely to have significant effects Likely to promote positive effects





Local Plan Reference: 9HA Site Location: Land at former Linkway Distribution Park, Elton Head Road, Thatto Heath Allocated or Safeguarded? Allocated



Council Assumptions	Pegasus Comments
Site Size: 12.39 hectares	Accurate, no comment.
Indicative Site Capacity: 350 units	The application on the site, approved in June 2018, approved 350 units so this site capacity is considered acceptable. Reserve the right to comment on housing trajectory and assumed delivery rates for the site, given that Reserved Matters consent is not yet in place.
Assumed Net Developable Area: 9.29 hectares (75%)	Accurate given planning permision in place.
Assumed Density: 38 hectares	Accurate given planning permision in place.

<u>Planning History:</u> P/2018/0060/FUL - Hybrid Planning application comprising of a full planning permission for demolition of existing buildings and structures and outline application all matters reserved except for access for residential development (up to 352 dwellings) and associated open space / green infrastructure. The application was granted on the 20th June 2018.

<u>Land Ownership/Availability:</u> There are two landowners within this parcel: Project Properties Ltd and St Helens Borough Council. St Helens BC only own one small parcel (MS512130). The rest is owned by Project Properties Ltd. MS452308, LA279049, LA161627, LA212902, MS599808.

Green Belt Parcel Reference: N/A (Brownfield Land)

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	N/A		N/A	
2. To prevent neighbouring town merging into one another	N/A		N/A	
To assist in safeguarding the countryside from encroachment	N/A		N/A	
4. To preserve the setting and special character of historic towns	N/A		N/A	



Overall Assessment					
	N/A			N/A	
Key -Low Contribution - LC	Mediun	n Contribution - MC	High Contribution - HC	l .	

Access	Access to the site will be taken off Sherdley Road which forms the western boundary of the site. The existing site includes two vehicular access points along Sherdley Road and these will be retained and used as the access to a site. Thatto Heath rail station is located 1.2km to the west and Lea Green is located 1km to the east. Between them they have good rail links to Wigan, Liverpool and Formby. There are bus stopes on Sherdley Road (the western boundary) offering regular services to St Helens, Sutton Heath and Parr.		
Heritage	The closest listed building to the site is Sherdley Hall Farmhorse. This is a Grade II listed building and is located 210m to the east of north eastern corner of the site. The development of the site is n		
Flood Risk	Flood Zone 1		
Landscape	andscape Not sensitive from a landscape perspective given brownfield nature and proximity to large built up area.		
Ecology/Trees	An ecological appraisal was carried out as part of the hybrid application and confirmed that a residential development at the site is acceptable.		
Agricultural Land	The site is within urban use and is not agricultural land.		
Contamination	Site remediation and clearance works will be required given there are existing buildings on site as part of Linkway Distribution Park. Ground contamination works were carried out as part of the approved application. EHO advised that no development will take place until a supplementary phase 2 site investigation and assessment shall be carried out and a remediation strategy is agreed.		

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Potentially adverse effects due to the site being 46m from a local wildlife site		No comment as planning permission already granted.
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-3. Therefore effects are neutral.		No comment as planning permission already granted.
SA3: To improve air quality in St Helens		The site is 1.5km from AQMA and proposed for housing use.		No comment as planning permission already granted.
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 1.6km from nearest ground water protection zone.		No comment as planning permission already granted.
SA5: To mitigate and adapt to the impacts of climate change		Site is 655m from Bold Forest Park. Potential to enhance green infrastructure links.		No comment as planning permission already granted.
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site is located in Flood Zone 1 therefore effects unlikely.		No comment as planning permission already granted.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of the site is within an area identified as being of low landscape sensitivity. Therefore effects are less likely. The site is 478m from a prominent ridge line.		No comment as planning permission already granted.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		1.73m to a conservation area, 229m to a listed building, 2.49km from an archaeological interest, 1.37km from a registered park and 1.33km distance to ancient monument. Given the distance from designated heritage assets, effects are unlikely. Furthermore, the site is currently a depot, and does not contribute positively to the cultural heritage of the area.		No comment as planning permission already granted.
SA9: Ensure access to and protection and enhancement		18m to Open Space. The site is adjacent to / intersected by a PROW (severance should be possible to avoid though)		



of high quality public open space and natural greenspace		No comment as planning permission already granted.
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and		No comment as planning permission already granted.
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered		
SA12: To improve health and reduce health inequalities	Access to GP: 386m from Dr D.B Brainbridge & Partners (within 4 minute walk) Access to Leisure: Within 1.2km of 4 Children's py Areas and 1 Allotment.	No comment as planning permission already granted.
SA13: To improve the education and skills levels of the population overall	Primary: 282m from St John Viannery Catholic Primary School Secondary: 732m from The Sutton Academy	No comment as planning permission already granted.
SA14: To ensure local residents have access to employment opportunities	1.2km from Suttons Transportation Depot	No comment as planning permission already granted.
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing proposed on land currently used for employment	No comment as planning permission already granted.
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential for delivery within the plan period .1.39km away from Shell pipeline	No comment as planning permission already granted.
SA17: To reduce poverty and social exclusion SA18: To reduce crime, disorder and the fear of crime		
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	1m from a bus stop and 1.3km from a train station	No comment as planning permission already granted.
SA20: To improve access to and use of basic goods, services and amenities in town and local centres	Residential site within 253m to the nearest convenience store (Everydayz) and 2km from a supermarket (Tesco)	No comment as planning permission already granted.

Total Score: 52

Key of Council's SA Scoring:

Likely to generate negative effects Potentially negative effects which could be mitigated Unlikely to have significant effects Likely to promote positive effects





Local Plan Reference: 10HA Site Location: Moss Nook Urban Village, Watery Lane Allocated or Safeguarded? Allocated



Council Assumptions	<u>Pegasus Comments</u>
Site Size: 26.74 hectares	Accurate, no comment.
Indicative Site Capacity: 802 dwellings	Whilst there is a live planning consent on site which has established that up to 1,200 dwellings could be delivered, we raise concerns about potential delivery rates. It is notable that the planning consent on the site has an elongated reserved matters timescale of 7
Assumed Net Developable Area: 20. 05 hectares (75%)	years. Furthermore, there are a number of remediation conditions attached to the permission given the former industrial use of the site. We therefore reserve the right to comment on detailed delivery rates at a later date and would raise potential concerns about the site delivering within the first 5 years of the plannerind
Assumed Density: 40 dwellings per hectare	No comment.

Planning History:

<u>P/2003/219/22 (Hybrid):</u> Demolition of existing buildings, provision of sports and recreational facilities, access roads, assosciated infrastructure and drainage works, open space and erection of new residential (up to 1,200 dwellings) and retail development (**Allowed at Appeal and by SoS: 23/05/2007**)

<u>P/2011/0058</u>: Section 73 application to vary conditions 4,33,34, 35 and 36 and remove conditions 31 and 32 of P/2003/219/22 (approved 22/05/2017)

<u>Land Ownership/Availability:</u> There are two landowners within this parcel: the Haworth Estate Investments and William Rainford Holdings. Haworth Estates own the majority of the land: MS547518, MS213675 and MS648371). William Rainford Holdings owns a small portion (MS180258).

Green Belt Parcel Reference (N/A- Brownfield)

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	N/A	N/A	N/A	N/A
2. To prevent neighbouring town merging into one another	N/A	N/A	N/A	N/A
3. To assist in safeguarding the countryside from encroachment	N/A	N/A	N/A	N/A
4. To preserve the setting and special character of historic towns	N/A	N/A	N/A	N/A
Overall Assessment	N/A	N/A	N/A	N/A
Key -Low Contribution - LC	Medium	Contribution - MC High Contribution - HC	!	



Access	The site can be accessed via Watery Lane, which runs along the eastern boundary of the site. There are two bus stops on Sutton Road (on either side of the road) offering irregular services to Newton-le-Willows, Earlstown, St Helens, Rainhill and Blackbrook. The nearest train station is St Helens Junction which is located 1.2km (walking distance) to the south of the site.
Heritage	Sutton Oak Welsh Chapel is a Grade II listed building, located on Sutton Road. This forms the southern/western boundary of the site.
Flood Risk	All the site is within Flood Zone 1. Around the northern boundary of the site is Sutton Brook and around this brook is Flood Zone 3 however this is not within the site boundary.
Landscape	Not particularly sensitive given brownfield nature and surrounding urban form.
Ecology/Trees	There are some large established trees on the site boundaries which would need to be retained where possible. There is very little tree growth and vegetation within the parcel.
Agricultural Land	Land is non-agricultural land and land is predominantley in urban use.
Contamination	Site remediation and clearance will be required on this site as a former works was located on this site.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site contains is 288m Local Wildlife site and is 89m to the nearest TPO.		No comment.
SA2: To protect and improve land quality in St Helens		Site includes 0% grade 1-2 agricultural land.		No comment.
SA3: To improve air quality in St Helens		Located 1.8km from AQMA. Could generate additional car traffic in the urban area.		No comment.
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Site is over 2km from ground water source protection zone.		No comment.
SA5: To mitigate and adapt to the impacts of climate change		Site is 285m from Bold forest Park. There is a brook nearby that could present opportunities for green infrastructure enhancement.		No comment.
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 100% in Flood Zone 1		No comment.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		Over 100% of the site is within an area classified as being of low landscape sensitivity. It is also 3.07 km from prominent ridgelines. Development will lead to enhancement of a currently derelict site		No comment.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Site is 19 m from a listed building		No comment.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Within 0m of public open space and a 148m from a Public Right of Way		No comment.
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and				



SA11: To reduce the amount		
of waste, and in order of		
priority, the proportion of		
waste reused, recycled and		
composted or recovered		
SA12: To improve health and	Access to GP: Site is 386m from Dr J r D'arcy and Partners	
	Access to Leisure: Within 1.2km of 4 Ch Play Areas, 1 allotment and 3 parks and	
reduce health inequalities	gardens.	No comment
SA13: To improve the	Primary: 578m from Sutton Oak CofE Primary school	
education and skills levels of	Secondary: 246m St Cuthberts Catholic Community College for Busines	
the population overall		No comment
SA14: To ensure local	Within 1m of Sutton Road Industrial Area	
residents have access to		No commont
employment opportunities		No comment
SA15: To support a strong,	Housing site on former employment land, which is in need of regeneration.	
diverse, vibrant and	Alternative sites nearby that are suitable to accomodate employment uses in the	No comment
sustainable local economy to	area	No comment
foster balanced economic		
SA16: To improve access to a	Potential to deliver over the plan period. Within 250m of landfill site, 4 mineshafts	
range of good quality and	which may reduce development capacity over 5.1km to Shell pipeline buffer zone	We raise concerns about this site delivering houses within the first five years of the plan
affordable housing that meets		period, given the remediation conditions attached to the permission as well as elongated
the diverse needs of the		timescales (7 years) for Reserved Matters.
SA17: To reduce poverty and		
social exclusion		
SA18: To reduce crime,		
disorder and the fear of crime		
SA19: To reduce the need to	11m from bus stop. Low frequency service	
travel, encourage alternatives		
to the car and other motor		
vehicles, improve highway		
safety and make the best use		
of existing transport		
infrastructure		No comment.
SA20: To improve access to	Residential site is located 68m to the nearest convenience store (Morrisons Petrol	
and use of basic goods,	Station) and 146m from nearest Supermarket (Morrisons).	
services and amenities in		Agrood
town and local centres		Agreed

Total Score: 50.5 49.5

Key of Council's SA Scoring:

Likely to generate negative effects
Potentially negative effects which
could be mitigated
Unlikely to have significant effects
Likely to promote positive effects





Local Plan Reference: 1HS Site Location: Land south of Leyland Green Road, Garswood Safeguarded



Council Assumptions	Pegasus Comments
Site Size: 12.92 ha	Realistic, no comment.
Indicative Site Capacity: 291	We raise concerns over this total figure, given that the SA flags up that there are 7 mine shafts located on site. This could reduce overall capacity and dwelling numbers. We reserve the right to comment on this matter at a later date once more detailed information has been provided.
Assumed Net Developable Area: 75% (therefore 9.69 ha)	As above- may be lower due to presence of mine shafts.
Assumed Density: Minimum 30 dwellings per hectare	No comments, realistic.

Planning History: None

<u>Land Ownership/Availability:</u> 1 Landowner (private landowner with no affiliation with housebuilder or developer)

Green Belt Parcel Reference: GBP_025a

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Medium	The sub-parcel is bounded to the west by Garswood Road, to the east by the western boundary of the settlement of Garswood, to the north by a belt of trees and agricultural land and to the south by Billinge Road. The south eastern corner of the sub-parcel contains a 5ha area of open space and playing fields (Birch Grove), a community centre and a primary care centre. Other than these buildings, the sub-parcel has very limited development and has a relatively open character to the west and south and in-part to the north. The parcel is not adjacent to a large built-up area but does adjoin the settlement of Garswood and does help prevent ribbon development along parts of Leyland Green Road and Billinge Road. The sub-parcel has strong boundaries to the east, south and west and in-part to the north and is therefore partially well contained.	Medium	Firstly, it is important to note that the Council's GB Assessment assessed a larger land parcel extending to Garswood's settlement boundary to the east, therefore does not correlate with the final red line boundary for the safeguarded site. We agree that the overall score against this green belt purpose is medium, because the site benefits from strong boundaries to the north, south and west. It's eastern boundary is very poorly defined, with no hedgerow or strong boundary, which instead comprises of a low lying wired fence. This could lead to concerns about sprawl to the east, hence why the site scores medium against this purpose of the Green Belt.
2. To prevent neighbouring town merging into one another	Low	The sub-parcel contributes broadly, along with other parcels (GBP_026), to the physical and visual separation of Billinge and Garswood. A strategic gap between Billinge and Garswood could be maintained if this sub-parcel was released from the Green Belt.	Medium	The gap between Billinge and Garswood is already narrow (circa 2km in this location). The development of this site would reduce the gap further, to circa 1.3km). We therefore consider this parcel provides a medium contribution to preventing neighbouring towns from merging.
3. To assist in safeguarding the countryside from encroachment	Medium	The south eastern corner of the sub-parcel contains some existing built development. The parcel is enclosed to the east and south and is in-part open to the north and largely to the west.	Medium	The site does not contain any built form. The site also contains no shrubbery/hedgerow, except for some low lying hedgerow along its southern boundary. This leads to the site being very open, particularly from Billinge Road looking northwards to the site and surrounding countryside. Despite being effected by some surrounding urbanising influences, the sparsity of vegetation and open views lead to the site bearing many characteristics of the countryside. The site therefore scores medium against this purpose of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A		Low	The site is not located near to any historic towns, conservation areas or listed buildings and therefore scores a low contribution against this purpose of the Green Belt.
Overall Assessment	Medium	The sub-parcel has strong boundaries to the east, south and west and in-part to the north and is therefore partially well contained. A strategic gap between Billinge and Garswood could be maintained if this sub-parcel was released from the Green Belt.	Medium	Whilst the site is contained by three strong boundaries, the eastern site boundary is very poorly defined leading to concerns about urban sprawl in this direction. The site is also open in nature due to a lack of vegetation and built form. The site therefore provides a medium contribution against the purposes of the Green Belt.
Key -Low Contribution - LC	Mediun	1 Contribution - MC High Contribution - HC		

Note: The GB parcel assessed in the Council's assessment is larger and differs to the final red line of the proposed safeguarded land allocation.



Access	Access could be taken either via Leyland Green Road to the north or Billinge Road to the south. Nearest Railway Station (Garswood) circa 1.1 miles to the south-east. Low frequency bus s		
Heritage	No Listed Buildings, Scheduled Monuments or Conservations are located within or adjacent to the site boundary		
Flood Risk	Flood Zone 1		
Landscape	The SA notes how the site is located in a Medium-High sensitivity area. The site is also very open due to limited tree coverage on site/low lying hedgerows.		
Ecology/Trees	There are very limited trees on site.		
Agricultural Land	Grade 3 (good to moderate)		
Other	The SA notes how there are 7 mine shafts located on site, which could have implications on site capacity and delivery.		

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Effects on biodiversity not likely		No comment
SA2: To protect and improve land quality in St Helens		Site is 100% Grade 3 agricultural land (10.51Ha)		No comment
SA3: To improve air quality in St Helens		Medium sized site (280 units) located over 796m from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water				
SA5: To mitigate and adapt to		Over 3.9km from nearest protection zone		No comment
the impacts of climate change		Site presents opportunities for enhancement of GI network and increased tree cover.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 100% in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		84% of the site is within a Medium-High or High Landscape Sensitivity area, 16% of the site is located in a low-medium or medium Landscape Sensitivity area and is situated on a prominent ridge.		Agreed, the site is also very open which heightens landscape sensitivity.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		No heritage assets within 300m. Effects unlikely.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Over 1.6km from open space. Site includes a Public Right of Way (severance could be mitigated against).		No comment No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
1	DI / A	Council and account this	
-	N/A	Council not assessed this	
SA12: To improve health and			No comment
reduce health inequalities		Access to GP: 716m of Garswood GP Surgery, Dr B W O'Brien & Partners	
		Access to Leisure: Within 1200m of 2 Children's Play Areas.	No comment
SA13: To improve the		,	
education and skills levels of			No comment
the population overall		Primary: 453m from Rectory CofE Primary School	INO COMMINENT
the population over an		Secondary: 1.96km from Cansfield High Specialist Language College	No comment
SA14: To ensure local			
residents have access to			
employment opportunities		992m of Liverpool Rd Industrial Estate	No comment
SA15: To support a strong,			
diverse, vibrant and			
sustainable local economy to			
foster balanced economic		Herry to a return of a star of table / the star of the second consent.	No. and the second seco
arouth.		Housing site on land not suitable/attractive for employment.	No comment
SA16: To improve access to a			
range of good quality and		Potential to deliver 280 units over 15-30 years, however there are 7 mine shafts are	
affordable housing that meets		present on site and likely to reduce development capacity.	
the diverse needs of the			No comment
SA17: To reduce poverty and			
social exclusion	N/A		
CA10: To reduce erime			
disorder and the fear of crime			
	N/A	Council not assessed this	
SA19: To reduce the need to			
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway			
safety and make the best use			
of existing transport			
infrastructure		9m from bus stop. Low frequency service.	No comment
SA20: To improve access to			
and use of basic goods,			The nearest convenience store (The Store) is approximately 750m from the eastern
services and amenities in		Residential site is 370m from the nearest convenience store (The Store) or	extremity of the site.
town and local centres		supermarket.	
town and local centres		'	

^{*}Note: The SA Assessment covers a larger land area than the proposed red line area for the safeguarded site.

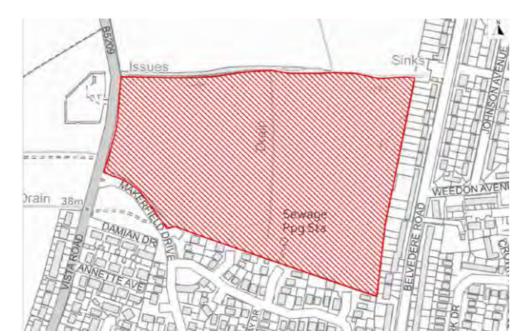
Total Score:

Key of Council's SA Scoring:

Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which could be mitigated
Likely to promote positive effects
44.5



2HS Safeguarded **Local Plan Reference:** Site Location: Land at Vista Road, Earlestown Allocated or Safeguarded?



Council Assumptions	Pegasus Comments
Site Size: 7.92 ha	Accurate, no comments.
Indicative Site Capacity: 178	No comment, albeit reserve the right to comment on assumed delivery rates at a later date.
Assumed Net Developable Area: 75% (therefore 5.94 ha)	Realistic, no comments.
Assumed Density: minimum 30 units per hectare Planning History: None	Realistic, no comments.

<u>Land Ownership/Availability:</u> 1 Land Title (private landowner- Taylor Wimpey have a land option on whole site)

Green Belt Parcel Reference: GBP_053_C

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Medium	The sub-parcel is bounded to the south by the urban edge of Newton-le-Willows, to the west by Vista Road and to the east by Ashton Road, the northern boundary (with sub-parcel GBP_053b) is a single temporary private highway. The sub-parcel adjoins the urban edge of Newton-le- Willows and a certain amount of development could be accommodated here without it leading to unrestricted sprawl. The site also prevents ribbon development along Ashton Road and Vista Road.	Medium	Firstly, it is important to note that the Council's GB Assessment assessed a larger land parcel extending to the access track to the north, therefore does not correlate with the final red line boundary for the safeguarded site. Whilst the eastern, southern and western site boundaries are permanent and well-defined, the northern boundary is not. This comprises of hedgerow, which provides a weaker boundary leading to concerns about urban sprawl.
2. To prevent neighbouring town merging into one another	Medium	The sub-parcel forms part of a strategic gap, along with subparcels GBP_053a and GBP_053b to the physical and visual separation of Haydock and Newton-le- Willows/Earlestown. However a strategic gap could still be maintained (via sub-parcels GBP_053a and GBP_053b) if parts of this sub-plot were released from Green Belt, especially the south-western corner, which would be viewed as a natural extension to Newton-le-Willows/Earlestown.	Medium	The gap between Newton-le-Willows and Haydock is approximately 930m in this location, which is a narrow separation distance. If this site was developed, this reduces the gap to circa 760m. We therefore consider this site to have a medium contribution to merger issues, albeit note that the existing settlement boundary of Newton-le-Willows already extends further north than this site.
3. To assist in safeguarding the countryside from encroachment	Medium	There is no built development within the sub-parcel, which has a semi-rural character when viewed from the south, east and western viewpoints due to existing urban fringe.	Medium- High	The site is very open in nature, due to a lack of vegetation cover and any built form. This leads to the site bearing many characteristics of the open countryside. Furthermore, the views are long-line in nature from Makerfield Drive, where landscape views looking northwards are particularly sensitive. We therefore score the site as medium to high against purpose 3.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	The site is not located near to any historic towns, conservation areas or listed buildings and therefore scores a low contribution against this purpose of the Green Belt.
Overall Assessment	Medium	The sub-parcel moderately meets the purposes considered. It has very little built development and plays a moderate role in checking unrestricted sprawl and preventing the two settlements from merging.	Medium	The northern site boundary is poorly defined and the gap between Haydock and Newton-le-Willows is already narrow. The site is very open due to a sparsity of vegetation and built form, therefore the overall contribution of the site to the Green Belt purposes is medium.
Key -Low Contribution - LC	Mediun	Contribution - MC High Contribution - HC		

^{*}Note: The GB parcel assessed in the Council's assessment is larger and differs to the final red line of the proposed safeguarded land allocation.



Access	Access could be taken via Vista Road to the west. The nearest railway station (Earlestown) is circa 0.9 miles to the south. Nearest bus stop circa 170m to north, provide bi-hourly access to
Heritage	An Archaeological Interest (Lodge Lane) intersects with the east of the site. There are no Listed Buildings, scheduled monuments or conservation areas nearby.
Flood Risk	The site is located within Flood Zone 1
Landscape	Site is very open due to limited tree coverage on site/low lying hedgerows.
Ecology/Trees	There are very limited trees on site.
Agricultural Land	Grade 3 (Good to Moderate)

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site is 206m to nearest Local Wildlife Site and 159m to nearest TPO. Effects considered unlikely.		No comment
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-2. There is 75.2% (17.17ha) overlap with ALC Grade 3. Potential impacts.		No comment
SA3: To improve air quality in St Helens		Medium sized development (180 units) located 223m from AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Site overlaps with nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site is located in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		90% of the site is within a Low-Medium or Medium landscape sensitivity area. 9% is located in a Medium- High or High sensitivity area. Over 3.8km from prominent ridge		Agreed and highlight that the site is very open in nature, leading to landscape sensitivities.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		An Archaeological Interest (Lodge Lane) intersects with the east of the site. Effects considered unlikely if inclusively designed.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		238m from area of open space. Site overlaps with a Public Right of Way (potential to mitigate against should links to open space be provided).		No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



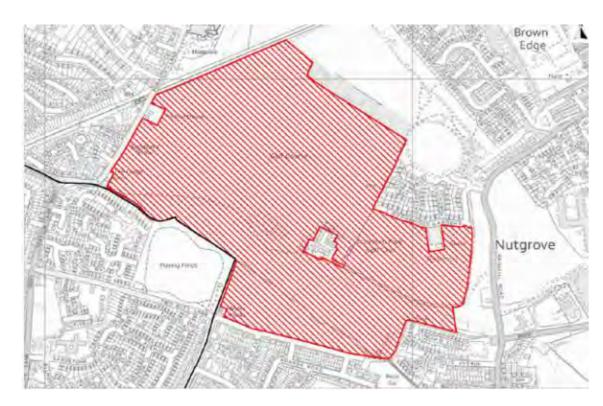
SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
composted or recovered N/A	Α	Council not assessed this	
SA12: To improve health and			
reduce health inequalities		Access to GP: 544m walk from Newton Clinic	
		Access to Leisure: Within 1.2km of 5 Children's play areas and 2 allotments.	No comment
SA13: To improve the		, , , , , , , , , , , , , , , , , , , ,	
education and skills levels of			
the population overall		Primary: Over 727m from St Mary's Catholic Infant School	
		Secondary: 508m from Hope Academy	No comment
SA14: To ensure local			
residents have access to		19m from Woodlands Industrial Estate	No comment
SA15: To support a strong,			
diverse, vibrant and			
sustainable local economy to			
foster balanced economic		Harrison alternational and archaellate to the lateral free free and a second	No. and the second seco
CALC T : Growth		Housing site on land not suitable/attractive for employment	No comment
SA16: To improve access to a			Given that the site is safeguarded, it should not score green as the SA methodology states
range of good quality and			that this relates to the site being considered to be available and/or achieavable in the first 5
affordable housing that meets			years.
the diverse needs of the		Potential to deliver 180 units over 15-30 years) carsi
SA17: To reduce poverty and	, ,		
social exclusion N/	/ A		
SA18: To reduce crime,			
disorder and the fear of crime N/A	A	Council not assessed this	
SA19: To reduce the need to			
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway		Bus stop is 19m away from the site. Regular fequency service.	
safety and make the best use		- · · · · · · · · · · · · · · · · · · ·	
of existing transport			
infrastructure			No comment
SA20: To improve access to			
and use of basic goods,		Residential site is located 632m from the nearest convenience store (Newton Mini	
services and amenities in		Mart) or supermarket	No comment
town and local centres		mart) or Superfildret	No comment

^{*}Note: The SA Assessment covers a larger land area than the proposed red line area for the safeguarded site.

Key of Council's SA Scoring: Unlikely to have significant effects Likely to generate negative effects 2	48.5
Likely to generate negative effects Potentially negative effects which could be mitigated 2	



Safeguarded **Local Plan Reference:** 3HS Site Location: **Former Eccleston Park Golf Club** Allocated or Safeguarded?



Council Assumptions	Pegasus Comments
Site Size: 49 ha	Accurate, no comments.
Indicative Site Capacity: 956 (Council note how the capacity may be capped at 500 until highway capacity issues in the area are addressed)	We raise concern about this assumed capacity, which we consider is likely to be lower. Not only have the Council flagged highway capacity issues and therefore a need to potentially cap to 500, electricity pylons runs through the central- southern section of the site, which would pose as a development constraint and reduce numbers. A development setback is also likely to be required along the northern railway boundary, to overcome noise concerns.
Assumed Net Developable Area: 65% (therefore 31.85 ha)	Whilst this is lower than the 75% assumed for all other sites, this could still be potentially lower given the need to consider noise and the no development zone near the 3 electricity pylons.
Assumed Density: minimum 30 units per hectare	Realistic, no comments.

No planning history since 2005 apart from minor applications which were in relation to the golf course e.g. Landscaping and redesigning.

<u>Land Ownership/Availability:</u> 1 Landowner<u>-</u>Mulbury (Warrington) Ltd

Green Belt Parcel Reference: GBP_087

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The parcel bounders the Liverpool to Manchester Northern Railway line to the north, a substantial protected woodland belt and residential dwellings to the north-east. Rainhill Road runs the length of the eastern boundary, with Two Butt Lane and the urban fringe of Rainhill on the southern boundary and the built-up area of Eccleston Park on the western boundary. There is very little development within the parcel (that encompasses the whole of Eccleston Park Golf Club and course) other than the clubhouse and associated structures almost central of the parcel, and a small number of dwellings dotted along its boundary. The parcel has strong boundaries and as such is considered to be well contained, and therefore would not lead to unrestricted sprawl.	Low	Agreed, albeit would highlight that the eastern boundary is not strong, comprising of a footpath.
2. To prevent neighbouring town merging into one another	Low	The parcel currently lies in a Green Belt 'gap' between Eccleston Park, West Park, Rainhill and Whiston. However, this gap has already been significantly reduced, due to the merging of Eccleston Park, Rainhill and Whiston on the north-western and southern sides. As such there is no longer any visual/perceptual separation of these settlements on the ground. Given the strong boundaries around the parcel which obscure the golf course from any public highway, the parcel provides only a moderate to weak role in preventing further merging. Therefore it is considered that there is no longer a strategic gap between Eccleston Park, Rainhill and Whiston in this location.	Low	Agreed, given that Eccleston Park, Rainhill and Whiston have effectively already merged in this location.
3. To assist in safeguarding the countryside from encroachment	Low	Although the parcel has an open aspect, it has strong permanent boundaries and is surrounded by residential development on three sides, so therefore lacks a sense of openness. The parcel is quite clearly a golf course and as such has a more recreational appearance than countryside character.	Low	Agreed and note that the site does resemble a recreational golf facility as opposed to countryside.
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	The site is not located near to any historic towns, conservation areas or listed buildings and therefore scores a low contribution against this purpose of the Green Belt.



Overall Assessment	Low	The parcel benefits from strong boundaries, and is encroached on almost all sides by urban development. The parcel plays a limited role in the prevention of merging any two settlements or built up areas.	Low	No comment
Key -Low Contribution - LC	Mediur	Contribution - MC High Contribution - HC		

Access	Access could be taken via Two Butt Lane to the south or Portico Lane to the west. Eccleston Park Railway Station is located immediately adjacent to the site boundary. Regular bus services serve stops located directly adjacent to the site boundary.	
Heritage	No Listed Buildings, Scheduled Monuments or Conservation Areas within or adjacent to the site boundary.	
Flood Risk	The site is located within Flood Zone 1.	
Landscape	The SA states that the site is of high landscape sensitivity.	
Ecology/Trees	There is a TPO present on site. There are also ponds on site, therefore there could be potential for great crested newts.	
Agricultural Land	Agricultural Land Classed as other land primarily in non-agricultural use.	
Other	Noise will need to be carefully considered along the northern boundary with the railway line. 3 large electricity pylons runs through the central- southern section of the site.	

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		198m to Local Wildlife Site and Local Site (Former Rainhill Hospital Site), and TPO present on site. Effects considered likely.		Sensitive from a tree perspective, also potential for great crested newts given the ponds located on site.
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-3.		No comment
SA3: To improve air quality in St Helens		Large scale developemnt (potentially 900+ units) located over 2.2km from AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		472m to nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		94% of the site is within Low-Medium of Medium landscape sensitivity area. 6% is considered to be of Medium-High sensitivity. Site overlaps with a prominent ridge line.		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Site is 116m from a Listed Building (Greenshouse Farmhouse). Effects considered unlikely due to existing screening.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site contains an area of open space. PROW exists along the southern border of the site (severance unlikely).		No comment



SA10: To minimise energy			
use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this	
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered	N/A	Council not assessed this	
SA12: To improve health and reduce health inequalities		Access to GP: Within 1.1km of DR L V Chana & Partner Access to Leisure: Within 1.2km of 5 children's play areas and 1 allotment	No comment
SA13: To improve the education and skills levels of the population overall		Primary: 384m from London Lane Community Primary School Secondary: Over 1.2km from St Edmund Arrowsmith Catholic Centre for Learning	London Lane Primary School is approximately 450m from the site, therefore falls within the SA's 400-800m category.
SA14: To ensure local residents have access to employment opportunities		Site 865m from Stoney Lane employment site.	No comment
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic		Housing site on land not suitable/attractive for development.	No comment
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the		Potential to deliver 900 units over 15-30 years. Likely to be at 65% developable area. Potential highway issues that could further reduce the potential yield, as well as underground pipelines.	Given that the site is safeguarded, it should not score green as the SA methodology states that this relates to the site being considered to be available and/or achieavable in the first 5 years. We raise concerns about overall—site capacity earlier on in this assessment.
SOCIOI CACIDION	N/A		We raise concerns about overall site cabacter carrier on in this assessment.
SA18: To reduce crime, disorder and the fear of crime	N/A	Council not assessed this	
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure		Site is 10m from the nearest Bus Stop. Regular frequent service.	No comment
SA20: To improve access to and use of basic goods, services and amenities in town and local centres		Residential site within 165m of a convenience store (MNS Late Shop) or supermarket.	No comment

Total Score: 51 49.5

Key of Council's SA Scoring:

Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects





Local Plan Reference: 4HS Site Location: Land East of Newlands Grange (former Vulcan works), Newton-le-Willows Allocated or Safeguarded? Safeguarded



Council Assumptions	<u>Pegasus Comments</u>
Site Size: 9.76 hectares	Accurate, no comments.
Indicative Site Capacity: 256 dwellings	Question whether the site will deliver this many houses, given the noise and heritage constraints. Access will also need to be carefully considered in terms of being upgraded and landscape is sensitive to the south. Reserve the right to comment on this at a later date.
<u>Assumed Net Developable</u> - 75% (therefore 7.32 hectares)	As above- could be lower due to noise, landscape and heritage considerations.
Assumed Density: 35 dwellings per hectare	Realistic, no comments.

Planning History: None

<u>Land Ownership/Availability:</u> There are two land owners within this parcel. MS546926 is the small land title and is owned by Key Property Investments (Number Nine) Ltd. Thomas Kenyon Drinkall owns the majority of the site (MS72105)- Jones Homes North West Ltd Development Option.

Green Belt Parcel Reference: GBP_044

Low	The parcel is bounded to the north by trees, Vulcan Park Way and Newton-le-Willows cemetery, to the west by Newlands Grange residential development, to the east by trees and the West Coast Mainline railway line and to the south by Alder Root Lane and Newton Brook. The parcel is therefore well contained to the west and the railway line provides a permanent boundary to the east.		It is important to note that the land parcel assessed in the Council's Green Belt Assessment is larger than, and differs to, the safeguarded allocation red line as it extends to Alder Root Lane to the south. Whilst we agree
	west and the ranway line provides a permanent boundary to the east.	Medium	that the western and eastern site boundaries are permanent and well defined, the northern and southern boundaries are less so. In particular, the south of the site has no defined boundary whatsoever, which seems to consist of an arbitrarily drawn line. There is no hedgerow or field pattern boundary to define the extent of the safeguarded land allocation. This therefore raises concerns about urban sprawl to the remaining green belt parcel to the south.
Low	The parcel does not fall within a strategic gap between two towns. The nearest towns that are not "washed over" by Green Belt are: Newton-le-Willows which lies immediately to the west of the parcel and Winwick, Warrington, which lies approximately 1.4km south east of the parcel. A strategic gap could be maintained between Winwick and Newton-le- Willows if this parcel was developed.	Low	Agreed, no comment.
	The parcel has strong permanent boundaries to the west and east. Some open eastward views are retained but the parcel and has limited openness to the north and south	Medium	Given the poorly defined southern boundary, open views looking towards the north of the site are present because the site is not well enclosed from the south. There is also a lack of vegetation in the land parcel, which makes the site bear many characteristics of the open countryside. The site has been effected by urbanising features to the north and west, so overall the site scores medium against this purpose of the Green Belt.
N/A		Low	The southern section of the site is located circa 70m from the Vulcan Village Conservation Area. It is notable that The Vulcan Village Conservation Area Management Plan (October 2009) also mentioned a proposal to extend the Conservation Area further eastwards and closer to the safeguarded site, albeit this has not materialised. Whilst heritage will need to be carefully considered, the overall contribution of the site to this purpose is low given that only the southern section of the site is located adjacent to the CA.
Low	The parcel has strong permanent boundaries to the west and east. Some open eastward views are retained but the parcel and has limited openness to the north and south. The parcel does not fall within a strategic gap between two towns.	Medium	The site has no defined southern boundary, leading to concerns about urban sprawl to the south. The site is also open in nature to a sparsity of vegetation, therefore scores medium against purposes 1 and 3 of the Green Belt.
Lo N	ow /A	towns that are not "washed over" by Green Belt are: Newton-le-Willows which lies immediately to the west of the parcel and Winwick, Warrington, which lies approximately 1.4km south east of the parcel. A strategic gap could be maintained between Winwick and Newton-le- Willows if this parcel was developed. The parcel has strong permanent boundaries to the west and east. Some open eastward views are retained but the parcel and has limited openness to the north and south The parcel has strong permanent boundaries to the west and east. Some open eastward views are retained but the parcel and has limited openness to the north and south. The parcel does not fall within a strategic gap between two	towns that are not "washed over" by Green Belt are: Newton-le-Willows which lies immediately to the west of the parcel and Winwick, Warrington, which lies approximately 1.4km south east of the parcel. A strategic gap could be maintained between Winwick and Newton-le- Willows if this parcel was developed. The parcel has strong permanent boundaries to the west and east. Some open eastward views are retained but the parcel and has limited openness to the north and south The parcel has strong permanent boundaries to the west and east. Some open eastward views are retained but the parcel and has limited openness to the north and south. The parcel does not fall within a strategic gap between two towns. Medium

^{*}Note: The GB parcel assessed in the Council's assessment is larger and differs to the final red line of the proposed safeguarded land allocation.



Access	There is significant mixed-use development coming forward to the west of the site. Vulcan Park Way runs along the northern boundary of the site. At present, this does not seem to form an adopted highway, running along the entirety of the northern boundary however it appears that this could be extended to provide access to the site. The nearest bus stop to the site is located approximately 730m to the west on Wargrave Road. These stops offer services to Vulcan, St Helens, Ashton, Newton-le-Willows, Warrington. There is a bus stop in Vulcan Village however there is no access from this part of the site at present.
Heritage	The course of Roman Road runs through the site. It is not clear if this has historic significance and further historic work is required to understand if this would constrain development. A registered battlefield is located over 220m to the east of the site. This battlefield is from the Battle of Winwick (which is also known as the Battle of Red Bank). There are no listed buildings within or in close proximity to the site however Vulcan Village Conservation area is located circa 70m to the west of the site and this would need to be taken into consideration should development come forward on this site.
Flood Risk	Flood Zone 1
Landscape The SA scores the site as being within a Medium-High landscape area and it is notable that the site is also quite open.	
Ecology/Trees	Newton Brook runs parallel with the northern boundary however it is not located within this parcel. There are trees and hedgerows along the site boundaries and some trees clumped together in the centre of the site.
Agricultural Land	The site comprises a mixture of Grade 1, 2 and 3 agricultural land.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site overlaps with a Local Wildlife Site (Newton Brook). Effects considered likely.		The site does not appear to overlap with the Local Wildlife Site. It is approximately 90m from the northern section of the site and should therefore score yellow in line with the Council's SA methodology.
SA2: To protect and improve land quality in St Helens		Site contains 2.5% ALC Grade 1-2. There is 14% (2.95ha) overlap with ALC Grade 3 however this does not exceed 20 ha.		No comment.
SA3: To improve air quality in St Helens		Medium sized development (250 units) located over 1.2km from AQMA		No comment.
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Site overlaps with nearest protection zone		No comment.
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment.
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		96% of the site is located in Flood Zone 1, and 3.6% located in Flood Zone 2 and 2.69% in Flood zone 3.		The site is located within Flood Zone 1.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of the site is within a Medium-High or High landscape sensitivity area. Over 6.4km from a prominent ridge line		Agreed, site also open in nature.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		Site is 6m from Conservation Area (Vulcan Village Conservation Area). Setting may be affected.		Until further details are provided about the potential archaeological implications of the Roman Road which runs through the site, we would flag this up as a site sensitive in heritage terms, especially given the adjacent Conservation Area.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site overlaps with an Open Space. North-east and south-west border overlap with a PROW (severance can be avoided)		No comment.



SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and			
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and			
SA12: To improve health and reduce health inequalities	Access to GP: 1.74km distance from DR M RAZA (10 minutes journey by public transport) Access to Leisure: Within 1.2km of 4 children's play areas		No comment.
SA13: To improve the education and skills levels of the population overall	Primary: 1.17km from Wargrave C of E Primary School Secondary: Over 2.58km from Hope Academy		No comment.
SA14: To ensure local residents have access to employment opportunities	79m from Vulcan Industrial Estate.		No comment.
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing site on land not suitable/attractive for employment.		No comment.
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential to deliver 250 units over 15-30 years.		Agreed, albeit reserve the right to comment on detailed delivery rates and assumed dwelling numbers at a later date.
SA17: To reduce poverty and social exclusion			
SA18: To reduce crime, disorder and the fear of crime			
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	535m from Bus Stop. Regular frequency service.		Agreed, albeit would note the nearest bus stop is circa 730m away from the site.
SA20: To improve access to and use of basic goods, services and amenities in	Residential site is located 487m from the nearest convenience store or supermarket (Aldi). A is larger and differs to the red line of the proposed safeguarded	land allocat	No comment.

Total Score:	47			47
Key of Council's SA Scoring:		Key of Pegasu	ıs scoring:	
Likely to generate negative effects Potentially negative effects which could be mitigated			1 2	
Unlikely to have significant effects			3	
Likely to promote positive effects			4	



Local Plan Reference: 5HS Site Location: Land west of Winwick Road, Newton-le-Willows Allocated or Safeguarded? Safeguarded



Council Assumptions	Pegasus Comments
Site Size: 7.29 hectares	Accurate, no comment
Indicative Site Capacity: 191 dwellings	Noise mitigation and the likely need for a landscape buffer to the south may reduce overall site capacity, therefore we reserve the right to comment on this and assumed delivery rates in detail at a later date.
Assumed Net Developable - 3.78 hectares (75%)	As above- may be less due to noise and landscape considerations.
Assumed Density: 35 dwellings per hectare	Realistic, no comment

Planning History: None

<u>Land Ownership/Availability:</u> The parcel is within one land ownership (MS580987). The site is owned by a Roderick Leslie Hamilton Steen, Christoper John Whittles and Mark Stephen Eastburn c/o of messrs Ingham and Yorke, Huntroyde Estate Office. Wainhomes has option upon this land.

Green Belt Parcel Reference: GBP_045A

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The sub-parcel is bounded to the north by residential development at Wayfarers Drive and Newton Brook Greenway, to the west by Newton Brook Greenway, to the east by the West Coast Mainline railway line, to the south by agricultural land and to the south/west by Newton Brook Greenway leading to Newton-le-Willows Cemetery. The sub-parcel is therefore well contained to the north, east and relatively well contained to the south and west.	Medium	Whilst the site benefits from strong boundaries to the north and east, the west and south are not strong in nature. In particular, the south of the site has no defined boundary whatsoever, which seems to consist of an arbitrarily drawn line. There is no hedgerow or field pattern boundary to define the extent of the safeguarded land allocation. This therefore raises concerns about urban sprawl to the remaining green belt parcel to the south. *Note that we have identified an error in the Council's proposals map, which indicates that the land parcel to the south of the 5HS allocation is not located within the Green Belt. It is shown just as white land, which is incorrect as this land is not being proposed for green belt release.
2. To prevent neighbouring town merging into one another	Low	The sub-parcel does not fall within a strategic gap between two towns. The nearest towns that are not "washed over" by Green Belt are: Newton-le-Willows which adjoins the subparcel and Winwick, Warrington, which lies approximately 1.8km south east of the sub-parcel. A strategic gap could be maintained between Winwick and Newton-le-Willows if this sub-parcel was developed.	Low	Agreed, no comment.
3. To assist in safeguarding the countryside from encroachment	Low	The sub-parcel has strong permanent boundaries to the north and east. Given the high level of enclosure, it is considered that the sub-parcel does not have a strong sense of openness or countryside character	Medium	Whilst the site is well enclosed on 3 sides, the southern boundary is not. View from Mill Lane (A49) looking westwards over the site are very open, given the lack of vegetation within the land parcel. The site also bears charactersitics of the open countryside because of this. However, as the site has been influenced by the existing urbanised features to the north and east, the overall score against this purpose of the Green Belt is medium.
4. To preserve the setting and special character of historic towns	N/A		Low	There is a designated Registered Battlefield circa 190m to the south of the site, albeit overall the site is considered to score low against this purpose of the Green Belt.
Overall Assessment	Low	The sub-parcel has strong permanent boundaries to the north and east. Given the high level of enclosure, it is considered that the sub-parcel does not have a strong sense of openness or countryside character. A strategic gap could be maintained between Winwick and Newton-le- Willows if this sub-parcel was developed	Medium	The site has no defined southern boundary, leading to concerns about urban sprawl to the south. The site is also open in nature to a sparsity of vegetation, therefore scores medium against purposes 1 and 3 of the Green Belt.
Key -Low Contribution - LC	Mediun	n Contribution - MC High Contribution - HC		

^{*}Note: The GB parcel assessed in the Council's assessment is larger and differs to the final red line of the proposed safeguarded land allocation.



Access	The site will be accessed via Mill Lane, in the far north eastern corner of the site. Mill Lane continues on over the railway line and the railway line forms the eastern boundary of the site. This small section of Mill Lane appears to be able to serve access to the site although this would probably need to be fully confirmed by a transport consultant. There are two bus stops on the A49 Mill Lane which provide regular services to Warrington, Vulcan and Wigan. Newton-le-Willows rail station is located a 0.6km to the north of the site and offers regular services to Liverpool, Crewe, Llandudno, Manchester Airport, Newcastle. A public right of ways runs adjacent with the western boundary however it is not located within the red line boundary of this site.
Heritage	There is a designated battlefield located 190m to the south of the site. This battlefield dates back to the battle of Winwick (also known as the Battle of Red Bank). This forms a potential constraint to development in close proximity to this site. There are also two listed buildings located 400m to the east of the site (Newton Park Farmbouse (Grade II) and Barn to the east of Newton Park Farmbouse (Grade II)). There is no existing development in between this site and these listed buildings and therefore development on this site could impact on the setting of these buildings.
Flood Risk	The majority of the site is located within Flood Zone 1 however there are sections along the western boundary of the site which are Flood Zone 2 and 3. This is associated with Newton Brook which runs parallel with the western boundary of the parcel.
Landscape	The SA scores the site as being within a Medium-High landscape area and it is notable that the site is also quite open.
Ecology/Trees	Located immediately adjacent to the western boundary of the site is Newton Brook which is a Local Wildlife Site. There are hedgrows and vegetation around the site boundaries however there is very little within the site.
Agricultural Land	The site is Grade 3 agricultural land which is considered to be good to moderate.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site includes a Local Wildlife Site (Newton Brook).		The Local Wildlife is adjacent to the site boundary and not in it.
SA2: To protect and improve land quality in St Helens		Site is 97.1% agricultural land Grade 3 (13.20Ha).		No comment
SA3: To improve air quality in St Helens		Medium size site (170 units) located 368m from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Within a ground water protection zone.		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and		Site is 84% in Flood Zone 1, 16% in Flood Zone 2 and 14% in Flood Zone 3.		Agreed, flood risk matters will be a key matter to consider.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the		Site is 100% within Medium-High or High Landscape Sensitivity area. Site is over 6km from prominent ridgelines		Agreed and notable that the site is also open in nature when looking westwards from Mill Lane (A49)
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		Site is over 400m of a conservation area, 306m from the closest listed building. Effects unlikely.		There will be a need to consider the relationship of the site with the registered battlefield located to the east of the site. Until further information is provided, we would flag this up as a potential heritage sensitivity.
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site borders open space and includes a Public Right of way (severance possible if not designed inclusively)		No comment



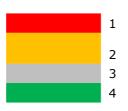
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and		
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered		
SA12: To improve health and reduce health inequalities	Access to GP: Site is 1.43km from Dr M Rahman & Partners Access to Leisure: Within 1200m of 6 Children's Play Areas, 2 Parks/Gardens and 1 allotment	No comment
SA13: To improve the education and skills levels of the population overall	Primary : Within 1.06km of St Peter's CofE Primary School Secondary : 2km from Hope Academy	No comment
SA14: To ensure local residents have access to employment opportunities	908m from Vulcan Industrial Estate	No comment
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing site on land not suitable/attractive for employment.	No comment
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential to deliver 170 units over 15-30 years.	Agreed, albeit reserve the right to comment on detailed delivery rates and assumed dwelling numbers at a later date.
SA17: To reduce poverty and social exclusion		
SA18: To reduce crime, disorder and the fear of crime		
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	118m from bus stop. High frequency service.	No comment
SA20: To improve access to and use of basic goods, services and amenities in	Residential site is 571m from the nearest convenience store (Rontec) or supermarket	No comment

*Note: The land parcel assessed in the SA is larger and differs to the red line of the proposed safeguarded land allocation.

Total Score: 45

Key of Council's SA Scoring:

Likely to generate negative effects
Potentially negative effects which
could be mitigated
Unlikely to have significant effects
Likely to promote positive effects





Local Plan Reference: 6HS Site Location: Land east of Chapel Lane, Sutton Manor Allocated or Safeguarded? Safeguarded



Council Assumptions	Pegasus Comments
Site Size: 5.04 hectares	
Indicative Site Capacity: 113 dwellings	It is indicated that 113 dwellings could be achieved on this site although the pre- application request that was submitted suggested a site capacity of 95 dwellings.
Assumed Net Developable 3.78 hectares	
Assumed Density: 30 dwellings per hectare	

<u>Planning History:</u> PRE/2017/0066/PREC - A pre-application request was submitted in 2017 for the development of the site for 95 no dwellings however the details are not available on the website.

Land Ownership/Availability: The site has one landowner: MS370971. The site is owned by George Haslam and Beryl May Haslam. Kingsland Strategic Estates Ltd have an option on the land.

Green Belt Parcel Reference: GBP_082A

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The sub-parcel is bounded by the urban fringe of Sutton Manor to the north, with Chapel Lane to the west and a protected woodland to the south and further woodland to the east. The sub-parcel bounders the built up area of Sutton Manor to the north and a protected woodland to the west. The remaining parcel is farmland, with very little built development. The parcel is considered to be well contained.	Low	The site benefits from strong boundaries, which despite being irregular in shape, comprise of protected trees, Chapel Lane and residential development which will prevent further urban sprawl.
2. To prevent neighbouring town merging into one another	Low	The sub-parcel forms part of a larger strategic gap between Sutton Manor (St. Helens core area) and Rainhill. However, the sub-parcel itself provides little or no discernible contribution to the merging of these two settlements. If development were to take place on this sub- parcel there would still be a significant visual strategic gap between both settlements (approx. 0.75km).	Low	The site would decrease the gap between Sutton Manor and Rainhill, however, because of the strong vegetation place, it is not considered that this would have a significant merger impact in visual terms.
3. To assist in safeguarding the countryside from encroachment	Low	The parcel has only a semi-rural character due to encroachment from existing urban development to the north and partly to the east	Medium	The site has a small element of built-form in its southern section, and is influenced by existing urban features to the north. However, the land parcel has very limited vegetation in it's centre and the western boundary along Chapel Lane does not have hedgerow or tall shrubbery to protect views. This leads to very open views across the site from Chapel Lane. There are also open views from Wordsworth Avenue to the north. The site bears a number of characteristics of the countryside, therefore we score this site as having an overall medium contribution to this purpose of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A		Low	No Listed Buildings or Conservation Areas are located directly adjacent to the site, so the site does not provide a strong contribution to this purpose of the green belt.
Overall Assessment	Low	The sub-parcel makes little or no contribution to the 3 purposes assessed as part of the review. The site is well contained with strong boundaries and does not significantly contribute to the wider strategic gap.	Low	Overall, the site is well contained and enclosed, with the exception of open views from the west (Chapel Lane) and north (Wordsworth Avenue) which slightly heightens the site from a green belt perspective.
Key -Low Contribution - LC	Mediur	n Contribution - MC High Contribution - HC		

^{*}Note: The GB parcel assessed in the Council's assessment differs to the final red line of the proposed safeguarded land allocation.



Agricultural Land	The site is Grade 3 agricultural land which is considered to be good to moderate.	
Ecology/Trees	The southern and part of the eastern boundary of the site comprises of dense wooded areas. There is some hedgerows around the other site boundaries however these are less dense. There is also a pond in the centre of the site, meaning there could be potential for great crested newts. A brook runs through the wooded area to the south of the site however this is not included within the red line boundary of the site.	
Landscape	The SA indicates that the site is of medium sensitivity and we note that there are open views of the site from Chapel Lane.	
Flood Risk	Flood Zone 1	
Heritage	There is a scheduled ancient monument located 80m from the north eastern corner of the parcel (Micklehead Green Moated site). There is some ribbon development which sits in between the site and the monument however the development of this site could have an impact on the setting of this monument and would need to be taken into consideration. Wood's House Farmhouse (Grade II) is located approximately 160m to the south of the site.	
Access	The site can be accessed via Chapel Lane which runs along the western boundary of the site. There is a bus stop on Walkers Lane (which forms the northern boundary of the parcel where there is some existing ribbon development). There are very limited services from this bus stop and only 1 or 2 services a day to St Helens. Further along Walkers Lane, there is a bus stop which offers frequent services to Laffak however this is the only destination. The nearest train station is located in Rainhill which is located 2.6km to the west of the site. The M62 motorway is located 1.4km to the south of the site.	

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site contains Local Wildlife Site (Pendlebury Brook) and TPO.		The site is located adjacent to the Pendlebury Brook Local Wildlife Site.
SA2: To protect and improve land quality in St Helens		There is 100% (7.33ha) overlap of the site with ALC Grade 3.		No comment
SA3: To improve air quality in St Helens		Small size site (105 units), located over 3.7km from AQMA.		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 1.7km from nearest protection zone.		No comment
SA5: To mitigate and adapt to the impacts of climate change		Within Bold Forest Park, site presents opportunities for enhancement of GI network.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		99% of site is Flood Zone 1, with 1% in Flood Zone 2. With careful/mitigation the zone 2 could be avoided.		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		97% of site within Low-Medium or Medium Landscape Sensitivity area. Over 950m from a prominent ridge line		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		Site is 157m from listed building (Wood's House Farmhouse) and 62m from Ancient Monument (Micklehead Green Moated Site).		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		Site is 333m from open space and 48m from PROW (severance unlikely)		No comment



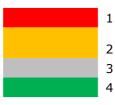
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and		
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered		
SA12: To improve health and reduce health inequalities	Access to GP: 1.61km distance from Four Acre Health Centre, Dr J Kurzeja & Partners. Access to Leisure: Within 1200m of 2 Children's Play Facilities and 2 allotments.	No comment
SA13: To improve the education and skills levels of the population overall	Primary: 326m from Sutton Manor Community Primary School. Secondary: 1.63km from The Sutton Academy.	The nearest primary school is approximately 535m from where the site would be accessed via Chapel Lane, therefore scores grey in accordance with the SA's methodology.
SA14: To ensure local residents have access to employment opportunities	75m from Lea Green Industrial Estate / St. Michaels Road.	No comment
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing site on land not suitable/attractive for employment.	No comment
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential to deliver 105 units over 15-30 years.	Agreed, albeit reserve the right to comment on detailed delivery rates and assumed dwelling numbers at a later date.
SA17: To reduce poverty and social exclusion		
SA18: To reduce crime, disorder and the fear of crime		
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	164m from Bus Stop. High frequency service.	No comment
SA20: To improve access to and use of basic goods, services and amenities in	Residential site is 695m to the nearest convenience store (SKS Late Shop) or supermarket. In the SA is larger and differs to the red line of the proposed safeguarded	No comment

*Note: The land parcel assessed in the SA is larger and differs to the red line of the proposed safeguarded land allocation.

Total Score: 49.5 49

Key of Council's SA Scoring:

Likely to generate negative effects Potentially negative effects which could be mitigated Unlikely to have significant effects Likely to promote positive effects





Local Plan Reference: 7HS Site Location: Land south of Elton Head Road, Thatto Heath Safeguarded



Council Assumptions	Pegasus Comments
Site Size: 3.72 ha	Realistic, no comment
Indicative Site Capacity: 84	No comment, albeit reserve the right to comment on detailed capacity assumptions at a later stage.
Assumed Net Developable Area: 75% (therefore 2.79 ha)	No comment
Assumed Density: Minimum 30 dwellings per hectare	No comment

Planning History: None

Adjacent to site: P/2012/0405- Residential development for 114 dwellings- Granted permission

Land Ownership/Availability: 1 Land Title (private landowner with no affiliation with housebuilder or developer).

Green Belt Parcel Reference: GBP_085C

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments	
1. To check the unrestricted sprawl of large built up area	Low	The sub-parcel comprises of St. John Vianney Catholic Primary School, agricultural fields and woodland. The subparcel is bounded to the north by Elton Head Road, to the south by woodland and newly approved residential development (Ref: P/2012/0405) to the west by a tree-lined field boundary and to the east by the primary school and further woodland. The woodland which is contained within this sub-parcel has been included as part of the landscaping scheme of Planning Approval P/2012/0405, and as such is both protected and will be retained as part of that scheme. The sub-parcel is only small with well contained boundaries, with planning consent for residential development on three sides of its boundary.	Medium	We agree that the site has strong boundaries on three sides, however the western boundary is less well defined. It comprises of hedgerow, which whilst providing some protection, leads to concerns about sprawl to the open fields and Green Belt to the west. We therefore score the site as scoring medium against this purpose of the Green Belt.	
2. To prevent neighbouring town merging into one another	Low	The sub-parcel forms part of a larger strategic gap between Sutton Heath /Thatto Heath (St. Helens core area) and Rainhill along with sub-parcels GBP_085a and GBP_085b, however, due to its location further north, if development were to take place on this parcel there would still be a significant visual strategic gap between both settlements (approx. 0.82km at the narrowest point).	Low	Agreed, no comment.	
3. To assist in safeguarding the countryside from encroachment	Low	The sub-parcel has a semi-rural character due to encroachment from existing urban development. The subparcel lacks open aspect due to its strong boundaries with woodland and residential development. The sub-parcel itself is only small in area with strong boundaries and residential development clearly visible when viewed from the south and west.	Medium	The site has no built form within its boundary, and vegetation is only present along it's boundaries. Due to the lack of built and natural form within the land parcel itself, it shares many characteristics of the countryside. Open views over the site are present when looking from Elton Head Road southwards. It therefore scores medium against this purpose of the Green Belt.	
4. To preserve the setting and special character of historic towns	N/A	N/A	Low	The site is not located near to any historic towns, conservation areas or listed buildings and therefore scores a low contribution against this purpose of the Green Belt.	
Overall Assessment	Low	This sub-parcel makes a weak contribution to the 3 purposes assessed as part of the review. The site is well contained with strong boundaries and does not significantly contribute to the wider strategic gap.	Medium	Whilst the site benefits from strong boundaries to the north, east and south, its western boundary is not strong which leads to concerns about sprawl to the west. Furthermore, the site is open due to a lack of built form and vegetation within the land parcel itself (vegetation and hedgerow are only located along its boundaries). The site therefore has an overall score of medium against the purposes of the Green Belt.	
Key -Low Contribution - LC	ey -Low Contribution - LC Medium Contribution - MC High Contribution - HC				



Access	Access can be taken via Elton Head Road to the north. Thatto Heath Railway Station approximately 0.9 miles to north. Nearby bus stops run low frequency service.	
Heritage	No Listed Buildings or Conservation Areas located within or adjacent to the site.	
Flood Risk	Located in Flood Zone 1	
Landscape	The SA considers the site to be sensitive in landscape terms. Quite open views due to lack of vegetation and built form within main land area.	
Ecology/Trees	Extensive tree belt and wooded area borders the site. Albeit limited coverage within land parcel.	
Agricultural Land	Grade 3 (good to moderate)	

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site is located 364m from nearest Local Wildlife site and over 500m to nearest TPO. E		No comment
SA2: To protect and improve land quality in St Helens		Site does not contain any ALC Grade 1-2. There is a 81.2% (3.94ha) overlap with ALC Grade 3, however this does not exceed 20ha.		No comment
SA3: To improve air quality in St Helens		Relatively small scale development located over 2.1km from an AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 1.3km from nearest protection zone		No comment
SA5: To mitigate and adapt to the impacts of climate change		843m from Bold Forest Park. Site too small to accommodate green infrastructure enh		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		100% of site is in Flood Zone 1		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		16% of the site is within a Low landscape sensitivity area, whilst 83% of site is considered to have a Low- Medium or Medium landscape sensitivity. The site clips with an area of prominent ridge line.		Agreed, the site is also quite open due to lack of vegetation and built form within land parcel (only confined to boundaries)
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic		No heritage assets within 200m of the site. Effects considered unlikely.		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		150m from area of open space. PROW follows to the south of the site (severance unlikely),		No comment No comment
SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and	N/A	Council not assessed this		



SA11: To reduce the amount			
of waste, and in order of			
priority, the proportion of			
waste reused, recycled and			
1	N/A	Council not assessed this	
-	IN/A	Council flot assessed tills	
SA12: To improve health and			No comment
reduce health inequalities		Access to GP: 1.3km distance from Bowery Medical Centre	
		Access to Leisure: Within 1.2km of 1 allotment and 2 parks/ gardens	No comment
SA13: To improve the			
education and skills levels of			No comment
the population overall		Primary: The site includes the St John Vianney Catholic Primary School	
		Secondary: 1.13km from The Sutton Academy	No comment
SA14: To ensure local			
residents have access to		JEAm from Cuttons Transportation Donot	No comment
employment opportunities		252m from Suttons Transportation Depot	No comment
SA15: To support a strong,			
diverse, vibrant and			
sustainable local economy to			
foster balanced economic		Site suitable and appropriate for housing	No comment
SA16: To improve access to a			
range of good quality and			
affordable housing that meets			
the diverse needs of the			
honough		Potential to deliver 84 units over 15-30 years	No comment
SA17: To reduce poverty and			
JOCIAI CACIASIOII	N/A	Non-employment site	
SA18: To reduce crime,			
disorder and the fear of crime	N/A	Council not assessed this	
SA19: To reduce the need to	,//	Council flot assessed tills	
travel, encourage alternatives			
to the car and other motor			
vehicles, improve highway		182m from Bus Stop with low frequency service and 453m from a bus stop with	Agreed site not well comed by high frequency but comitees
		hourly service.	Agreed, site not well served by high frequency bus services.
safety and make the best use			
of existing transport			
infrastructure			
SA20: To improve access to			
and use of basic goods,		Decidential site within 00m of a convenience store (The Co. energtive Food) or	
services and amenities in		Residential site within 98m of a convenience store (The Co-operative Food) or	No command
town and local centres		supermarket	No comment

Total Score:	48	48

Key of Council's SA Scoring:

Unlikely to have significant effects
Likely to generate negative effects
Potentially negative effects which
could be mitigated
Likely to promote positive effects





Local Plan Reference: 8HS Site Location: Land south of A580 between Houghtons Lane and Crantock Grove Allocated or Safeguarded? Safeguarded



Council Assumptions	Pegasus Comments
<u>Site Size:</u> 52.69	Accurate, no comments
Indicative Site Capacity: 1,027 dwellings	We question whether this total site capacity is accurate, because there are a number of constraints including ecology (presence of a Local Wildlife Site), flood risk as well as noise from the A580 to the north. We therefore consider that total capacity could be lower than this and reserve the right to provide detailed comments at a later stage.
Assumed Net Developable Area: 34.24 hectares (65%)	Assumed 65% NDA seems realistic given the ecology, flood risk and noise constraints, albeit further detail needed to confirm.
Assumed Density: 30 dwellings per hectare	Realistic, no comments

<u>Planning History:</u> The relevant planning history for this site relates to a 54km buried pipeline connecting Prescot Reservoir, Knowsley to Woodgate Hill reservoir in Bury (16.58km is located in St Helens) (Application Ref: P/2008/0872). Application was granted in February 2009.

Land Ownership/Availability: 10 different titles within the parcel.

The largest land holding within the parcel is MS78462. MS280405 - Theodorus Constantinou. MS101141 - Nedgroup Trust (Jersey) LTd and Nedgroup Private Wealth Fiduciary Services Ltd. MS189679 - David Henry Cook and Joan Cook. MS284050 - Stephen David Brine and Frances Mary Harrap. MS538799 - Mark John Thomas and Pauline Thomas. MS78462 - Peter Swift. MS426083 - Craig Joseph Lee Pickavance. MS79325 - Anne Patricia Clarke. MS632437- Peter Swift. MS128499 - Calderbank and Fairhurst Ltd. MS280779 - Joseph Swift.

Although there are a number of different landowners within this parcel, Story Homes and Planet Properties Ltd have options on the whole of the parcel. Story Homes have an option on the majority of the parcel.

Green Belt Parcel Reference: GBP_098

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The south and east boundary of the parcel adjoin the large built-up area of St. Helens (Windle). The parcel is bounded to the north by the A580 East Lancashire Road, to the south and east by residential development and to the west by Houghtons Lane and agricultural land. The parcel is therefore well contained.	Low	The site benefits from strong boundaries on all sides.
2. To prevent neighbouring town merging into one another	Low	The parcel does not fall within a gap between towns.	Low	Agreed, site is located within St Helen's Core Area which has already effectively merged.
3. To assist in safeguarding the countryside from encroachment	Low	The parcel has very little inappropriate development and retains some open views to the west. The A580 to the north and the residential development to the south and east impact on countryside character, but parts of the parcel do retain a sense of openness when looking westwards	Medium	The site bears many characteristics of the open countryside, because it has sparse vegetation coverage leading to it being quite open. Long-line views are particularly present when looking from Houghtons Lane westwards, as well as from Ecclesfield Road looking northwards. Therefore, we would score the site as being of medium sensitivity against this purpose of the Green Belt.
4. To preserve the setting and special character of historic towns	N/A		Low	No Listed Buildings or Conservation Areas are located directly adjacent to the site, so the site does not provide a strong contribution to this purpose of the green belt.
Overall Assessment	Low	The parcel is well contained. The A580 to the north and the residential development to the south and east impact on countryside character.	Low	The site benefits from strong boundaries and does not present any merger issues, albeit the open and long line views looking northwards and westwards do heighten green belt contribution and sensitivity.
Key -Low Contribution - LC	Mediun	Contribution - MC High Contribution - HC		



Access	There is a PROW running running through the site, running parallel with Windle Brook which runs from north to south. Access to the site would be taken via Houghton's Lane which runs along the western boundary of the site. There is a bus stop in the far north eastern corner of the site which offers services to Ormskirk, Park Hill, Rainford and St Helens. There is little in the way of bus provision in the south western corner of the site. The East Lancashire Road runs along the northern boundary of the site which runs from Manchester to Liverpool. The nearest train station is a
	7.5km drive away in the centre of St Helens.
	No listed buildings within or adjacent to the site. The nearest buildings are located over 430m to the south east of the site and substantial residential development sits in between the site and the
	listed buildings. Borough Cemetry is Grade II registered park and garden and is located approx 400m to the east. Similarly, existing residential development sits in between this site and the
Heritage	registered park/garden.
	The majority of the site is located within Flood Zone 1 however there is a small section of the site within the centre of the site which is flood zone 3 and flood zone 2. This is located around Windle
Flood Risk	Brook, which runs from north to south. There is also a pond in this location which is the focus of some of the flood risk.
Landscape	The SA scores the site as being in a Medium-High Landscape Sensitivty Area and we also note how the site is very open.
Ecology/Trees	Trees and hedgerows are located along the site boundaries and divide the individual field parcels. Within the parcels, there is a pond and Windle Brook running from north to south. Windle Brook is a Local Wildlife Site.
Agricultural Land	The site is made up of Grade 1 and Grade 2 agricultural land which is considered to be the best and most versatile agricultural land.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		Site includes a Local Wildlife Site (Windle Brook). Effects considered likely.		The site is sensitive from an ecology perspective due to the presence of the Local Wildlife Site.
SA2: To protect and improve land quality in St Helens		Site is 98% Grade 1 agricultural land (50ha), 16% Grade 2 agricultural land (9.7Ha), therefore effects considered likely.		Agreed, the loss of high quality agricultural land is a negative constraint for this site.
SA3: To improve air quality in St Helens		Large scale site (1,119 units) over 2.3km from AQMA		No comment
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water		Over 1.9km from nearest protection zone.		No comment
SA5: To mitigate and adapt to the impacts of climate change		Site presents opportunities for enhancement of GI network and increased tree cover.		No comment
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 91% in Flood Zone 1, 9% Flood Zone 2 and 5.6% in Flood Zone 3.		No comment
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		100% of site within a Medium-High or High Landscape Sensitivity area and includes a prominent ridge		No comment
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		Site on an archaeological interest area (field west of watery lane). Effects to the setting of this asset are considered likely		No comment
SA9: Ensure access to and protection and enhancement of high quality public open space and natural greenspace		649m from open space, but Public Right of Way on site (severance possible if not designed inclusively)		No comment

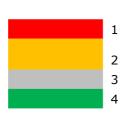


SA10: To minimise energy use and increase the proportion of energy both purchased and generated from renewable and		
SA11: To reduce the amount of waste, and in order of priority, the proportion of waste reused, recycled and composted or recovered		
SA12: To improve health and reduce health inequalities	Access to GP: 529m from Eccleston Medical Centre, Dr K H T Mikhail & Partner Access to Leisure: Within 1.2km of 3 Children's Play Areas and 1 allotment.	No comment, albeit would note due to the size of the site that the sustainability of the northern section will be less favourable than the south.
SA13: To improve the education and skills levels of the population overall	Primary: 525m from Bleak Hill Primary School Secondary: 1.49km from De La Salle School	No comment
SA14: To ensure local residents have access to employment opportunities	1.56km from Catchdale Moss / Farming	No comment
SA15: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic	Housing site on land not suitable/attractive for employment	No comment
SA16: To improve access to a range of good quality and affordable housing that meets the diverse needs of the	Potential to deliver 1,119 units over 15-30 years	This scoring is not consistent with the SA's methodology. As this site is safeguarded land, the site will not be available and achievable in the first 5 years.
SA17: To reduce poverty and social exclusion SA18: To reduce crime, disorder and the fear of crime		
SA19: To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure	85m from bus stop. Low frequency service.	A site of this size will need to consider improvements to local bus services, given that large areas of the site are not well connected to existing bus services (particularly the south-western section of the site).
SA20: To improve access to and use of basic goods, services and amenities in town and local centres	Residential site within 45m of a convenience store (East Lancashire Service Station) or supermarket	No comment

Total Score: 43.5 42.5

Key of Council's SA Scoring:

Likely to generate negative effects Potentially negative effects which could be mitigated Unlikely to have significant effects Likely to promote positive effects





Site Location:

Land north of the M62 and south of Mill Lane



Pegasus Comments
Site Size: 36.67 hectares
Indicative Site Capacity: 750 dwellings
Assumed Net Developable Area: 21.5 hectares (approx 60%)
Assumed Density: 35 dwellings per hectare
<u>Planning History:</u> None
<u>Land Ownership/Availability:</u> Wallace Land Investments have an option on the majority of the land (MS653499 and MS103186). One small parcel is owned by Dorothy Case (MS598227).

Green Belt Parcel Reference: GBP_089

Green Belt Purpose	Council Rating	Council Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	Low	The parcel adjoins the large built-up area of Rainhill. The parcel is bounded to the north by Mill Lane and in-part the A57 Warrington Road, to the west by Hall Lane, to the south by the M62 and to the east by residential development at Norland's Lane. The parcel is therefore well contained. Despite the size of the parcel, given the level of relatively high enclosure it is considered that development of the parcel is unlikely to lead to unrestricted sprawl.	Low	We agree that this parcel adjoins the large built up area of Rainhill and forms an extension to this settlement. The parcel is well contained with existing residential development and Mill Lane to the north, Hall Lane to the west, the M62 to the south and existing residential development and road infrastructure to the east. We agree that the parcel is considered to be well contained and enclosed and therefore this parcel has a low contribution to this purpose.
2. To prevent neighbouring town merging into one another	Medium	The parcel falls within a partially strategic gap between Rainhill and Town End (Halton Borough). A strategic gap could be maintained between these settlements if this parcel was developed.	Low	We disagree with this rating and consider the parcel to have a low contribution to this Green Belt purpose. Immediately to the south of the site is the M62 motorway which forms a robust boundary and would prevent the merging of Rainhill with Town End. As recognised in the Council's comments with regards to purpose 3, the parcel has strong permanent boundaries and is well contained. From the edge of the M62 to Town End, there is a distance of over 1km and therefore if this site was developed, it would not cause the merging of these two distinct settlements. The strategic gap would still exist and therefore we do not consider this to have a medium contribution to this purpose. The existing gap between Rainhill and Town End is 1.4km so the development of this site would not cause the gap to significantly reduce. Given the presence of the M62, this site is considered to have a low contribution to this purpose. This is further the case given that the south-eastern urban extent of Rainhill already extends southwards so that it is parallel with Junction 7 of the M62. If this site was released from the Green Belt, this built line would be parallel with the existing built form to to the immediate north- west of junction 7 of the M62. It is also notable that Town End is not listed as a settlement which the Council have specifically highlighted as having potential merging issues in their Green Belt Assessment (see Paragraph 2.20). Paragraph 2.21 later confirms that the Council have given more limited weight to the preservation of gaps between settlements which they have not listed at paragraph 2.20. It is therefore unclear why the site has been scored medium.
3. To assist in safeguarding the countryside from encroachment	Low	The development of this parcel would extend the built form of Rainhill into the countryside. The parcel contains little inappropriate development and does retain some open views looking westwards, which provide a degree of countryside character. However the parcel has strong permanent boundaries and is well contained.	Low	We support the Council's assessment of this parcel with regards to this purpose. The parcel has strong permanent boundaries and is well contained. There is also existing vegetation and tree growth along the site boundaries which prevent long distant views into the open countryside. Overall, this parcel is considered to make a low contribution to this purpose.
4. To preserve the setting and special character of historic towns	N/A		Low	Whilst some Listed Buildings are located in close proximity to the site's northern boundary, the site is not located near to any historic towns, which is the strict meaning of this purpose of the Green Belt. Therefore, the site scores low against this purpose of the Green Belt.

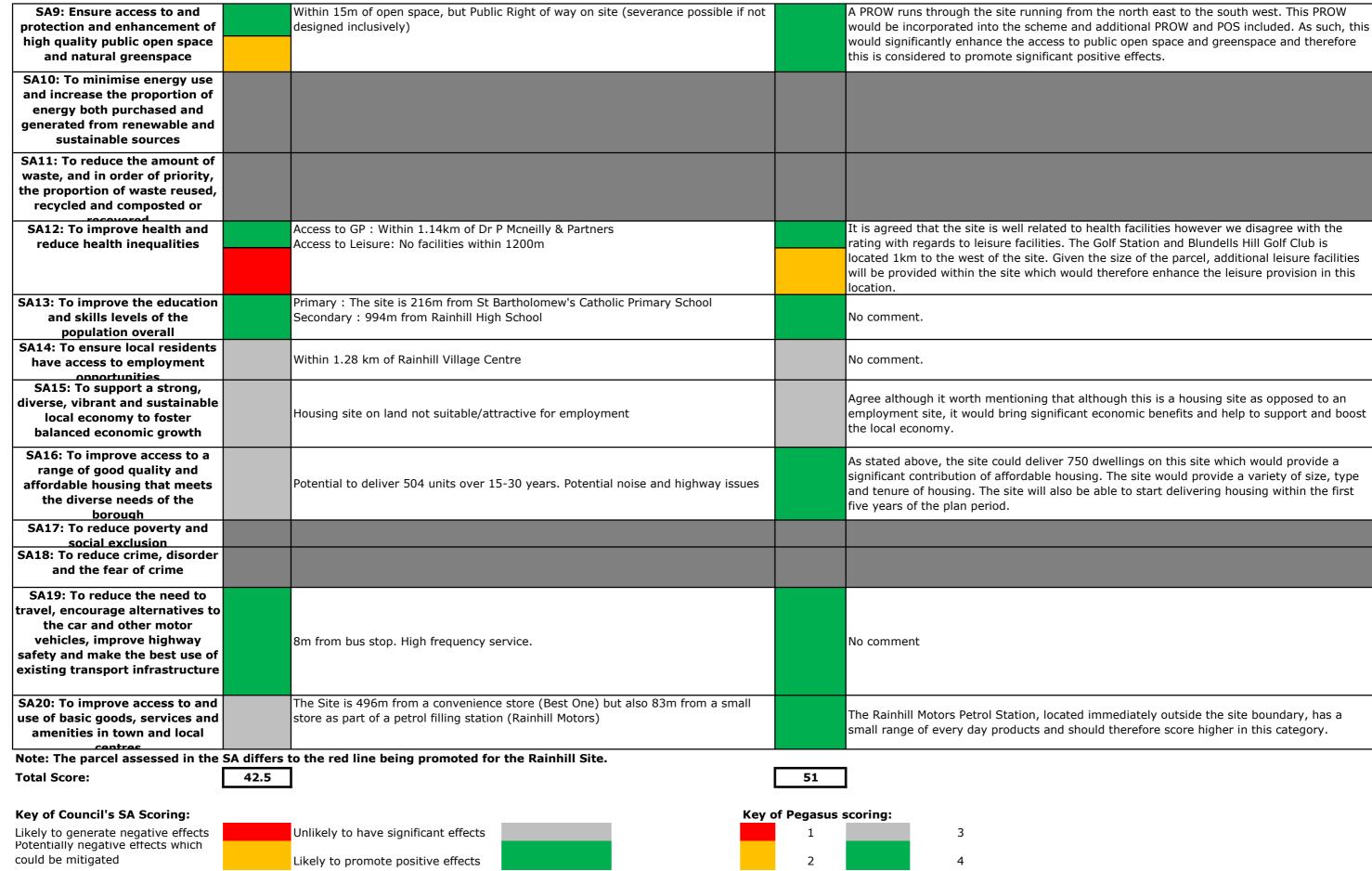


Overall Assessment		The parcel has strong permanent boundaries and is well contained. The parcel falls within a partially strategic gap between Rainhill and Town End (Halton Borough). A strategic gap could be maintained between these settlements if this parcel was developed.	Low	Overall, we disagree with overall rating of this parcel and consider this parcel to have a low contribution to the Green Belt purposes as opposed to a medium contribution. The site is bound by strong, durable and robust boundaries. The M62 boundary to the south of the parcel is a strong boundary and the development of this site would not cause neighbourhood of Rainhill and Town End to merge.
Key -Low Contribution - LC	Medium C	Contribution - MC High Contribution - HC		

Access	Vehicular access for the site will be provided from Mill Lane and will be in the form of a priority junction. This will be located between the large pond associated with Manor Farm Public House and Manor Croft. The site is within a 2km walking catchment from the centre of the site and the whole of Rainhill village is accessible via foot. The nearest bus stops are located on the Mill Lane frontage. Regular services are available to Billinge (via St Helens), and the railway station. The nearest railway station is located approx 2km walking distance from the centre of the site and provides regular services to Liverpool, Manchester and Warrington. A public right of way runs through the site from north to south however this can be incorporated into a development scheme.
Heritage	There are a number of listed buildings located along Mill Lane (the northern boundary of the site) including: Cross (Grade II), Briars Hey (Grade II), Manor Farmhouse (Grade II*), Smithy Cottage and that part of the same house incorporated within Smithy House (Grade II), Rainhill Cottage (Grade II). There are also two scheduled ancient monuments located approximately 280m to the western boundary of the site. These comprise of Rainhill Farm Moated Site and twelve fish ponds in the Rough Designation and The Old Farmhouse (Grade II*). The development on this site will be appropriately designed and masterplan to ensure that development does not have an impact on these heritage assets.
Flood Risk	Flood Zone 1
Landscape	A detailed Landscape Assessment, prepared by Bright and Assosciates in January 2017, confirms that the mitigation as shown on the illustrative masterplan results in the development being acceptable from a landscape perspective.
Ecology/Trees	The site is within a SSSI Impact Risk Zone. The nearest SSSI in the Mersey Estuary which is located 6.1km to the south of the site. The site is part of the Mersey Community Forest however this proposal will not impact on these designations. There are some small ponds within the site. The site is boundary by hedgerows and trees and there are trees clustered around the ponds.
Agricultural Land	The site is a combination between Grade 2 and Grade 3 agricultural land. The majority of the land is Grade 2.

SA Topic	Council Rating	Council's Rationale for score	Pegasus Rating	Pegasus Comments
SA1: To protect and enhance biodiversity		The site includes a TPO.		The red line site area being promoted by Wallace does not include any protected trees.
SA2: To protect and improve land quality in St Helens		Site is 78% Grade 2 agricultural land (40Ha) and 17% falls into Grade 3 Agricultural Land (8.9Ha). Combined coverage 49Ha, therefore effects considered likely.		A detailed Agricultural Land report confirms that the vast majority of this site is Grade 3b land. In line with this more detailed assessment, the site scores amber against the SA methodology.
SA3: To improve air quality in St Helens		Large scale site (504 units) located 3.9km from AQMA		No comment.
SA4: To maintain and enhance the quality of controlled waters and to sustainably manage water resources		Over 392m from nearest protection zone		No comment.
SA5: To mitigate and adapt to the impacts of climate change		Site located between 420-1062m from Bold Forest Park. Site presents opportunities for enhancement of GI network.		No comment.
SA6: To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties		Site is 100% in Flood Zone 1		We agree with this comment. The entire site is located in Flood Zone 1 and therefore the development of this site would not heighten the risk of flooding elsewhere or cause any residual risk to neighbouring people and properties.
SA7: To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside		99% of the site is within Low-Medium or Medium Landscape Sensitivity area and 1% falls within Medium-High or high Landscape Area. The site contains prominent ridgelines		A detailed Landscape Assessment (prepared by Bright and Assosciates in January 2017) has been previously submitted to the Council. This concludes that although the site does have landscape sensitivity (especially towards the south of the site), the mitigation proposals shown on the previous Masterplan can support sustainable development principles in the contet of visual amenity and landscape character.
SA8: To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment		A listed building falls within the Site (Manor House and Briars Hey). The setting of nearby heritage assets is likely to be effected.		We disagree with this rating. Firstly, we would like to clarify that the Manor House and Briars Hey are not located within the red line boundary. It is acknowledged that the listed buildings are located in close proximity to the site, however the illustrative masterplan has carefully taken these heritage assets in to consideration and propose ample mitigation.





PO3822



{In Archive} St Helens Borough Local Plan 2020-2035 Submission Draft

to:

planningpolicy 21/02/2019 13:48



I wish to object to the Local Plan on the following grounds.

The area where I live should not be retained within the Green Belt. The areas I refer to are the residential areas of Moss Lane (Windle Ashes Farm to no 44), Rainford Rd (123-189), St Helens Rd (no 1Hillside -186). Inglewood Drive, Inglewood Rd, Longwood Close and Hill Top Rd, the Bottle and Glass PH and the Plumbers Merchants MLR.

This is a substantial suburban housing area of c 170 houses and two businesses. It is not a village in the countryside. Most of the houses front two increasingly busy and noisy dual carriageways the A570 and the A580 .There is more tarmac than open field,

The reasons for objection to maintaining the land within the Green Belt are-

- 1 None of the five reasons for including land in Green Belt are met here. You have declined to argue differently in representations made to you more than a year ago.
- 2 You have declined also to state that the review of the Green Belt included any specific review of this area.

10

- 3 The area has been included in the Green Belt for some time and yet your Council has granted planning permission for several houses materially larger than the original dwellings, large extensions, granny flats and recently a swimming pool because your Development Control Team have been reluctant to enforce Green Belt Policy in this area given that development within the built up area does not adversely affect the openness of the surrounding Green Belt.
- 4 Normal Planning Policy would be sufficient in this area.
- 5 There are infill sites within this built up area , for example the land opposite the Bottle and Glass PH which could be used for much needed housing and to contribute to the Councils other policies promoting self build, retirement homes and affordable housing.
- 6 It is perverse to allocate large areas of open farmland and previously a golf course which only caters for the volume house builders and has raised very strong objections, at the same time as retaining a built up area like this within the Green Belt. It serves no useful purpose and it is unnecessarily restrictive.

Regards

Keith McCormack 31 St Helens Rd Rainford St Helens

WA117QR

PO3823

73



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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9-GER-GENERAL
9-GER-3HS
10-GER-3HS
10-LPAO7-8HS
13-IDP
10-LPCOI



Council

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

Ref: LPSD (For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on 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	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:	Date: 13th 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 <u>5pm on Monday 13th May 2019</u> 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. If you still need assistance, you can contact us via:

Email:

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.

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

Now please complete <u>PART B</u> 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 B1 SPATIAL STRATEGY (LPA01 & 2)

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.

Policy	Paragraph / diagram	Policies	Sustainability	X	Habitats
LPA01 02	/ table	Мар	Appraisal/ Strategic Environmental Assessment		Regulation Assessment
name do	cuments (please cument and part/section)		Review (GBR) lity Assessment. (S	SA)	А

4. Do you consider the St F Please read the Guidance no Soundness	Helens Borough Locate for explanations of	cal Plan 2020-2035 is: f Legal Compliance and the Tests of
Legally Compliant?	Yes	No □ X Unsure
Sound?	Yes	No □ X
Complies with the Duty to Cooperate	Yes	No □ X
Diagram Mala and assessment of a	•	

Please tick as appropriate

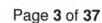
	Plan is <u>unsound</u> , is it because it is not: for explanations of the Tests of Soundness
Positively Prepared?	
Justified?	□ X
Effective?	\Box X
Consistent with National Policy?	□х

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

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

INTRODUCTION

- 1. We support Local Plan led sustainable development. we are not against industrial and housing development where there is genuine need and it is justified and sustainable.
- However, we are strongly opposed to unnecessary Industrial and Housing development on Green Belt land. The CPRE view, in line policies in the National Planning Policy Framework (NPPF) that Green Belt, Greenfield and Green Space land is essential to quality of life and the health and wellbeing of the community, is fully supported.
- This submission is made by me and on behalf of 13 other residents in Chapel Lane as the separate attached lists. This response complements the submission made by Kirkwells Planning Consultants on behalf of the St Helens Green Belt Association (SHGBA) on the 13th March 2019.



- have inconsistent approach to SA objectives
- having the sites being preselected for safeguarding with the objectives and reasoning being drafted in order to validate.
- having more positive factors when in reality more negative factors would produce another outcome.
- have poor integrity resulting in misleading data skewing the assessment outcome of the objectives.
- 56. The Sustainability Appraisal methodology is therefore questionable. A review of the SA needed to restore confidence in its findings.

Green Belt Review (GBR) Evidence document.

- 57. Again, as will be seen in other responses, particularly those from RTPI Planner, there are similar concerns in respect of how the Green Belt Review (GBR) has been conducted.
- 58. The concerns relate to the following:-
 - The scoring mechanism used is entirely subjective.
 - The methodology would not stand up to a recognised process designed to deliver consistent assessments.
 - It seems that the parcels of land have been divided amongst council officers for assessment as the resulting scores differ for the same assessment criteria.
 - If the parcels were to be redistributed and re-assessed, different results would be obtained, thus failing the consistency test required for any measurement system.
 - Whilst the review attempts to portray a sense of their being a level playing field, assessing
 each parcel individually, those assessments are not applied consistently across the board
 which has led to inconsistencies in the output.
 - One cannot logically reason for one parcel and assign a score, then find those same reasons for a different parcel but assign a different score.
- 59. Discounting purpose 5 the regeneration of derelict land is a concern. By ignoring this purpose disincentivises the recycling of and reuse of such land thereby adding to and perpetuating the problem of town centre regeneration.
- 60. It could be argued that it would be more effective to employ staff on assessing unsuitable sites.
- 61. The points raised throughout the GBR document clearly show inconsistencies with subjective scoring and findings. It's is almost as if some of the parcels of land have been pre-selected for safeguarding or discounting and then the scoring, findings and rationale documented to produce the desired results.
- 62. A review of the GBR methodology and process is needed to restore confidence in its findings.

Green Belt Land Parcels (GBP) Profiles

GBP 098 8HS (formerly HA16 in SHLPPO 2016) East Lancs Site.

- 63. The *Green Belt Review (GBR)* outlines the justification for removing sites from the Green Belt LPSD para 4.6.
- 64. 8HS has a gross area of area of 52.69 ha and has a net developable area ratio of 65 % to reflect development constraints on the site. A nominal capacity of 1027 homes with a nominal dph of 30. Development constraints are related to UU water mains crossing the site and flooding from Windle brook. Also the site would involve the provision of significant and expensive utility provision and infrastructure.



(out of 956) on the site until the traffic issues are resolved. It is difficult to see how this can be resolved practicably or economically in such a land locked parcel of land.

- 74. The site is the last piece of green space remaining that separates Knowsley, Eccleston Park, Nutgrove, Thatto Heath, and if lost to development will see all these settlement merge into one mass of urban development to perpetuate sprawl. These communities would lose a valuable asset and green space essential to health and wellbeing and contrary of National Policy.
- 75. The fact that site lacks visual amenity and openness beyond its boundaries is not a reason for concluding that the parcel does not possess enough greenfield value.
- 76. The council in order to develop this site still have to address the concerns of Sport England. The site should remain as Green Belt and be used for recreation.
- 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 LPSD may not be DtC compliant in respect of economic growth, transport, agriculture and healthcare.
 - The spatial strategy is based on flawed economic data that needs review.
 - Housing Need assessment needs review to reflect latest information to comply with NPPF para 31 and National Audit Office guidance.
 - A more robust Agricultural policy at Regional and local level is needed to ensure Food Security.
 - A strategic policy directing development to central urban areas is needed to be consistent with National Policy.
 - Redevelopment and recycling of Previously Developed Land (PDL) not currently on the Brownfield Register requires addressing before development of Green Belt land in order to be consistent with National Policy.
 - Regional Strategy needs review to ensure achievable and sustainable economic growth that satisfies the obligations under the Duty to Cooperate and Statements of Common Ground.

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:

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

Kirkwells submission was submitted on the 13th 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

PO3824

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

13/05/2019 14:20

2 attachments





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Please confirm receipt.

kind regards

Ken Marr

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6-LPAOS
6-LPAOS
9-GER-GENERAL
9-GER-3HS
10-GER-3HS
10-LPAO7-8HS
13-IDP
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Council

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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:	Date: 13th May 2019

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Yes 🛛 (Via Email)	No 🗌	
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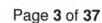
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PO3825

73



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

This email has been checked for viruses by AVG. https://www.avg.com

D-DEC-porm 1.7.2
2-LPAOI
3-LPAOI
3-LPAOS
4-GENERAL
5-LPAOS
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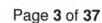
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PO3826



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Last Name: STACH-KEVITZ	Last Name:
Organisation/company: RESIDENT -	Organisation/company:
ABUTTING PROPERTY	
	Address:
BIRCHLEY, BILLINGE,	
Postcode: WN5 7QL	Postcode:
	Tel No:
Mobile No:	
Email:	mail:
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post to:

Local Plan

St.Helens Council

Town Hall

Victoria Square

St Helens

WA10 1HP

or by hand delivery to:

Ground Floor Reception

St. Helens Town Hall

(open Monday-Friday 8.30am - 5.15pm)

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PART B - YOUR REPRESENTATION

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3. To whic	h part of the Local Pl	an does this repres	sentation relate?	
Policy	Paragraph/ diagram table	Policies Map ACO 3	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	uments (please name and relevant part/sect	ion)		
	consider the St Heler read the Guidance note		Plan 2020-2035 is: Legal Compliance and t	he Tests of Soundness
Legally Co	empliant?		res 🔽 No	
Sound?			res ✓ No	
Complies	with the Duty to Coope	erate :	∕es	
Please tick	k as appropriate			
Positively I Justified? Effective?	 	e for explanations of	the Tests of Soundness	
		ou consider the Lo	cal Plan is not legally co	empliant or is unsound
or fails	to comply with the du	uty to cooperate. P	ease be as precise as p	ossible.
-	rish to support the leg s box to set out your (oundness of the Local	Plan, please also
I AGREE INTO TV I DO N PLUS TH KEPT AS	THAT THE LINE WO PARTS (GREE IOT UNDER STA IE LAND AND BU S "GREEN BELT".	OF DEMARKATION AND OTHER ND, HOWEVER	ON', WHICH SPLITS ZWISE), DOES SEE , WHY THE WHOL TS CURTILAGE"SHO TAIN THAT THE PROF	EM MISALIGNED. E STRUCTURE OULD NOT ALL BE
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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.

REMINDER: BIRCHLEY HALL IS AN ELIZABETHAN HOUSE BUILT IN 1594

AND IS, WITHOUT DOUBT, OF VERY IMPORTANT HISTORIC YALUE TO

ST. HELENS AND DISTRICT, THE HALL, AND ALL ASSOCIATED

STRUCTURES "IN ITS CURTILAGE", IS GRADE 2* LISTED.

IN THE RECENT PAST SOMEONE SOUGHT TO HAVE THE GREEN BELT LISTING ON THE NORTHERN SIDE "DOWNGRADED", SINCE THEN A LARGE CONSERVATORY WAS ALLOWED PERMISSION TO BE ERECTED ON THAT SIDE. IF ALLOWED INPUT AT THE TIME OF THE PROPOSAL TO DOWNGRADE, I WOULD HAVE SUBMITTED THAT IT WAS CONTRARY TO THE BUILDING'S HERITAGE - BUT THAT TIME IS PAST.

N.B. THE BARNS (ONE DERELICT) ON THE SOUTHERN SIDE OF ACO3 ARE TO BE INCORPORATED INTO THE PROPOSED FIVE-BED DETACHED PROPERTY (See S.G) - GRANTED BY S.H.C. WITH STRICT CONTROLS ON THESE GRADE 2* STRUCTURES, FRESH SUBMISSIONS ARE LIKELY SOON AS TIME IS LAPSED, IF YOU MODIFY THE BUINDARY AS IN S.G. THE SAME CONTROLS MUST BE IN PLACE.

Please continue on a separate sheet if necessary

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

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

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



Yes, I wish to participate at the oral examination

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

ABUTTING HAVE RESIDED THE IN A PROPERTY "DE-LISTING PROPOSED AREA FOR AS GREEN BELT FOR YEARS, MANY YEARS BIRCHLEY HALL AND ESTATE) THAT NO RTS OF THE ESTATE WOULD RELATED THAT NO 40 AGO I WAS THE LATE, BERNARD PRIVATE OW'NERS OF FURTHER PARTS WOULD BE DOWN-PURPOSES GRADED FOR DEVELOPMENT WHAT MR, WOOD CONTRADICT THIS PROPOSAL WOULD GIVEN TO UNDERSTAND. WAS

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SPARE: FOR PRINTING

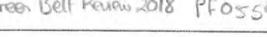




PO3827

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Council

1 2 MAR 2019

Ref: LPSD

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

Your Agent's Details (if applicable) (we will correspond via your agent)
Title:
First name:
Last Name:
Organisation/company:
Address: Postcode:
Tel No:
Mobile No:
Email:
Date: 11 MARCH 2019
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Plan 2020-2035? (namely submit Inspector's recommendations an	ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the d adoption of the Plan)
Yes (Via Email)	No 🗌
Please note - e-mail is the Councilland address is provided, we will contain	cil's preferred method of communication. If no e-mail act you by your postal address.

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Other docume part/sec	ent and re	s (please name levant	Green Belt F	Review (2018)	

 Do you consider the St He Please read the Guidance note 	lens Borough Local Pl for explanations of Lega	an 2020-2035 is: al Compliance and the Tests of Soundness
Legally Compliant?	Yes	No
Sound?	Yes	No X
Complies with the Duty to Cooperate	Yes	No

Please tick as appropriate

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

- The Green Belt Review (2018) contains questionable decisions. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land.
- Sustainable infrastructure has not been addressed and will cause problems if site 8HS is
 allowed to be safeguarded for development. The decision to include this parcel in the Plan
 leads to significant doubt that the Plan has been positively prepared.
- St Helens Council has used ONS(2014) statistics rather than later and more accurate ONS(2016) data. The Council are aware of this reduction in housing need but still chooses to uplift older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the need to build on Green Belt.
- The Plan does not make effective use of Brownfield and Previously Developed Land (PDL). St Helens Council states that 3,170 ha of the lowest priority contaminated brownfield land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites, barely 7% of the 3,170-ha available. There is little justifiable need to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. It is not reasonable to assume that sites cannot be made available within the 15- year Plan period being considered.
- The loss of Grade 1 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and food security is not considered.

The	Plan is not justified.
	The lack of infrastructure and the poor healthcare and education offering means that St delens is a less desirable place to live and work. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need.
The	Plan is not effective.
	Please continue on a separate sheet if necessary
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(No, I do not wish to	participate at the	The state of the s	participate at the oral
	oral examination	of the standard district	examination	
If	you wish to participate	at the oral part of the	examination please	outline why you conside
is t	to be necessary:	The star part of the	Samuelon, picaso	outline wily you conside
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ea:	se note the Inspector v	vill determine the mos	t appropriate procedu	re to adopt to hear tho:
10	have indicated that the	y wish to participate a	t the oral part of the e	xamination
	Thank you for ta	king the time to comp	lete and return this re	sponse form.
		Please keep a copy fo	r future reference.	
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PO3828



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1 2 MAR 2019

Ref: LPSD

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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	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR,	Title:
First Name: KENNETH ENDLER	First name:
Last Name: FIDLER	Last Name:
Organisation/company:	Organisation/company:
Address: 11 MARYLEBONE AVE	Address:
Postcode: WA955Z	Postcode:
	Tel No:
	Mobile No:
No. of the Control of	Email:

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.

Plan 2020-2035? (namely subminspector's recommendations an	ated of future stages of the St Helens Borough Local ission of the Plan for examination, publication of the d adoption of the Plan)
Yes (Via Email)	No 🗹
Please note - e-mail is the Counc address is provided, we will conta	cil's preferred method of communication. If no e-mail act you by your postal address.

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Policy	LPA05	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
	ent and re	(please name levant	Green Belt I	Review (2018)	

4. Do you consider the St He Please read the Guidance note		an 2020-2035 is: of Compliance and the Tests of Soundness
Legally Compliant?	Yes	No
Sound?	Yes	No X
Complies with the Duty to Cooperate	Yes	No

Please tick as appropriate

	is <u>unsound</u> , is it because it is not: explanations of the Tests of Soundness
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	

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The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and verifiable facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt.

The Plan does not make effective use of Brownfield and Previously Developed Land (PDL). For example, St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that --

3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available.

Why should we give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. The Council has, in the past, undertaken remediation. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

The loss of Grade 1 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and food security is not considered.

The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need.

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Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites. If this action is not taken it will leave large areas of the borough as barren, brownfield deserted sites, whilst our beautiful green belt will be gone.

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

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			-			

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PO3829

(1)-LPAOG Q-Green Belt Review 2018 PF0562



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Title: MRS.	Title:
First Name: ELAINE	First name:
Last Name: BLACKBUEN	Last Name:
Organisation/company: H A	Organisation/company:
Address: I ECCLESTIEUD ROAD ROCHESTON Postcode: NAID SLU	Address: Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 10-03.2019

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	ted of future stages of the St Helens Borough Local ssion of the Plan for examination, publication of the d adoption of the Plan)
Yes (Via Email)	No 🗌
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Policy	LPA05	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)		Green Belt I	Review (2018)		

4. Do you consider the St He Please read the Guidance note		an 2020-2035 is: al Compliance and the Tests of Soundness
Legally Compliant?	Yes	No
Sound?	Yes	No X
Complies with the Duty to Cooperate	Yes	No

Please tick as appropriate

	is <u>unsound,</u> is it because it is not: explanations of the Tests of Soundness
Positively Prepared?	X
Justified?	X
Effective?	X
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

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and verifiable facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt.

The Plan does not make effective use of Brownfield and Previously Developed Land (PDL). For example, St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that _

3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available.

Why should we give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. The Council has, in the past, undertaken remediation. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

The loss of Grade 1 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and food security is not considered.

The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need.

The Plan is not effective.

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.

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites. If this action is not taken it will leave large areas of the borough as barren, brownfield deserted sites, whilst our beautiful green belt will be gone.

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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l. If	your representation is seeking a modification oral part of the examination? (the hearings in	n; do you consider it necessary to participate a		
(No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination		
. If	you wish to participate at the oral part of the to be necessary:	examination, please outline why you consider		
lea	se note the Inspector will determine the mos	st appropriate procedure to adopt to hear thos		
110	have indicated that they wish to participate a Thank you for taking the time to comp			
	Please keep a copy for	or future reference.		

PO3830



Council

617

1 2 MAR 2019

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	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: CLAIRE	First name:
Last Name: KEENAGHAN	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 9 3 19

comments to be considered you MUST include your details above.

	ted of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the ladoption of the Plan)
Yes (Via Email)	No Y
Please note - e-mail is the Counci address is provided, we will conta	I's preferred method of communication. If no e-mail ct 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

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PO3831

- Green Best Review 2018 744

1 3 MAR 2019



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Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MR	Title:
[2] [2] [2] [4] [4] [4] [4] [4] [4] [4] [4] [4] [4	First name:
	Last Name:
	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 25.02.2019
Please be aware that anonymous forms cannot be considered you MUST include your details above.	e accepted and that in order for your comments to be
	ages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred me ve will contact you by your postal address.	thod of communication. If no email address is provided,

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St Helens WA10 1HP

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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.

Shaun Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are in frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." *Professor Barbara Maher 05/09/2016*

Haydock does not need so many warehouses, the growth in the borough does not justify the extra warehouse building. There is no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from business rates). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

PO3832



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First Name: DOROTHY JEAN	First name:
Last Name: DUES	Last Name:
Organisation/company:	Organisation/company:
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	e stages of the St Helens Borough Local Plan 2020-2035? on, publication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred we will contact you by your postal address.	method of communication. If no email address is provided,

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Legally	Complia	int?		Yes	□ No C	DON'T KNOW
Sound?	?			Yes	☑ No	
Compli	es with th	ne Duty to Cooper	ate 🗆	Yes	☑ No	
Please	tick as a	ppropriate				
			is <u>unsound</u> , is it for explanations of			
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Justifie	d?					
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Thank you for taking the time to complete and return this response form. Please keep a copy for future reference.

indicated that they wish to participate at the oral part of the examination

Dorothy Jean Duffy

47 Wrigley Road, Haydock, St Helens, WA11 0NN

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are a frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

Haydock does not need so many warehouses, the growth in the borough does not justify the extra warehouse building. There is no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from business rates). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.



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

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at:

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	_ Title:
	First name:
	Last Name:
	Organisation/company:
Address: 85, CARMILL RD BILLINGE	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature	
Please be aware that anonymous forms cannot be a considered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	es of the St Helens Borough Local Plan 2020-2035? blication of the Inspector's recommendations and
Yes (via email)	☐ No
Please note - email is the Council's preferred methowe will contact you by your postal address.	od of communication. If no email address is provided,

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

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FURTHER INFORMATION

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Email: 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**

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 Pla	n does this repres	entation relate?	
Policy Acos	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
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No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of this to be necessary:	the examination, please outline why you consider

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Part B - Your Representation(s)

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we will contact you by your postal address.

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

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	Title:
_	First name:
Last Name:	Last Name:
-	Organisation/company:
Address: 85a 50 Car/ Mill Ld Sillinge	Address:
	Postcode:
Tel No:	Tel No:
	Mobile No:
Email:	Email:
Signature:	Date: 12 31 9
Please be aware that anonymous forms cannot be considered you MUST include your details above.	accepted and that in order for your comments to be
(namely submission of the Plan for examination, puadoption of the Plan)	jes of the St Helens Borough Local Plan 2020-2035? iblication of the Inspector's recommendations and
Via post.	☐ No
Please note - email is the Council's preferred meth	nod of communication. If no email address is provided,

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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 Pla	n does this repre	sentation relate?	
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
	nents (please name nd relevant part/sectio		mean Belt Revie	2w.
4. Do you co	onsider the St Helens ad the Guidance note	Borough Local I	Plan 2020-2035 is: Legal Compliance and th	e Tests of Soundness
Legally Com	pliant?		Yes No	
Sound?			Yes No	
Complies wi	th the Duty to Coopera	ate 🗘	Yes ☐ No	
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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.

Take this out of the local plan altogether. Leave it as it is - it should be in the greenbelt.

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

Yes, I wish to participate at the oral examination

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

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

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

Please keep a copy for future reference.

- 6.
- . No proper access to the Barrows farm site.
- Public Pootpath at the entrance to Barrays fam Should be kept in the greenbett.
- Industrial Units already mean more tradition.
- Access is on a bad bend
- Football also an site, could be considered. overdeveloped as it is. I wouldn't want more dewelopment.
- Can Mill Road is more like a country lane with only one footpoh on one side, nor sulable for development.
- Should be kept open land.
- Jobe Kept part of the greenbelt as its an original farm Studius.
- Fookprint on the fam hasn't changed.
- Nobody will benefit from this being made browndield.
- _ 2 Schools on the same road already traffic problems
- Danger for public services re emergency services can smuggle to have access as it is.
- There how been damage to vehicles from heavy goods vehicles on Carr Mill Rd.

Representor Details

Web Reference Number	WF0006
Type of Submission	Web submission
Full Name	Mr Peter Appleton
Organisation	Mr
Address	7 Mill Brow Close St. Helens WA9 4JR
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?

Sustainability Appraisal & Green Belt Review
see question 6 of this questionnaire

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

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 included Sustainability Appraisal states 7 strategic aims, each is addressed below specifically regarding the apparent 'need' for loss of Green Belt land for future development:

1. Supporting regeneration and balanced growth: By definition to regenerate an area is to rebuild and improve an existing urban area, it is not to convert green space into an urban area, it is questioned as to how converting green belt land is a net contribution to regeneration for the future of St Helens (a few one off section 106 agreement payments from developers does not constitute a long term regeneration strategy). Loss of Green Belt land will have little benefit and much drawback on the existing urban areas, through issues such as: increased demand on transport infrastructure; loss of amenity space; greater strain on air quality through additional urban activity in the borough and reduced capacity of the Green Belt to filter out pollution.

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Whilst 'balanced growth' needs to be sustainable in terms of the environment and balanced across a range of different economic sectors, it is questioned how this will be achieved through loss of Green Belt land. The local environment will be damaged if more Green Belt is urbanised, that is a fundamental impact of replacing vegetation with roads and buildings. With regard to balancing across economic sectors, the plan in item 1.17 of the Dec 2018 Green Belt Review main report identifies 'large scale distribution uses' as a key market opportunity in St. Helens as a factor in the need for Green Belt review. No other economic sectors (except perhaps housebuilding which creates temporary work during the few months of construction only) have been identified in the statements

for 'The Need For A Green Belt Review in St. Helens'. This lack of diversity in economic growth is a fundamental matter in the future of the borough, it is effectively a gamble on a single corner of the market, it is an unsustainable high risk strategy. Therefore the need to address 'balanced growth' has not been met as plan of the proposed plan, therefore need for Green Belt loss has not been justified, and more worryingly the future economic sustainability of the existing urban area appears at risk through lack of diverse economic strategy.

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2. Ensuring quality development: Quality of development is difficult to ensure with respect to release of significant portions of green belt land as large corporate organisations such as national housebuilders and national commercial developers will likely buy up large plots (as has already been demonstrated in the area) with a view to maximising their profit in developing land. This is at odds with quality development which is more generally seen when smaller scale developments by local persons as they are more accountable to local people and have more personal connection to investing quality in their region. Large scale distribution centres are low quality 'large shed' type buildings offering huge capacity to store goods as their objective, they offer little to nothing with regard to Architectural merit and offer very few employment opportunities relative to the size of the development, which will no doubt reduce further as distribution centres become further automated in future years.

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We have recently seen similar developments to the North of Warrington at Burtonwood. These series of large shed distribution centres replaced a series of WWII aircraft hangers on seemingly brownfield land, very close to the St. Helens borough, it is questioned also therefore how will quality not be further reduced due to a high supply of such buildings in the area as developers/ landlords cut costs wherever possible to remain competitive.

cut costs wherever possible to remain competitive.

3. Creating an accessible St Helens: Item 1.17 of the main report identifies St. Helens as being in close proximity of the M6, M62, A580 & strategic rail routes. None of these major transport assets are recent developments and all appear to have future capacity problems on the horizon for any noticeable increase in use, it is therefore questioned as to how giving up Green Belt land for housing and employment in mostly large scale distribution can possibly have a positive impact on the accessibly of St. Helens. Quite simply an increase in demand of HGVs (on the road or when loaded onto Goods Trains) for distribution centres and commuters in additional homes will put significant

additional strain on local transport infrastructure, therefore St. Helens is at risk of becoming less

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accessible though loss of Green Belt land.

4. Meeting housing needs: Nationally it is reported in the media that the UK has a housing stock shortage, however in reality this is very unequal across the country. The south east in particular may have an acute housing shortage, as demonstrated by significant increases in house prices over recent years, however that is not the case in the St. Helens area. Looking at data from the UK House Price Index it appears the average house price percentage increase in England's approximately twice as much as the average increase for St. Helens in the same time period. This implies demand for housing in the St. Helens borough is not outstripping supply and has not done so for a sustained period, therefore it is questioned as to the 'need' to vastly increase the housing stock of the borough through building on Green Belt land, as opposed to the 'want' of housebuilders seeking land which is simple to build on compared to brownfield.

06

5. Ensuring a strong and sustainable economy: It has already been identified in item 1 of this response that plans towards a sustainable economy for St. Helens are seriously lacking with respect to how further Green Belt land may be used for sustainable employment. It is also questioned on what evidence base the claim in item 1.20 of the 'risk that residents would need to move out of the borough' if Green Belt land was released elsewhere rather than in St. Helens. This is a bold claim with serious consequences as to if it can be justified or not. Given: relatively low for England local house prices are, as identified from the UK House Price Index; and the previous identification of good strategic transport assets in close proximity: it is reasonable to assume a significant portion of existing residents work outside of the borough and use St. Helens as a suitable commuter town to larger economic centres such as Liverpool and Manchester — as no doubt will be a similar case for all

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other towns in neighbouring boroughs. It is therefore questioned as to how the decision to not release Green belt land would prompt local residents to move out of the borough to areas which may by then have committed to reducing their Green Belt. This appears an unjustified assumption which misleads the case for a sustainable economy. A further question is raised as to how sustainable economically a set of large distribution centres can be in the long term given the further automation of such activities in future, thus requiring fewer employees and with little incentive for the national and international nature of companies who run these centres to invest in any other aspect of the local economy.

6. Safeguarding and enhancing quality of life: Safeguarding is to protect from harm or damage, it is questioned as to how building on Green Belt land is protecting our health and wellbeing in future years. We have recently seen in national media the UN Global Assessment report declare human activity 'threatens 1million plant and animal species with extinction', with loss of habitat the main significant factor in this, which concerns converting Green Belt land into land for housing or employment. At this time as a society we are on the brink of irreparable damage to biodiversity which will have major impact on human health and wellbeing in future years. At a local level the safeguarding and life quality of local people is put at risk if Green Belt land is lost as biodiversity will be impacted negatively - as it will be cumulatively in every borough of the UK if reports written in a similar manor to this are carried forward without more serious environmental impact assessment and mitigation measures implemented prior to any plans proceeding.

7. Meeting resource and infrastructure needs: Item 1.20 of the main report claims justification for the loss of Green Belt in St. Helens as otherwise it will be lost elsewhere, but this assumption appears based on only immediately neighbouring authorities and not tested against the wider North West region, therefore it is questioned as to the weight given to this assumption in with respect to 'meeting needs' justifying loss of Green Belt. As an example, the relatively low house price value compared to the average for England is a strong indicator that housing resources in St. Helens are not subject to adverse demand to justify thousands of additional units to be built on Green Belt land.

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

Wider environmental impact assessment needs to be made with respect to reducing Green Belt land in any area. At what point will Green Belt land be designated to not be given up - once it is all gone? No significant area of Green Belt land should be made available for release to development as the Local plan does not meet its 7 Strategic Aims in the Sustainability Assessment and the just case for Need for Green Belt Review has not been made.

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

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

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

Response Date	5/13/2019 12:53:12 AM
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Representor Details

Web Reference Number	WF0104
Type of Submission	Web submission
Full Name	mrs marion rosbotham
Organisation	
Address	white house farm, higher lane, rainford, st helens wa11 8nl
Agent Details	

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

Yes (via e-mail)

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

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

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

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	Yes

- 5. If you consider the Local Plan is unsound, it because it is not:
- 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.
- 7. Please set out modification(s) you consider are necessary

please use other sites than greenbelt as these sites are very necessary for the production of food and a healthy environment, for wildlife and to avoid air pollution.

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

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

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

Response Date	3/13/2019 10:59:11 AM

Representor Details

Web Reference Number	WF0115
Type of Submission	Web submission
Full Name	MR MIKE CARR
Organisation	
Address	17 BROOKSIDE AVENUE
	ECCLESTON WA10 4RN
Agent Details	MR MIKE CARR

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	PARCEL GBP 098
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.

A REPORT WILL BE SENT TO THE PLANNING POLICY EMAIL TODAY. 13TH MARCH 2019

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

THE REMOVAL OF PARCEL GBP 098 FROM THE LOCAL PLAN PROCESS

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

Yes, I wish to participate at the oral examination

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

I CONSIDER THIS NECESSARY BECAUSE I AM A CHARTERED TOWN PLANNER WITH SIGNIFICANT EXPERIENCE IN THIS TYPE OF PROCESS.

I CONSIDER THAT THE COUNCIL APPROACH TO THE INITIAL ALLOCATIONS PROCESS WAS UNLAWFUL, PARTICULARITY THAT IT SET SUCH A SMALL SERIES OF CONSTRAINT PARAMETERS SO AS TO SELECT SITES FOR ALLOCATION. THIS DID NOT COMPLY WITH THE REQUIREMENTS OF THE NPPF OR THE NPPG. IN PARTICULAR, THE LPA DID NOT FOLLOW THE LAWFUL REQUIREMENTS SET OUT IN

THE NPPF, WHICH REQUIRED PARCEL GBP 098 TO BE SEQUENTIALLY TESTED AGAINST OTHER AVAILABLE SITES THAT WERE LESS EXPOSED TO FLOODING.

SUBSEQUENTLY, THE PARAMETERS IDENTIFIED BY THE LPA WHERE NOT LAWFUL, NOR ROBUST ENOUGH AND LET A SPECIFIC AND WHAT I CONSIDER TO BE PRE-SELECTED SITE INTO THE SELECTION PROCESS.

TAKING THE ABOVE INTO ACCOUNT, THE LPA'S GREEN BELT REVIEW DECEMBER 2018 NOW CLEARLY IDENTIFIES THE FOLLOWING IN RELATION TO THIS PARCEL -

"ALTHOUGH THE PARCEL WAS PROPOSED BY THE COUNCIL AS AN ALLOCATED SITE AT THE LPPO STAGE, A NUMBER OF CONSTRAINTS AFFECT IT THAT WOULD HAVE A SIGNIFICANT IMPACT ON THE NDA AND THE DELIVERABILITY OF DEVELOPMENT WITHIN IT"

THIS SUPPORTS MY CONCLUSIONS THAT THE ALLOCATION OF THIS SITE FOR DEVELOPMENT AT ANY STAGE WOULD, BECAUSE OF THE FLAWED ALLOCATIONS PROCESS, WOULD BE UNLAWFUL BECAUSE THE RULES SET OUT IN THE NPPF HAVE NOT BEEN FOLLOWED, THEREBY MAKING THE DEVELOPMENT OF THIS SITE UNSUSTAINABLE IN PRINCIPLE.

Response Date 3/13/2019 8:38:09 AM

Representor Details

Web Reference Number	WF0129
Type of Submission	Web submission
Full Name	Mr John Ryder
Organisation	None
Address	6 Tarlton Close
	Rainhill
	Merseyside
	L358QB L358QB
Agent Details	N/a

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

Yes (via e-mail)

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

or to trinein part of the zood file does this top coordation relater	
Policy	Green belt
Paragraph / diagram / table	All surrounding areas of Rainhill/whiston
Policies Map	Rainhill
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective

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

There is no justification in your policy to build on green belt land Traffic is a major issue, there is no way our roads or future roads can take this impact

Schools, hospitals, doctors, dentists and many other facilities such as shops, leisure centres etc are nowhere or will not be suffice to deal with the impact of this one gigantic housing estate your building, as well as traffic pollution among many other factors

You have got to get back in touch with the public to understand the problems
It can never be legally complaint when it's not morally right.

Thank you

John

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

As above, if it's morally not right, it's wrong.

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:

To fully explain my views

Response Date	3/12/2019 9:34:07 PM

Representor Details

Web Reference Number	WF0203	
Type of Submission	Web submission	
Full Name	Mrs Rose Hatton	
Organisation		
Address	16 Heywood Gardens WA10 4JU	
Agent Details		

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

No

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

Policy	LPA05	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		100
Other documents	Green Belt Review	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

- No exceptional circumstances have been demonstrated to deviate from the Standard Method calculation
- The employment land requirements are based on aspirational growth rather than need
- The Plan then goes on to base housing needs on the flawed methodology used to calculate employment growth
- It's disappointing that despite many and numerous organisation disagreeing with the use of 2014 figures to calculate housing need, the Government has so far insisted on using them instead of more up to date figure from the ONS 2016
- Given the uncertainty of the figures, some allowance should be made to use a lower figure whilst that is being resolved and potentially allow a 10 year plan to be released instead of 15 years
- There is no evidence that all options have been explored to recycle some of the 3170 ha of the lowest priority contaminated land that exists in St Helens.
- Just a small percentage of that would be needed to avoid any Green Belt land being required
- Given no evidence that all options are explored, the Green Belt Review should not have been carried out
- The effort and expense of the GBR would have been better served remediating contaminated sites
- The LP mentions that much of the borough is Agricultural Land and as such this appears to have been discounted from decision making

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and food security to the greater North West region; particularly in this period of uncertainty during Brexit	0
 The growth projections and figures used are pre-Brexit and no account appears to have been made as to the impact this could have; even with a deal, the Governments own figures still point to negative growth 	0
 The borough already has significant and long term network issues, with congestion and pinch points on the increase 	
 The IDP discusses these problems and the planned fixes in place for these issues but does not address future problems; only that development won't be approved until they are The Plan does not promote sustainability with many sites promoting car dependency and isolation from public transport 	0
 This will increase air and noise pollution along with associated health issues, which surely cannot be in-line with NPPF 	
 The borough already struggles to provide GP appointments in a timely manner and additional GP's are already required for today's needs, especially in light of an aging population and current GP's reaching retirement age. 	05
- The IDP does not actually put a plan in place for how this will be resolved	

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

The plan has completely ignored the important role agricultural land has for jobs and food security. None of the best ALC should be used for development. The figures used are way out of date and over the top. No exceptional circumstances are shown for not using the standard method or for changing GB boundaries

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:

3/11/2019 9:14:20 PM	
	3/11/2019 9:14:20 PM

1-LPAOS @LPAO6, 8HS 3-Green Bell Review 2018

Representor Details

Web Reference Number	WF0378
Type of Submission	Web submission
Full Name	Mrs Gemma Scott
Organisation	
Address	17 Calderhurst Drive St. Helens Windle WA10 6DX
Agent Details	The state of the s

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

Yes (via e-mail)

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

Policy	
Paragraph / diagram / table	8HS
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

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

I am flabbergasted at the utter contempt St Helens Council appears to hold for its residents. Aside—from the clear fact that these properties are not to aid the development of low income affordable homes and are clearly placed in order to maximise council tax revenue, the truth is that St Helens does not need so many houses. The growth in the Borough does not justify the extra house building and as such, there are no special circumstances that warrant Green Belt release.

The site of 8HS is not a sustainable parcel of land on which to build over 1000 houses either. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is noisy and polluted and already a hazard. The addition of thousands of vehicles is hardly likely to improve this.

The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered and the results will be to the detriment of air quality, noise, tranquility and general health.

8HS is currently a mixture of Grade 1 and 2 agricultural land and should be protected for this reason as such. The site also has a main river running through it. There is a flood plain to either side which falls within Flood Zone 3 of the Environment Agencies current mapping system. Other Green Belt sites have been discounted for this reason, 8HS has not and St Helens Council have not justified this choice of parcel.

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Response Date	3/3/2019 4:53:09 PM
. If you wish to participate in the oral part his to be necessary:	t of the examination, please outline why you consider
lo, I do not wish to participate at the oral e	examination
. If your representation is seeking a modit he oral part of the examination?	ication, do you consider it necessary to participate at
te and an analysis to analysis a security	ication, do you consider it necessary to participate at
eep 8HS in the greenbelt.	
. Please set out modification(s) you consid	der are necessary
uture development.	
	the site 8HS from the greenbelt to safeguard it for
nce it does not comply with the NPPF 2018	3.
his plan is neither positively prepared, just	ifiable, effective nor in compliance with central policy
reen Belt for the reasons above.	
ne Green Beit Review (2018) appears drive	arding for development when it should be maintained as
onsense. ha Grann Balt Baylaw (2018) annears drive	n by developer's requests and not by local need. This —
	recast from 2014 of 486 a year in order to justify this
he latest ONS estimate (2016) suggests tha	t 383 houses per year are to be required and yet the
he Local Plan is based on flawed employme	ent forecasts and cannot be supported by historical facts. ~
help.	14.00 (1.00
ist agreed to the reinstatement of some bu	is routes, hundreds of additional residents are not going
rrent buses do not connect Eccleston and	Windle with employment areas. The council have only
nowhere to build them.	The train stations are in town, over 4 miles away. The
	oversubscribed. New schools will be required and there—

O-LPAOS Q-LPAO6, 845 3- Green Belt Review, 2018

Representor Details

Web Reference Number	WF0379
Type of Submission	Web submission
Full Name	Mr Simon Scott
Organisation	
Address	17 Calderhurst Drive St. Helens Windle WA10 6DX
Agent Details	ANCHORY THE TYPE

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?

HA16/8HS
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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

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

I am flabbergasted at the utter contempt St Helens Council appears to hold for its residents. Aside from the clear fact that these properties are not to aid the development of low income affordable homes and are clearly placed in order to maximise council tax revenue, the truth is that St Helens does not need so many houses. The growth in the Borough does not justify the extra house building and as such, there are no special circumstances that warrant Green Belt release.

The site of 8HS is not a sustainable parcel of land on which to build over 1000 houses either. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is noisy and polluted and already a hazard. The addition of thousands of vehicles is hardly likely to improve this.

The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered and the results will be to the detriment of air quality, noise, tranquility and general health.

8HS is currently a mixture of Grade 1 and 2 agricultural land and should be protected for this reason as such. The site also has a main river running through it. There is a flood plain to either side which falls within Flood Zone 3 of the Environment Agencies current mapping system. Other Green Belt sites have been discounted for this reason, 8HS has not and St Helens Council have not justified this choice of parcel.

The local Primary and Secondary schools are oversubscribed. New schools will be required and there is nowhere to build them. 8HS is not well serviced by public transport. The train stations are in town, over 4 miles away. The current buses do not connect Eccleston and Windle with employment areas. The council have only just agreed to the reinstatement of some bus routes, hundreds of additional residents are not going to help. The Local Plan is based on flawed employment forecasts and cannot be supported by historical facts. The latest ONS estimate (2016) suggests that 383 houses per year are to be required and yet the council continues to use the older higher forecast from 2014 of 486 a year in order to justify this nonsense. The Green Belt Review (2018) appears driven by developer's requests and not by local need. This parcel of land has been accepted for safeguarding for development when it should be maintained as Green Belt for the reasons above. This plan is neither positively prepared, justifiable, effective nor in compliance with central policy since it does not comply with the NPPF 2018. Quite simply, it is a dreadful idea to remove the site 8HS from the greenbelt to safeguard it for future development. 7. Please set out modification(s) you consider are necessary Keep 8HS within the greenbelt. 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary: 3/3/2019 4:48:51 PM Response Date

O-Green Belt Review, Stage ZB

(4) - Green Belt Review, 845

Page 1 of 1

EL0138

2-landscape Character Assessment Report 5-S.A 3-SA scoping report 6-10P



Local Plan Submission joanne Smith

planningpolicy@sthelens.gov.uk 12/03/2019 22:25



1 Attachment



Local_Plan_Submission_2019_03_11.docx

To whom this may concern,

Please find attached a copy of my objection letter in regards to the councils local plan submission.

Can I please have confirmation that you have received this email.

kind regards Joanne Smith Joanne Smith 12 Hamilton Road Windle St Helens WA10 6HG

11th March 2019

To whom this may concern,

Please find enclosed my response to the recent Local Plan publication. Almost all of the points of reference I make in this response relate to 8HS as that is the one I have most scrutinised, but it wouldn't surprise me at all if the flaws in this version of Local Plan can be equally applied across all parcels of land being threatened with removal from Green Belt.

The online form asks if I consider the plan to be legally compliant. I doubt anyone in the borough can truly answer that without some formal legal training and in-depth knowledge of local plans and national policy. However, in the absence of said training and knowledge, I would assume that for something to be legally compliant it must at least be accurate, factual, trustworthy and complete; something this plan appears to fall short of in several areas.

The Green Belt Review document is a significant portion of this plan submission, but it appears to be completely missing the Stage 2B pro-forma documents detailing the development potential of each parcel of land. It is therefore impossible for residents to review how the Council arrived at its 'Good', 'Medium' and 'Limited' outcomes for those pieces of Green Belt land. There is no reasoning or rational findings detailed for each parcel to explain why they have been categorised in such a way, as they have done at Stage 1B when assessing their contribution towards Green Belt aims and purposes.

Additionally, the omission of this major section of the Green Belt Review document must also bring into question the 'duty to cooperate' question that is also posted on the response form. The absence of these pro-formas is a glaring omission and must surely question the integrity and validity of the review if nobody is able to dissect the findings. In a worst case scenario, the outputs of Stage 2B could have been completely chosen in order to match a predetermined decision to remove certain parcels from Green Belt.

This document is not complete. Therefore the plan cannot be considered complete. Feedback and responses cannot therefore be complete or properly scrutinised. It should therefore follow that the plan cannot be legally compliant.

There are several reports that are referenced within the Local Plan; reports written by consultants at great expense no doubt. I find it hard to understand how this plan can be sound or demonstrate a duty to cooperate when those findings or recommendations appear to be ignored.

Landscape Character Assessment – Land Use Consultants

This document identifies the agricultural land in Eccleston as having high landscape sensitivity and additionally a medium visual sensitivity. It goes on to further state the strategy in this area should be one of 'Conserve and Restore'. The judgement of LUC is that given the unique landscape character, further development should be avoided.

Representor Details

Web Reference Number	WF0006
Type of Submission	Web submission
Full Name	Mr Peter Appleton
Organisation	Mr
Address	7 Mill Brow Close St. Helens WA9 4JR
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?

Sustainability Appraisal & Green Belt Review				
see question 6 of this questionnaire				

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

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 included Sustainability Appraisal states 7 strategic aims, each is addressed below specifically regarding the apparent 'need' for loss of Green Belt land for future development:

1. Supporting regeneration and balanced growth: By definition to regenerate an area is to rebuild and improve an existing urban area, it is not to convert green space into an urban area, it is questioned as to how converting green belt land is a net contribution to regeneration for the future of St Helens (a few one off section 106 agreement payments from developers does not constitute a long term regeneration strategy). Loss of Green Belt land will have little benefit and much drawback on the existing urban areas, through issues such as: increased demand on transport infrastructure; loss of amenity space; greater strain on air quality through additional urban activity in the borough and reduced capacity of the Green Belt to filter out pollution.

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Whilst 'balanced growth' needs to be sustainable in terms of the environment and balanced across a range of different economic sectors, it is questioned how this will be achieved through loss of Green Belt land. The local environment will be damaged if more Green Belt is urbanised, that is a fundamental impact of replacing vegetation with roads and buildings. With regard to balancing across economic sectors, the plan in item 1.17 of the Dec 2018 Green Belt Review main report identifies 'large scale distribution uses' as a key market opportunity in St. Helens as a factor in the need for Green Belt review. No other economic sectors (except perhaps housebuilding which creates temporary work during the few months of construction only) have been identified in the statements

for 'The Need For A Green Belt Review in St. Helens'. This lack of diversity in economic growth is a fundamental matter in the future of the borough, it is effectively a gamble on a single corner of the market, it is an unsustainable high risk strategy. Therefore the need to address 'balanced growth' has not been met as plan of the proposed plan, therefore need for Green Belt loss has not been justified, and more worryingly the future economic sustainability of the existing urban area appears at risk through lack of diverse economic strategy.

03

2. Ensuring quality development: Quality of development is difficult to ensure with respect to release of significant portions of green belt land as large corporate organisations such as national housebuilders and national commercial developers will likely buy up large plots (as has already been demonstrated in the area) with a view to maximising their profit in developing land. This is at odds with quality development which is more generally seen when smaller scale developments by local persons as they are more accountable to local people and have more personal connection to investing quality in their region. Large scale distribution centres are low quality 'large shed' type buildings offering huge capacity to store goods as their objective, they offer little to nothing with regard to Architectural merit and offer very few employment opportunities relative to the size of the development, which will no doubt reduce further as distribution centres become further automated in future years.

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We have recently seen similar developments to the North of Warrington at Burtonwood. These series of large shed distribution centres replaced a series of WWII aircraft hangers on seemingly brownfield land, very close to the St. Helens borough, it is questioned also therefore how will quality not be further reduced due to a high supply of such buildings in the area as developers/ landlords cut costs wherever possible to remain competitive.

cut costs wherever possible to remain competitive.

3. Creating an accessible St Helens: Item 1.17 of the main report identifies St. Helens as being in close proximity of the M6, M62, A580 & strategic rail routes. None of these major transport assets are recent developments and all appear to have future capacity problems on the horizon for any noticeable increase in use, it is therefore questioned as to how giving up Green Belt land for housing and employment in mostly large scale distribution can possibly have a positive impact on the accessibly of St. Helens. Quite simply an increase in demand of HGVs (on the road or when loaded onto Goods Trains) for distribution centres and commuters in additional homes will put significant

additional strain on local transport infrastructure, therefore St. Helens is at risk of becoming less

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accessible though loss of Green Belt land.

4. Meeting housing needs: Nationally it is reported in the media that the UK has a housing stock shortage, however in reality this is very unequal across the country. The south east in particular may have an acute housing shortage, as demonstrated by significant increases in house prices over recent years, however that is not the case in the St. Helens area. Looking at data from the UK House Price Index it appears the average house price percentage increase in England's approximately twice as much as the average increase for St. Helens in the same time period. This implies demand for housing in the St. Helens borough is not outstripping supply and has not done so for a sustained period, therefore it is questioned as to the 'need' to vastly increase the housing stock of the borough through building on Green Belt land, as opposed to the 'want' of housebuilders seeking land which is simple to build on compared to brownfield.

06

5. Ensuring a strong and sustainable economy: It has already been identified in item 1 of this response that plans towards a sustainable economy for St. Helens are seriously lacking with respect to how further Green Belt land may be used for sustainable employment. It is also questioned on what evidence base the claim in item 1.20 of the 'risk that residents would need to move out of the borough' if Green Belt land was released elsewhere rather than in St. Helens. This is a bold claim with serious consequences as to if it can be justified or not. Given: relatively low for England local house prices are, as identified from the UK House Price Index; and the previous identification of good strategic transport assets in close proximity: it is reasonable to assume a significant portion of existing residents work outside of the borough and use St. Helens as a suitable commuter town to larger economic centres such as Liverpool and Manchester — as no doubt will be a similar case for all

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other towns in neighbouring boroughs. It is therefore questioned as to how the decision to not release Green belt land would prompt local residents to move out of the borough to areas which may by then have committed to reducing their Green Belt. This appears an unjustified assumption which misleads the case for a sustainable economy. A further question is raised as to how sustainable economically a set of large distribution centres can be in the long term given the further automation of such activities in future, thus requiring fewer employees and with little incentive for the national and international nature of companies who run these centres to invest in any other aspect of the local economy.

6. Safeguarding and enhancing quality of life: Safeguarding is to protect from harm or damage, it is questioned as to how building on Green Belt land is protecting our health and wellbeing in future years. We have recently seen in national media the UN Global Assessment report declare human activity 'threatens 1million plant and animal species with extinction', with loss of habitat the main significant factor in this, which concerns converting Green Belt land into land for housing or employment. At this time as a society we are on the brink of irreparable damage to biodiversity which will have major impact on human health and wellbeing in future years. At a local level the safeguarding and life quality of local people is put at risk if Green Belt land is lost as biodiversity will be impacted negatively - as it will be cumulatively in every borough of the UK if reports written in a similar manor to this are carried forward without more serious environmental impact assessment and mitigation measures implemented prior to any plans proceeding.

7. Meeting resource and infrastructure needs: Item 1.20 of the main report claims justification for the loss of Green Belt in St. Helens as otherwise it will be lost elsewhere, but this assumption appears based on only immediately neighbouring authorities and not tested against the wider North West region, therefore it is questioned as to the weight given to this assumption in with respect to 'meeting needs' justifying loss of Green Belt. As an example, the relatively low house price value compared to the average for England is a strong indicator that housing resources in St. Helens are not subject to adverse demand to justify thousands of additional units to be built on Green Belt land.

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

Wider environmental impact assessment needs to be made with respect to reducing Green Belt land in any area. At what point will Green Belt land be designated to not be given up - once it is all gone? No significant area of Green Belt land should be made available for release to development as the Local plan does not meet its 7 Strategic Aims in the Sustainability Assessment and the just case for Need for Green Belt Review has not been made.

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

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

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

Response Date	5/13/2019 12:53:12 AM
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Representor Details

Web Reference Number	WF0006
Type of Submission	Web submission
Full Name	Mr Peter Appleton
Organisation	Mr
Address	7 Mill Brow Close St. Helens WA9 4JR
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?

Sustainability Appraisal & Green Belt Review				
see question 6 of this questionnaire				

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

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 included Sustainability Appraisal states 7 strategic aims, each is addressed below specifically regarding the apparent 'need' for loss of Green Belt land for future development:

1. Supporting regeneration and balanced growth: By definition to regenerate an area is to rebuild and improve an existing urban area, it is not to convert green space into an urban area, it is questioned as to how converting green belt land is a net contribution to regeneration for the future of St Helens (a few one off section 106 agreement payments from developers does not constitute a long term regeneration strategy). Loss of Green Belt land will have little benefit and much drawback on the existing urban areas, through issues such as: increased demand on transport infrastructure; loss of amenity space; greater strain on air quality through additional urban activity in the borough and reduced capacity of the Green Belt to filter out pollution.

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Whilst 'balanced growth' needs to be sustainable in terms of the environment and balanced across a range of different economic sectors, it is questioned how this will be achieved through loss of Green Belt land. The local environment will be damaged if more Green Belt is urbanised, that is a fundamental impact of replacing vegetation with roads and buildings. With regard to balancing across economic sectors, the plan in item 1.17 of the Dec 2018 Green Belt Review main report identifies 'large scale distribution uses' as a key market opportunity in St. Helens as a factor in the need for Green Belt review. No other economic sectors (except perhaps housebuilding which creates temporary work during the few months of construction only) have been identified in the statements

for 'The Need For A Green Belt Review in St. Helens'. This lack of diversity in economic growth is a fundamental matter in the future of the borough, it is effectively a gamble on a single corner of the market, it is an unsustainable high risk strategy. Therefore the need to address 'balanced growth' has not been met as plan of the proposed plan, therefore need for Green Belt loss has not been justified, and more worryingly the future economic sustainability of the existing urban area appears at risk through lack of diverse economic strategy.

03

2. Ensuring quality development: Quality of development is difficult to ensure with respect to release of significant portions of green belt land as large corporate organisations such as national housebuilders and national commercial developers will likely buy up large plots (as has already been demonstrated in the area) with a view to maximising their profit in developing land. This is at odds with quality development which is more generally seen when smaller scale developments by local persons as they are more accountable to local people and have more personal connection to investing quality in their region. Large scale distribution centres are low quality 'large shed' type buildings offering huge capacity to store goods as their objective, they offer little to nothing with regard to Architectural merit and offer very few employment opportunities relative to the size of the development, which will no doubt reduce further as distribution centres become further automated in future years.

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We have recently seen similar developments to the North of Warrington at Burtonwood. These series of large shed distribution centres replaced a series of WWII aircraft hangers on seemingly brownfield land, very close to the St. Helens borough, it is questioned also therefore how will quality not be further reduced due to a high supply of such buildings in the area as developers/ landlords cut costs wherever possible to remain competitive.

cut costs wherever possible to remain competitive.

3. Creating an accessible St Helens: Item 1.17 of the main report identifies St. Helens as being in close proximity of the M6, M62, A580 & strategic rail routes. None of these major transport assets are recent developments and all appear to have future capacity problems on the horizon for any noticeable increase in use, it is therefore questioned as to how giving up Green Belt land for housing and employment in mostly large scale distribution can possibly have a positive impact on the accessibly of St. Helens. Quite simply an increase in demand of HGVs (on the road or when loaded onto Goods Trains) for distribution centres and commuters in additional homes will put significant

additional strain on local transport infrastructure, therefore St. Helens is at risk of becoming less

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accessible though loss of Green Belt land.

4. Meeting housing needs: Nationally it is reported in the media that the UK has a housing stock shortage, however in reality this is very unequal across the country. The south east in particular may have an acute housing shortage, as demonstrated by significant increases in house prices over recent years, however that is not the case in the St. Helens area. Looking at data from the UK House Price Index it appears the average house price percentage increase in England's approximately twice as much as the average increase for St. Helens in the same time period. This implies demand for housing in the St. Helens borough is not outstripping supply and has not done so for a sustained period, therefore it is questioned as to the 'need' to vastly increase the housing stock of the borough through building on Green Belt land, as opposed to the 'want' of housebuilders seeking land which is simple to build on compared to brownfield.

06

5. Ensuring a strong and sustainable economy: It has already been identified in item 1 of this response that plans towards a sustainable economy for St. Helens are seriously lacking with respect to how further Green Belt land may be used for sustainable employment. It is also questioned on what evidence base the claim in item 1.20 of the 'risk that residents would need to move out of the borough' if Green Belt land was released elsewhere rather than in St. Helens. This is a bold claim with serious consequences as to if it can be justified or not. Given: relatively low for England local house prices are, as identified from the UK House Price Index; and the previous identification of good strategic transport assets in close proximity: it is reasonable to assume a significant portion of existing residents work outside of the borough and use St. Helens as a suitable commuter town to larger economic centres such as Liverpool and Manchester — as no doubt will be a similar case for all

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other towns in neighbouring boroughs. It is therefore questioned as to how the decision to not release Green belt land would prompt local residents to move out of the borough to areas which may by then have committed to reducing their Green Belt. This appears an unjustified assumption which misleads the case for a sustainable economy. A further question is raised as to how sustainable economically a set of large distribution centres can be in the long term given the further automation of such activities in future, thus requiring fewer employees and with little incentive for the national and international nature of companies who run these centres to invest in any other aspect of the local economy.

6. Safeguarding and enhancing quality of life: Safeguarding is to protect from harm or damage, it is questioned as to how building on Green Belt land is protecting our health and wellbeing in future years. We have recently seen in national media the UN Global Assessment report declare human activity 'threatens 1million plant and animal species with extinction', with loss of habitat the main significant factor in this, which concerns converting Green Belt land into land for housing or employment. At this time as a society we are on the brink of irreparable damage to biodiversity which will have major impact on human health and wellbeing in future years. At a local level the safeguarding and life quality of local people is put at risk if Green Belt land is lost as biodiversity will be impacted negatively - as it will be cumulatively in every borough of the UK if reports written in a similar manor to this are carried forward without more serious environmental impact assessment and mitigation measures implemented prior to any plans proceeding.

7. Meeting resource and infrastructure needs: Item 1.20 of the main report claims justification for the loss of Green Belt in St. Helens as otherwise it will be lost elsewhere, but this assumption appears based on only immediately neighbouring authorities and not tested against the wider North West region, therefore it is questioned as to the weight given to this assumption in with respect to 'meeting needs' justifying loss of Green Belt. As an example, the relatively low house price value compared to the average for England is a strong indicator that housing resources in St. Helens are not subject to adverse demand to justify thousands of additional units to be built on Green Belt land.

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Response Date	5/13/2019 12:53:12 AM
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O-Green Belt Review, Stage ZB

(4) - Green Belt Reviou, 845

Page 1 of 1

EL0138

2-landscape Character Assessment Report 5-S.A 3-SA scoping report 6-10P



Local Plan Submission joanne Smith

planningpolicy@sthelens.gov.uk 12/03/2019 22:25



1 Attachment



Local_Plan_Submission_2019_03_11.docx

To whom this may concern,

Please find attached a copy of my objection letter in regards to the councils local plan submission.

Can I please have confirmation that you have received this email.

kind regards Joanne Smith Joanne Smith 12 Hamilton Road Windle St Helens WA10 6HG

11th March 2019

To whom this may concern,

Please find enclosed my response to the recent Local Plan publication. Almost all of the points of reference I make in this response relate to 8HS as that is the one I have most scrutinised, but it wouldn't surprise me at all if the flaws in this version of Local Plan can be equally applied across all parcels of land being threatened with removal from Green Belt.

The online form asks if I consider the plan to be legally compliant. I doubt anyone in the borough can truly answer that without some formal legal training and in-depth knowledge of local plans and national policy. However, in the absence of said training and knowledge, I would assume that for something to be legally compliant it must at least be accurate, factual, trustworthy and complete; something this plan appears to fall short of in several areas.

The Green Belt Review document is a significant portion of this plan submission, but it appears to be completely missing the Stage 2B pro-forma documents detailing the development potential of each parcel of land. It is therefore impossible for residents to review how the Council arrived at its 'Good', 'Medium' and 'Limited' outcomes for those pieces of Green Belt land. There is no reasoning or rational findings detailed for each parcel to explain why they have been categorised in such a way, as they have done at Stage 1B when assessing their contribution towards Green Belt aims and purposes.

Additionally, the omission of this major section of the Green Belt Review document must also bring into question the 'duty to cooperate' question that is also posted on the response form. The absence of these pro-formas is a glaring omission and must surely question the integrity and validity of the review if nobody is able to dissect the findings. In a worst case scenario, the outputs of Stage 2B could have been completely chosen in order to match a predetermined decision to remove certain parcels from Green Belt.

This document is not complete. Therefore the plan cannot be considered complete. Feedback and responses cannot therefore be complete or properly scrutinised. It should therefore follow that the plan cannot be legally compliant.

There are several reports that are referenced within the Local Plan; reports written by consultants at great expense no doubt. I find it hard to understand how this plan can be sound or demonstrate a duty to cooperate when those findings or recommendations appear to be ignored.

Landscape Character Assessment – Land Use Consultants

This document identifies the agricultural land in Eccleston as having high landscape sensitivity and additionally a medium visual sensitivity. It goes on to further state the strategy in this area should be one of 'Conserve and Restore'. The judgement of LUC is that given the unique landscape character, further development should be avoided.



If a comparison is done to GBP_005 for instance which was discounted, one of the comments made – on that decision was, "likely harmful effects with regard to biodiversity, landscape sensitivity and loss of high quality agricultural land". [8HS is also Grade 1 agricultural land as well as having this landscape sensitivity] How can it be that the findings of expert consultants are applied subjectively? There must surely be some consistency throughout the decision making process. It must therefore follow that the plan cannot be deemed sound given the subjective nature of applying expert consultancy findings.

SA Scoping Report - Land Use Consultants

This document again reinforces the landscape sensitivity issues, stating how they provide an important role in providing a landscape setting and contrast to urban areas. Additionally providing opportunities for recreation; 8HS does with 4 Public Rights of Way passing through it, so providing walking routes for locals.

The report also highlights the Council has identified 'several thousand' sites of potentially contaminated land and yet the most recent strategy prepared is dated 2001. How can this plan be deemed to be sound when it is removing land from Green Belt and yet there are thousands of sites that could have potential but the last strategy prepared in their regard is over 15 years old – older than a Local Plan is meant to operate for?

In terms of sustainability the report identifies that the integrity of the landscape should not be impacted upon through planning decisions; the Local Plan should ensure that landscapes are protected. It further points out that the LP should seek to avoid development on the best and most versatile agricultural land; 8HS is almost entirely Grade 1 ALC. Some of the contaminated land could apparently pose a risk to human health and the natural environment. How can a Local Plan be deemed to be sound when ignoring this contaminated land and the opportunity to remediate it and bring it back into appropriate use, in favour of removing land from Green Belt?

With respect to flooding, the scoping report advises that the Local Plan should avoid the highest risk locations when allocating sites for development; 8HS is located in flood risk zone 3.

It could somehow be argued that weighing up certain scenarios, ignoring one or may be even two of the above could somehow be justified in order to safeguard 8HS for development. The fact is though, the Council appear to be ignoring most (if not all) recommendations from the consultancy companies. Flooding, Agricultural Land, re-use of contaminated sites is all being passed over and yet we are supposed to read the Local Plan as having proved 'exceptional circumstances' in order to justify the removal of land from Green Belt? Sorry, but the logical process steps that the Council are trying to sell in this Local Plan just do not add up.

If a comparison is done to GBP_010 for instance, and 8HS, one of the reasons to discount 010a is — that parts of it lie within flood zones 2 and 3; exactly the same as 8HS. 010b is Grade 1 ALC, with small sections in flood zones 2 and 3; exactly the same as 8HS. In addition to that for 010b, because of its proximity to the A570, there is the potential for significant air and noise pollution, meaning a buffer and attenuation measures are required; exactly the same as 8HS. If that weren't enough, 010b is also affected by an oil pipeline buffer; exactly the same as 8HS with a two UU pipelines, actual pipelines and not just a buffer.

Continuing with GBP_010c, Grade 1 ALC and in a flood zone, air quality and noise issues again, but when these constraints are assessed cumulatively the parcel is dismissed; 8HS has the same

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constraints if not more, but is safeguarded for development? Finally the same for 010d in a flood zone and Grade 1 ALC, equally discounted.

The Council are being very subjective in applying the 'rules' and justifying their decision process; one rule for some land and different for others. That does not stack up to be a trustworthy plan and as per my opening of this response, if it can't be trusted then in my view I'm not sure it can be classed as legally compliant, sound or demonstrating a duty to cooperate.

Sustainability Appraisal Main - AECOM

In the case of this report from these consultants, some of the contents appear to be just plain inaccurate. If the council have used this document to substantiate their own results in terms of discounting or safeguarding land, then once again, how on earth can the plan be legally compliant with such factual inaccuracies?

Appendix A of this report details the specific findings for each parcel of land, with GBP_098 having AECOM ID:75 (Page 146). Objective SA3 relates to air quality and apparently development on this parcel is unlikely to have significant effects on that. The council has already recognised a substantial new junction would be required on the A580 in order to access this development; I can picture that being a traffic light controlled junction just like that a little further east at Haresfinch (A580/Green Leach Lane junction). This would undoubtedly lead to stationary traffic with idling engines. How can that not have any significant effects? The councils own Green Belt Review document even recognises the need for a significant buffer of minimum 40m to mitigate the impacts of noise and air pollution; mitigate, not eliminate!

SA6 brings up the flooding subject and the suggestion is it's likely to be negative impact which can be mitigated; again, not eliminated but mitigated. United Utilities have stated they would expect the Windle Brook watercourse to manage water dispersal from this site, but given that it doesn't today since the site floods, why would they expect that to be the case following a development of this scale? Windle Brook does not currently cope with flooding at Bleak Hill School or in Hamilton Road and it runs directly adjacent to those areas.

SA12 for health apparently scores 'likely to promote positive effects' and explains the rationale for that as being "529m from Eccleston Medical Centre". I'm not sure who or how this was measured, but that GP surgery is 1km from the site of 8HS, from one very specific corner; much of the site is far in excess of that distance. Putting that to one side though, very shortly this medical practice will move to a new location, so to state 529m is entirely misleading and a complete misrepresentation of what will be the reality when this Local Plan is adopted. It brings into question again the integrity of the data in the plan documents and the trustworthiness of them. Once the practice moves location it will become at least 1.5km distance from one specific point on the 8HS site, with much of the site 2.5 to 3km travelling. This will undoubtedly lead to many short car journeys, thus increasing congestion and additionally air pollution, therefore having a negative effect on health.

SA13 to improve education is scored neutrally, part of that rationale being because it is apparently 525m from Bleak Hill Primary School. Again, this might be the case from the nearest point of the 8HS site, but for much of the site, it is further than this. Putting the distance to one side though, because it's really quite irrelevant in this case, Bleak Hill has no capacity. The Council are already looking at plans to expand the school in order to manage todays problems, let alone an influx of a further 1000 homes to the area. The site could be 5m from the school, but without capacity, it simply cannot be scored as neutral. At a minimum this should be negative which could be mitigated but in all honesty should be 'likely to generate negative effects' since it will involve another school



1 2 MAR 2019

Ref: LPSD

(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.

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.

Your Details (we will correspond via your agent)				
Title: Mrs	Title:			
First Name: Sandra	First name:			
Last Name: Upton	Last Name:			
Organisation/company: Resident	Organisation/company:			
Address: 18 Crantock Grove Windle St Helens Postcode:WA10 6EJ	Address: Postcode:			
Postcode.WATO OLD	Tel No:			
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lease be aware that anonymous forms calcomments to be considered you MUST incomments to be considered you MUST incommendated of Plan 2020-2035? (namely submission of Inspector's recommendations and adoptives (Via Email)	Mobile No: Email: Date: 10 3 2019 annot be accepted and that in order for your clude your details above. future stages of the St Helens Borough Local of the Plan for examination, publication of the			

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

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

Email:

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.

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

Now please complete <u>PART B</u> 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.

To which part of the Local Plan	does this repre	sentation relate?		-80
Policy Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)		re Development Plan Review 2018		
4. Do you consider the St Helens Please read the Guidance note for e	Borough Local I	gal Compliance and the 7	ests of Soundness	ruk
Legally Compliant?	Yes 🗆	No 🗆 x		
Sound?	Yes 🗆	No □x		
Complies with the Duty to Cooperate	Yes 🗆	No 🗆		
Please tick as appropriate				
5. If you consider the Local Plan in Please read the Guidance note for e	s <u>unsound</u> , is it xplanations of the	because it is not: Tests of Soundness		4,80
Positively Prepared?	Гх	A Commission of the Commission		
Justified?	Сх			
Effective?	Гх			
Consistent with National Policy?	Cx			

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

Part B: 6. The Local Plan is not legally compliant and is unsound

Legally Compliant: Questionable at the very least!

S20 (5)(c) of the Planning and Compulsory Purchase Act 2004 requires that the Local Plan complies with a legal requirement to consult with the local community. Although, on paper, this may seem to have been achieved, there was a distinct lack of transparency in the early stages of revealing the plan. The initial Preferred Options Local Plan Consultation was timetabled to take place from the 5th December 2016 - 30th January 2017 (i.e. to include the Christmas and New Year period when many people are otherwise occupied). It was extended to the end of January after complaints that the Council were trying to push it through with little opposition. In reality, the letters were only sent out to the public on the 15th December and many were not received until the 19th, meaning two weeks had already elapsed before residents could even start to consider the document which was complex and lengthy. No public meetings to disseminate information were organised by the Labour Council. It was left to a small number of opposition councillors who took the initiative to inform residents as to what was happening.

The Local Plan Scoping Consultation Document 2016 should have been published as part of the additional documentation to the Preferred Options plan as this focussed on Green Belt and many

comments were made by members of the public. However, it was only released 5 days before the close of consultation after public request. I was personally was not aware of the Scoping Document of 2016. We had not been informed of its existence and had no knowledge the Green Belt was being reviewed. As there were only 212 replies to the consultation it suggests not many people were in the know.

The actual Comment Form for the Preferred Options Plan was difficult to understand deterring many from responding. However, after a public outcry it was finally agreed to also allow comments via letters or e-mails. Nearly 6,000 responses were ultimately received of which 97% voted against.

The general policy behind the Plan appeared to be motivated by the ruling labour council to allow the release of large amounts of Green belt land for easy development instead of encouraging Brownfield first. Indeed, our own Ward Labour Councillors did very little to inform or help local residents who would be directly affected by the proposals if the document was accepted. Because of the public outcry some changes were made to produce the Local Plan Submission Draft but there are still many issues present that I believe make the current local Plan unsound as detailed below.

The lack of transparency by the Council in the initial stages of the draft Local Plan suggests that the legal requirement to consult with the local community as required by the NPPF 2018 has not been met.

Failure to meet the Soundness test:

The Plan is Not Positively prepared:

The plan does not achieve sustainable development (development that meets the needs of the present without compromising the ability of future generations to meet their own needs):

- 1. <u>Inflated Housing Need Figures</u>: The Council are using a forecast for minimum average housing need from the 2014 ONS figures of 486 houses per year, yet the latest estimate produced by the Office for National Statistics in 2016 predicts that only 383 houses per year will be required to meet housing need in St Helens. Using a more accurate figure would mean Brownfield sites rather than release of Green belt could accommodate the need.
- 2. No requirement to safeguard land-'only where necessary': The Council have identified several sites as 'safeguarded' to meet development needs after 2035 stating that the NPPF requires this when undertaking a green belt review to meet longer term development needs. However the NPPF actually states that local authorities should safeguard land only where necessary. It is not a requirement that land should be safeguarded for development although some authorities seem to think otherwise. In fact this was discussed in parliament (Official Report, 24 October 2013;Vol.569, C.193WH) where Nick Boles MP then Under Secretary of State for Communities and Local Government stated: 'there is nothing in the localism Act 2011, in the NPPF or in any aspect of Government planning policy that requires someone to plan beyond 15 years. So anybody who is suggesting there is any requirement to safeguard land for the future development between 2030 and 2050 is getting it wrong'. Once land has been removed from green belt it is effectively gone forever as development is practically guaranteed to occur on the site at some point in the future where Local Authorities give in to pressure from developers. How can Local Authorities accurately predict housing and employment needs in 20 to 30 years time? It is nonsense and cannot meet the areas objectively assessed needs.

I currently live opposite a large parcel of land that has been designated as 'safeguarded' for development after 2035 i.e. parcel 8HS (land south of A580 between Houghton Lane and Crantock Grove, Windle). The land has been designated as safeguarded for potential housing development after 2035 and planning permission for permanent development should only be granted following a future local plan review. However, under the NPPF 2018 local plan reviews should occur every 5 years. A builder already has an option on the land and is unlikely to wait 15 years for it to come to fruition. As residents, we will be forced to live under the shadow of a potential development (1000 houses) on our doorstep which could happen at any time following the local plan review.

Parcel 8HS should not be released from the Green belt. It is Grade 1 Agricultural land having been farmed since 1850 and is enjoyed by many local residents who use the numerous footpaths for walks and well being. It is the only accessible green space in the Windle area. If this is built upon residents would

have to cross the very busy A580 to access open countryside or use the grounds of the Crematorium to walk their dogs. Neither option is desirable or practical. The traffic problems that would result from cars generated by the proposed 1000 new homes feeding into the A580 at Windle Island and the already congested local roads would be intolerable. The estate would completely alter the nature of the area, likely creating a dormitory community, on the outskirts of the town, for commuters to Liverpool or Manchester. 'Safeguarding' the land and thereby removing it from the protection of green belt will only serve to attract greedy developers who will not have to show 'very special circumstances' to build.

3. The Green Belt Review 2018 is fundamentally flawed and biased towards developers.

The methodology states that 'the Government has not set any prescribed method for conducting a Green Belt Review but in common with other authorities has followed a step by step approach'. Their method involved looking at parcels of land for their contribution to purposes 1-3 of Green Belt (Stage 1B) but also looking at the degree to which those parcels would contribute to development needs if released from Green Belt (Stage 2B). They state parcels with good development potential are those that would be highly likely to come forward for development within the plan period. This suggests development takes priority over retaining Green Belt status. Constraints were looked at in Stage 2A but were often played down if development potential was good:

To Illustrate the above- when assessing the land between Crantock Grove and Houghtons Lane (now designated 8HS) the report found that despite having well defined boundaries 'it would form a sizeable extension of the urban area into the countryside'. Does this statement not encapsulate the concept of 'Urban sprawl'? The prevention of urban sprawl is defined as the first purpose of green belt in the NPPF Ch13 s134. The methodology required a grading classification of the land to help minimise loss of high quality agricultural land. Parcel 8HS was found to be high quality (grade 1 & 2). The methodology also stated that sites should avoid creating local infrastructure problems yet 8HS was found to need significant improvements to highways infrastructure and significant improvements to public transport facilities. Constraints included possible requirements for the creation of another primary school and upgrades to social infrastructure and amenities. Only 65% of the 55Ha could actually be developed due to constraints caused by the closeness of the A580, a local brook running across the land and two UU pipelines. However the land was still chosen to be removed from the Green Belt register albeit 'safeguarded' to meet housing needs beyond the Plan. A developer had already taken out an option on the land and it would appear that factor has taken precedence over keeping the land as Green Belt. The plan has not been positively prepared nor does it satisfy the Governments requirement of release only in exceptional circumstances. The methodology used has been geared towards speculative development opportunities rather than the 5 purposes of GB stated in the NPPF. The fifth purpose is to 'assist in urban regeneration by encouraging the recycling of derelict and urban land' but the method used in the review is not encouraging that purpose. Developers are obviously keen to take green spaces rather than clean up Brownfield sites in urban centres.

The Plan is Not Justified:

1.Safeguarding land. As already stated above the Council cannot accurately predict employment or housing needs for the next 30 years so how can they justify 'safeguarding' an additional 155 HA for development beyond 2035 thereby removing the protection of green belt status from land that might never be required.

2.The Brownfield register. The plan makes no mention of Brownfield and Previously Developed Land that is not yet available or included on the Brownfield register. There are large areas of Contaminated Land sites in St Helens that are being ignored. This will only detract from regenerating the town and make it harder to attract new residents. Similar contaminated sites in Prescot (the old BICC works) and Widnes (where land had housed several Chemical factories) have been decontaminated and used for development. Why can't St Helens show such innovation? Instead the Council is proposing to allocate two Green belt sites of 49ha (3HS) and 53 ha (8HS) contributing to a total of 148ha to be removed from Green Belt into 'safeguarded land' to fulfil the housing need. This does not make sense and cannot be justified. Developers will obviously take the easy option of building on Grade 1 Agricultural land rather than clean up Brownfield sites.

3.Job losses if Agricultural land is developed. The loss of grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites has been ignored yet this will result in loss of jobs and a loss to the local economy from the produce they create

The Plan is Not effective

- 1. The Infrastructure plan (IDP) and LPA07 & LPA08 are not effective. The proposals put forward in the Draft Local Plan would create massive increase in vehicles on already congested roads. The IDP concentrates on projects that are already under way rather than how it would mitigate and fund the future issues that the Local Plan would create. For instance, the current Windle Island Junction scheme due for completion in 2019 at a cost of £7m, is aimed at easing congestion at the junction between the A580 and A570 a well known bottle neck. In reality, although there will be some immediate improvement it is unlikely to fully solve the problem. There will be even greater traffic flow at that junction from HGV's once Liverpool's Super Port becomes fully operational together with traffic from the ever increasing number of warehouses being built along the A580 corridor and from the developments planned for neighbouring West Lancashire. Add to this the potential additional 2000 vehicles that could arise if 'safeguarded' site HS8 is developed with a knock on effect to the local roads such as Bleak Hill and Rainford Road and the area will be gridlocked. Although the IDP refers to some of these issues it does not detail how these problems will be resolved or funded. Many of the solutions are quoted as TBC. At best, the plan is aspirational.
- 2. The St Helens Local plan is broadly one-dimensional. It relies on private developers and a buoyant housing market to achieve its objective. However what happens if all these proposed houses fail to sell? If the economy takes a downturn what commitment would those developers have to St Helens. The employment opportunities all seem to revolve around Warehousing and logistics and it fails to address other types of job creation. In other areas where Warehouses have been built companies have relocated to fill them but also brought with them their own staff creating minimal employment opportunities for the local community. Warehousing also requires vast amounts of land which seems mainly to be earmarked for Green Belt in the Local Plan. If the Warehouses remain unused that Green belt has been wasted. Under the NPPF Green belt release should only be allowed in exceptional circumstances. Those exceptional circumstances have not been proven.

The Plan is not Consistent with national policy:

- 1. It does not put use of Brownfield first: The plan cannot be said to be consistent with national policy. The framework recommends use of Brownfield first to help regenerate urban areas but the Local Plan seems to be concentrating on use of Green Belt by arguing there is not enough of the former to meet demand. Due to the industrial history of St Helens there are many hectares of derelict Brownfield land that are in need of regeneration but if development is allowed to use Green Belt first then regeneration and economic growth will not occur.
- 2. The Green Belt Review methodology is developer led. The methodology for determining which sites should be released is flawed. It is using a developer led system rather than approaching it on a case by case basis. The process appears to have started by asking land owners to come forward if they were willing to sell and then looking for speculation advance by developers. Using the 2018 Green Belt review the 5 key purposes of Green Belt seem to have been assessed to fit in with those areas showing developer interest (as illustrated in my earlier comments under Green Belt methodology). Using that method conflicts totally with Green Belt purpose 5 (Ch 13 s134 NPPF): 'to assist in the urban regeneration by encouraging the recycling of derelict and urban land'. Developers should not touch Green Belt land whilst Brownfield sites are available.
- 3. The Infrastructure development plan is poor and incomplete. It addresses current problems and areas where mitigation is already taking place but although it lists a lot of the perceived future threats to highways, education, health etc. it gives only vague ideas on how they would be dealt with and funded. This is not consistent with national policy

Based on the reasons I have given above the Local Plan has <u>NOT</u> been: Positively Prepared, Justified or Effective and is not consistent with national policy. It is NOT SOUND.

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.

Part B: 7. To make the plan sound:

- · Use the standard method for determining housing need to avoid unrealistic targets
- Investigate ways of decontaminating some of the lower quality Brownfield sites to enable them to be brought onto the Brownfield register
- There is no requirement to have 'safeguarded' land in the Plan. The NPPF states 'only where necessary'
 and the plan has not shown it is necessary. Such sites should stay in Green belt.
- The Infrastructure Plan is incomplete and superficial. In particular, it does not address how the local
 transport system would deal with all of the additional traffic (commercial and residential) or who would
 fund the new roads. Other aspects of infrastructure (e.g. educational establishments, local amenities,
 health etc.) need much greater research and explanation for mitigation and funding.
- Investigate other employment opportunities that could be brought to St Helens rather than concentrating purely on Warehousing and Logistics which are unlikely to generate sufficient employment options for local people.
- I do not believe the exceptional circumstances to justify release of green belt land have been shown. The
 methodology that was used for determining which parcels of land should be released does not conform
 to NPPF. It appears to be a developer led criteria rather than an objective test of the 5 purposes. Other
 reasonable alternatives have not been fully explored including lower target figures and using more
 previously developed land. These alternatives will have less impact on the environment and reduce the
 need for new infrastructure.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and allocating more previously developed land.

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.

INSCHANGE.	your representation is seeking a modification oral part of the examination? (the hearings in	; do you consider it necessary to participate at 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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Representor Details

Web Reference Number	WF0006
Type of Submission	Web submission
Full Name	Mr Peter Appleton
Organisation	Mr
Address	7 Mill Brow Close St. Helens WA9 4JR
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?

Sustainability Appraisal & Green Belt Revie	
see question 6 of this questionnaire	
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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

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 included Sustainability Appraisal states 7 strategic aims, each is addressed below specifically regarding the apparent 'need' for loss of Green Belt land for future development:

1. Supporting regeneration and balanced growth: By definition to regenerate an area is to rebuild and improve an existing urban area, it is not to convert green space into an urban area, it is questioned as to how converting green belt land is a net contribution to regeneration for the future of St Helens (a few one off section 106 agreement payments from developers does not constitute a long term regeneration strategy). Loss of Green Belt land will have little benefit and much drawback on the existing urban areas, through issues such as: increased demand on transport infrastructure; loss of amenity space; greater strain on air quality through additional urban activity in the borough and reduced capacity of the Green Belt to filter out pollution.

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Whilst 'balanced growth' needs to be sustainable in terms of the environment and balanced across a range of different economic sectors, it is questioned how this will be achieved through loss of Green Belt land. The local environment will be damaged if more Green Belt is urbanised, that is a fundamental impact of replacing vegetation with roads and buildings. With regard to balancing across economic sectors, the plan in item 1.17 of the Dec 2018 Green Belt Review main report identifies 'large scale distribution uses' as a key market opportunity in St. Helens as a factor in the need for Green Belt review. No other economic sectors (except perhaps housebuilding which creates temporary work during the few months of construction only) have been identified in the statements

for 'The Need For A Green Belt Review in St. Helens'. This lack of diversity in economic growth is a fundamental matter in the future of the borough, it is effectively a gamble on a single corner of the market, it is an unsustainable high risk strategy. Therefore the need to address 'balanced growth' has not been met as plan of the proposed plan, therefore need for Green Belt loss has not been justified, and more worryingly the future economic sustainability of the existing urban area appears at risk through lack of diverse economic strategy.

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2. Ensuring quality development: Quality of development is difficult to ensure with respect to release of significant portions of green belt land as large corporate organisations such as national housebuilders and national commercial developers will likely buy up large plots (as has already been demonstrated in the area) with a view to maximising their profit in developing land. This is at odds with quality development which is more generally seen when smaller scale developments by local persons as they are more accountable to local people and have more personal connection to investing quality in their region. Large scale distribution centres are low quality 'large shed' type buildings offering huge capacity to store goods as their objective, they offer little to nothing with regard to Architectural merit and offer very few employment opportunities relative to the size of the development, which will no doubt reduce further as distribution centres become further automated in future years.

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We have recently seen similar developments to the North of Warrington at Burtonwood. These series of large shed distribution centres replaced a series of WWII aircraft hangers on seemingly brownfield land, very close to the St. Helens borough, it is questioned also therefore how will quality not be further reduced due to a high supply of such buildings in the area as developers/ landlords cut costs wherever possible to remain competitive.

cut costs wherever possible to remain competitive.

3. Creating an accessible St Helens: Item 1.17 of the main report identifies St. Helens as being in close proximity of the M6, M62, A580 & strategic rail routes. None of these major transport assets are recent developments and all appear to have future capacity problems on the horizon for any noticeable increase in use, it is therefore questioned as to how giving up Green Belt land for housing and employment in mostly large scale distribution can possibly have a positive impact on the accessibly of St. Helens. Quite simply an increase in demand of HGVs (on the road or when loaded onto Goods Trains) for distribution centres and commuters in additional homes will put significant

additional strain on local transport infrastructure, therefore St. Helens is at risk of becoming less

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accessible though loss of Green Belt land.

4. Meeting housing needs: Nationally it is reported in the media that the UK has a housing stock shortage, however in reality this is very unequal across the country. The south east in particular may have an acute housing shortage, as demonstrated by significant increases in house prices over recent years, however that is not the case in the St. Helens area. Looking at data from the UK House Price Index it appears the average house price percentage increase in England's approximately twice as much as the average increase for St. Helens in the same time period. This implies demand for housing in the St. Helens borough is not outstripping supply and has not done so for a sustained period, therefore it is questioned as to the 'need' to vastly increase the housing stock of the borough through building on Green Belt land, as opposed to the 'want' of housebuilders seeking land which is simple to build on compared to brownfield.

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5. Ensuring a strong and sustainable economy: It has already been identified in item 1 of this response that plans towards a sustainable economy for St. Helens are seriously lacking with respect to how further Green Belt land may be used for sustainable employment. It is also questioned on what evidence base the claim in item 1.20 of the 'risk that residents would need to move out of the borough' if Green Belt land was released elsewhere rather than in St. Helens. This is a bold claim with serious consequences as to if it can be justified or not. Given: relatively low for England local house prices are, as identified from the UK House Price Index; and the previous identification of good strategic transport assets in close proximity: it is reasonable to assume a significant portion of existing residents work outside of the borough and use St. Helens as a suitable commuter town to larger economic centres such as Liverpool and Manchester — as no doubt will be a similar case for all

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other towns in neighbouring boroughs. It is therefore questioned as to how the decision to not release Green belt land would prompt local residents to move out of the borough to areas which may by then have committed to reducing their Green Belt. This appears an unjustified assumption which misleads the case for a sustainable economy. A further question is raised as to how sustainable economically a set of large distribution centres can be in the long term given the further automation of such activities in future, thus requiring fewer employees and with little incentive for the national and international nature of companies who run these centres to invest in any other aspect of the local economy.

6. Safeguarding and enhancing quality of life: Safeguarding is to protect from harm or damage, it is questioned as to how building on Green Belt land is protecting our health and wellbeing in future years. We have recently seen in national media the UN Global Assessment report declare human activity 'threatens 1million plant and animal species with extinction', with loss of habitat the main significant factor in this, which concerns converting Green Belt land into land for housing or employment. At this time as a society we are on the brink of irreparable damage to biodiversity which will have major impact on human health and wellbeing in future years. At a local level the safeguarding and life quality of local people is put at risk if Green Belt land is lost as biodiversity will be impacted negatively - as it will be cumulatively in every borough of the UK if reports written in a similar manor to this are carried forward without more serious environmental impact assessment and mitigation measures implemented prior to any plans proceeding.

7. Meeting resource and infrastructure needs: Item 1.20 of the main report claims justification for the loss of Green Belt in St. Helens as otherwise it will be lost elsewhere, but this assumption appears based on only immediately neighbouring authorities and not tested against the wider North West region, therefore it is questioned as to the weight given to this assumption in with respect to 'meeting needs' justifying loss of Green Belt. As an example, the relatively low house price value compared to the average for England is a strong indicator that housing resources in St. Helens are not subject to adverse demand to justify thousands of additional units to be built on Green Belt land.

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

Wider environmental impact assessment needs to be made with respect to reducing Green Belt land in any area. At what point will Green Belt land be designated to not be given up - once it is all gone? No significant area of Green Belt land should be made available for release to development as the Local plan does not meet its 7 Strategic Aims in the Sustainability Assessment and the just case for Need for Green Belt Review has not been made.

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

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

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

Response Date	5/13/2019 12:53:12 AM
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Re: Representation Mel Benyon

to:

planningpolicy 13/03/2019 13:24

1 Attachment



OBJECTION LETTER.docx

Dear Sirs

Please find attached my representation for the current Local Plan to development WA10 8HS 'Eccleston Vale'.

Kind regards

Mrs Melissa Benyon

Lancots Lane Sutton Oak. St Helens UK WA9 3EX

Melissa Benyon 9 Ecclesfield Road Eccleston St Helens WA10 5LU

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on current or accurate figures.

It would appear figures from 2014 are bring used to forecast 486 houses per year, when the Office for National Statistics estimate from 2016,383 houses. Surely, the most up to date figures should be utilised for something as important as a 15-year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the table 4.6 of the plan, which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figures from that table would still only equate to 1724 houses and 57Ha of land for housing. It makes little sense then why Table 4-5 allocates 288Hs of land for housing.

The council further then claims the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha or development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required.

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the exiting Brownfield register. That does not even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not yet available or included in the register. The councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 433Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. It appears the Council have no policy in place for bringing back these sites for use; it is completely unreasonable to assume that they cannot be made available within the 15-year plan period.

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of green belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply cannot be considered sound.

A major concern I have with the scale of growth being aspired to within the Local Plan is the infrastructure required to support it, something that St Helens Council are simply not taking into consideration.

The Infrastructure Development Plan (IDP) documents the projects currently underway to attempt to alleviate problems faced today, but seems to lack any substance on what will be done to solve issues of the future that adoption of this plan will bring

07

The plan promotes unsustainable traffic growth, which will cause severe traffic issues that surely cannot satisfy the National Planning Policy Framework (NPPF). The traffic growth will be in the exact areas that the borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, etc. The IDP refers to some of these existing but does not detail how these problems will be solved or funded. It mentions a great deal about 'seeking' or contributions 'will be sought' but there are numerous TBC's and unknowns detailed within IDP.

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The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and general health. The IDP does not address these issues.

The IDP touches on Healthcare and Education, but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it does not address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with long term impacts of the education needs of new and existing communities.

09

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requirements 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data, which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document, it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on Hectares of Grade 1 farmland resulting in the loss of jobs.

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In conclusion, the Local Plan in its current form when examined by the Planning Inspector cannot be considered justified, effective and consistent with National policy. Consequently, it must surely follow that it cannot be considered sound.

Kind regards

Yours faithfully

Melissa Benyon



OBJECTION LETTER Cathrine Benyon to:

planningpolicy 13/03/2019 14:00

1 Attachment



OBJECTION LETTER.docx

Dear Sirs,

See attached objection letter to St Helens Council Local Plan in relation to development of 'Eccleston Vale'.

Regards,

Cath Benyon Director

Aidapt Bathrooms Ltd Lancots Lane Sutton Oak St Helens Merseyside WA9 3EX

Catherine Hanwright 56A, The Oaks, Houghtons Lane Eccleston St Helens WA10 5LD

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on current or accurate figures.

It would appear figures from 2014 are bring used to forecast 486 houses per year, when the Office for National Statistics estimate from 2016,383 houses. Surely, the most up to date figures should be utilised for something as important as a 15-year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the table 4.6 of the plan, which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figures from that table would still only equate to 1724 houses and 57Ha of land for housing. It makes little sense then why Table 4-5 allocates 288Hs of land for housing.

The council further then claims the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha or development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required.

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the exiting Brownfield register. That does not even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not yet available or included in the register. The councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 433Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. It appears the Council have no policy in place for bringing back these sites for use; it is completely unreasonable to assume that they cannot be made available within the 15-year plan period.

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of green belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply cannot be considered sound.

A major concern I have with the scale of growth being aspired to within the Local Plan is the infrastructure required to support it, something that St Helens Council are simply not taking into consideration.

The Infrastructure Development Plan (IDP) documents the projects currently underway to attempt to alleviate problems faced today, but seems to lack any substance on what will be done to solve issues of the future that adoption of this plan will bring

07

The plan promotes unsustainable traffic growth, which will cause severe traffic issues that surely cannot satisfy the National Planning Policy Framework (NPPF). The traffic growth will be in the exact areas that the borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, etc. The IDP refers to some of these existing but does not detail how these problems will be solved or funded. It mentions a great deal about 'seeking' or contributions 'will be sought' but there are numerous TBC's and unknowns detailed within IDP.



The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and general health. The IDP does not address these issues.

The IDP touches on Healthcare and Education, but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it does not address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with long term impacts of the education needs of new and existing communities.



The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requirements 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data, which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document, it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on Hectares of Grade 1 farmland resulting in the loss of jobs.



In conclusion, the Local Plan in its current form when examined by the Planning Inspector cannot be considered justified, effective and consistent with National policy. Consequently, it must surely follow that it cannot be considered sound.

Kind regards

Yours faithfully

Catherine Hanwright

Representor Details

Web Reference Number	WF0203	
Type of Submission	Web submission	
Full Name	Mrs Rose Hatton	
Organisation		
Address	16 Heywood Gardens WA10 4JU	
Agent Details		

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

No

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

Policy	LPA05	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		100
Other documents	Green Belt Review	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

- No exceptional circumstances have been demonstrated to deviate from the Standard Method calculation
- The employment land requirements are based on aspirational growth rather than need
- The Plan then goes on to base housing needs on the flawed methodology used to calculate employment growth
- It's disappointing that despite many and numerous organisation disagreeing with the use of 2014 figures to calculate housing need, the Government has so far insisted on using them instead of more up to date figure from the ONS 2016
- Given the uncertainty of the figures, some allowance should be made to use a lower figure whilst that is being resolved and potentially allow a 10 year plan to be released instead of 15 years
- There is no evidence that all options have been explored to recycle some of the 3170 ha of the lowest priority contaminated land that exists in St Helens.
- Just a small percentage of that would be needed to avoid any Green Belt land being required
- Given no evidence that all options are explored, the Green Belt Review should not have been carried out
- The effort and expense of the GBR would have been better served remediating contaminated sites
- The LP mentions that much of the borough is Agricultural Land and as such this appears to have been discounted from decision making

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and food security to the greater North West region; particularly in this period of uncertainty during Brexit	0
 The growth projections and figures used are pre-Brexit and no account appears to have been made as to the impact this could have; even with a deal, the Governments own figures still point to negative growth 	0
 The borough already has significant and long term network issues, with congestion and pinch points on the increase 	
 The IDP discusses these problems and the planned fixes in place for these issues but does not address future problems; only that development won't be approved until they are The Plan does not promote sustainability with many sites promoting car dependency and isolation from public transport 	0
 This will increase air and noise pollution along with associated health issues, which surely cannot be in-line with NPPF 	
 The borough already struggles to provide GP appointments in a timely manner and additional GP's are already required for today's needs, especially in light of an aging population and current GP's reaching retirement age. 	05
- The IDP does not actually put a plan in place for how this will be resolved	

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

The plan has completely ignored the important role agricultural land has for jobs and food security. None of the best ALC should be used for development. The figures used are way out of date and over the top. No exceptional circumstances are shown for not using the standard method or for changing GB boundaries

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:

3/11/2019 9:14:20 PM	
	3/11/2019 9:14:20 PM

Web Reference Number	WF0248	
Type of Submission	Web submission	
Full Name	Mrs Catherine Houlihan	
Organisation		
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB	- 1
Agent Details		

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

No

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	1
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

circumstances has been made.

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.

 rails to comply with the duty to cooperate. Flease be as concise as possible.	
The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy: - the requirement for Sustainable development.	01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.	02
- sustainable housing, targets proposed are based on aspirational employment growth predictions.	03
 effective land use by concentrating on Green Space development over town centre development with higher densities. 	64
- food security by ignoring Agricultural Land Quality.	05
7. Please set out modification(s) you consider are necessary	
The following fundamental elements of the Plan remain questionable:	
 Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 	06
- Adequate regional and cross border collaboration has not been undertaken.	07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. - The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. - The St Helens Council statement of "Contanimated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered. - The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is 05 not mentioned. The negative impact on farming and distribution jobs is not considered. - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). - The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for 10 edge of town developments. - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary: Response Date 3/10/2019 6:03:27 PM

07

Representor Details

Web Reference Number	WF0249
Type of Submission	Web submission
Full Name	Mr Brendan Houlihan
Organisation	
Address	68 Ecclesfield Rd Eccleston St Helens WA10 5NB
Agent Details	

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

Yes (via e-mail)

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or

	fails to comply with the duty to cooperate. Please be as concise as possible.	
	The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy: - the requirement for Sustainable development.	0
	 the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 	02
	- sustainable housing, targets proposed are based on aspirational employment growth predictions.	03
	 effective land use by concentrating on Green Space development over town centre development with higher densities. 	04
	- food security by ignoring Agricultural Land Quality.	05
	7. Please set out modification(s) you consider are necessary	
1	The following fundamental elements of the Plan remain questionable:	
	 Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 	06

- Adequate regional and cross border collaboration has not been undertaken.

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. - The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. - The St Helens Council statement of "Contanimated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered. - The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). - The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for 10 edge of town developments. - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or 11 reference to collaboration with the Hospital Trust, local CCGs or education authorities.
 - 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

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

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

Response Date	3/10/2019 5:58:24 PM	
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Web Reference Number	WF0250
Type of Submission	Web submission
Full Name	Mr Richard Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

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

No

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	, A.
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development.

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.

- sustainable housing, targets proposed are based on aspirational employment growth predictions.

- effective land use by concentrating on Green Space development over town centre development with higher densities.

- food security by ignoring Agricultural Land Quality.

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

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. - The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. - The St Helens Council statement of "Contanimated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered. - The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). - The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for 10 edge of town developments. - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or u reference to collaboration with the Hospital Trust, local CCGs or education authorities. 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?
 - No, I do not wish to participate at the oral examination
 - 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 5:51:50 PM	

Web Reference Number	WF0313	
Type of Submission	Web submission	
Full Name	Mrs Ann-Marie Barrow	
Organisation		
Address	11 Lynton Way Windle St. Helens WA10 6EQ	
Agent Details		

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

Yes (via e-mail)

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

Policy	Yes
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	ar ar

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

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

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

Justified, Effective, Consistent with national policy

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

_	the state of the state of the de de de de de de de possible.		
	This version of the plan does not satisfy:		
	the requirement for Sustainable development	01	
	 the criteria for Sustainable transport as the plan promotes increased car 	-2	
	dependency remote from transport hubs.	02	
	 sustainable housing, targets proposed are based on aspirational 	-	
	employment growth predictions.	03	
	 effective land use by concentrating on Green Space development over town 	-41	
	centre development with higher densities.	04	
	 food security by ignoring Agricultural Land Quality. 	05	
	In addition, the following fundamentatal elements of the Plan remain questionable -	0.	
	 Economic growth predictions for St Helens are based on flawed historical 	- 06	
	data that does not justify the aspirational targets included in the plan.	26	
	 Adequate regional and cross border collaboration has not been undertaken. 	07	
	The Housing Need assessment does not use Standard Methodology, and no		
	case for exceptional circumstances has been made.	-9	
	 The latest estimate produced by the ONS (2016) predicts that 383 houses 	00	
	per year will be required to meet housing need in St Helens. The Council		

05

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are using an older forecast (2014) of	186
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- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

7. Please set out modification(s) you consider are necessary Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

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

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

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

Response Date	3/7/2019 12:03:49 PM

Web Reference Number	WF0346
Type of Submission	Web submission
Full Name	Mrs Elizabeth Graner
Organisation	
Address	45 Alpine Close Eccleston St Helens
	Merseyside WA10 4EY
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy	5	
Paragraph / diagram / table			+
Policies Map	8HS	- 14	
Sustainability Appraisal / Strategic Environmental Assessment	Yes		
Habitats Regulation Assessment	Yes		
Other documents			

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

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

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

Justified, Effective, Consistent with national policy

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

lails to comply with the duty to cooperater reasons as as as as as		
I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).	01	
I also believe that this version does not satisfy:		
the requirement for Sustainable development		
 the criteria for Sustainable transport as the plan promotes increased car 	02	
dependency remote from transport hubs.		
 sustainable housing, targets proposed are based on aspirational 	23	
employment growth predictions.	0)	
 effective land use by concentrating on Green Space development over town 	all	
centre development with higher densities.	0-1	
food security by ignoring Agricultural Land Quality.	05	

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

In addition, the following fundamental elements of the Plan remain questionable -

C	,
 Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 	06
 Adequate regional and cross border collaboration has not been undertaken. 	01
 The Housing Need assessment does not use Standard Methodology, and no 	
case for exceptional circumstances has been made.	
 The latest estimate produced by the ONS (2016) predicts that 383 houses 	
per year will be required to meet housing need in St Helens. The Council	
are using an older forecast (2014) of 486.	
 The Plan makes no mention of Brownfield and Previously Developed Land 	
(PDL) that is not (yet) available or included on the Brownfield Register.	
 The St Helens Council statement of "Contaminated Land (CL) sites" (2015) 	28
indicates that 3,170 ha of the lowest priority contaminated land exists in	00
St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being	
reclassified as safeguarded land sites and included to fulfil the housing	
need, much less than 7% of the 3,170-ha available, if it were to be	
remediated.	
 The council in conjunction with Liverpool City Region Combined Authority 	
(LCRCA) and neighbouring authorities have no policy for bringing	
'unsuitable' sites outside the Brownfield Register back into use. It is not	
reasonable to assume that sites cannot be made available within the 15-	
year plan period or the 25-year safeguarded period being considered.	
 The loss of Grade 1 and 2 Agricultural land that comprises most Allocated 	_ c
and Safeguarded sites is not mentioned. The negative impact on farming	0.
and distribution jobs is not considered.	
 The Borough has significant long term and intractable problems at Windle 	
Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26.	
The Infrastructure Delivery Plan (IDP) refers to current road	09
improvements but does not outline how local and borough wide road	0-1
improvements are to be made and funded. The Plan promotes unsustainable	
traffic growth causing severe traffic issues that will not satisfy the NPPF	
(2016)	
 The increase in traffic proposed in the Plan will have a significant impact 	10
on air-quality, noise, tranquillity and general health. It does not promote	10
less vehicle dependency with its proposals for edge of town developments.	
The IDP fails to explain the impact on Healthcare and Education. The	
current situation is touched on broadly, but how this will be managed and	11
funded is missing or vague. There is no indication or reference to	
collaboration with the Hospital Trust, local CCGs or education authorities.	

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

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

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

Response Date 3/5/2019 6:20:22 PM

Web Reference Number	WF0347
Type of Submission	Web submission
Full Name	Mr Alan Garner
Organisation	
Address	45 Alpine Close
	Eccleston
	St Helens
	Merseyside WA104EY
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

I consider that the Local Plan is neither justified, effective or	
consistent with National policy. (National Planning Policy Framework (NPPF)2018). I also believe that this version does not satisfy: • the requirement for Sustainable development	01
 the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 	02
 sustainable housing, targets proposed are based on aspirational employment growth predictions. 	03
 effective land use by concentrating on Green Space development over town centre development with higher densities. 	04
food security by ignoring Agricultural Land Quality.	05.

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

In addition, the following fundamental elements of the Plan remain questionable - $\,$

	• Feenenia manual manua	
V	 Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 	06
-	 Adequate regional and cross border collaboration has not been undertaken 	
	 The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 	08
	 The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated 	
	and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.	05
	The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)	09
	The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. The ISS of the second	10
	The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.	"
	 8. If your representation is seeking a modification, do you consider it necessary to p 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 y this to be necessary: 	
	Response Date 3/5/2019 6:19:13 PM	

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5-Green B	elt Review 2	018 6)-1	LPAOL (7) 000 172	OTO
8-LPAOS	9-LPAOS	10- LPAO	7 0-1	PAOS	UIC

Representor Det	ails
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Web Reference Number	WF0394	
Type of Submission	Web submission	
Full Name	Mr Michael McLoughlin	
Organisation		
Address	3b Sadlers Lane Rainford St. Helens WA11 7HT	
Agent Details		

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?

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

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

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

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

14		
	this version does not satisfy:	
	the requirement for Sustainable development	01
	 the criteria for Sustainable transport as the plan promotes increased car 	-2
_	dependency remote from transport hubs.	02
	 sustainable housing, targets proposed are based on aspirational 	2
_	employment growth predictions.	05
	 effective land use by concentrating on Green Space development over town centre development with higher densities. 	04
-	food security by ignoring Agricultural Land Quality.	
	In addition, the following fundamental elements of the Plan remain questionable -	
	Economic growth predictions for St Helens are based on flawed historical	
_	data that does not justify the aspirational targets included in the plan.	66
	 Adequate regional and cross border collaboration has not been undertaken. 	67
	 The Housing Need assessment does not use Standard Methodology, and no 	
	case for exceptional circumstances has been made.	08
	 The latest estimate produced by the ONS (2016) predicts that 383 houses 	00

per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. • The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15year plan period or the 25-year safeguarded period being considered. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated 05 and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road 09 improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) The increase in traffic proposed in the Plan will have a significant impact 10 on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and U funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 7. Please set out modification(s) you consider are necessary 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

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

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

Response Date	3/2/2019 1:35:59 PM
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Web Reference Number	WF0445
Type of Submission	Web submission
Full Name	Mr Paul McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

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

Yes (via e-mail)

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

Policy	Yes	
Paragraph / diagram / table		
Policies Map	Areas 8HS and 3HS	
Sustainability Appraisal / Strategic Environmental Assessment	Yes	
Habitats Regulation Assessment	Yes	
Other documents		

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

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

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

Justified, Effective, Consistent with national policy

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

fails to comply with the duty to cooperate. Please be as concise as possible.	77.35
The plan does not comply with NPPF 2018	
I believe that this version the plan does not satisfy:	
the requirement for Sustainable development	
 the criteria for Sustainable transport as the plan promotes increased car 	
dependency remote from transport hubs.	
 sustainable housing, targets proposed are based on aspirational 	
employment growth predictions.	
 effective land use by concentrating on Green Space development over town 	
centre development with higher densities.	
 food security by ignoring Agricultural Land Quality. 	
7. Please set out modification(s) you consider are necessary	
In addition, the following fundamental elements of the Plan remain questionable -	
Economic growth predictions for St Helens are based on flawed historical	
data that does not justify the aspirational targets included in the plan.	
Adequate regional and cross border collaboration has not been undertaken.	

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for 10 edge of town developments. The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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

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

Response Date	2/24/2019 3:12:06 PM	T

Web Reference Number	WF0446
Type of Submission	Web submission
Full Name	Mrs Helen McKeon
Organisation	
Address	59 Springfield Lane
	Eccleston
	St Helens
	Merseyside WA105HB
Agent Details	

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

Yes (via e-mail)

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

Policy	Yes	
Paragraph / diagram / table		
Policies Map	Area s 8HS and 3HS	
Sustainability Appraisal / Strategic Environmental Assessment	yes	
Habitats Regulation Assessment	yes	
Other documents		

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

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

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

data that does not justify the aspirational targets included in the plan.

Adequate regional and cross border collaboration has not been undertaken.

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.	244714127
The plan does not comply with NPPF 2018	
I believe that this version the plan does not satisfy:	01
the requirement for Sustainable development	
 the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 	02
 sustainable housing, targets proposed are based on aspirational employment growth predictions. 	03
 effective land use by concentrating on Green Space development over town centre development with higher densities. 	04
food security by ignoring Agricultural Land Quality.	05
7. Please set out modification(s) you consider are necessary In addition, the following fundamental elements of the Plan remain questionable -	
 Economic growth predictions for St Helens are based on flawed historical 	46

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486. The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to 09 current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for 10 edge of town developments. The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or u reference to collaboration with the Hospital Trust, local CCGs or education authorities.
- 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

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

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

Response Date	2/24/2019 3:06:37 PM

1-LPAOS	2-LPAO4 3- Green Bell Reus	ew
(4)-LPAOT	3-Para 172 DTC	

Web Reference Number	WF0162	
Type of Submission	Web submission	
Full Name	Mrs Vicky Riley	
Organisation	Mr	
Address	35 Kiln Lane WA10 6AD	
Agent Details		

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

No

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

Policy	LPA05	
Paragraph / diagram / table	4 / 1 / 1 / 1 / 1	
Policies Map		
Sustainability Appraisal / Strategic		
Environmental Assessment		
Habitats Regulation Assessment		
Other documents	Green Belt Review	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

As I understand the whole of the North West are creating these local plans but there doesn't seem to be much mentioned about discussions with other authorities. I think it is known as Duty to Cooperate and Statement of Common ground, but they appear to be absent.

With all regional authorities following a similar growth trajectory, they must surely be competing for the jobs and new residents.

This surely cannot be deemed sustainable.

Current government policy is not to be encouraging international immigration, in fact the opposite. That must mean that the migration for these jobs and houses must be UK internal.

If one borough gains though, another must lose. So they cannot all grow by these ludicrous and aspirational figures that are being suggested.

The St Helens growth figures are far in excess of any previous actual growth and looking extremely optimistic to say the least.

The employment growth seems to be completely centred and focused on logistics and warehousing. That growth though appears to be reliant on land being released.

I think someone at the council must have recently watched "Field of Dreams" and adopted an 'if you build it, they will come' attitude.

This must lead to a situation of questioning the entire strategic decision process that this local plan is built upon.

The construction industry themselves have questioned whether they even have the ability and capacity to deliver such astronomical growth predictions. The standard method calculation shows 468 houses per annum and the plan does not demonstrate any exceptional need to deviate from this and shift to 486. A minimal increase of 18pa is not exceptional. The table in the plan (4.6) details all the housing numbers. I can't follow the trail of the figures and some appear to be wrong and there must be a transparency question raised in regard to this table. It is almost a self-fulfilling problem given that of the 1695 capacity that is required to be found on green belt, 794 of them are for non-delivery (15% of SHLAA). Instead of performing the huge green belt review, it would have been better to figure out how to ensure delivery of everything in the SHLAA and then find a relatively small amount of contaminated land to make up the balance of approx. 700 dwellings. Using the smaller figure of 468 (342 fewer houses) plus ensuring delivery of those 794 means only a shortage of 559 dwellings. Such a low number surely cannot lead to exceptional circumstances for a once in a lifetime green belt review. There must also be a transparency question raised in regard to the green belt review process. The parcels of land apparently undergo a developability assessment with the result being good, 3) medium or limited, but the process and findings to arrive at the results are missing from the documents and therefore cannot be scrutinised in this consultation process. A massive concern of mine would be the delivery of infrastructure needed for growth of this scale. All around Windle and Eccleston there are massive congestion issues. It is the same at Haydock and around the M6. St Helens Council will quite simply be incapable of delivering the requirements to manage this scale They cannot maintain the roads today, never mind with thousands more cars on them. More congestion will be inevitable leading to more noise and air pollution leading to greater health 7. Please set out modification(s) you consider are necessary Reduce the growth projection. Do not use green belt. Utilise more brownfield land. 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No, I do not wish to participate at the oral examination If you wish to participate in the oral part of the examination, please outline why you consider

3/12/2019 7:39:21 PM

this to be necessary:

Response Date

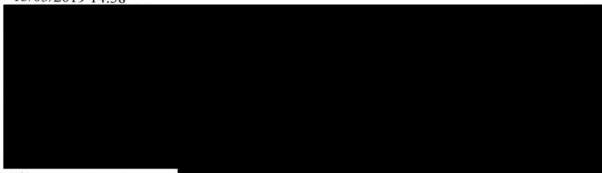


Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 1 of 4 (main representations)

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.

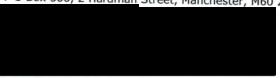
Please note that this email is 1 of 4 and the main representations are attached. The technical appendices will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

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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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

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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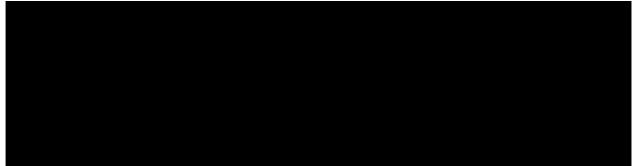


RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 3 of 4 (Appendix B)

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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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 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.

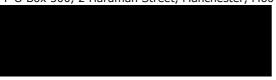
Please note that this email is 4 of 4 and is the final part of our representations. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

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

allocated site in Rainford (Commissioners' sites highlighted in yellow) (St Helens MBC / Deloitte 2019)

...planning policies should identify a sufficient supply and mix of sites taking into account their availability suitability and likely economic viability. Planning Policies should identify a supply of:

- a) Specific, deliverable sites for years one to five of the plan period, and,
- Specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15 of the plan.
- 3.21 Similarly, the Commissioners consider that the Draft Plan's removal of all the safeguarded sites previously identified in Rainford within the 2016 St Helens Local Plan Preferred Options Policies Map results in an approach to planning for future residential development which is not positively prepared and does not comply with national planning policy, and is therefore unsound. Therefore, some sites will need to be identified for safeguarding in Rainford within the Draft Plan.



- 3.22 The Commissioners assert that land within their ownership at Rainford could accommodate residential development of an appropriate scale to meet identified housing need within the Borough over the Plan period and beyond. The Hydes Brow site (Land to the west of News Lane) is suitable for allocation for new residential development within the Draft Plan, and the land east of Higher Lane / South of Muncaster Drive / at White House Lane (formerly identified as safeguarded land under Ref. HS18) is suitable for safeguarding. The suitability of these sites is set out at paragraphs 3.40 to 3.104 below.
- 3.23 These two sites have previously been submitted by the Commissioners for consideration by the Council as appropriate locations for residential development. However, both sites have been rejected following the Council's most recent Green Belt Review (December 2018). The Commissioners object to the approach taken by the Council in assessing these sites in relation to the Green Belt Review. Our objections are set out within the following part of this Section.

St Helen's Green Belt Review

- 3.24 Having identified a shortfall of suitable land within its existing urban areas to meet the needs for housing, employment and other forms of development, the Council undertook a Green Belt Review (published in December 2018) to identify greenfield sites where development could be accommodated with minimal impact the Green Belt. As noted above at paragraph 3.1, the December 2018 Green Belt Review forms part of the evidence base for the site allocations within the Draft Plan.
- 3.25 St Helens has a high proportion of Green Belt, comprising 8,844 ha and covering 65% of the total land area in the Borough. It has been over 30 years since the Green Belt in St Helens was designated, which has been unchanged during this time.
- 3.26 The fundamental aim of Green Belt policy (as defined by the national planning policy at Paragraph 133 of the NPPF) is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. NPPF Paragraph 134 states:

Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.27 NPPF Paragrap135 states that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.
- 3.28 When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. The NPPF (Paragraph 138) states:
 - Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 3.29 Regarding the Commissioners' landholdings at the Hydes Brow site (Land to the west of News Lane), and the land east of Higher Lane / South of Muncaster Drive / at White House Lane, we note that both sites were discounted as options during Stage 1B of the Green Belt Review, which is the second step in a five step process.

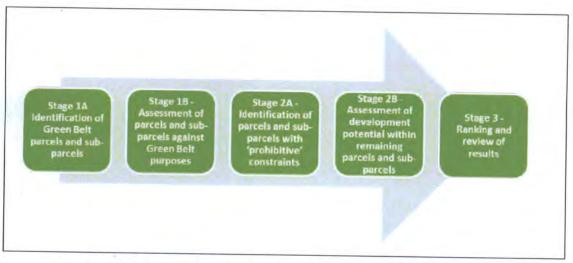


Figure 4: Main stages of the St Helens Green Belt Review (St Helens MBC, 2018)

3.30 The parcels of land considered by the Council at this stage were only assessed against the first three NPPF "purposes" of Green Belt (as set out at Paragraph 134). Stage 1B therefore considered the following in relation to individual sites:

- a) the contribution that each parcel/sub-parcel makes to each of Green Belt purposes 1,2 and 3 considered individually has been assessed and attributed a score of 'low', 'medium', or 'high';
- the contribution that each parcel/sub-parcel makes to purposes 1,2 and 3 considered collectively has been assessed and attributed a score of 'low', 'medium', 'high' or 'high+'; and
- c) a conclusion has been reached about whether each parcel/sub-parcel should, due to its overall contribution to the Green Belt, be 'screened out' from subsequent stages of the Review.
- 3.31 Both sites were given an overall score of "High" contribution to Green Belt purposes and were therefore not carried forward to the next stages in the Green Belt Review. The Council's comments regarding Hydes Brow (Green Belt Review ref. GBP_006_A) are set out below at Table 2:

Table 2: The Council's Green Belt Review Findings regarding Hydes Brow

NPPF Purpose		Green Belt Purpose Score
Purpose 1 - To check the unrestricted sprawl of large built-up areas	The sub-parcel is moderately well contained with strong physical boundaries to the east (News Lane) and south (rear of residential properties on Hydes Brow and Old Lane). Boundaries to the west (treeline forming Rainford Linear Park) and north (treeline) are weaker.	Low
	It does not directly adjoin or lie in close proximity to an identified large built-up area and is considered insufficient in size to result in substantial sprawl in its own right if released from the Green Belt for development.	
Purpose 2 - To prevent neighbouring towns merging into one another	The sub-parcel lies adjacent to the identified settlement of Rainford but does not fall within a strategic gap between other identified settlements.	Low
Purpose 3 - To assist in safeguarding the countryside from encroachment	The sub-parcel comprises agricultural fields and contains limited inappropriate development. It is enclosed to an extent by existing residential development to the south and treeline forming Rainford Linear Park to the west; although it retains strong sense of openness to the east and north-east.	High
Overall significance of contribution to Green Belt Purposes	The sub parcel's role in preventing sprawl and in preventing merger is limited. However, it maintains a significant degree of countryside character and openness.	High

3.32 Given that two of the three purposes are given a "Low" score, it would be more appropriate to conclude that the overall score is "Medium" as opposed to the "High" score that was identified by the Council.

- 3.33 In terms of the site's potential to accommodate residential development, although Hydes Brow retains an openness to the east and north-east, the size of the site means that through careful and sensitive design it would be possible to retain this sense of openness and also to create a boundary with planting to prevent sprawl. This would align with Paragraph 35 in the NPPF in being effective and positively prepared.
- 3.34 The Council's comments regarding the land east of Higher Lane (Green Belt Review ref. GBP_020_E) are set out below at Table 3:

Table 3: The Council's Green Belt Review Findings regarding the Land east of Higher Lane

NPPF Purpose	The Council's Findings	Green Belt Purpose Score	
Purpose 1 - To check the unrestricted sprawl of large built-up areas	The sub-parcel is partially contained with a strong physical boundary to the west; although boundaries to the north, east and south are weak. It does not directly adjoin or lie in close proximity to an identified large built-up area and is considered insufficient in size to result in substantial sprawl in itself if released from the Green Belt for development.	Medium	
Purpose 2 - To prevent neighbouring towns merging into one another	The sub-parcel lies adjacent to the identified settlement of Rainford, although its role in preserving the integrity of a strategic gap between Rainford and other identified settlements is limited.	Low	
Purpose 3 - To assist in safeguarding the countryside from encroachment The sub-parcel contains limited inappropriate development. It is enclosed to a limited extent by existing residential development adjacent to the south-west and north-west although there is very little enclosure to the east providing a strong sense of openness.		High	
Overall significance of contribution to Green Belt Purposes The sub-parcel plays a moderate role in preventing sprawl with limited role maintaining a gap between identified settlements. It does maintain a strong level of countryside characteristics and openness.		High	

- 3.35 The Commissioners contend that the Green Belt purpose score given against criterion 1 by the Council for the land east of Higher Lane is incorrect and should be revised to "Low", which would ensure a consistent approach in relation to sites which are "considered insufficient in size to result in substantial sprawl in itself if released from the Green Belt for development". This would result in a revised aggregate score of "Medium" (as opposed to "High") as proposed in paragraph 3.32 above.
- 3.36 As noted in the Council's own comments, the land east of Higher Lane is bounded by existing residential development to the south-west and north-west of the site. The natural topography of the site (which lies on gently sloping land created by a rounded landform undulation for which the high point is immediately to the east of the site area, and in which a natural break is present in this slope between the top fields and the larger, lower elevated, field compartment) means that, means that through careful and sensitive design,

- it would be possible to develop the lower parts of the site while retaining the sense of openness to the east.
- 3.37 For example, paragraphs 4.4 and 4.5 of the Green Belt Review explain that exceptions have been made for some sites that have scored "High" and "High+", due to being, "fairly well contained...[and there being] strong evidence of developer interest in providing employment uses."
- 3.38 The Commissioners therefore object to the approach taken within the Council's assessment of the suitability of these two sites for release from the Green Belt as it is not proportionate and consequently these sites have not been robustly assessed.
- 3.39 The NPPF states at Paragraph 38 that "Local planning authorities should approach decisions on proposed development in a positive and creative way". The Commissioners assert that this has not been done with regards to the Hydes Brow site (Land to the west of News Lane), and the land east of Higher Lane / South of Muncaster Drive / at White House Lane. The next part of this Section sets out the suitability of these sites for allocation for residential development and for safeguarding within the Draft Plan.



Hydes Brow (Land to the west of News Lane)

Site Location and Description

- 3.40 As set out within the Development Framework submitted in support of the Commissioners' representations to the St Helens Local Plan Preferred Options in January 2017, the Hydes Brow site comprises a number of arable and pastoral fields and measures a total area of approximately 15.5 ha, with a wider site ownership boundary of 22.8 ha.
- 3.41 The Development Framework identified c.5 ha to be allocated for initial development within the Local Plan (shown as 'Phase One' on the site area plan at Figure 5), and c.10.5 ha to be safeguarded for development subject to a Local Plan Review ('Phase Two').

PO3862



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

Graham Trewhella

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 Trewhella Director





architecture masterplanning planning landscape conservation

ST HELENS BOROUGH LOCAL PLAN 2020-2035

SUBMISSION DRAFT

REPRESENTATIONS ON BEHALF OF REDROW HOMES LTD





Cass Associates

Studio 204B The Tea Factory 82 Wood Street Liverpool L1 4DQ housing requirement. This is evident if a comparison is made with the neighbouring authority of West Lancashire – The Preferred Options Local Plan Review Document for West Lancashire aims to take full advantage of economic growth associated with City Region initiatives that are likely to have wide impact such as Liverpool2. It proposes to progressively increase housing supply over a long period to 2050 and builds in a considerable allowance (120 dwellings per year) for Growth from Skelmersdale Rail and Large Scale Logistics Employment. St Helens should show a similarly bold approach and should increase its housing requirement.

- 2.11 Overall, there is a sound and justified case for a greater uplift in the housing requirement to account for:
 - More choice and competition in the housing market to provide a positive inpact on affordability (over and above the affordability adjustment ratio in the standard method)
 - The ongoing trend of an increasing population creation and in migration
 - · The full implications of employment creation and economic growth
- 2.12 For these reasons it is reasonable, justified and sound to 'maintain' the long standing ambition to achieve 570dpa.

Housing Land Supply

- 2.13 The supply of land for housing and housing delivery are key considerations.
- 2.14 The majority of housing is expected to be built in the existing urban area. The St Helens Strategic Housing Land Availability Assessment (SHLAA) 2017 identifies urban sites with a total capacity of 7817 dwellings. There is a difference, however, between identified capacity and the likelihood of the delivery of housing. A combination of physical infrastructure, environmental and viability constraints and legal impediments could frustrate development on many of the sites identified in the SHLAA. Although there is an allowance for reduced delivery in the later years of the SHLAA period the SHLAA approach does not provide the degree of flexibility that is needed to be reasonably sure that projected delivery can be realised and it provides limited scope to adapt to changes in housing and employment land requirements brought about, for instance, by the outcome of the emerging Liverpool City Region Spatial Framework.
- 2.15 The uncertainty that surrounds delivery of the identified sites is particularly acute with previously developed sites where remediation, land reclamation and weak market demand can challenge delivery in a significant way. An example includes Moss Nook urban village which the SHLAA anticipates will deliver over 800 dwellings but there are other examples including the Bold Forest Garden Suburb and Land at Laffak Road and Carr Mill Road.
- 2.16 The housing land supply includes a number of sites to be released from the Green Belt. The selection of sites to be released from The Green Belt has been guided by the Green Belt Review.

The Green Belt Review 2018

- 2.17 The Green Belt Review is based on the assessment of parcels of land and sub-parcels of land (in the main at the edge of urban areas). Parcel boundaries have been defined using strong boundaries.
- 2.18 Each land parcel has been assessed against three of the purposes for including land in the Green Belt and beyond this, against any 'prohibitive' constraints and accessibility. Parcels have been discounted or considered suitable

27

for development as housing according to the assessment at different stages of the review. In turn, the ranking of overall scores in the stages of assessment has led to the identification of land parcels or sub parcels that would be most suitable for allocation in the plan period or for safeguarding.

- 2.19 Redrow Homes Ltd is promoting housing at one of the Green Belt sub parcels Land east of News Lane West and Junction Road (reference GBP-006c). Although the assessment of this land parcel 'passed' the stage 1B assessment which looked at the contribution the parcel makes to Green Belt purposes it was discounted at Stage 2A as highways access is considered to be 'not feasible'.
- 2.20 In terms of the assessment against Green Belt purposes (Stage 1B) parcel GBP-006C the review concludes:

	Green Belt Purpose	een Belt Purpose Findings		
1)	To check the unrestricted sprawl of large built up areas	 Well contained by strong physical features Does not adjoin a large built up area Will not result in substantial sprawl 	Low	
2)	To prevent neighbouring towns merging into one another	Does not fall in a strategic gap between settlements	Low	
3)	To assist with safeguarding the countryside from encroachment	 No development on the parcel Well enclosed Some sense of openness to the north 	Medium	

- 2.21 This parcel was carried forward for further consideration. At Stage 2A (constraints) the parcel was discounted for the following reason:
 - 'Highways access not feasible for sub-parcel in its own right. Site would need 1 access and 1 emergency access for 200+ dwellings. Both potential options, Junction Road or Stanley Avenue fall below minimum width standards and already exceed the maximum cul-de-sac length. However potential delivery of this sub parcel could be further explored contingent on suitable access arrangements being provided in conjunction with adjacent site GBP 05A'
- 2.22 The exclusion of this land parcel at Stage 2A is not well founded. The Transportation Assessment (Appendix 2) submitted at the Preferred Option Consultation Stages finds that the land can be accessed using existing routes and that any new housing development would lie in a highly sustainable location.
- 2.23 This land parcel is a strong candidate for removal from the Green Belt and allocation for housing development for the reasons given in the Site Selection and Development Statement at Appendix 1. In brief:

03

- The land is well contained and enclosed by existing built development and by the raised rail embankment which itself supports dense woodland
- This is a highly sustainable location with high accessibility to local services and facilities by sustainable modes of transport.
- There is the opportunity to integrate new housing development with its surroundings by way of roads, footpaths and cycle routes.
- There are no significant impediments to development including those set out at Stage 2B of the Green Belt Review 2018)
- · There are no constraints to deliverability
- New development is viable
- 2.24 If the land parcel had not been discounted for access reasons (which have been overcome by the Transportation Assessment), there is no reason to believe that it would not have reached the short list of sites considered for allocation or safeguarding. It is a sustainable location for development which could be readily assimilated into the urban fabric of Rainford. In many ways it is a more sustainable option for housing growth in Rainford than the land parcel proposed for allocation (GBP-019a) where there are potential constraints associated with landscape sensitivity, the relationship to a listed building and the proximity to protected trees and it is less well contained by existing development and landscape features.

The Sustainability Appraisal – Site Appraisal review of land parcel GBP-006-C (Land east of News Lane, west of Junction Road) concludes that, for most environmental objectives, the development of the land is unlikely to have significant effects. For many of the objectives there is potential for positive outcomes including:

- To ensure access to and protection and enhancement of high quality public open space and natural greenspace
- To improve health and reduce inequalities
- To improve the education and skills levels of the population overall
- To ensure that local residents have access to employment opportunities
- To reduce the need to travel, encourage alternative to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure.

There is one predicted negative environment effect – an impact on biodiversity due to an overlap with a Local Wildlife Site and TPOs. The plans in the Site Selection and Development document (Appendix 1) show that areas of biodiversity significance and existing trees can be accounted for in the approach to development. It is not believed that nature conservation is an impediment to development.

The Sustainability Appraisal supports the contention that this site should be further considered. It reinforces the conclusions reached in the Site Selection and Development document (Appendix 1)

PO3863



St Helens Local Plan 2020 - 2035, Submission Draft - Representations Dan Ingram

to:

planning policy @sthelens.gov.uk

13/03/2019 14:20



2 Attachments



27020.A3.DI.SG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.





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

Ref: LPSD

(For official use only)

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

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

Your Agent's Details (if applicable) (we will correspond via your agent)		
Title: MC		
First name: DAN		
Last Name: TNGNAM		
Organisation/company: BARTON WILLMON		
Address: Tower 12 BRIGHT STREET MANCHESTER Postcode: M3 38Z		

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)

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)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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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.

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

Now please complete <u>PART B</u> 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.

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St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representations on behalf of Miller Homes

March 2019



8.0 LAND SOUTH OF ROOKERY LANE AND EAST OF PASTURE LANE

- 8.1 In addition to our Client's land interests detailed within Section 4, our Client has additional land interests within Rainford, namely land south of Rookery Lane and East of Pasture Lane, or "Site B" as referred to earlier within this representation.
- 8.2 The Site was previously included in the Local Plan Preferred Options (December 2016) as a site safeguarded for housing (LPA Reference: HS21).
- 8.3 Whilst our Client considered that the Site should have been included as part of the adjoining housing allocation, our Client was supportive of the Site's inclusion within the Local Plan Preferred Options document as safeguarded land for residential development.
- 8.4 As part of the New Local Plan our Client notes that their Site B land interests have now been entirely removed from the Plan as safeguarded land and are now proposed to be retained as Green Belt. Our Client is disappointed by this omission and respectfully requests that the Council reconsiders its position with regard to the developability of this Site, having regard to the accompany Development Framework document.
- 15
- Our Client notes that in removing this Site from the New Local Plan, Rainford now has no safeguarded land, with only one housing and one employment allocation to meet the current and future needs of Rainford. As detailed throughout this representation, the New Local Plan is catering for a clear north/south divide within the Borough, and whilst the southern half of the Borough plays host to considerable land allocation and safeguarded land, the north of the Borough is proposed to have only one safeguarded site.
- 8.6 Putting figures to the proposed site allocations, allocations in the northern half of the Borough equate to 21.07 ha, with allocations in the south of the borough equating to 266.63 hectares. Therefore, out of a total 287.7 hectares of housing allocations, only 21.07 hectares (or 7.3%) can be found in the north of the Borough. This demonstrates a clear imbalance of housing distribution across the Borough, both now and beyond the Plan period.
- 8.7 As outlined throughout this representation, it is our Client's contention that the Council must make provision for additional safeguarded land in tandem with an early release

mechanism to ensure that the Plan can meet the needs of the Borough in the event that some of the strategic sites upon which the Council is reliant fail to deliver.

- 8.8 The Council's Green Belt Review, which forms part of the evidence base of this New Local Plan, identifies our Client's Site B as Parcel GBP_011c. In discounting this land parcel, the Review recognises that it was previously proposed for safeguarding in the Local Plan Preferred Options document but has since been discounted owing to a number of constraints that would impede upon the net deliverable area of the Site; namely, that a significant portion of the Site lies within Flood Zones 2 and 3, potential noise issues from the nearby industrial estate, an area of woodland within the Site, as well as landscape impact. The Review states that cumulatively, these impacts mean that the Site would not be suitable for release from the Green Belt. The Review also considers that a significant amount of land would need to be released from the Green Belt to deliver a relatively small number of residential dwellings.
- 8.9 In recognising the constraints of the Site, Barton Willmore submitted a Development Framework Document on behalf of our Client in October 2017 which demonstrated those areas of the Site which could be developed, as well as how the development could be assimilated within the landscape, and the wider social and environmental benefits that the development of the Site would offer. An updated version can be found at **Appendix** 5 of these representations.
- 8.10 In May 2018 the Council were provided with additional technical information which sought to demonstrate that the development of the Site would be acceptable from a technical perspective. Accompanying this technical information was a plan, commissioned by our Client, which provided detailed flood modelling and offered a comparison to the Environment Agency's own Flood Zone designations (attached at Appendix 4). This plan demonstrated that the area of the Site at risk of flooding is substantially less than that indicated by the Environment Agency and, as a result, the net developable area of the Site is in fact far greater than originally anticipated.
- 8.11 When considering the existing built form of Rainford, as well as the proposed allocations at Sites 8HA and 9EA, Site B would be surrounded by built form on three sides, and a permanent and defensible boundary at its southern edge in the shape of Pasture Lane. With suitable landscaping, it is realistic to consider that the future development of this land parcel would not harm the wider landscape and would represent a logical release of Green Belt land. When considering some of the social and environmental benefits that

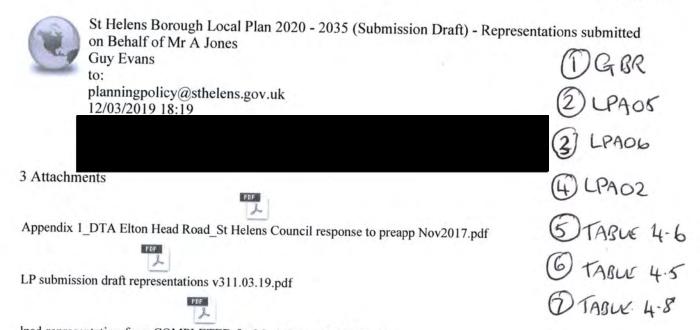
EL0192

the Site could offer, including the delivery of new market and affordable dwellings, open space provision for community use, net gains in biodiversity, flood alleviation measures on Pasture Lane, vehicular access to the adjoining allocated employment site, developer contributions, and a New Homes Bonus for the Council, the benefits of releasing the land for development would far outweigh the benefits or retaining it as an area of Green Belt land which would fail to fulfil the primary purposes of Green Belt set out in Paragraph 134 of the NPPF.

- 8.12 Accordingly, our Client considers that the Council should safeguard its future supply of housing land (and the soundness of the Plan) by increasing the number of safeguarded land sites within the Borough, particularly in the north, as well as providing an early release mechanism in the event that the delivery of other sites should fail. Our Client's Site B is available and deliverable and would represent a logical infill/rounding-off of development in a part of the Borough where little provision has been made to support future growth. The landscape impact that the development of the Site would have must be read in the context of the surrounding site allocations; on this basis, Site B would serve no tangible benefit as an area of Green Belt.
- 8.13 Taking all of the comments within this Section, as well as the clear need for additional site allocations as demonstrated throughout this representation, our Client respectfully requests that the Council re-consider its position in respect of this land parcel and as a minimum reinstate it as safeguarded land in the New Local Plan moving forward.

PO3864

EL0120



lpsd-representation-form COMPLETED for Mr A Jones 12.03.19.pdf

Dear Sir / Madam

Please find attached representations submitted on behalf of Mr A Jones in respect of land south of Elton Head Road, Thatto Heath, St Helens.

Confirmation of receipt would be appreciated.

Regards

Guy Evans BSc (Hons) MSc MRTPI **Director** Chartered Town Planner



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

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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	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Andy	First name: Guy
Last Name: Jones	Last Name: Evans
Organisation/company:	Organisation/company: Cassidy + Ashton
Address: c/o Agent	Address: 10 Hunters Walk, Canal Street, Chester
Postcode:	Postcode: CH1 4EB
Signature:	Date: 12.03.2019

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.

	Plan 2020-2035? (namely submission inspector's recommendations and actions and actions are submission.)	d of future stages of the St Helens Borough Local on of the Plan for examination, publication of the doption 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 <u>5pm on Wednesday 13th March</u> <u>2019</u> 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:

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 <u>PART B</u> 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.

Policy	I DAGE 4			this repre			I I I a la italia
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7. Please set out what modification(s) you conscompliant or sound, having regard to the matter relates to soundness (NB please note that any incapable of modification at examination). You will be a local Plan legally compliant or sound. It will suggested revised wording of any policy or text.	you han non-corwill need be help	npliance with the duty to cooperate is do to say why this modification will make oful if you are able to put forward your
Refer to separately submitted representation	n / resp	onse statement
Please note your representation should cover a supporting information necessary to support / ju modification, as there will not normally be a subtrepresentations based on the original representations that this stage, further submissions will be on matters and issues he/she identifies for the support of th	ustify the sequent tation a conly a	e representation and suggested nt opportunity to make further t the publication stage. t the request of the Inspector, based
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No, I do not wish to participate at the oral examination	х	Yes, I wish to participate at the oral examination
9. If you wish to participate at the oral part of th this to be necessary:	e exam	ination, please outline why you consider
Requirement for detailed discussion around strategy. Critical analysis of housing land re Critical analysis of Green Belt Review and s	equiren	nents and supply (Table 4.6)required.

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Cassidy+ Ashton

Architecture + Building Surveying + Town Planning



ST HELENS BOROUGH LOCAL PLAN 2020 - 2035

SUBMISSION DRAFT
JANUARY 2019

A BALANCED PLAN FOR A BETTER FUTURE

St. Helens Borough Local Plan
Submission Draft Consultation
Response Statement on behalf of the
Jones Family – Land off Elton Head Road

CASSIDY + ASHTON | 10 Hunters Walk, Canal Street, Chester, CH1 4EB

1.0 INTRODUCTION

- 1.1 This statement is submitted alongside the completed comments form, in response to the Consultation which has been taking place on St. Helens Borough Local Plan Submission Draft document dated January 2019.
- 1.2 This response is submitted on behalf of the Jones Family, in relation to the area of land known as "Land south of Elton Head Road (adjacent to St. John Vianney Primary School), Thatto Heath ", which has been identified as safeguarded land for housing through Policy LPA06 and associated Table 4.8 of the consultation document.
- 1.3 The Council intends to submit the Local Plan to the Government for Examination, during which, amongst other matters, the Inspector must be satisfied that the Local Plan is positively prepared, justified, effective and consistent with national policy these being the tests of soundness. The purpose of these representations is to highlight the fact that we do not consider the Plan, as submitted, to meet the tests of soundness and what changes need to be made to rectify this position.
- 1.4 Whilst these representations, as a starting point, support in principle the allocation of the land south of Elton Head Road for housing, the crux of them is that the land would be better placed as an allocated site under Policy LPA05.1: Strategic Housing Sites, as opposed to Policy LPA06: Safeguarded Land, for reasons outlined within this response. The site is deliverable and can be brought forward for residential development without delay within the early stages of the Plan.
- It is noted that, for the purpose of assessment and the Green Belt review 1.5 documentation, the land in question has predominantly been considered in conjunction with a wider landholding to the west, the Gascoyne land. In summary, it is evident that the Gascoyne land has been discounted from allocation or safeguarding and the Jones' land has been supported in isolation - referred to as 'in-part' in the Green Belt Review documentation. As will be evidenced through these representations, we are of the view that the assessment of the combined Gascoyne / Jones site has in essence, and incorrectly been detrimental to the 'scoring' of the Jones' land for consideration as release from the Green Belt and supported for allocation or safeguarding. We are of the view, and as evidenced in these representations that, considered in isolation, the Jones' land should score higher than has been shown and so promoted to the allocations under Policy LPA05.1 as opposed to safeguarded land under Policy LPA06. So ensuring the soundness of the Plan against the tests of being justified and effective.
- 1.6 The question lies as to whether the promotion of the land to the allocations should be done to the detriment of one or more of the sites currently

2 Sanarios

SUPPORT IN PRINCIPL SUPPORTED ALDERICA



5.0 GREEN BELT REVIEW

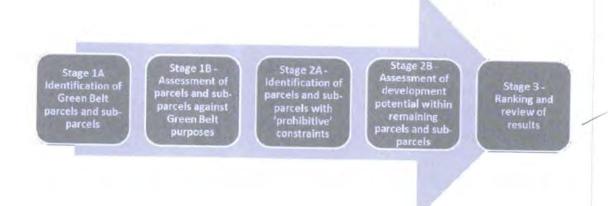
- Some of the SHLAA sites are subject to physical or other constraints that could affect their rate of development, for example due to the need to deal with contamination caused by previous industrial activities. An allowance of 15% has been made for reduced delivery on the SHLAA sites over the later years of the SHLAA period. Total delivery from sites in the urban area is expected to fall substantially short of the total housing delivery required under Policy LPA05. As a result, the proposed land supply includes a number of allocated sites that have been released from previous designation as Green Belt. This element of the supply includes a contingency of 20% to allow for potential delays in development, for example to allow for the provision of essential infrastructure in currently undeveloped areas and other issues that may affect supply.
- 5.2 In accordance with Policy LPA02, the housing land supply will be distributed across the Borough, albeit with a concentration in existing urban areas and the major urban extension planned at Bold. In total, the allocated brownfield sites (3HA, 6HA, 9HA and 10HA) have an estimated capacity of 2,029 dwellings in the Plan period. The location of sites that have been released from the Green Belt has been determined by the St. Helens Green Belt review (Dec. 2018). In total, the former Green Belt sites (1HA, 2HA, 4HA, 5HA, 7HA, and 8HA) have an estimated capacity of 2,056 dwellings in the Plan period.
- 5.3 A range of sites are being proposed for removal from the Green Belt. These have been split into either 'Safeguarded' housing sites or 'Allocated' housing sites.
- 5.4 Allocated housing sites would come forward for development within the approaching plan period (2020 2035), whilst safeguarded sites would be reserved for development within the following 15 year plan period from 2033.
- 5.5 The Submission Draft Plan states Green Belt Review document states that, in accordance with Policy LPA02, the safeguarded sites listed for housing have been safeguarded to meet potential long term development needs. Whilst they have been removed from the Green Belt, they are not allocated for development before 2035. Their purpose is to ensure that the new Green Belt boundaries set by this Plan can endure well beyond 2035.
- 5.6 The reasons why specific sites are safeguarded rather than allocated for development before 2035 are set out in the St. Helens Green Belt Review 2018. It is with reference to this that we raise series question as to the 'selection of sites' for release from the



Green Belt and their support for either allocation or safeguarding within the Plan. As seen through the following, a critical analysis of the Green Belt Review leads to the Council's site selection category to be greatly questioned, which in turn raises questions over justification of the Plan, i.e. the second test of soundness.

GREEN BELT SITE ASSESSMENT

- 5.7 The Green Belt Review was published in December 2018 and sets out the LPA methodology of determining which parcels of land should be removed from the Green Belt.
- 5.8 As part of the Green Belt Review, candidate sites have been assessed through a five step process set out below.



- 5.9 Following the above assessment methodology, *Table 5.3* was produced which ranked a total of 56 residential sites that had progressed through the earlier 4 stages.
- 5.10 This ranking exercise combined the two scores from Stages 1B and 2B to create a new Overall Score with 6 being sites with the most potential for being removed from the Green Belt and 1 with the least potential.
- 5.11 This exercise resulted in 10 sites which were given the score of 6 and 8 sites were given the score of 5.
- 5.12 Of the sites given the score 6, 9 of these were *allocated* and one has been marked as a *Green Belt Anomaly*.
- 5.13 Of the sites given the score 5 all of these have been indicated as Safeguarded.



- 5.14 In turn these sites have been included within the St Helens Borough Local Plan 2020 -2035 Submission Draft Document (January 2019).
- 5.15 The following table indicates all of the allocated and safeguarded housing sites including non-Green Belt release sites.

Response Statement on behalf of the Jones Family – Land off Elton Head Road St. Helens Borough Local Plan Submission Draft Consultation | 11/03/2019

Good Good Good Good Good Good Na Na Na Na Na Medium	Site	Allocation	Safeguarded	Currently	Units	Units	Units	Stage	Stage	GB review
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- 5.16 As can be seen above, site 7HS, or GBP_085c as it is referenced in the Green Belt Review Document (December 2018), is the smallest of the sites included within the allocated or safeguarded sites.
- 5.17 Below is an extract from the Green Belt Review where the site is analysed and is indicated as having an overall score of 5 due its stage 2b score being only medium in regard to development potential.

GBP_085c	Land south of Elton Head Road, adjacent to St. John Vianney Catholic Primary School.	Low	Medium	5	84
	Thinds you see the second				

- 5.18 As can be seen above the site achieved the best score possible at stage 1b (Low) however received only the score of *Medium* at the Stage 2b Assessment resulting in an overall score of 5.
- 5.19 This score relates to the assessment of development potential in the remaining sites. The sites were assessed against constraints, accessibility to modes of transport and ownership and viability issues.
- 5.20 The LPA assessment of each parcel is set out in table 5.4, the comments on the decision relating to site GBP_085c are included below.

GBP_085c Land south of Elton	Safeguarded (in part)	This sub-parcel is located south of Thatto Heath and forms part of a larger area of land which was proposed by the Council as safeguarded land at the LPPO stage.
Head Road, adjacent to St. John Vianney Catholic Primary School		A number of constraints affect the sub-parcel as a whole which impact on its overall NDA. These constraints, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to recommend a reduced NDA within the sub-parcel.
Sulloi		The sub-parcel is sustainably located as it is within walking distance of a local convenience shop and readily accessible by users of public transport and the local highway network. The sub-parcel is also well self-contained visually, by the existing development to the north, a school to the north east, woodland and the new Waterside Village housing estate to the south east, and by higher ground to the west.
		However, development of the larger site proposed at LPPO stage would be likely to cover the prominent side of a scarp slope with characteristic rocky outcrops. As a result it would be likely to cause harm to the character and appearance of the area, within an area which scores Medium to High for landscape visual sensitivity. The resultant harm can be adequately addressed by

reducing the NDA so that it just covers the eastern portion of the sub-parcel. The NDA within the reduced area would also be well defined by a clear, robust field boundary which runs through the sub-parcel and by the woodland and primary school grounds to the east.

Access to the sub-parcel can be provided from Elton Head Road, where there is a 20mph speed limit. Any development would also need to apply an appropriate buffer alongside the priority habitats woodland to the south east and alongside a priority habitat grassland.

These constraints would not be sufficient to preclude the development of the sub-parcel within the reduced NDA referred to above.

The sub-parcel constitutes mixed grade 3 agricultural land. The surrounding area includes substantial opportunities for re-development of previously developed sites including at the Suttons depot site a short distance to the east. To ensure an appropriate phasing of development within the Thatto Heath area it would be appropriate to delay any development within sub-parcel GBP_085c until after the end of the Plan period.

The SA assessed the sub-parcel as part of the larger site proposed at LPPO stage. It concluded that its development would have a positive impact on the achievement of a number of SA objectives.

Having regard to all the factors set out above, it is concluded that the eastern part of the subparcel only should be released from the Green Belt, and safeguarded to help meet potential housing development needs after the Plan period.

- 5.21 It is clear from the above assessment that the individual site is still being assessed as part of the much larger allocation (HS24), which was considered at the LPPO stage.
- 5.22 Due to this there are a number of discrepancies where points relating to the wider site are identified as being negative however when considering the site in isolation these are not relevant.

INDEPENDENT STAGE 2B ASSESSMENT

- 5.23 In light of the above and for the benefit of these representations, we have undertaken an independent site assessment (equivalent of Stage 2B assessment), which follows the same methodology set out within the Green Belt Review. This is set out a follows:
- 5.24 Constraints are identified in the table below and an assessment is made against each element identified within the Green Belt Main Report.

Constraint type	Reason why this constraint was assessed	Assessment
Landscape and Visual Character	To Minimise impact on the landscape	Is identified within response as being well self-contained visually by existing development to the North, a School to the North East, Woodland and the new Waterside village

		housing estate to the South East.
Ecology	To minimise impacts of new development on biodiversity	The site is a green field site however there are no ponds on the site and although tree lined boundaries might form suitable habitats for bats it is not considered that this would unduly impact upon the developable area.
Agricultural Land Quality	To take into account the economic and other benefits of best and most versatile agricultural land	The site is Grade 3 agricultural Land and hence does not represent either the best of most versatile agricultural land
Heritage Assets	To consider the effects of development on the identified heritage assets	There are no Heritage assets within the setting of the site
Flooding	To implement national policy that areas within flood zone 2 or 3 should not be developed unless development needs cannot be met by use of land at lower flood risk.	The site is not within any identified flood zones
Trees and woodland	To minimise loss of important trees and woodlands	There will be minimal loss of trees to facilitate access
Open space and recreation	To avoid loss of open space and sporting facilities in areas of shortage	No open space or sporting facilities will be lost
Minerals	To ensure that important mineral resources are not sterilised by new development	The site is not identified as a minerals safeguarding zone
Infrastructure	To ensure that development does not jeopardise (a) the integrity of existing infrastructure or (b) the ability to deliver future infrastructure improvements.	Existing infrastructure is sufficient to accommodate the proposed site.
Ground Conditions	To identify any likely constraints related to	No ground conditions issues have been identified

	landfill, contamination or subsidence.	
Air, Water and noise pollution	To identify whether the site is suitable for the proposed use in relation to these pollution issues	The site is a Greenfield site and is not subject to any of the pollutants identified.
Hazardous Installations	To identify whether occupiers of the site would be subject to unacceptable risks from such installations (including pipelines).	There are no hazardous installations on the site
Neighbouring uses	To ensure proposed use would be compatible with nearby land uses.	All of the surrounding uses are compatible with the nearby land uses

- 5.25 As can be seen above, due to survey work that has already been completed on the site, it is exceptionally well placed to be brought forward for residential development. These results are as good if not better than all of the sites included for allocation and awarded a High potential for being brought forward.
- 0
- 5.26 The next element of assessment for stage 2B is in relation to accessibility to sustainable modes of Transport. The below table follows the guidelines set out within the methodology.

Modes of Transport	Guidance to differentiate between parcels/sub-parcels	Assessment
Walking	Within 600 metres safe and convenient walking distance of a district or local centre	Site is well located for walking as identified within LPA Green Belt Review Comments
Cycling	Within 1 mile safe and convenient cycling distance of a district or local centre	Site is well located for cycling as identified within LPA Green Belt Review Comments
Public Transport	Within 400 metres safe and convenient walking distance of a bus stop with a reasonable range of services to different destinations	Site is readily accessible by users of public transport as identified within LPA Green Belt Review Comments
Vehicular Traffic	Safe and convenient access can be provided for all vehicles that are	Site is readily accessible by users of the local highway network as

likely to use the parcel/sub-parcel to and from (a) the public highway and (b) the	identified within LPA Green Belt Review Comments
strategic road network	

- 5.27 The site is exceptionally well located for access to sustainable transport methods and meets all of the recommended guidance. As such this site must be considered to be awarded a <u>High</u> mark for this element of the Stage 2B assessment.
- 5.28 The third and final element of assessment relates to ownership and viability issues. Within this element in the methodology it sets out 3 elements for consideration, these are covered below.
- 5.29 Whether there is active developer interest;

The land owner has been approached repeatedly by house builders including those operating within close proximity to site.

5.30 Whether similar areas have been successfully developed in recent years;

Directly to the South and east of the site is a residential development which is currently being built out by Morris Homes. Due to this sites close proximity and ongoing successful build out it is felt that if the proposed site were to be included as an allocation there might be opportunities for the new site to form a final phase for the emerging residential site.

This could give opportunities for shared facilities and infrastructure between the permitted and the new site if allocated

5.31 Whether there are any known abnormal development costs

A number of surveys of the site have been completed and none of these have identified any potential abnormal development costs. As this is a green field site and has never been developed there are not expected to be significant abnormal site constraints including contamination or difficult constructions access.

CONCLUSION OF UPDATED SITE 2B ASSESSMENT

5.32 The aim of Assessment 2b is to reach overall conclusions on the development potential of each parcel/sub-parcel of land and consider the likelihood that those sites would come forward for development within the plan period if they are release from the Green Belt.

5.33 Site reference 7HS/GBP_085c is ideally located for Green Belt release and the above independent site assessment clearly sets out that when considered on its own rather than as part of a larger site the only possible score it should be given is <u>High</u>.

CHARACTERISTICS COMPARED TO OTHER SAFEGUARDED AND ALLOCATED GREEN BELT SITES

5.1 The allocated and safeguarded sites have been assessed by the Council in a manner based on certain characteristics, which have determined whether they are placed within one tranche or the other.

Allocated Sites

- 5.2 When assessing Land off Elton Head Road as an individual site, it is clear that the characteristics of the site(s) and their good deliverability is much more akin to the allocated rather than the safeguarded sites.
- 5.3 The site area of Land off Elton Head Road at 3.70 hectares is lower than some of the allocated sites (although it is acknowledged that some of these allocated sites are strategic allocated sites, which by their nature are of a significant size).

Safeguarded Sites

- 5.4 In comparison to the other safeguarded sites, the majority of these are significantly larger in area and do not relate as well to existing built forms. In addition, they are often much further away from local services and facilities and would have greater impact upon the landscape and purposes of the Green Belt.
- 5.5 Unlike several safeguarded sites, Land off Elton Head Road site does not score less in terms of deliverability. It has no prohibitive constraints and is under single ownership. There is clearly a positive relationship with the surrounding built forms and the site is in a sustainable location.
- 5.6 The development of the site would not have a detrimental effect on the amenities of neighbouring land uses. The proposed use will complement the neighbouring land uses, which are principally residential. The development of the site would have a limited impact on the character of the wider landscape. The development provides the scope to enhance and create a more appropriate settlement edge to the area.

IMPACT UPON OVERALL SCORE AND SUBSEQUENT IMPACT ON ALLOCATION

- 5.7 The Land owner and the LPA both agree that site 7HS/GBP_085c should be awarded the best score at stage 1b (Low) and as such be allocated the full 3 points at stage 3. There is a difference in opinion however regarding the stage 2b score. The LPA marked this as medium rather than **High** as the above assessment concludes. Having reviewed the LPA comments it becomes clear that this low score can only be achieved due to the LPA considering it as part of the much wider site rather than considering the site on its own merits.
- 5.8 When the site is considered on its own merits it is clear the only correct score can be <u>High</u> with this in mind it should also be allocated the full 3 points at stage 3 resulting in an overall score of 6.
- 5.9 As set out above all other sites with a score of 6 have been included as Allocated sites. It is our view that the site, when considered fairly is an incredibly logical piece of land for release from the Green Belt with limited impacts upon the purposes of including land within the Green Belt and also with no known constraints to prohibit efficient delivery of homes.





PO3865



Local Plan Representations on behalf of Story Homes - Email 1 of 7 Helen Hartley

to:

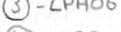
planningpolicy@sthelens.gov.uk

ELO208 Site 8HS ()-LPAOS (2)-Table 4.6



5 Attachments





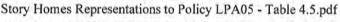
13.03.2019_FINAL DRAFT_Representation on behalf of Story Homes - Eccleston Vale .pdf



Story Homes Representations to Policy LPA05 - Housing Need.pdf



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Story Homes Representations to Policy LPA05 - Table 4.6.pdf Story Homes Representations to Policy LPA06.pdf

Dear Sir/Madam

Thank you for the opportunity to comment on the Submission Local Plan.

I am pleased to attach representations on behalf of Story Homes in relation to the following parts of the Plan specifically:

- Policy LPA05
- Policy LPA05 Table 4.5
- Policy LPA05 Table 4.6
- Policy LPA06

I will attach the following information over 7 separate emails due to file size:

- Representations Statement by Nexus Planning (Email 1)
- Representations Forms (Email 1)
- Appendix 1: Illustrative Masterplan (668-STO 002) (Email 2)
- Appendix 2: Vision Brochure: Eccleston Vale A Vision for Sustainable Family Living. Vision Brochure (August 2016) (Email 3,4,5)
- Appendix 3: Infrastructure and Delivery Statement: Eccleston Vale, St. Helens (January 2018)
 (Email 6,7)
- Appendix 4: Preliminary Ecological Appraisal (July 2016) (Email 2)
- Appendix 5: Recommended changes to SA Site Assessment Scoring (Email 2)
- Appendix 6: Story Homes SA Site Scoring (Email 2)

Given the large size of some of the files, I would be extremely grateful if you could confirm receipt of all 7 emails.

Kind regards Helen

Helen Hartley Principal Planner Nexus Planning is pleased to have been shortlisted by the RTPI as a finalist for **Planning Consultancy of** the Year 2019





Nexus Planning - Manchester Eastgate, 2 Castle Street Castlefield Manchester M3 4LZ



RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7 Helen Hartley

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:35

2 Attachments



Appendix 1 - Eccleston Vale, Windle, St Helens - Indicative Masterplan August 2017.pdf



Appendix 4, 5 and 6.pdf

Email 2 of 7

From: Helen Hartley

Sent: 13 March 2019 15:34

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

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Nexus Planning - Manchester Eastgate, 2 Castle Street Castlefield Manchester M3 4LZ



RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7 Helen Hartley

to:

planningpolicy@sthelens.gov.uk 13/03/2019 15:37



1 Attachment



Appendix 2 - Eccleston Vale, Windle - FINAL August 2016 Document - Submission Version_Part1.pdf

Email 3 of 7

From: Helen Hartley

Sent: 13 March 2019 15:36

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley

Sent: 13 March 2019 15:34

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

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Kind regards Helen

Helen HartleyPrincipal Planner







Nexus Planning - Manchester Eastgate, 2 Castle Street Castlefield Manchester M3 4LZ





RE: Local Plan Representations on behalf of Story Homes - Email 4 of 7 Helen Hartley

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:38

1 Attachment



Appendix 2 - Eccleston Vale, Windle - FINAL August 2016 Document - Submission Version_Part2.pdf

Email 4 of 7

From: Helen Hartley

Sent: 13 March 2019 15:37

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7

Email 3 of 7

From: Helen Hartley

Sent: 13 March 2019 15:36

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley Sent: 13 March 2019 15:34

To: 'planningpolicy@sthelens.gov.uk' < planningpolicy@sthelens.gov.uk>

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

Dear Sir/Madam

Thank you for the opportunity to comment on the Submission Local Plan.

I am pleased to attach representations on behalf of Story Homes in relation to the following parts of the Plan specifically:

- Policy LPA05
- Policy LPA05 Table 4.5
- Policy LPA05 Table 4.6
- Policy LPA06

I will attach the following information over **7 separate emails** due to file size:

- Representations Statement by Nexus Planning (Email 1)
- Representations Forms (Email 1)
- Appendix 1: Illustrative Masterplan (668-STO 002) (Email 2)

- Appendix 2: Vision Brochure: Eccleston Vale A Vision for Sustainable Family Living. Vision Brochure (August 2016) (Email 3,4,5)
- Appendix 3: Infrastructure and Delivery Statement: Eccleston Vale, St. Helens (January 2018) (Email 6,7)
- Appendix 4: Preliminary Ecological Appraisal (July 2016) (Email 2)
- Appendix 5: Recommended changes to SA Site Assessment Scoring (Email 2)
- Appendix 6: Story Homes SA Site Scoring (Email 2)

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Kind regards Helen

Helen HartleyPrincipal Planner

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Nexus Planning - Manchester Eastgate, 2 Castle Street Castlefield Manchester M3 4LZ



RE: Local Plan Representations on behalf of Story Homes - Email 5 of 7 Helen Hartley

to:

planning policy @sthelens.gov.uk

13/03/2019 15:38



1 Attachment



Appendix 2 - Eccleston Vale, Windle - FINAL August 2016 Document - Submission Version_Part3.pdf

Email 5 of 7

From: Helen Hartley

Sent: 13 March 2019 15:37

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 4 of 7

Email 4 of 7

From: Helen Hartley

Sent: 13 March 2019 15:37

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7

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RE: Local Plan Representations on behalf of Story Homes - Email 6 of 7 Helen Hartley

to:

planningpolicy@sthelens.gov.uk 13/03/2019 15:41



1 Attachment



Appendix 3 - Eccleston Vale Infrastructure and Delivery Statement 22.01.2018_Part1.pdf

Email 6 of 7

From: Helen Hartley

Sent: 13 March 2019 15:38

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 5 of 7

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Nexus Planning - Manchester

Eastgate, 2 Castle Street Castlefield Manchester M3 4LZ





RE: Local Plan Representations on behalf of Story Homes - Email 7 of 7 Helen Hartley

to:

planning policy @sthelens.gov.uk

13/03/2019 15:40



1 Attachment



Appendix 3 - Eccleston Vale Infrastructure and Delivery Statement 22.01.2018_Part2.pdf

Email 7 of 7

From: Helen Hartley Sent: 13 March 2019 15:39

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 6 of 7

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file:///C:/Users/GriffithsCh/AppData/Local/Temp/notes0C98C3/~web5577.htm



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

Ref: LPSD

(For official use only)

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

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> 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	Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Ms
First Name:	First name: Helen
Last Name:	Last Name: Hartley
Organisation/company:	Organisation/company:
Story Homes	Nexus Planning
Address:	Address:
c/o Agent	Eastgate,
	Castle Street,
	Manchester,
Postcode:	
	Postcode: M4 3LZ

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 <u>5pm on Wednesday 13th March</u> <u>2019</u> by:**

post to: Local Plan

St. Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

<u>or</u> by hand delivery to: Ground Floor Reception, St. Helens Town Hall (open Monday-

Friday 8:30am – 5:15pm)

<u>or</u> by e-mail to: <u>planningpolicy@sthelens.gov.uk</u>

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

Email: 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.

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

Now please complete <u>PART B</u> 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 wl	3. To which part of the Local Plan does this representation relate?								
Policy	LPA05	Paragraph	Table	Policies		Sustainability		Habitats	
		/ diagram	4.5	Мар		Appraisal/		Regulation	
		/ table				Strategic		Assessment	
						Environmenta	I		
						Assessment			
Other documents (please name									
document and relevant part/section)									
4. Do you consider the St Helens Borough Local Plan 2020-2035 is:									
						2020-2035 IS: ompliance and ti	he Tests	of Soundness	
	Compliar		Yes		ogui o	No		01 00011011000	
Sound?			Yes			No	X		
Complie	es with the	e Duty to	Yes			No			
Cooperate									
Please tick as appropriate									
E. If you consider the Level Dien is unsecued in it hereuse it is not.									
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									
	ly Prepar		X		10 100				
Justified			Х						
Effective	e?		Х						
Consist	ent with N	National Polic	y? X						
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or fails t	o comply	with the duty	to coop	<u>erate.</u> Ple	ase b	e as precise as	possibl	<u>e.</u>	
If you w	ich to our	nort the loge	l compli	ongo or og	undna	one of the Lone	l Dlop ir		thio
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 Section 3 of Statement prepared by Nexus Planning on behalf of Story Homes.									
				. ,		5		,	

		Please continue on a separate sheet if necessary
	• •	
7. Please set out what modification(s) you conscompliant or sound, having regard to the matter relates to soundness (NB please note that any incapable of modification at examination). You the Local Plan legally compliant or sound. It wis suggested revised wording of any policy or text	r you ha non-coi will nee Il be hel	ave identified at 6. above where this mpliance with the duty to cooperate is d to say why this modification will make pful if you are able to put forward your
Please see Section 3 of Statement prepared by Nexus Planning on behalf of Story Homes. This sets out our position that Site 8HS should be allocated to meet housing needs over this Plan Period under Policy LPA05 and LPA05.1. The need to allocate the Site is even more pressing given Story Homes' view that the Submission LP needs to allocate more Green Belt land to meet housing needs as expressed in our representations to Policy LPA05.		
Please note your representation should cover supporting information necessary to support / j modification, as there will not normally be a sur	ustify th	e representation and suggested
representations based on the original represen	•	
After this stage, further submissions will be on matters and issues he/she identifies for	only a	t the request of the Inspector, based
8. If your representation is seeking a modificati the oral part of the examination? (the hearings		
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 this to be necessary:	ne exam	ination, please outline why you consider

Story Homes are promoting land identified in the Submission LP as Safeguarded Site '8HS: Land South of A580 between Houghtons Land and Crantock Grove, Windle'. The concerns expressed go to the heart of the soundness of the Local Plan. They are important and complex issues which need to be discussed through the Examination in Hearings process.
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 Plan January 2019

on behalf of Story Homes

March 2019





Executive Summary

This representation is prepared by Nexus Planning on behalf of Story Homes. It should be read in conjunction with the representations also submitted by Nexus Planning on behalf of a Consortium comprising of Story Homes, Wainhomes, and Eccleston Homes (hereafter referred to as the 'Consortium') in relation to Policy LPA05 of the St. Helens Submission Local Plan (the 'Submission LP').

Story Homes have an agreement with the landowners of land identified in the Submission LP as Safeguarded Site '8HS: Land South of A580 between Houghtons Land and Crantock Grove, Windle' (hereafter referred to as 'Eccleston Vale'). Story Homes has promoted the Site for residential development of around 1,100 dwellings throughout the plan preparation process.

In proposing to safeguard Eccleston Vale, the Council has recognised that the Site represents a suitable and sustainable location for housing. Story Homes welcome and support this recognition. In the 2016 Preferred Options Draft of the Local Plan, the Site was identified as a proposed allocation to come forward within this Plan Period. The Council has therefore acknowledged the acceptability of the Site at every stage of the planmaking process.

However, as these representations set out, Story Homes believe that the LP should be allocating significantly more Green Belt land for release to meet housing needs during the Plan Period than is being proposed in the Submission Draft. This is both due to Story Homes' view that the LP should be planning for a higher level of housing growth *and* the concerns set out in these representations that the urban area will not deliver dwellings at the level or to the timescales anticipated. The release of more Green Belt land is essential if the LP is to form an effective, deliverable and therefore sound strategy for achieving the sustainable growth of St. Helens, in line with Paragraph 35 of the National Planning Policy Framework.

It is in this context that these representations contend that rather than safeguarded for development not until after 2035, Eccleston Vale (Site 8HS) should be allocated for development in this Plan Period (2020 – 2035) under Policy LPA05.

Story Homes 4











These representations set out the reasons for this as follows:

Housing Needs

The representations submitted on behalf of the Consortium set out Story Homes' view that the proposed housing requirement figure of 486 dwellings per annum (Policy LPA05) does not represent the most appropriate housing figure to ensure the sustainable growth of the Borough. With regard to the Strategic Housing Market Assessment (SHMA) Update 2019, and the advice in Planning Practice Guidance, we conclude that the most appropriate housing requirement figure for St Helens over the Plan Period would be 604dpa.

Housing Land Supply

The Consortium also share serious concerns that the Submission LP is overly reliant on sites from the urban area to deliver the housing requirement. A review of the SHLAA sites has highlighted how, for a significant proportion of the sites being relied on to deliver housing needs, the prospects that these sites will actually deliver dwellings is uncertain at best. Story Homes consider that at least 1,100 dwellings from the total estimated supply figure from the SHLAA, cannot be relied on to come forward. There is therefore a real risk that these sites will not come forward as anticipated and that as a result the LP will fail to meet housing needs over the plan period.

The preparation of the LP presents a vital opportunity to review the Green Belt boundaries. Story Homes welcome and strongly support the acknowledgement that not all of the Borough's future housing needs can be met within the existing urban areas and that exceptional circumstances exist, in line with paragraph 136 of the NPPF, to justify the release of Green Belt land within the next Plan Period. Paragraph 136 is clear that Green Belt boundaries should only be altered through the preparation or updating of plans.

In this context, it is essential that in order to meet the future housing requirements of St Helens in full, that the LP is founded upon a sound and credible evidence base and that the opportunity to make informed decisions regarding the release of Green Belt is not missed.

Requirement for Additional Green Belt Release

In light of the above concerns, it is Story Homes' view that Green Belt land for around 3,560 additional dwellings must be identified for release over the Plan Period than is currently being proposed. This view is set out in detail within the representations prepared by Nexus Planning on behalf of the Consortium. This is

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Story Homes 5



essential in order to ensure a sound and deliverable Local Plan Strategy which will meet the housing needs for the Borough, as required in the NPPF.

Eccleston Vale (Site 8HS)

These representations set out an overview of the background to the Eccleston Vale Site in terms of the extensive technical work and discussions with the Council so far. The Site was identified as a proposed housing allocation in the Preferred Options Draft of the LP in 2016. These representations demonstrate why the reasons given in the St Helens Green Belt Review (GBR) (2018) for now safeguarding the Site rather than allocating it, are not justified.

It is demonstrated that the Council's evidence base raises no insurmountable technical constraints which would warrant precluding this Site from allocation in this Plan Period. The submitted evidence demonstrates how the development can respond positively to each point raised. In fact, many of the considerations raised in the GBR (2018) represent aspects of the Site which make it a particularly sustainable and suitable location to allocate for development.

Particularly detailed work has been undertaken to show that dwellings can be delivered within the earliest stages of the Plan Period. The Council can therefore have confidence that the allocation can be delivered in full within this Plan Period.

Eccleston Vale as a Particular Opportunity

The representations explain why Eccleston Vale should be seen as a substantial unique opportunity to deliver the necessary growth of St Helens in a sustainable manner which will bring numerous positive benefits. The particular advantages of allocating the site are set out as follows:

- It has direct Access to one of the Borough's main transport routes the A580 East Lancashire Road. Eccleston Vale will therefore deliver new homes in a sustainable location with excellent access to key employment destinations, with minimal impact on the local road network.
- Accessible to Local Facilities A range of day-to-day services lie within 1,000 metres of the site.
 Development here would therefore promote a modal shift towards sustainable transport. The



Illustrative Masterplan prepared by Story Homes also provides for the provision of a primary school and doctor's surgery/ health centre on the Site.

- Low contribution towards the purposes of the Green Belt The Site has been identified in St
 Helens own Green Belt Review as one of the most suitable sites in the whole Borough for Green Belt
 release.
- Provides a 'critical mass' of development Eccleston Vale is capable of delivering around 1,100 dwellings. By virtue of its strategic size, it will be able to deliver significant benefits in the form of affordable housing, a true range, type and size of dwelling, significant contributions towards local infrastructure, improvements to the local road network and the opportunity for positive placemaking through careful and comprehensive design.
- Provision of Education Facilities By virtue of the scale of the development, it is possible to provide
 land within the Site for a new primary school. The opportunity to comprehensively plan for the
 provision of a new primary school is a significant material benefit the development will bring to this
 part of St. Helens.
- Watery Lane Green Corridor The proposed development will create a major new biodiversity and
 recreational resource for St. Helens in the form of Watery Lane Green Corridor a wide linear park
 to be created as a focal point through the centre of the Site.

Eccleston Vale as a Preferred Site

The particular suitability of Eccleston Vale also becomes apparent when regard is had to the evidence base used to inform the LP, and the constraints facing the other sites which have been identified as able to meet the housing need (both allocated and safeguarded).

It is apparent from a review of the Council's own evidence base that Eccleston Vale (Site 8HS) is one of the most suitable housing sites across the Borough. It does not face any technical constraints that would preclude or limit its development, and Story Homes' proposals for the Site respond positively to the opportunities and constraints of the Site. What is more, the release of the Site for development would not harm the overall function or integrity of the Green Belt in St. Helens.



Safeguarded Land

It is submitted that there is an over-whelming case to allocate Eccleston Vale for development in this Plan Period under LPA05. Should the Inspector however, be minded not to identify the Site for allocation, Story Homes submit that the identification of the Site as safeguarded land would be wholly appropriate and indeed essential to ensure the LP Strategy is sound.



It is recommended that given the wider concerns over the deliverability and viability of sites identified by the Council in the urban area the Local Plan includes a policy containing a formal 'trigger' mechanism for allocating the safeguarded sites identified under Policy LPA06 in the event the allocated sites and SHLAA sites not come forward as anticipated. This would improve the flexibility of the Plan, as required by NPPF (Paragraph 11, NPPF).



3.10 It is against this background that these representations seek to provide a succinct overview of the proposals for the Site and the technical work undertaken which demonstrates its suitability as a housing allocation. Detail is contained in the following technical documents which are now appended to this Statement.

Document Author		Now provided	
Illustrative Masterplan (668-STO 002)	Design by Pod	Appendix 1	
Vision Brochure: Eccleston Vale – A Vision for Sustainable Family Living. Vision Brochure (August 2016)	Story Homes and Turley	Appendix 2	
Infrastructure and Delivery Statement: Eccleston Vale, St. Helens (January 2018) – considering highways and access, public transport, footpaths and cycle routes, education, health, green infrastructure, noise, drainage, utilities as well as delivery trajectory and infrastructure phasing.	Story Homes and Turley	Appendix 3	
Highways and Access Appraisal (July 2016)	Vectos	Appendix 3 (appended to Infrastructure and Delivery Statement)	
Bus Strategy Briefing Note	Vectos	Appendix 3 (appended to Infrastructure and Delivery Statement)	
Noise Assessment Report	RS Acoustic Engineering Ltd	Appendix 3 (appended to Infrastructure and Delivery Statement)	
Preliminary Ecological Appraisal (July 2016)	Urban Green	Appendix 4	

St. Helens Local Plan Submission Draft 2019

3.11 In the Submission Draft LP, the site has been removed as a proposed housing allocation, and its status amended to Safeguarded Land under Policy LPA06.



3.12 The apparent justification for this change in status is set out as follows in Table 5.4 of the Green Belt Review (2018):

"This large parcel is located outside the edge of the current urban area to north west of Windle and Eccleston. Although the parcel was proposed by the Council as an allocated site at the LPPO stage, a number of constraints affect it that would have a significant impact on the NDA and the deliverability of development within it. These constraints, considered in the context of the reduced amount of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to this parcel.

The parcel has well defined boundaries formed by existing housing and adjacent highways. However, it constitutes a substantial greenfield site which provides high quality agricultural land. Its development would form a sizeable outward extension of the urban area into the countryside, beyond a currently well-defined urban edge. These factors mean that the release of the parcel for development, and the timing of its development, would need to be carefully justified in the light of the Council's objective of making efficient use of previously developed land to meet development needs.

Significant improvements to highways infrastructure would also be required to support the successful development of the parcel. It would not be possible to provide vehicular access (except for potentially a very limited number of dwellings) directly from the estate roads from the south due to existing capacity issues along small estate roads and junctions. As a result, access is likely to be primarily from Houghton's Lane, which is currently a narrow country lane which would require a substantial upgrade and realignment through the parcel and a new junction to link with the A580. Significant improvements would also be likely to be needed to public transport facilities including (due to the scale of the parcel) a new bus route through the parcel.

The Habitats Regulation Assessment process has identified that the parcel is likely to provide functionally linked habitat for bird species, connected with European protected sites in the wider area. Any proposed development would need to be informed by a suitable ecological study informed by wintering bird surveys. If the use of the parcel by the relevant species is confirmed, a mitigation strategy (which may need to be of substantial scale given the size of habitat which may be affected) would need to be agreed and implemented, probably using land which is outside the parcel. This process is likely to take a considerable period of time. Development would only be acceptable if a suitable and deliverable mitigation strategy is agreed.

A further factor that needs to be considered is the availability of schools capacity and other social infrastructure. Given the scale of the parcel it is possible that a new primary school will be required and potentially upgrades to other social infrastructure and amenities.

The parcel is also affected by a number of other constraints as set out below. It is considered that these can be addressed within the master planning of a new development. A buffer of approximately 20m would be required to protect Windle Brook (a designated LWS, which runs through the site). This can be readily accommodated as part of the green infrastructure to serve development within the parcel. Two UU pipelines, including a main combined sewer, run



through the site from its north-eastern to south western corners. Their size and location is likely to limit the residential capacity of the parcel.

Due to the parcel's proximity to the A580 a significant buffer (with a minimum width of 40m) would be needed, together with other attenuation measures, to mitigate the impacts of noise and air pollution from the road.

The 2018 SA concluded that development of the parcel would have a mixed impact on the achievement of SA objectives, with a number of likely negative effects in relation to biodiversity, landscape sensitivity, agricultural land and the historic environment. Whilst these effects (with the exception of the loss of agricultural land) are considered to be likely to be capable of being suitably mitigated this will impact on the phasing of development.

In summary, the parcel is considered suitable for removal from Green Belt. However, having regard to all the factors described above, it is now recommended that the parcel be safeguarded (in order to meet potential housing needs beyond the Plan period) rather than allocated for development."

3.13 These representations go on to take each point of this justification in turn and demonstrate why, with regard to the evidence that has already been provided to the Council (and is now appended to these Representations), these purported concerns about the deliverability of the site in the Plan Period are not warranted. In fact, there is extensive evidence to demonstrate the deliverability of the Site in the early stages of the Plan Period. It is submitted that these, and the particular advantages of releasing the Site for development, present an overwhelming case that Eccleston Vale should be allocated for development now under LPA05.

GBR (2018) Comment: The site provides 'high quality agricultural land

- 3.14 The Sustainability Appraisal identifies the site as being predominantly Grade 1 and Grade 2 Agricultural Land. This is based solely on the Agricultural Land Classification (ALC) Maps produced by Natural England. It is therefore based on a high level data, rather than any site-specific investigations of the land.
- 3.15 The majority of the northern part of the Borough is identified as Grade 1 or Grade 2 land and land to the immediate east and south-east of the St. Helens Core Area is identified as Grade 3 land. This Grade 3 land also has the potential to be 'Best and Most Versatile', as defined in Annex 2 of the NPPF. Accordingly, the majority of land around the existing built up area of St Helens may have value as agricultural land.



- 3.16 It has been accepted by the Council that it is necessary to release some greenfield land to meet housing needs over the Plan Period. In this context, given the large proportion of the Borough classified as 'Best and Most Versatile' land, there will inevitably be some loss of 'high quality' agricultural land through allocations in the Local Plan. Specifically, to ensure a distribution of some new housing towards the northern part of the Borough, the loss of some land identified as Grade 1 and 2 on the Natural England ALC Maps will be necessary.
- 3.17 It is considered that this loss can be justified in light of the need to meet housing needs in sustainable locations. In this context, this should not be considered a reason to preclude the allocation of Eccleston Vale.

GBR (2018) Comment: Its development would form a sizeable outward extension of the urban area into the countryside, beyond a currently well-defined urban edge.

3.18 It is acknowledged that the development of Eccleston Vale would represent an extension of the urban area. However, Story Homes disagree with the suggestion that the Site would extend beyond a currently well-defined urban edge. Rather, the Site is extremely well-related to the shape of the existing settlement. The assessment undertaken in the GBR describes how the parcel is well contained. It is bound to the north by the A580 East Lancashire, to the south and east by the existing built up settlement and to the west by Houghtons Lane. The development would not extend further west into the existing countryside than the existing built up area of Eccleston and would represent a logical 'rounding off' of the settlement. An observation that the site would form a sizable outward extension of the urban area into the countryside should not be weighed negatively against the Site as this is equally true of most of the other proposed allocation / safeguarded sites. Most notably, 4HA - Bold Forest Garden Suburb, 1HA and 1HS – west of Garswood.

GBR (2018) Comment: Significant improvements to highways infrastructure would be required...it would not be possible to provide vehicular access (except for potentially a very limited number of dwellings) directly from the estate roads to the south. As a result access primarily from Houghton's Lane, which is currently a narrow country lane which would require a substantial upgrade and realignment through the parcel and a new junction to link with the A580.



- 3.19 The fact the that development at Eccleston Vale would have a direct access to the A580 East Lancashire Road – the Borough's key strategic transport corridor is a major advantage in favour of this Site. The Site is ideally placed to make a significant contribution to housing needs in a location that can utilise the strategic road network of St. Helens, without exacerbating congestion on local roads.
- 3.20 The Assessment undertaken by Vectos demonstrates that vehicular access can be made principally from Houghtons Lane via the A580, with other smaller extensions to the existing housing estate roads to help knit the new development to the existing neighbourhood without causing any adverse traffic impacts on local estate roads. It is proposed to create a new north-south link parallel to Houghtons Lane through the site, and then downgrade Houghtons Lane to an access only route to serve the properties that are located off it. There are several advantages to this approach in that it would limit the impact on existing properties along Houghtons Lane and allows an improved landscaping edge to the west of the site. The new highway link (referred to as 'New Houghtons Lane') can then be designed to standard and include footways, cycle routes and lighting.



Figure 1: Extract of Illustrative Masterplan showing 'New Houghtons Lane'

(1) Highway Issues





3.21 An improved junction from 'New Houghtons Lane' onto the A580 would be required. Vectos have reviewed the following two options for this and undertaken a high level costings exercise and a review of the impact on the A580. Through discussions, highways officers at SHMBC supported both options.

lunction Options		Costing
Option	Details	Exercise
Roundabout Arrangement	A roundabout of a similar scale and design as the Blindfoot Road roundabout on the A580 1.1km to the west. A layout design for this option is contained in the Vectos Assessment (Dwg VN50540 D001). The roundabout is deliverable within highway land or land within Story Homes' control.	£2.5 million
Traffic Signals Arrangement	A T-junction controlled with traffic lights and potential linked to the Windle Island signalised junction 1.3km to the east. A junction layout is provided in the Vectos Assessment (Dwg VN50540 D002 Rev. A). This includes dedicated left and right turn lanes into the site to ensure traffic flows on the A580 are not delayed by traffic turning into/out of the Site.	£2.5 Immorr

- 3.22 The Illustrative Masterplan has been prepared on the basis of the Roundabout Option, but Story Homes would be comfortable with either approach. It is acknowledged that the impact of the junction upon the flow of traffic along the A580 will be a key concern for SHMBC. An initial traffic forecast has been made. An improved junction onto the A580 will represent a gateway into the site without causing additional delay at Windle Island. It is expected that the roundabout junction option would have the least impact on the free flow of traffic on the A580 particularly in off-peak periods.
- 3.23 In this way, the development of Eccleston Vale presents an opportunity to deliver a substantial upgrade to the capacity of the local highway network at the western edge of St. Helens.
- 3.24 Section 4 of the Highways and Access Note (Appendix 3) describes how the Site could be developed and the internal layout design to provide some limited extensions to the existing housing estate roads along the southern boundary of the Site to serve some of the dwellings. These extensions would not be connected by general traffic to the road network of the wider development so that they could not



be used as rat runs to the A580. In this way, it is considered approximately 280 dwellings could be delivered while the new junction to the A580 is being constructed.

3.25 Within the GBR, the improvements to highways infrastructure are presented as a reason not to allocate the Site for development in this Plan Period. However, to the contrary, the evidence provided shows that the ability to connect to the Primary Road Network, and deliver substantial improvements to the network in this part of St. Helens, should be recognised positively as a significant advantage of this Site and a material benefit it can deliver. It has also been demonstrated that around 280 of the new homes could be delivered in the earliest stages of the Plan Period, while the new junction to the A580 is being constructed.

GBR (2018) Comment: Significant upgrades required to public transport facilities including (due to the scale of the parcel) a new bus route through the parcel.

- 3.26 Similarly, the potential of the development to deliver improvements to public transport in the area, and encourage a real modal-shift in both future and existing residents should be viewed as a particular opportunity in favour of allocating the Site in this Plan Period. The Site is in an optimal location at a gateway entrance into St. Helens on the Borough's key transport route and in close proximity to existing facilities in the local area. Story Homes are therefore keen to maximise on the opportunity presented by the Site's location and ensure public transport is fully integrated into the proposals from the start.
- 3.27 To this end, Story Homes and their transport consultant Vectos, have engaged with SHMBC and Merseytravel regarding a proposed bus strategy to serve the Site. The details of this Bus Strategy are now contained in Appendix 3. This demonstrates it would be both practical and viable to extend the existing number 37 service which links St. Helens to Eccleston. The number 37 service currently passes along Walmesley Road less than 300 metres from the southern edge of the site. The Bus Strategy describes how it could access Eccleston Vale along Houghton's Lane and loop the Site before returning via the same route. This would equate to a 900 metre extension of its existing route. This proposed strategy would ensure the entire of Eccleston Vale falls within 400 metres of either an existing or proposed new bus stop. This is indicated in the below extract of the Bus Strategy (Appendix 3).

D PUBLIC TRANSPOR



- 3.28 Enhanced opportunities for walking and cycling are also incorporated into the Illustrative Masterplan.

 In particular:
 - Footpath and cycle routes incorporated throughout the development, in particular along the proposed Watery Lane Green Corridor;
 - New cycle crossing facilities as part of the new A580/Houghton's Lane junction;
 - Footpath and cycle connections provided to the open countryside to the north of the Site through the improvement in the usability and attractiveness of connections via the existing A580 underpass.

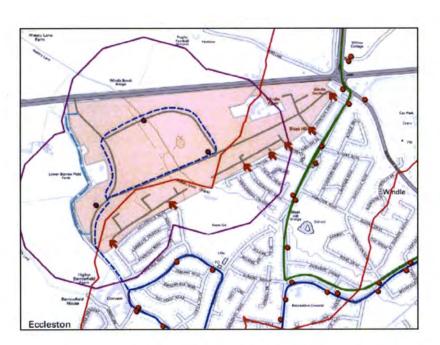


Figure 2: Extract of Bus Strategy showing extension to No. 37

GBR (2018) Comment: The Habitats Regulation Assessment process has identified that the parcel is likely to provide functionally linked habitat for bird species, connected with European protected sites in the wider area – any proposed development would need to be informed by a suitable ecological study, informed by wintering bird surveys. If species found – would need

Walking + Cycle Route

26



mitigation strategy (which may need to be of a substantial scale given the size of habitat which may be affected), probably using land which is outside the parcel. This process is likely to take a considerable period of time. Development would only be acceptable if a suitable and deliverable mitigation strategy is agreed.

- 3.29 Ecologists Urban Green have considered this issue specifically in light of this comment in the GBR. They raise concerns that the information contained within the St. Helens Habitats Regulation Assessment (HRA) is not wholly accurate. The HRA states the Eccleston Vale Site is located 7.8km away from the Mersey Estuary SPA and Ramsar site as the nearest European designated site. However, this does not appear to be an accurate measurement as the Multi Agency Geographic Information for the Countryside (MAGIC) maps shows the distance to be approximately 12.9 km. Furthermore, the HRA suggests the site is within the IRZ of a SSSI for pink-footed geese. However, the name of the SSSI is not provided and an assessment by Urban Green has found the closest SSSI with pink-footed geese as a qualifying feature appears to be Martin Mere SSSI, located approximately 17.8km to the north. Given these inconsistencies, more clarity is needed from the Council on the purported impact on designated sites and whether this concern is justified.
- 3.30 Whilst it is acknowledged that the Site may provide habitat for wintering birds, the arable habitat is not unique to the Eccleston Vale site, and is in fact very abundant in the wider region. It is therefore unlikely that the Site in itself is of such high significance to wintering birds that it will result in significant adverse effects as a result of habitat loss. Furthermore, given the Site is over 12km from the Mersey Estuary SPA, it is considered unlikely that any adverse effects of developing the site would be of a high enough significance that they could compromise the conservation objective of the international site.
- 3.31 There is more than enough time to undertake surveys and agree a mitigation strategy if necessary as part of the planning application process on the Site, and this is a process common to many development proposals. It is not reasonable to suggest such a requirement would risk delaying the development of the Site such that it could not come forward in the Plan Period. Indeed, this was not considered to be the case at the Preferred Options stage when the Council proposed the allocation of the Site. It is also not being suggested for other allocated/safeguarded Sites which have been identified as providing functionally linked habitat (Rookery Lane, Rainford and Land South of Leyland Green Road, Garswood).

HRA













GBR (2018) Comment: A further factor is the availability of schools capacity and other social infrastructure. It is possible a new primary school would be required and potentially upgrades to other social infrastructure and amenities.

- 3.32 The Infrastructure and Delivery Statement (2018) (Appendix 3) has considered the estimated impact of the proposed development on local schools capacity. It is estimated that Eccleston Vale will generate approximately 41 primary school pupils (equivalent to slightly in excess of a 1-form entry primary school) and 18 secondary school pupils (equivalent to approximately 0.5-form entry secondary school).
- 3.33 Story Homes fully acknowledge that schools capacity would be a key consideration of bringing the Site forward and a new primary school may be required. In this context, detailed consideration of this issue has already been undertaken and the submitted information confirms that the Site would be able to provide any additional capacity required. This should be viewed as a benefit of the Eccleston Vale site, not a constraint.
- 3.34 The scale of development would enable any new facilities required to be planned and provided for as part of the development. In the event that the on-site delivery of a new primary school is the preferred approach, the Illustrative Masterplan includes an area of land of approximately 1.6 ha, sufficient to accommodate a 1.5-form entry primary school. A financial contribution to facilitate the construction of the primary school would also be provided to SHMBC. The land identified for the school has been located in the southern part of the Site, and immediately adjacent to the proposed internal loop road and existing playing pitches to the south. This ensures it would be accessible to residents both of the proposed development and the surrounding neighbourhoods helping to serve the wider needs of the area and integrate the development as part of the existing community.

GBR Comment (2018): The GBR acknowledges that the following constraints could be addressed through the masterplanning of a new development.

3.35 We go on to describe the technical work Story Homes have undertaken to assess these constraints, and how they have been fully incorporated within the Illustrative Masterplan.

28



Masterplanning considerations highlighted in the Green Belt Review	Story Response
A buffer of approximately 20 metres would be required to protect Windle Brook (a designated LWS, which runs through the site).	A Preliminary Ecological Appraisal has been undertaken by Urban Green (Appendix 4). This recommends that the Brook should be retained in its current form, with a buffer between the brook and any developed area. A central part of the Illustrative Masterplan is the creation of the Watery Lane Green Corridor. This will be a large landscaped area running adjacent to Windle Brook, retaining the necessary buffers to the Brook and providing a wide linear park through the site which acts as a focal point in the neighbourhood and connects to the existing recreation ground to the south.
Two UU pipelines run through the site from its north-eastern to southwestern corners.	The Infrastructure and Delivery Statement (January 2018) (paragraph 4.34) provides detail about the range of existing infrastructure located at or in close proximity to the Site. It confirms that investigations have been undertaken which confirm that none of these present an insurmountable constraint to delivery. Of the two water mains crossing the Site, one is proposed to be retained in its current position with the required 10 metre easement, whilst the other is proposed to be diverted. The Infrastructure and
	Delivery Statement describes how UU have confirmed that approach is acceptable.
A significant buffer (with a minimum width of 40m) would be required from the A580, to mitigate the impacts of noise and air pollution from the road.	An assessment has been undertaken by RS Acoustic Engineering Ltd and is now provided in Appendix 4 of the Infrastructure and Delivery Statement (Appendix 3). This Assessment offers guidance on how the new development can interact with the A580. The Illustrative Masterplan takes account of this guidance and includes a 'buffer zone' of 30-40 metres between the proposed dwellings and the A580.

3.36 It is clear from the above that the Council's evidence base raises no insurmountable technical constraints which would warrant precluding this Site from allocation in this Plan Period. The submitted evidence demonstrates how the development can respond positively to each point raised. In fact,



many of the considerations raised in table 5.4 of the GBR (2018) represent aspects of the Site which make it a particularly sustainable and suitable location to allocate development.

Proposed Timescales

- 3.37 The technical work undertaken thus far provides confidence that Eccleston Vale can deliver homes in the early stages of the Plan Period. This is with regard to the following considerations.
- 3.38 Availability: Story Homes have a single option agreement with the landowners of Eccleston Vale, such that the entire Site is under the control of a single housebuilder. Story Homes is a privately owned housebuilder with a long and successful reputation of building quality homes across the North of England and of delivering developments in a timely fashion. The Site is not subject to any legal or ownership constraints and subject to receipt of the necessary planning permissions, there is nothing of this nature that would delay a start on site. As evidenced by the positive discussions already undertaken, Story Homes would work proactively with SHMBC and other stakeholders to deliver the development quickly, after the adoption of the Local Plan.
- 3.39 Market Demand: Story Homes can confirm the development of Eccleston Vale would be viable in the short-term. The Site is located in a strong market area which experiences a high demand for homes. The highly accessible location, adjacent to the strategic road network provides further confidence that there will be a strong market demand for the new homes.
- 3.40 <u>Lead-in Timescales</u>: Given the scale of due diligence which has already been undertaken in respect of the Site, Story Homes consider an 18-month lead-in time from adoption of the LP to development of the first dwellings on Site is realistic. This allows time to secure a hybrid planning permission comprising outline permission for the entire Site and detailed permission for the first phase of development, discharge the relevant pre-commencement conditions and prepare the Site for development. Assuming the LP is adopted in mid-2020 as anticipated, this means the first dwellings will be delivered on site during 2022/23.







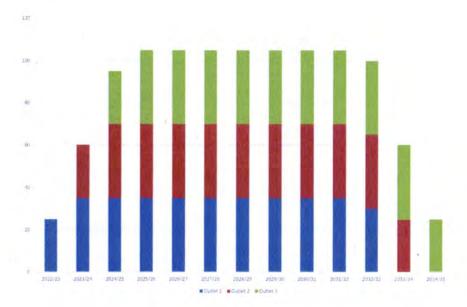


Figure 3: Eccleston Vale Indicative Trajectory

- 3.41 <u>Build-out Rate</u>: Given its size, the Site will be built out by an anticipated 3 outlets. Based on rates of delivery achieved by other large-scale development elsewhere in the North West, it is anticipated each outlet can deliver around 35 dwellings a year. As set out in the graph above, this leads to an estimated delivery trajectory of 12 years for the whole Site.
- 3.42 Infrastructure Phasing: Based on the due diligence work and discussions undertaken already, as set out in the Appendices to this Statement, Table 2 below sets out an indicative approach to the delivery of the infrastructure required to support the development. It is anticipated the precise phasing of the development and delivery of infrastructure would be agreed with SHMBC and other stakeholders through discussions.



Table 2: Indicative Phasing			
Phasing Period	Estimated number of new homes delivered	Indicative Infrastructure Delivery	
2022/23 – 2026/27	390 dwellings	A580 junction Houghton's Lane diversion and upgrade Diverted and extended bus services SUDS, including 40% betterment	
2027/28 – 2021/31	420 dwellings	Primary school Watery Lane Green Corridor Health Centre Water main diversion	
2031/32 – 2034/35	290 dwellings	Sports facilities Secondary school contribution	

3.43 Overall, there is clear evidence to demonstrate the deliverability of Eccleston Vale. Particularly detailed work has been undertaken to show that dwellings can be delivered within the earliest stages of the Plan Period. The Council can therefore have confidence that the entire of the allocation can come forward within this Plan Period.



Eccleston Vale as a Preferred Site

- 3.46 For the above reasons, Story Homes believe Eccleston Vale presents a particular opportunity to plan positively for the sustainable future growth of St Helens.
- 3.47 The particular suitability of Eccleston Vale also becomes apparent when regard is had to the evidence base used to inform the LP, and the constraints facing the other sites which have been identified as able to meet the housing need (as identified in Policy LPA05 and LPA06).

Contribution towards the Green Belt

3.48 Overall, Story Homes consider the Green Belt Review (GBR) (2018) undertaken to inform the LP takes a robust approach. The GBR identifies Eccleston Vale (referred to as Parcel GBP_098) as one of the few sites across the Borough which makes only a 'low' contribution towards the purposes of the Green Belt (Paragraph 134 of the NPPF). For the reasons set out above, Story Homes strongly supports the conclusions of the GBR in relation to the Site at Eccleston Vale.



- 3.49 After assessing the contribution of each identified Parcel towards the purposes of the Green Belt (Paragraph 134, NPPF), the GBR goes on to discount those Parcels facing 'prohibitive constraints' to development (Stage 2A of the GBR methodology). It then assesses each Parcel against a list of other non-prohibitive constraints (Stage 2B). The Stage 2B proformas for each Parcel are not published at the time of consultation. It is not clear therefore what the justification is for the conclusion in Table 5.3 of the GBR that the overall development potential of Parcel GBP_098 is 'medium'.
- 3.50 It is noted however, that the list of constraints assessed under Stage 2B (as set out in Table 2.7 of the GBR) broadly corresponds to the Objectives established in the Sustainability Appraisal (SA) 2019. We have therefore reviewed the Site Assessment Proformas contained in the SA Report Technical Appendix A to understand the Council's position on the key constraints facing the various Sites.
- 3.51 In relation to Eccleston Vale specifically, Story Homes wish to highlight certain scores within Technical Appendix A of the SA which are not considered to accurately reflect the nature of the Site or the likely impacts of its development. With regard to the work undertaken in relation to the site constraints, Table 3 below sets out where Story Homes suggest the scores assigned in the SA can be improved.

TD)





PO3866

Representor Details

Web Reference Number	WF0167
Type of Submission	Web submission
Full Name	Mr Neil Bailey
Organisation	
Address	13 Peebles Close
	Garswood
	Wigan WN4 OSP
Agent Details	A CANADA CAN

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

Yes (via e-mail)

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

Policy	LPA06-Site1HS	
Paragraph / diagram / table		
Policies Map		
Sustainability Appraisal / Strategic Environmental Assessment		
Habitats Regulation Assessment		
Other documents		

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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 Council should be put to strict proof of its population estimates. The population of St Helens has been in steady decline since 1981 and now they think it's suddenly going to improve. Where are all these people going to come from?

The Greenbelt must be protected at all costs and the removal of this Greenbelt for immediate and future housing must be a last resort. The Council has taken the easy option of removing Greenbelt rather than the most environmentally friendly option of using brownfield and derelict land. This option must be utilised first. Once the Greenbelt is sold to developers it will never be replaced. One of the purposes of Greenbelt is to encourage the recycling of derelict land and this must be observed.

Garswood has a large amount of wildlife - bats, wild birds and small animals that will lose their habitat and never return.

The infrastructure in Garswood is not sustainable. The narrow country roads couldn't take the extra traffic, either during building works or once the houses are built. The site access to either Billinge Road or Smock Lane would be inadequate and any necessary highway works must be funded by the developer and not the Council Tax payers.

There is a lack of doctors surgeries - the current one already has long waiting times.

1

The Council have admitted that there isn't a village centre but seem intent on building more houses without infrastructure. Garswood is unsuitable as the commuter area they appear to want. The railway station has NO parking and nowhere to put any and there is no disabled or pram access to the station platforms. Residents are forced to use their cars and if they want to use public transport the bus routes are few and the railway station not fit for purpose.

The local schools wouldn't be able to cope with an influx of children.

Due to the close proximity of the primary and high schools in Bryn and Ashton that already need to

Due to the close proximity of the primary and high schools in Bryn and Ashton that already need to be used for children in Garswood, these plans would appear to show that there is no statement of common ground with the neighbouring authorities.

* The adjacent playing fields are also planned to be removed from the Greenbelt. This mustn't be allowed to happen as it is one of the very few amenities that young people in the area have. If it isn't planned for housing, and the council line is that it isn't, then it MUST stay as Greenbelt. As a professional football coach I know of the benefits to young and old alike of all sports and this land must be protected.

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

Delete this land - and the playing field - from the proposed removal from the Greenbelt.

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

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

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

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Response Date	3/12/2019 7:03:25 PM

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Green Belt Review HA9 response letter Nicholas Cliffe

planningpolicy

13/05/2019 16:33

2 Attachments





PL(00)01 Site Location Plan (-).pdf St Helens Local Plan Submission draft rep.doc

Dear Sirs

Please find attached the supporting letter from my family, the Cliiffe's, our site. The online comment form does not seem to be working at the time of writing,

I have also supplied a site overview of our property. I am sure you will also have versions of this too.

I would really appreciate an acknowledgment of receipt of this email as I have not been able to get the online response form to reply. If it is down please address this.

Thank you for your time.

Best wishes

Nick Cliffe

Nick Cliffe Higher Barrowfield Farm Houghtons Lane Eccleston St Helens WA10 5LD

St.Helens Council
Development Plans Section
Place Services
Town Hall Annexe
Victoria Square
St.Helens
WA10 1HP

12 May 2019

Dear Sirs

St Helens Borough Local Plan Submission Draft

I am writing in relation to the St Helens Local Plan Submission Draft. The Cliffe Family own Higher Barrowfield Farm, on Houghton's Lane in Eccleston, and the paddock adjacent to it. A plan of this site is appended to this letter. Despite the property's name, it no longer has any connection to agriculture.

The paddock was identified as a Housing Allocation in the Preferred Option version of the St Helens Local Plan (2016). It was identified as Site Ref HA9 in that document under Policy LPA05, with an estimated capacity of 8 dwellings.

The Submission Draft version of the Local Plan proposes to remove the site from the Green Belt by a minor boundary alteration. We understand the rationale behind this change given the relatively small size of the site and the fact that it is surrounded by the existing urban area on 3 sides. We are supportive of this approach which will facilitate the development of the site for housing. However, we would also support the formal allocation of the site should this be considered more appropriate.

Site Background

Higher Barrowfield Farm was originally included in Green Belt following the 1983 Merseyside Green Belt Study. This Study sought to draw a tight boundary around the existing urban area in order to promote urban regeneration.

In 1983, Higher Barrowfield Farm was used as a farm house associated with the adjacent agricultural land. However, the farm house was purchased in the late 1980s by the Cliffe Family, and has since been used as a residential dwelling unrelated to the adjacent farmland. The former agricultural buildings have also been converted to an office and storage associated with the main house. The paddock area was purchased in the early 1990s and now forms part of the wider residential curtilage. The site no longer has any connection to agriculture.

Green Belt Contribution

The site is surrounded on 3 sides, and along approximately two-thirds of its length, by the existing urban area. There are also a number of urbanising features present on the site that distinguish it from the adjacent agricultural fields. These include several buildings, an electricity substation, and a tarmac access road. The site is also not in a countryside use. The openness of the site and its contribution to the Green Belt are therefore limited.

The redesignation of the site would create a shorter and more rational Green Belt boundary in this location. The new boundary would be a continuation of the existing Green Belt boundary line that runs from the south west towards Houghtons Lane. The existing access road is also flanked by hedgerows and a number protected trees, which could be supplemented with further planting to create a strong and permanent boundary to the urban edge.

The Council's Green Belt Review 2018 identifies the site as one of a number of Green Belt anomalies that require a minor adjustment to the Green Belt boundary. It states that:

"The current Green Belt boundary encompasses this group of buildings on the edge of the urban area, and does not constitute a strong boundary. It is recommended that the boundary be adjusted to exclude these buildings to create a stronger boundary on the ground" (Table 6.1, Pg 153, Site Ref AC05)

Land Supply Considerations

The Government is generally supportive of the identification of small housing sites such as this. These sites provide an opportunity for smaller house builders who are usually unable to compete with the volume builders for larger allocations. We have already had house builder interest in the site, and should it be removed from the Green Belt then we would seek to release it for development immediately.

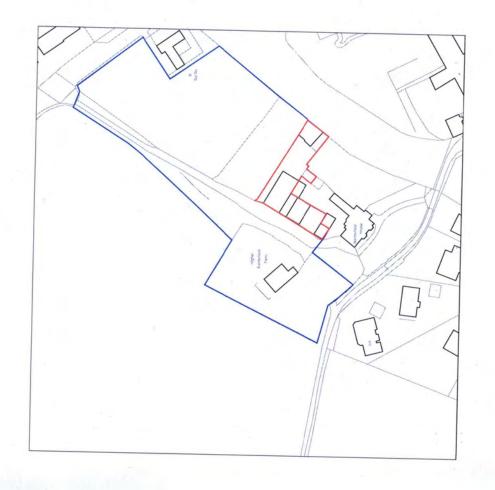
Conclusion

The site makes a very limited contribution to the Green Belt, and its redesignation would correct an anomaly in the current boundary. In our view, the site has more in common with the adjacent urban area, and it is distinct from the agricultural uses to the north west in a number of respects.

We would ask for the opportunity to appear at the Local Plan hearing sessions should this site, or the correction of Green Belt anomalies, be subject to discussion.

Yours Sincerely

18 PURK @



Cliffe Development SITE LOCATION PLAN
Born Conversion

Born Conversion

Site Location Plan

Site Location

PL(00)01

PO3868



{In Archive} St. Helens Borough Local Plan 2020-2035 (Submission Draft) Representation Form paul.johnson to:

planningpolicy 22/02/2019 12:37



1 Attachment









image001.jpg image006.jpg image007.jpg St. Helens Representation Form - Worthington Land Settlement.pdf

We attach herewith a completed representation form and plan for your attention.

Paul Johnson FRICS FAAV Director, Frank Marshall & Co., 121 Billinge Road, Garswood, Ashton-in-Makerfield, Wigan. WN4 OXD

CHARTERED SURVEYORS AUCTIONEERS & ESTATE AGENTS















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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.

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

1. Your Details		Your Agent's Details (if applicable) (we will correspond via your agent)		
Title:		Title:	Mr.	
First Name		First name:	Paul	
Last Name:		Last Name	: Johnson	
Organisatio	n/company: Worthington Land Settlement	Organisatio	on/company: Frank Marshall & Co.	
Address: Postcode:	C/o Frank Marshall & Co. 121 Billinge Road, Garswood, A-in-M, Wigan. WN4 0XD	Address: Postcode:	121 Billinge Road, Garswood, A-in-M, Wigan. WN4 0XD	
Signature:	Annual English Commence of the	Date:		
			February 2019	
ease be aw omments to	are that anonymous forms cannot be considered you MUST include y	our details abo	ove.	
Wanta				
Plan 2020-2	like to be kept updated of future 2035? (namely submission of the Precommendations and adoption of	lan for examin	ation, publication of the	

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 <u>5pm on Wednesday 13th March</u> <u>2019</u> 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. If you still need assistance, you can contact us via:

Email:

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.

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

Now please complete <u>PART B</u> 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 I	Plan does this repr	esentation relate?	
Policy LPA02	Paragraph / diagram / table	Policies Map Page 7	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other docur document a part/section		ne		
4. Do you co	onsider the St Held	ens Borough Local	Plan 2020-2035 is: egal Compliance and the	Tasts of Soundhass
Legally Con	pliant?	Yes C	No 🗆	rests or Soundriess
Sound?		Yes C	No ₩	
Complies wi	th the Duty to	Yes 🗆	No □	
Please tick as	appropriate			
	vith National Policy			
Please giver or fails to con	ve details of why y mply with the duty	ou consider the Lo to cooperate. Plea	cal Plan is <u>not legally c</u> ase be as precise as po	ompliant or is unsound ssible.
If you wish to box to set ou	support the legal tyour comments	compliance or sou	undness of the Local Pl	an, please also use this
1. Introdu	ection			
behalf o	of the Trustees of th	structed to submit re be Worthington Land bounts to about 0.21 a	d Settlement the owner of	St. Helens Local Plan on f the land edged in red on
2. Plannin	g Context			- William Co.

- 2.1 The land is allocated as Green Belt in the Local Plan for the Borough adopted on 2nd July 1998.
- 2.2 An evaluation of the site against the principles relating to Green Belt is necessary to justify its removal with regard to the principles outlined in the assessment of the purposes of the Green Belt contained in the Council's Green Belt Review (December 2018).
- 2.2.a To check the unrestricted spread of large built-up areas.

The land lies within the boundary of a haulage yard as bounded to the North/West by a concrete panel fence. This use as a haulage yard has been continuous since 2005. As such this Green Belt objective would not be compromised.

2.2.b To prevent neighbouring towns merging into one another.

The removal of the land from the Green Belt would have no material effect on this Green Belt objective.

2.2.c To assist in safeguarding the countryside from encroachment.

Encroachment took place over 13 years ago and is immune from enforcement action as such.

2.2.d To preserve the setting and special character of historic towns.

This is not a relevant consideration in this case.

2.2.e To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This objective would be achieved by the removal of the land from the Green Belt.

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.

Modification of the Policies Map (January 2019) to exclude the area edged red on the attached plan from the Green Belt and its allocation/designation as employment land with the Park Industrial Estate.

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.

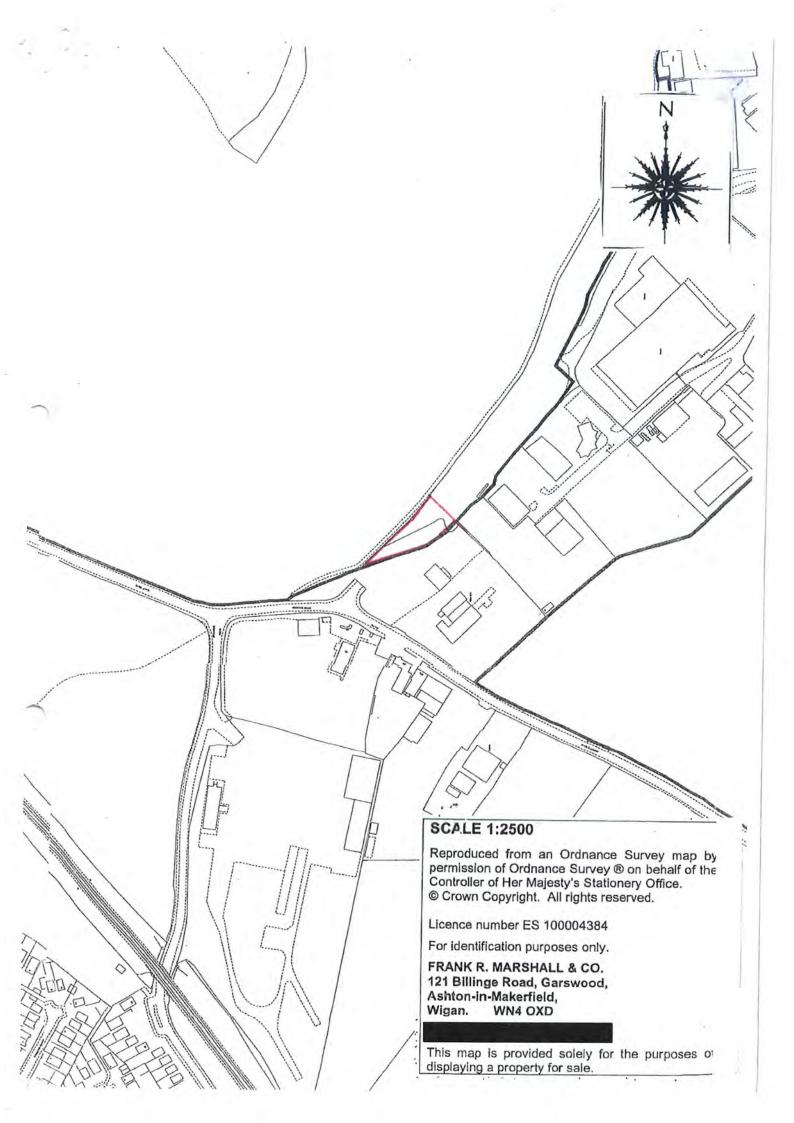
8. If the o	your representation is seeking a modification or all part of the examination? (the hearings in	do you consider it necessary to participate at public)
/	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination

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o, ii jou mon to pan	ioipate at the oral part of	une examination o	ICSISCEO BILLINGEN	'NV VOII CONSIDER
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this to be necessary	MARKET AND AND THE TOTAL AND A SECOND ASSECTION ASSEC			
time 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.



PO3869



Representation regarding 'The Submission Draft of the St. Helens Local plan' john howard

to:

planningpolicy@sthelens.gov.uk, john howard 11/03/2019 15:50



1 Attachment



AC06 fourth draft.docx

I attach my observations regarding the 'St. Helens Local Plan' that will be presented to a Government Inspector for scrutiny. I have today also hand delivered a paper copy at the Town Hall and had a duplicate copy date stamped.

Yours sincerely

Mr. J. Howard

Sent from Mail for Windows 10

For the attention of the 'Independent Planning Inspector'

Dear Sir/Madam

I request that you consider a 'modification' to the St. Helens 'Local Plan' regarding the proposed removal of Site AC06 from Green Belt status.

I understand that the independent inspector's remit for approving the plan is whether it satisfies the government's criteria of releasing land for development, not whether it is in the best interests of the communities within the Borough. The latter responsibility fell upon the council advised by its officers. I believe that some of those officers have acted in dereliction of their duties as summarised in part two of this representation.

St. Helens Council Cabinet's report of 12/12/18 recognised (2.8) that 'The new Local Plan must, before being adopted by the Council, be found to be legally compliant and sound by the Government Inspector'.

I believe that the plan is **not 'legally compliant'** as due process has not been followed. There is no mention of 'Location 10' (Site AC06) in the document prepared by the Planning Department titled 'Local Plan Preferred Options Report of Consultation, December 2018' presented by the council's officers to the Town Council for consideration before its decision to adopt that plan. Residents representations in opposition to the proposal to remove this site from Green Belt protection were not presented for consideration by the Council and in consequence the Local Plan requires modification with site AC06 retaining its Green Belt status and current boundary line which is clearly defined by the road. I raised this issue with the Borough's 'Development Manager' at the drop-in session in Rainford on Thursday 28th February, the following day I spent considerable time reviewing what I believe to be all the literature published by the Council regarding the 'St. Helens Local Plan' and subsequently e-mailed the 'Development Manager' the following morning at 09:44 Monday 4th March reporting the results of my research regarding this 'Disclosure issue' and attached examples of a number of representations (including my own) that should have been presented to the Council before they made the decision to accept the Local Plan preared by their advisors. To date (11th March) I have not had a reply.

The Planning Department's request that you sanction the re-designation of Site AC06 from its current protected GB status and re-designate the whole of site AC06 on the grounds that there is an 'anomaly of boundary' is unjustified. There is no anomaly as the existing boundary is a permanent road feature and is therefore a 'strong' fixed boundary as described on p.14 of the Councils own 'Green Belt Review' published December 2018. Within that designated Green Belt land the Planning Department allowed the 'the erection of two ranges of stables' (0694/110) and the construction of two large detached residential properties adjoining the road for which there seems to be no planning reference available. Correspondence from Planning regarding the 'Local Plan Preferred Options' initially dated 1/3/17 sent to (some) local residents states in the misleading opening sentence that the intention is to remove the parcel of land identified as Location 10 (later AC06) from Green Belt 'in order to make the Green Belt boundary more logical and robust'. The opening sentence of the second paragraph states 'The proposed minor modifications to the Green Belt Boundary'. What is proposed is no mere tidying up of the boundary. Shifting the boundary from the permanent feature of the road to the back garden fences of the two recently built detached properties and the re-designation of a significant area of land behind those properties splitting the Barrows Farm Site into two parts, one designated Green Belt the other not is far from being 'logical'. When advising St. Helens Council the Planning Department made no reference to representations by residents and others regarding Site AC06, the Council Committee accepted the Local Plan and now await its ratification by the Government Inspectorate, I hope you share my understanding of what can be considered 'minor modifications' and accept the principle that all representations be disclosed to those tasked with decision making.

To summarise, National Planning Policy Framework guidelines make it very clear that 'exceptional circumstances' are required to change a Green Belt boundary line and no 'exceptional circumstances' are cited by the Planning Department. There is no anomaly that warrants a correction as proposed on page 445 of the 'St. Helens Borough Local Plan 2020 – 2035 Green Belt Review December 2018'. The Green Belt boundary is clearly defined by the road and page 14 of that same document defines permanent roads as strong boundary features. There was not full disclosure to the Planning Committee of the representations made. In consequence, I e-mailed the Planning Inspectorate on 1/3/2019 requesting confirmation that the inspector appointed to review the proposed St. Helens Local Plan would have access to each individual representation and not just a summary of that documentation prepared by the Council.

Despite the area being Green Belt, local planners also sanctioned (P/1997/0058 & P/2011/0643) permitting the construction of three steel clad buildings with a collective floor area of 1109 square metres for commercial purposes the 'Local Plan' retains these buildings within the Green Belt . It is illogical to split Barrows Farm into two, one part in Green Belt and another part removed. Should the inspector sanction the re-designation of AC06 on the pretext of 'an anomaly' a dangerous precedent would be set keeping in mind that the Local Plan will be subject to three or five yearly reviews with the larger piece of land being put forward for development by the owners.

What is difficult to comprehend is the St. Helens Planning and Highways Departments ongoing compliance to a series of retrospective applications from this site which morphs between (depending upon the nature of the application) a 'Farm', 'Sports Centre' or 'Business Park'. Only when tonnes of rubble and hard-core were installed to create unauthorised new hardstanding for the storage of heavy equipment mostly used elsewhere for the VAT registered business 'A.W. Lowe Contracting' behind the homes of people who had previously enjoyed open views and with no consideration for the rural nature of the site or highway safety was an 'Enforcement Order' served, later upheld following an appeal.

The planning history of this site is varied and complex and residents believe that a full independent review of that history is required.

Part 2 (Additional Information)

Currently operating from this site within designated Green Belt land are (1) A. W. Lowe Contracting (heavy agricultural equipment hire) (2) Anthony William Furniture Ltd (3) S.C. Packaging Technology (4) Billinge Health and Fitness Studio (5) Green-Thumb (lawn treatment) (6) Serenity all Round (7) David Aspinall (Builders) (8) Billinge Sports & Soccer Centre (whose website promotes the unregulated hire of both the indoor & outdoor facilities for a wide range of events).

To be fair, some have little impact but others should not be permitted on the grounds of road safety, noise and detrimental impact upon the environment and the community particularly when one considers the 'conditions' (see below) that were attached to approvals but since largely ignored.

Residents request that an 'Independent' Inspector research this Farm, Sports Centre come Business Park by reviewing the file of documentation (available for retention) and suggest a site visit from both access routes to experience the inappropriate and unsafe nature of the infrastructure providing access to the various activities at this location in order to gain an appreciation of the dangers and detrimental impact of what has been allowed.

Both Planning and Highways have been inconsistent, indeed contradictory in the advice given to the Council Chamber, there are numerous examples in the planning archives. For example, a letter dated 3/10/93 requested information regarding any planning constraints on the buildings and land a Barrows Farm. The Assistant Chief Executive for Development stated in his reply (17/3/93) 'I consider that a farm shop & commercial nursery would represent an unacceptable intensified retail use which would be detrimental to the Green Belt and create unacceptable pressures for additional traffic'. Since that date there have been numerous retrospective planning applications sanctioned by the Borough's advisors. Application P/1997/0058 requesting permission for the erection of two new buildings to form 1) Equestrian Unit (880 metre square and 2) Equestrian Shop Unit (63 metre square) were granted planning permission in 1997. Presumably mindful of the advice given a few years earlier the applicant on the form dated 31/01/97 in response to question 15 regarding 'the estimated vehicular flow to this site during a normal working day excluding vehicles driven by employees appears to have noted 6 cars per day plus 2 or 3 with horse trailers. Permission was granted!

P/1997/0058 lead to a total of 965 square metres of new construction on Green Belt land for the purposes of a commercial indoor riding school and separate retail outlet. There were conditions attached, no.4 being that the 'Equestrian Unit shall not be used for holding competitions or functions without express planning permission'. The reason being that 'such uses would generate a substantial amount of traffic and therefore, detract from the residential amenity of nearby residents and be detrimental to highway and pedestrian safety'. Reason no. 5 stated that 'separate retail use would be unacceptable in terms of the Green Belt location of the site and the potential increase in vehicular activity'. Reason no. 6 states 'In the interest of residential amenity and highway safety bearing in mind the potential for additional traffic generated by use'.

The equestrian business venture failed.

St. Helens Planning Department permitted P/2006/1029 'Change of use from horse riding centre to community sports hall/soccer centre. The Planning Committee 5/12/06 was advised sec 1.4 'The building subject to change of use was granted planning permission in 1997, upon when officers would have considered the impact upon the Green Belt'.

I considered it unacceptable that 'The Planning Committee' did not consider the impact of 'change of use' and wrote (24/1/18) to the 'Enforcement team Leader' enquiring why. The reply stated that 'in planning terms, the football/soccer centre use was

considered to be in the same use class as that of the equestrian unit and therefore to use the building as a soccer centre did not require a formal application or separate planning permission'.

I found the reason given difficult to understand. In an attempt to aid my comprehension I accessed the 1997 documentation regarding the creation of an equestrian business on Green Belt land hoping to read the 'considered' advice regarding 'the impact upon the Green Belt' presented by the officers to the Planning Sub-Committee regarding the construction of 42m x 21m steel clad indoor riding area of 882 metre square building with a 6m ridge height plus an additional 10.5m x 4.2m (floor area 63 square metres). I could find little or no advice presented to the 13/5/1997 Planning Committee by a named officer nor mention of the conditions imposed on previous applications (no competitions or functions). Reference 3.6 of the document prepared by the planning department for that meeting does mention a representation from 'The Joint Countryside Advisory Service based locally in the village of Maghull dated 24/3/97. Surprisingly JCAS did not object in principle to a purpose built indoor exercise area of the size proposed, the reason being that an 'equestrian centre' was already established. It did suggest a 'condition to prevent competitions'. This had been a condition when the initial planning approval was given permitting a 'small equestrian business'. I considered sending JCAS a copy of this letter and request observations regarding the subsequent developments on this Barrows Farm/Sports Centre/ Business Park but the organisation no longer seems to exist and there is no information about it available on the internet. Its headquarters are now a day nursery.

Following change of use P/2011/0643 permitted the construction of yet another large steel clad structure for changing room facilities resulting in a total new build surface area of 1109 metre squares on what is and will remain Green Belt. The conditions imposed by P/1997/0058 regarding competitions or functions being prohibited on the grounds of road safety and detrimental impact to the area were ignored!

Documents available in the file referred to above show that residents have requested that council advisors visit the site to witness for themselves the evident dangers that have been allowed to develop. Access for any class of vehicle into the site is on a right hand bend and then crosses a public footpath. The infra-structure is completely unsuitable for the number and range of vehicles now accessing the site. Council representatives have declined to visit the site and residents have suggested that Google Earth be used to monitor the number of vehicles as the dangers experienced by the community would be evident to those in the Town Hall. Another consideration is that should there be an incident at the site, fire, injury to player or spectator etc. the emergency services would be unlikely to gain access because of the number of vehicles parked. The opening paragraph of a letter from planning dated 5th February 2018 states 'Permissions P/2007/0229 and P/2008/0634 make 22 and 20 car parking spaces available retrospectively, on a site where there was previously no allocated car parking. This does not mean that the planning permission restricts the site to 42 vehicles. Indeed, there are no conditions attached to either permission that restricts the parking availability at the site'.

Planning & Highways dismiss residents concerns regarding the numerous activities based at the site. The dangerous road conditions that is the consequence of surges in traffic that timetabled activities at both the Football Centre and Fitness Studio. The Football Club's website promotes the hire of its facilities for numerous activities such as indoor bowling, floodlight football matches and children's parties etc. Residents advised the Authority that the club's own literature indicates that it plays matches and trains outside its permitted hours, there is no enforcement and all other activities are unregulated, never-the-less in December 2018 the Council approved an extension to playing hours despite objections. To repeat, P/1997/0058 stipulated that the equestrian business should 'not be used for competitions or functions'. The reason being because of the concerns for 'highway safety and residential amenity'. Change of use ignored this stipulation and both Planning and Highways have been in dereliction of duty.

P/2011/0344 to extend the football clubs hours was refused because a [Highways Planning Advisor] noted 'Carr Mill Road is a narrow road with a number of bends and substandard footways. The footway is limited to the eastern side of Carr Mill Road for most of its length and runs from extremely narrow to non-existent in places. Carr Mill Road is subject to significant on-street parking, particularly during school hours and is extremely busy at school start/finish times ...any change in the current operating circumstances will lead to an increase in pedestrian movement along substandard footways and an increase in vehicular traffic along an inadequate highway'. The Highways Advisor concluded 'Carr Mill Road is considered to be inadequate by reason of its poor alignment, restricted width and substandard footway. The proposal if permitted would be likely to give rise to conditions detrimental to highway safety and contribute additional interference with the free and safe flow of traffic and would be contrary to Policies GEN 1 – Primacy of the Development Plan, GEN 2 – Good Environments and GEN 9 – Parking and Servicing of the adopted Unitary Development Plan'.

Those road conditions still exist. Carr Mill Road is narrow and twisting with two right angled bends, much of its length is bordered by a stone wall. There is little off road residential parking and significant lengths become in effect a single track lane highway with one very narrow pavement diminishing in some places to virtually none. I believe that St. Helens Council's Planners and Highways have been in dereliction of their duty in allowing a series of applications of detriment to the environment and local amenity and creating dangerous road conditions.

Planning sanctioned P/2018/0781/S73 permitting extended playing hours.

In response to the failed P/2011/0344 request to extend the playing hours Billinge Parish Council requested that St Helens MBC 'carry out a full residential survey of the area i.e. Carr Mill Road and the "Mucklow" Estate requesting residents' views'. The

survey did not occur. In response to resident's representations the Parish Council voted on 18/2/19 to object to the proposed re-designation of site AC06.

The residents request that the 'Independent Planning Inspector visit the area to personally to witness the impact of the permitted development on what is still designated Green belt Land and to evaluate the infra-structure bearing in mind that on Carr Mill Road itself there is a large Primary School and Nursery plus a large residential school (Nugent House) each generating significant traffic surges. The commercial activities at this site often require heavy goods vehicles to negotiate the road conditions and the competitive sports and social activities produce surges in traffic with players, officials and spectators collectively arriving and leaving within a tight time frame. Inexplicably, Planning and Highways are now both in denial of what the community experiences daily.

Planning and Highways have not been consistent in their 'duty of care' to the residents/visitors and are currently in dereliction of their duties in permitting the present reality to develop. Highways response (4.1) to P/2006/1029 regarding change of use from an Equestrian Centre to Sports facility made no reference to the surrounding infra-structure nor the nature of Carr Mill Road itself, choosing instead to restrict observations regarding the entrance to the site and parking within it. The 'Unitary Development Plan Policies GB2' stipulates 'development in the Green Belt will be judged against the following criteria (i) it is appropriate in terms of its siting, scale, design ... and does not detract from the appearance and openness of the Green Belt' (ii) 'that development within an area designated Green Belt should not generate so much traffic as to cause nuisance or danger'. Planning advised the Sub Committee that 965 square metres of steel clad, new build in a rural location with sub-standard infra-structure complied with such stipulations!

Article 1 of the First Protocol of Human Rights Act 1998 sets out a person's rights to the peaceful enjoyment of property. The Planning Dept. has dismissed representations from the residents requests for guaranteed periods of respite from the shouting and often inappropriate language that is a consequence of the football activity be it either a 'practice' or competitive fixture. The 'Health & Fitness Studio' often has amplified instructions and pounding beat music that can be heard at distance. Both sources of noise and disturbance are totally inappropriate in a Green Belt area accessed by visitors seeking peace and tranquillity.

I request that the Planning Inspector reviews the complex planning history of this site as part of his or her analysis of the proposed Local Plan accessing the file of documentation prepared for such a purpose. The Local Plan if approved without 'modification' regarding the re-designation of site AC06 will facilitate further inappropriate development and detract from the local environment, residential amenity and road safety which were of concern to the Authority's Officers in 1997 and 2011 but not since.

Part 1 of this document is a representation to the government's independent inspector regarding St. Helens Council's intention (following the advice of its officers) to remove part of the Barrows Farm site from its current Green Belt status. Part 2 is a summary of the complex 25 year planning history of the site and its negative impact. It has been difficult to decide how to end section two of this document but a chronological overview provides an interesting perspective. Available on microfiche is planning application 0694/110 documenting the advice given by the planning department to the Planning Sub-Committee of 8/11/94 'It is the applicants intention to establish a small riding school, accommodating approx 12 to 15 horsesin terms of traffic generation, the proposed use would not attract significantly higher volumes of traffic'. Permission was subsequently granted with conditions, no. 9 stating 'No part of the associated open land....shall be used for purposes other than the grazing & keeping of horses'. I wrote in support of that application, that letter along with another of mine objecting to the imposition of 'business rates' that lead to the subsequent closure of the Equestrian Centre are available in the Council Archives. What we have now on this site are numerous businesses with associated noise and disruption with a completely inadequate infra-structure, it is dangerous and unreasonable. The latest planning permission P2018/0781/S73 permitted an extension to the playing times of the football club. To remove Site AC06 from its current Green Belt status would be wrong as it would set a precedent and legitimise further development to the detriment of the area.

It is my right to be notified regarding (i) Council's submission of the Local Plan including its summary of the submissions for the Inspector to consider (ii) the Inspectors recommendations and (iii) Council's adoption of the Local Plan 2020-2035. Please send such documentation to the address above.

Yours faithfully

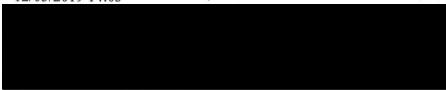
Mr J. Howard

PO3870



St Helens Borough Local Plan 2020-2035: Submission Draft - Representation from Billinge Chapel End Parish Council Tom Kelly

to: planningpolicy 12/03/2019 14:03



1 Attachment



Local Plan Representation MARCH 19.pdf

I am attaching a representation from Billinge Chapel End Parish Council

Many thanks

Tom

Tom Kelly
Clerk to the Council and Responsible Financial Officer
Billinge Chapel End Parish Council | Public Hall | Pingot Road | Billinge | WN5 7LX |





Billinge Chapel End Parish Council

Public Hall, Pingot Road, Billinge, WN5 7LX

12 March 2019



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

Dear Sirs

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Reference AC06 – Barrows Farm, Carr Mill Road, Billinge

I am writing on behalf of Billinge Chapel End Parish Council about an anomaly in the Submission Draft proposals that is not in the interests of residents. Under the "Correction of Green Belt Anomalies", the Draft recommends site AC06 (Barrows Farm, Carr Mill Road) should be released from the Green Belt. Residents are very concerned about this proposal and the likely impact on the area.

The Parish Council considers the Submission Draft proposals are unsound as they are not consistent with national policy and cannot be justified. It is also concerned about the process of community consultation and the duty to cooperate. The reasoning behind these concerns is set out below.

Soundness

Encroachment

Under the National Planning Policy Framework (February 2019), the Green Belt serves five purposes, including "to assist in safeguarding the countryside from encroachment" (para 134). The Submission Draft refers to the proposed change as a "minor adjustment to the Green Belt boundary" (Green Belt Review: table 6.1). However, the Parish Council believes this adjustment will lead to further encroachment into the Green Belt.

There are several businesses on the "Barrows Farm" site, including an area where enforcement action was taken following the unauthorised use of land as a hardstanding to store vehicles, plant and machinery. Although this area won't be affected by the proposed boundary change, it has the same owner as the remainder of the Farm. A history of retrospective planning applications and unauthorised development does not bode well for safeguarding the countryside and is likely to

facilitate development or enable this to happen more easily. We are concerned that incremental losses will have a significant cumulative impact on the openness of the area. What may appear a minor change will remove restrictions on inappropriate development in this area of open countryside.

The Council therefore believes this proposed change to the Green Belt boundary is unsound, as it is inconsistent with national policy. This change will significantly increase the risk that encroachment will happen.

Boundaries

The NPPF notes that "When defining Green Belt boundaries, plans should.... define boundaries clearly, using physical features that are readily recognisable and likely to be permanent" (para 139). The Green Belt Review states "The current Green Belt boundary... follows no visible boundary on the ground". This is not accurate as the boundary follows the pattern of the road (Carr Mill Road) which is a permanent, physical feature. The Council's own Green Belt Review defines a road as a "strong boundary feature" (pp 13-14).

It makes no sense to remove an area of the farm from the Green Belt. This is another example where the proposed change to the Green Belt boundary is unsound, as it is inconsistent with national policy.

Exceptional Circumstances

The NPPF states that "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans" (para 136).

The Council's justification for the boundary change is as follows: "The current Green Belt boundary includes a number of dwellings and business outlets in this location, and follows no visible boundary on the ground. As the site is already significantly developed, it is recommended that the Green Belt boundary be realigned to follow the rear of the existing outbuildings".

This justification does not suggest any exceptional circumstances to justify the proposed boundary change. Residents have reported that case law sets out the legal position on exceptional circumstances. In Gallagher Homes Ltd v Solihull Borough Council (2014), it was recorded that exceptional circumstances must be demonstrated and are a matter of law. Changes to the Green Belt require more the justification given in the Submission Draft, suggesting the proposed change is unsound.

Duty to cooperate

The process of community involvement in developing the Plan has not been followed properly. The Council's Revised Statement of Community Involvement (November 2013) states that at submission a report will be prepared outlining "the number of representations made and a summary of the main issues raised in those representations" (para 9.2).

Residents were not included in the initial consultation for the Local Plan Preferred Options in 2017. This was subsequently addressed with residents and the Parish Council given an extended deadline to make representations. Both the Parish Council and residents did make representations. In addition, a district councillor and resident met with officers to highlight their concerns.

The Council's Local Plan Preferred Options Report Of Consultation - December 2018 sets out a summary of the main issues raised by representations and how these were addressed. Despite the level of concerns from residents, district councillors and the Parish Council, their representations are not mentioned anywhere in the 265 pages of the Report on Consultation. I am not sure how the Council defines "main issues" but it is disappointing that this level of community concern has had no impact. I realise that there are many significant issues arising from the consultation, but it appears that community views have been ignored on this matter.

We are happy about the effectiveness of the overall process of consultation. However, there is some doubt whether the duty to cooperate under section 20(5) of the Planning and Compulsory Purchase Act 2004 has been met regarding the proposals to change the Green Belt designation of Barrows Farm.

Conclusion

The Parish Council believes the proposal to change the boundary is unsound; it does not comply with National Planning Policy Framework and has not been justified. We also have concerns about whether the duty to cooperate under section 20(5) of the Planning and Compulsory Purchase Act 2004 has been met.

We therefore believe the proposed boundary change in AC06 should be deleted from the Submission Draft. As an alternative proposal, ward district councillors have met Planning Officers and proposed the Greenbelt Boundary be realigned along the rear garden fences of the properties standing on Carr Mill Road and that the cluster of converted farm buildings remain in the Greenbelt. The Parish Council would support this proposal.

The Parish Council would be happy to participate in the oral examination of the Plan.

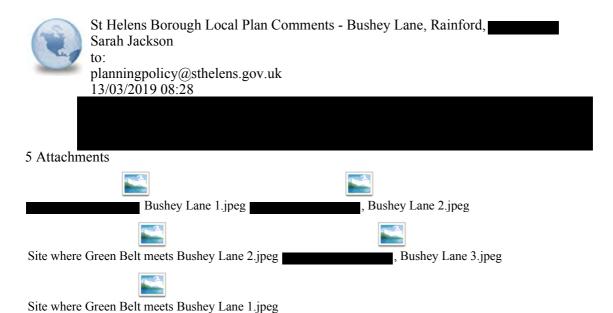




Yours faithfully

Tom Kelly
Clerk to the Council and Responsible Financial Officer

PO3871



To whom it may concern,

This letter is regarding our objection for the proposed change to the boundary of the Green Belt off Bushey Lane in Rainford Junction.

An area of land off Bushey Lane has been highlighted as a Green Belt anomaly as it does not follow a clearly defined feature on the ground. The proposal to adjust all of this site from Green Belt would in turn make it part of the local settlement. The National Policy determines that land within a village boundary or settlement would constitute sustainable development. The proposed change to push back the Green Belt for the entire plot of land would create and allocate land suitable for development without full assessment of its suitability in accordance with the requirements set out within the National Planning Policy Framework (NPPF) and Planning Practice guidance.

In the NPPF regarding identifying land for homes, the importance of identifying small and medium sized sites for development is stated. However these should be identified through the development plan or brownfield registers, not through changes to the Green Belt boundaries. Also, the creation of a developable area should only be undertaken if there is a prospect of the land being developed. We feel that the site is not developable, and therefore the Green Belt boundary should not be altered significantly, for the following reasons;

On the Ordinance Survey map provided, it appears that the site adjoins the highway (Bushey Lane) and so could be developable. At the point where it joins the highway the ground level is in excess of 10 feet from the road level. Also, access at this point would be through the back gardens of three properties

The only other access to the site would be through the Peet Meadow estate. This is a gated community of four properties on a single track unadopted road. Access to a plot of land for building development through this estate would be unfeasible and unsafe. Photographs have been attached.

There would also be an additional volume of traffic onto Bushey Lane. The access to Peet Meadow is, as previously mentioned, limited to a gate only suitable for single traffic. Visibility onto Bushey Lane from the Peet Meadow estate is limited and so additional traffic, particularly the volume required for building work, would be dangerous.

The site is alongside farm land and housing and may form an ecological function as part of a wider ecological network. In taking away its Green Belt protection this in turn may promote the sites development and the sites ecological function has not been considered or assessed.

In summary, the land off Bushey Lane does not all need to be removed from the Greenbelt. The anomaly could be addressed by merely following the garden boundaries of the adjoining properties. The proposal to amend the Green Belt boundary via an anomaly is inadvertently allocating land for development without full consideration of the purposes of maintaining land within the Green Belt, or an assessment of the suitability of the site for development. The land is not suitable for development therefore pushing back the Green Belt is of little benefit to the planning authority and local community. The impact of removing this land from the Green Belt has not been properly assessed so the process is flawed and could be subject to judicial review.

Kind Regards,

Sarah Jackson











PO3872



Fw: Barrows Farm re-designation/transparent democracy -community participation

Jonathan Clarke to: planningpolicy

13/05/2019 17:48

Dear colleague,

Could you please add the attachment as a representation, to be logged and sent to the Inspector (see e-mail to Mr Howard)?

Best Regards.

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

Tel. 01744 676198

---- Forwarded by

From:

To:

Date:

13/05/2019 16:39

Subject:

Fw: Barrows Farm re-designation/transparent democracy-community participation

Here it is, its not clear in the email, so I would take it as a representation to be on the safe side.

- Apr 12.docx

Service Manager - Development & Building Control

Place Services | St Helens Council | Town Hall | Victoria Square | St Helens | Merseyside | WA10 1HP

---- Forwarded by

on 13/05/2019 16:37 ----

From:

To:

Date:

13/05/2019 13:29

Date. 13/03/2019 1

Subject: Re: Barrows Farm re-designation/transparent democracy-community participation

Hi

Just working through e-mails while I was off.

Could you please forward to me the attachment to Mr Howard's e-mail (it is deleted in your response). Also do you know if the attachment is intended as a representation in its own right?

Best Regards.

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

Tel. 01744 676198

Dear Mr howard, May I first apologise for the dela...

09/05/2019 16:06:32

From:

To: Cc:

Date:

09/05/2019 16:06

Subject: Re: Barrows Fa

Re: Barrows Farm re-designation/transparent democracy-community participation

Dear Mr howard,

May I first apologise for the delay in responding to you. I had several hundred emails during my time out of the office. You are concerned about a number of issues regarding representations in relation to the Local Plan. I can therefore comment as follows:

You have asked a number of questions that you have asked previously regarding the way in which representations to the Local Plan Submission Draft will, be treated. I therefore refer you back to those responses, specifically my emails dated 11th and 12th March 2019. You have also had an assurance from the Planning Inspectorate on this point. I cannot add anything further.

In terms of notification, for your information, there is in fact no legal requirement. The Council has notified on the basis of what is reasonable in the circumstances, including the residents in and around Barrows Farm.

In terms of the form, this is a model form issued by the Planning Inspectorate, not St Helens Council.

I hope this clarifies the position. I will also ensure that your comments here are forwarded to the relevant officers so that they are included in the Council's submission to the Planning Inspectorate later in the year

Yours sincerely,

Service Manager - Development & Building Control

Place Services | St Helens Council | Town Hall | Victoria Square| St Helens | Merseyside| WA10 1HP

john howard

Dear

Please find attached a word docu...

16/04/2019 09:06:43

Dear (Service Manager- Development)

I write in reference to the 'representations' that were submitted regarding the removal of Green Belt status of an area of land at Barrows Farm, Billinge designated Site AC06 in the St. Helens Local Plan. You have confirmed that no reference was made of this location in the 437 page document titled 'Local Plan Preferred Options – Report of Consultation – December 2018'. St. Helens Council voted to accept that plan having no knowledge of those representations and therefore 'due process' was not followed and the decision to alter the firm fixed Green Belt boundary line on the pretext of a boundary 'anomaly' and re-designate that parcel of land identified as Site AC06 I consider to be not legally valid.

The NPPF makes it very clear that 'exceptional circumstances' are required to change a Green Belt boundary and there are none. The 'Local Plan' requires modification.

A group of people are considering submitting a collective representation regarding Site AC06 and have noted that on page 10 of the 17 page Council advisory document dated 29/1/19 the following statement 'A summary of the key issues raised by respondents to the Preferred Options and earlier scoping consultationwill be supplied to the Inspector. However, the actual comments received during these stages will not be submitted unless the Inspector asks to see these'.

Given that there is no mention whatsoever of the Barrows Farm (Site AC06) in the Council's consultation report the group (some of whom submitted the ignored 'individual' representations) wish to request that the Inspector accesses all representations regarding Site AC06 that the public servants in the Planning Office dismissed. To quote from a recent publication 'to lose sight of the public interest is to lose sight of the very purpose of planning' (Ref 1). There is previous history of non-disclosure, my wife and I e-mailed a representation dated 26/8/11 to for publication on the council website during a consultation period and yourself confirmed that this did not occur. Please access our subsequent e-mail to sent at 19:28 on 5/9/2011. I retain a printed copy of that document.

The consultation period regarding the Local Plan has now been extended from its March 13th deadline into May 2019 as the officers responsible did not follow the correct notification procedures. There is irony in the fact that although Billinge residents did submit representations they were regarded as being of no significance and not presented for consideration to the Council Planning Committee, nor would they be made available for the Inspector unless he or she requested to see them which of course would not happen as there is no mention of Site AC06 in the 437 page 'Representations' document.

The fourth paragraph of my communication to dated 27/3/17 questioned the adequacy of the notification procedures regarding the Barrows Farm site. It was only when the issue was raised by Parish Councillor that a later deadline of April 12th was adopted and the consultee base extended but even then the majority of letters went to the landowner's family and his tenants. Recent publicity suggests that notification letters should be sent to households within 200 metres of a proposed change. It is my understanding that no residents of the adjacent Brownheath Avenue received such letters and only two households on Powell Drive. Two years later the deadline for the whole Borough has had to be extended in recognition of systemic failure. If the legal requirements regarding residential notification were not adhered to then that calls into question the legality of the 'Local Plan' adapted by the council in December regarding Site AC06 and other locations.

The form to submit 'representations' is extra-ordinarily difficult to understand. The instructions regarding how to complete it must surely deter many. What is particularly confusing is the large bold text instructing 'complete PART B of this form, setting out your representation/comment. Most people wanting to comment would not have a single comment/representation to make but have numerous thoughts and would wonder at the presumption of the singular. They would become more confused by the bold print instruction 'Please use a separate copy of Part B for each separate comment/representation'. Should a collective submission be decided upon there will be a number of observations that we would wish the Inspector to read

as a whole sequence with one observation logically following on from another. It would be very difficult to compartmentalise an individual or collective representation into separate parts. Moreover, parts 3, 4 and 5 on Part B are difficult to comprehend. I suspect that a group of experienced Town Planners would have difficulty agreeing what would be the correct response regarding ticking the jargon dominated three sections. It would be much more preferable to submit an individual or group 'representation' in the traditional manner of a letter and request confirmation that this is acceptable and would be passed onto the Inspector. Given our understandable distrust of the Planning Department permitting/enabling those making decisions to be made aware of 'representations' there is much concern that the Planning Dept. will withhold (hide) submissions on procedural grounds, claiming that the form/forms have not been completed in the correct manner and so declared invalid, rather like a spoiled ballet paper. Given that our previous individual 'representations were not presented for consideration by the 'decision makers' we hold that our concerns are valid.

David Lock, currently Vice President of the Town and Country Planning Association writing in the October 2018 edition of 'The Town and Country Planning' magazine noted in his article titled 'Trustworthy Public Engagement' (p.376) stated in his third paragraph 'The public has been smothered in a cloud of fake participation' and later in the same article observes 'a single Preferred (by them) Option for the shape of the area for the next 15 years is flashed for six weeks' statutory consultation via a pro-forma that seeks to lead the respondent down the plan—makers' preferred lines'.

Lock's final paragraph concludes 'Leadership in planning should be a power entrusted by the people to transparent and accountable democratic institutions. The perspective here is how to make planning processes 'legitimate'...Trust is broken. Legitimacy is achieved through collaborative planning by which the empowered institution engages deeply with those involved and is required to demonstrate it has listened as widely as possible. That seems the best way to carry the people with the plans that must be made'.

The 2018 'Interim Report of the Raynsford Review of Planning in England' sets out nine propositions for a new planning system of which proposition 4 calls for 'A new covenant for community participation'. David Lock and those participating in the 'Raynsford Review' will find documentation regarding the St. Helens 'Local Plan' and the planning history of the Barrows Farm Site and the final outcome following the involvement of the Inspectorate an interesting read.

Should we proceed with a 'collective' representation in the form of single letter to the Inspector accompanied by multiple Form A's to confirm identities it is requested that our document would be officially accepted as valid for presentation to the Inspector before the new deadline in May. If a number of Part B submissions are demanded I would welcome the opportunity to sit with a Planning Officer to assist me complete boxes 3-5 and then have those documents officially approved as valid for submission to the Inspector.

Please advise.

Yours sincerely

John Howard

Ref 1: B Clifford: 'Contemporary challenges in development management'. In J Ferm and J Tomaney (Eds): *Planning Practice: Critical Perspectives from the UK*. Routledge, 2018, pp.55-69

PO3873



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

Ref: LPSD

(For official use only)

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

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

This form has two parts:

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
	_ Title:
	First name:
Last Name: MCDONNELL	Last Name:
Organisation/eompany: St Hillens MBC	Organisation/company:
TOWN HALL	Address:
Postcode: SC HELENS WAID I HIS	Postcode:
Tel No:	Tel No:
Mobile No Email	Mobile No:
Signature:	Date: 08-03-19
Please be aware that anonymous forms cannot be acconsidered you MUST include your details above.	ccepted and that in order for your comments to be
Would you like to be kept updated of future stage (namely submission of the Plan for examination, pub adoption of the Plan)	s of the St Helens Borough Local Plan 2020-2035? lication of the Inspector's recommendations and
✓ Yes (via email)	☐ No
Please note - email is the Council's preferred metho	d of communication. If no email address is provided,

PART B - YOUR REPRESENTATION CLLR DIM DENNELL

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 w	hich pa	rt of the Loca	i Plan c	loes this re	present	ation relate?			
Policy	1	Paragraph/ diagram table	V	Policies Map	V	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
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•Sound	?				☐ Yes	☑ No			
Compli	es with t	he Duty to Co	operate		✓ Yes	☐ No			
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7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A REASONABLE ALTERNATIVE IS OFFERED AS A MODIFICATION TO MAKE THE LOCAL PLAN LEGALLY COMPLIANT AND SOUND:

REPLACE THE TEXT OF ACOE PAGE 153 WITH . -

MTHAT THE GREENBELT BOUNDARY BE REALISNED ALONG THE REAR GARDEN FENCES OF THE PROPERTIES STANDING ON CARR MILLROAD AND THAT THE CHUSTER OF CONVERTED FARM BUILDINGS REMAIN IN THE GREEN BELT"

PLEASE SEE ATTACHED FURTHER DETAILS

Please continue on a separate sheet if necessary

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

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

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

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

Yes

Yes, I wish to participate at the oral examination

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

IT IS NORMAL PROCEDURE FOR WARD COUNCILLORS TO MAKE VERBAL REPRESENTION ON BEHALF OF LOCAL RESIDENTS

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 Council

Democratic Services
Town Hall

Victoria Square St Helens WA10 1HP

Planning Inspector St Helens Local Plan Please reply to :- Clir D Mc Donnell Tel 01744 678061

8th March 2019

The St Helens Borough Local Plan 2020-2035 Submission Draft

Representation to the Government Planning Inspector concerning the Greenbelt Review AC06 Barrows Farm, Carr Mill Road, Billinge

Dear Inspector,

The Greenbelt Review proposes that Barrows Farm is taken out of the Greenbelt for the following reasons:-

AC06 The current Greenbelt Boundary includes a number of dwellings and business outlets in this location and follows no visible boundary on the ground. As the site is already significantly developed it is recommended that the Greenbelt Boundary is realigned to follow the rear of the existing outbuildings.

There is an anomaly at No.83 and No.83a Carr Mill Road as the Greenbelt Boundary runs along the street in front of these properties. The reason for this is because No.83 was the original Farm house and No. 83a is a new build permitted as infilling along the street. Both properties are in the Greenbelt and should be removed. The Greenbelt Boundary should run along their rear garden fences as it does for the rest of the street. This would give a clear visible boundary on the ground.

The proposal to remove the cluster of Converted Farm Buildings to correct the Greenbelt Boundary at the farm is unnecessary and goes against Council Policy to retain as much Greenbelt land as is reasonably possible.

The statement that "The site is already significantly developed" (so should be removed from the Greenbelt) is misleading.

There are no new developments at this site only a 'change of use' of the original Farm Buildings (which occurred 30 years ago)

The Converted Farm Buildings occupy the same footprint as they have for the past 100 years. The open rural aspect of the site has not changed the Farm Buildings belong in the Greenbelt.

The Ward Councillors have met with Planning Officers and have proposed the following alternative for AC06 Barrows Farm:-

"That the Greenbelt Boundary be realigned along the rear garden fences of the properties standing on Carr Mill Road and that the cluster of Converted Farm Buildings remain in the Greenbelt"

The Planning Officers have not expressed disagreement with this alternative but cannot amend the Submission Draft at this final stage. Therefore the recommendation to adopt the alternative proposal for the Greenbelt Boundary is brought to your attention.

The Ward Councillors of Billinge & Seneley Green would be happy to attend any Hearing that you deem necessary to give verbal representation on this matter.

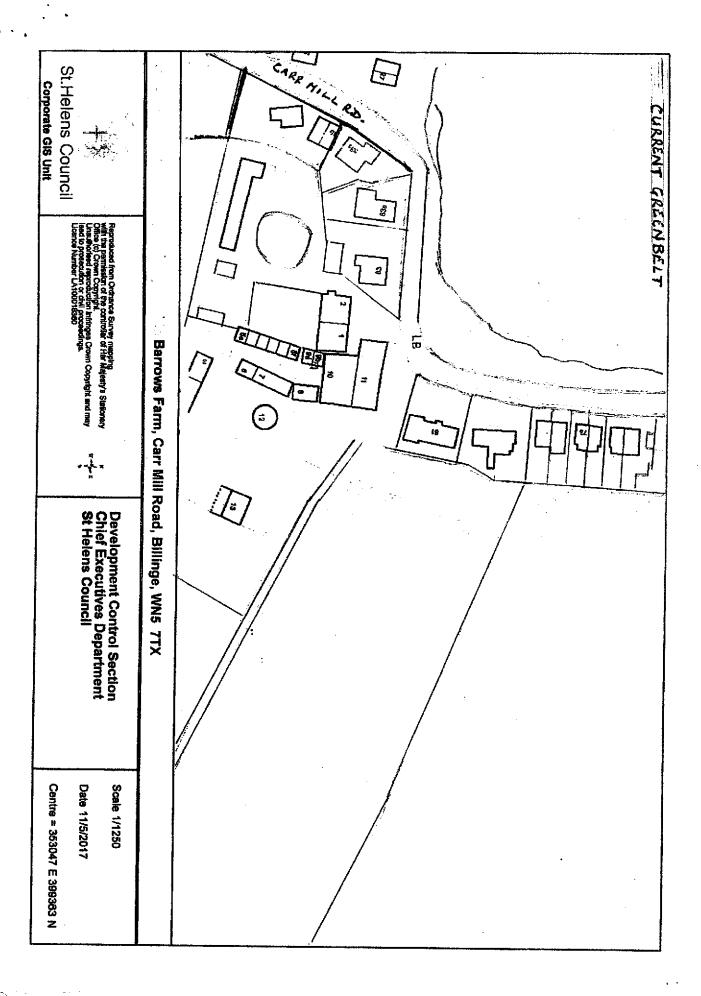
Yours Sincerely,

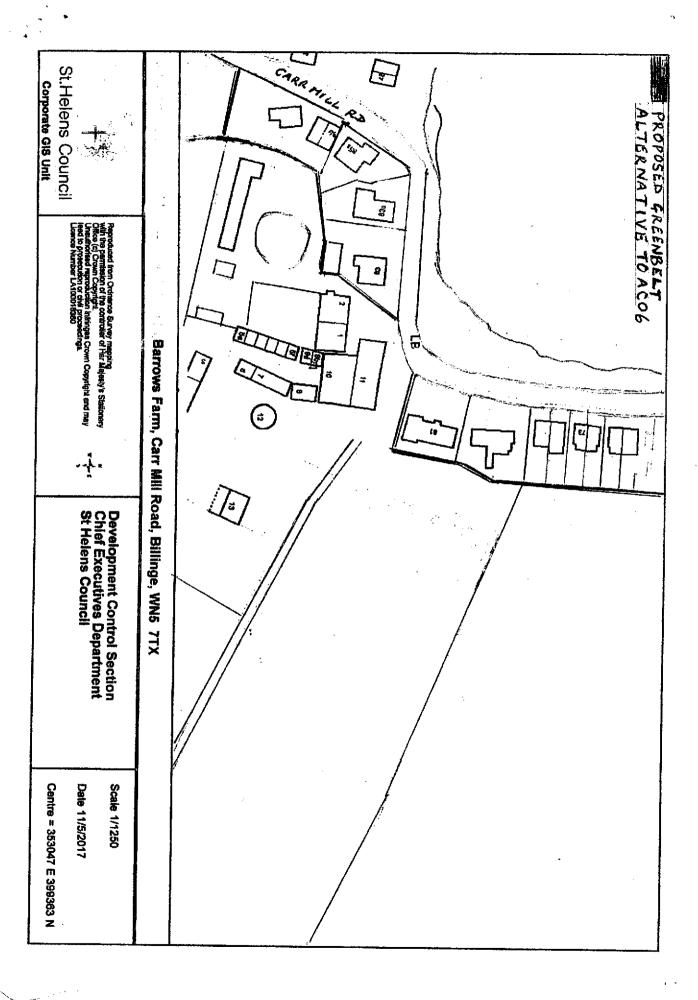
Cllr D Mc Donnell

Cllr S E Murphy

Cllr J Pearson

Billinge & Seneley Green Ward St Helens MBC





PO3874

Council

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

Ref: LPSD

1 1 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

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)

STIC ACOS I

PART A - YOUR DETAILS

we will contact you by your postal address.

1 view at http://www.legislation.gov.uk/ukpga/2004/5/contents

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

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
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Please be aware that anonymous forms cannot considered you MUST include your details above	be accepted and that in order for your comments to be re.
Would you like to be kept updated of future so (namely submission of the Plan for examination, adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred m	nethod of communication. If no email address is provided,

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

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

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

Email: 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

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.

Policy	V	Paragraph/ diagram table	V	Policies Map	~	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	
		its (please nan relevant part/s		AC06	G.E.	een Belk Revieu cember 2018	i Document	
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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. Removal of ACOG from the local Plan / Eveenbelt Review Document altogether. The proposal is unsound, does not comply with the NPPF, Local Planning Policies and is not lawful. Errors in the document relating to wwo is affected (see notes in p.6.) No clear objective, no justification that is viable in terms of planning Policy-(NB, This point is addressed on our previous comments, under 'Firal Summay) 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 Yes, I wish to participate at the oral at the oral examination examination

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

Significant ewors & unsound planning judgement is being applied with this proposal Residents from the immediate locality of 1606 need to be heard.

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.

We are of the opinion that this Local Plan cannot be considered sound and as such we request modification to the local plan to completely remove the following site from the Local Plan/Green Belt Review Document December 2018

SITE AC06 38a, 38 and various outbuildings at Barrows Farm, Carr Mill Road, Billinge

We make this request as it does not comply with the National Planning Policy Framework (NPPF) (or Local policies) and our arguments are supported by Case Law.

According to the NPPF

'133. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'

The Council justification for amending the green belt boundary in the green belt review documents is as follows

'The current Green Belt Boundary includes a number of dwellings and business outlets in this location, and follows no visible boundary on the ground. As the site is already significantly developed, it is recommended that the Green Belt boundary re realigned to follow the rear of the existing outbuildings'

This is the only justification for the change of Boundary.

The boundary should not be changed for the following reasons:

No exceptional Circumstances have been stated as justification for this proposal.

Green belt boundaries are meant to be permanent. The Green Belt Boundary here is already established and defined and there are NO exceptional circumstances stated in the Local Plan to justify moving the boundary at all. There is NO proposal to develop the land. Therefore, it is not necessary to re-define the boundary. The reasons stated above do not justify exceptional circumstances. Indeed, the NPPF states: -

- '135. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should: a) demonstrate why normal planning and development management policies would not be adequate;
- b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- c) show what the consequences of the proposal would be for sustainable development;
- d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and
- e) show how the Green Belt would meet the other objectives of the Framework.

136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.'

Preparing a new local plan is not, of itself, an exceptional circumstance justifying alteration to a Green Belt boundary. The test for re-defining a Green Belt boundary has not been changed by the updating of the NPPF. The same commitment remains to protect the Green Belt we believe it is clear that the reasons cited by the council would not pass the exceptional circumstances test.

In this proposal, there has been no justification that makes a boundary revision 'necessary' and as the council have already stated that there is no legal requirement to do this and this site is not being proposed for 'development' therefore it should not be changed. Exceptional Circumstances have not been demonstrated.

Therefore the Council in this proposal have failed to comply with NPPF paragraphs 133,134,135,136.

Legal position on Exceptional Circumstances

Our understanding that the legal position on 'Exceptional Circumstances' is that this test is the starting point required for any considered green belt boundary revision.

There is a considerable amount of case law in relation to 'exceptional circumstances. The most recent is **Gallagher Homes Ltd v Solihull Borough Council (2014).** This case also makes reference to other previous cases.

The case states that Exceptional circumstances have to be demonstrated and what is capable of amounting to exceptional circumstances is a matter of law, the Green Belt has already been established and it requires more than general planning concepts to justify an alteration. There has to be a necessity.

Further details of this and other relevant case law on 'exceptional circumstances' are detailed in Appendix 1 document enclosed. Comments have been provided by No 5 Chambers – one of the leading firms of Planning and Environmental Barristers in the UK.

We request that this appendix is read in full prior to making any decisions. The full judgement and appeal documents can be read online.

Furthermore, the following in stated within the NPPF

'137. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;
b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

Has any of this even been considered by the council in this proposal? Where is the assessment? In reality we believe this means that as there is no proposed development,

there is no necessity which in turn means that there are no 'exceptional circumstances.'. St Helens Council have failed to comply with the NPPF – ref paragraph 137

Furthermore, it was not deemed necessary to change the boundary in the previous local plan and the site retains the same footprint as previously. Green Belt boundaries are meant to be permanent. The Green Belt boundary here is already established and defined and there are **no exceptional circumstances** stated in the local plan. It is simply not necessary to do this and there is no lawful compulsion to do this. From the discussions and emails that have taken place between ourselves, our ward councillor and parish councillors, this proposal is being positioned as a 'tidying up' exercise. However, this is a substantial area to be removed from the green belt without good reason. We believe that the impact of such a decision if implemented will be detrimental causing irrevocable damage to the countryside, of residents' enjoyment of their homes and also the surrounding area.

The absence of any necessity within this proposal should of itself mean that this boundary change be withdrawn from the Local Plan. We therefore believe that the council has failed this first important test thereby potentially rendering all other possible justifications moot points. Failure to demonstrate 'exceptional circumstances' is reason enough for the proposal to be removed altogether from the Local Plan. Evidence suggests failure to adhere to this could be legally challenged.

Despite the above we wish to make additional comments on the proposal as we believe they are no less important.

SUSTAINABILITY ASSESSMENT

The NPPF makes reference to the following when reviewing Green Belt Boundaries:

'138. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

This goes back to the previous points – the green belt boundary change would have to be considered necessary for the purposes of development and have to meet the other criteria including sustainability and subject to proper assessment under the NPPF. This does none of these things so therefore does not meet NPPF paragraph 138. The site would have been unlikely to pass such a sustainability test if ever proposed. There are previous documented highway problems on Carr Mill Road.

To expand on this point, we also draw your attention to the NPPF paragraph 39 which states:

139. When defining Green Belt boundaries, plans should:

a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;

b) not include land which it is unnecessary to keep permanently open;

c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

During discussions with planning staff from the local authority at the local plan Roadshows it was clear that the council consider this proposal to meet NPPF 139b and 139f. However, the NPPF is clear in that that the document must be viewed as a whole, not just on picking individual points that the council choose to try and justify their proposal.

Our view to these points is as follows

139a –There is no evidence that the council has met identified requirements for sustainable development or even whether the land was subject to assessment.

OPENNESS

RE 139b We believe It is necessary to keep this land open to protect the wider greenbelt. (As per NPPF paragraphs. 133 and 134 – green belt 5 purposes

I draw your attention in particular to NPPF 134c 'to assist in safeguarding the countryside from encroachment' By proposing this change, the council are doing the exact opposite of this purpose. By proposing a change of status from Green Belt to brownfield, this is likely to allow encroachment of the countryside. The area for the proposed change is in the Green Belt - there is a good reason for that. It is part of a wider farm site and is in keeping with the area. The site is surrounded by Green Belt - by removing a square chunk, you will be taking away the openness. The site to be removed is part of a much larger site. It makes no sense whatsoever to subdivide a single continuous greenbelt site and make it part brownfield whilst the surrounding wider area is to be kept as green belt. It should all be kept as green belt. Applications have been approved on this site by the council over the last 10+ years in accordance with Green Belt policies. (see separate appendix for further information) It was deemed appropriate then and planning officers comments explicitly stated these applications did not detract from the openness. Now we have the council saying exactly the opposite. By proposing the boundary to be changed to make the site proposed brownfield means that this could and probably would be enclosed. However, although the NPPF has been updated, the policy on Green Belt has not changed so why have the council now decided that this site should be allocated brownfield? The council have allowed development in the greenbelt and deemed it entirely appropriate so why now is there a need to change the boundary. The developments mainly consisted of change of use of existing buildings. Approving a change of use of agricultural buildings does not mean that the land they are on should be removed from the Green Belt. If the change of use was acceptable and did not detract from the openness then why suddenly would it now be considered unnecessary to retain this very same land within the green belt. For the council to now state NPPF 139b as a sole justification is weak in itself but seems to directly contradict its own previous retrospective

approvals. There has been no recent development on this site and as a former working farm with agricultural buildings then there is still 'openness'. The site considers itself to be a working farm as it stated so in its last retrospective planning application.

By proposing this Green Belt site to be made brownfield with no justification of exceptional circumstances the council would be encouraging urban sprawl as they would be giving a green light to development with little controls. This is entirely inappropriate as the site itself is open aspect, surrounded on 3 sides by Green Belt. This would not make the Green Belt boundary robust It would actually be less robust and would mean encroachment. The council's position would again be contrary to the NPPF guidelines on this issue (NPPF 133), and it would cause harm to the wider Green Belt resulting in loss of openness.

PHYSICAL FEATURES

139f NPPF states 'define boundaries clearly using physical features that are ready recognisable and likely to be permanent.'

The council say the current Green Belt boundary follows no visible boundary on the ground. This is unsound reasoning. The current Green Belt boundary follows the pattern of the road which is a permanent physical feature and it is likely to endure for a far greater time than farm outbuildings at the site. The boundary has already been established (again refer back to NPPF 133,134,135) and is permanent. It was also clearly set in the correct place - there have be no past errors in this respect. Barrows farm is open land in the greenbelt and should remain so. The road is and will remain a permanent physical feature - there are no plans to change the road so why do the council feel the need to establish other physical features instead. Farm site outbuildings on private land can be demolished too easily they are less likely to be permanent - this marker would therefore not be enduring or robust, it is essentially weaker than the existing physical feature which is the road. The road is the strongest physical feature on the ground and therefore the boundary should stay as it is. There are other buildings at Barrows Farm which remain in the greenbelt - why take some out that have been deemed acceptable to local planners against greenbelt policy yet leave other buildings on site in the greenbelt. The new proposed boundary would cut across the public footpath and a car park which are both open land. This makes no sense at all. Therefore how can the council propose to follow the rear of buildings when there is an expanse of space that contains no buildings at all. The proposed boundary will be completely arbitrary and unrecognisable in parts. The existing boundary line is correct, there was no "anomaly" when the green belt was set as the physical feature was the road. It is clear that the existing boundary was set so that Barrows Farm site would rightfully be retained within the green belt. Therefore, it is clear to us and other residents that there is no "anomaly" and the boundary should remain the same. The council planners cannot simply decide that the boundary line is in the wrong place based on their own opinion, (another planner may take an entirely different view) it takes proper justification and necessity to revise the boundary.

DEVELOPMENT

Other paragraphs in the NPPF cover development i.e. NPPF 143-147 in the Greenbelt.

As no development is being proposed at present and there are no exceptional circumstances to justify the change in boundary then these points need not to be covered. We are being asked to comment on what is in the local plan proposed by the council today and as there is no development planned then the only issue is whether the green belt

boundary should be changed. Any development in the Green Belt has always been subject to Green Belt Policies and there is no reason why this should change now.

If the boundary were to remain the same, any future planning applications would be judged against the NPPF Green Belt Policies (as they have been in the past) in addition to other planning considerations. This is in accordance with the wider surroundings and the site as a whole. If the boundary is changed then there would be limited controls in terms of planning regulations which would enable almost anything to be built on the site. This action would encourage urban sprawl. If this were to happen it would undoubtedly cause harm to the environment and the wider greenbelt. Therefore, the harm from these actions would far outweigh any benefits. It cannot be considered that this proposal is 'positively planned.'

As stated previously, the site contains open areas and not just buildings. This includes landscaping and hardstanding which would have been appropriate for its agricultural use. Previous applications have given weight to the openness given its location in the Green Belt. The hardstanding and buildings were already there prior to the previous UDP in which the Green Belt boundary was not changed. Whilst there may have been a change of use of some of the buildings, there has been no fundamental change to the landscape for many years.

ERROR IN THE LOCAL PLAN DOCUMENT

We refer to an error in the Green Belt review Document (page 153) in relation to AC06. The proposed changes are said to affect '38a,38 and various outbuildings at Barrows Farm, Carr Mill Road, Billinge'. In fact, no. 38 is some way away in an entirely different part of Carr Mill Road in Billinge and is part of a different postcode. There is no. 38a. Errors such as this highlight a lack of due diligence – the council are inviting representations based on incorrect information.

NO DETRIMENT TO RESIDENTIAL DWELLINGS

Any residential dwellings mentioned in the council's document within the boundary would suffer no detriment by remaining in the Green Belt. (The error re 38 & 38a has been highlighted previously). The Barrows Farm dwelling is part of a wider farm site that should automatically remain in the Green Belt. This is just one of the original agricultural buildings. In respect of the other properties, when these were built, planning permission would have been sought and subject to planning policy at the time. The boundary revision was not necessary previously, why would this be necessary now. By remaining in the Green Belt it may offer them greater protection from inappropriate development directly at the rear of their properties. All other properties on the same side of Carr Mill Road in the immediate area will still have green belt land at the rear of their properties but these houses would not if this went ahead. The proposal put forward by the council is not just to remove the dwellings it is also to remove part of the Barrows Farm site and the public footpath. Therefore, comments are made on the whole proposal and not just the residential dwellings.

RETROSPECTIVE APPLICATIONS

Again in view of the fact that the council has spent the last 10+ years approving applications and deeming them appropriate for the Green Belt to then use the fact that there has been development on the site as a reason for removal from the Green Belt is ludicrous and contradictory

It is an indisputable fact that the council knew what they were approving at the time as the buildings were in place when granting **retrospective permission**. The council could have refused the applications and took enforcement action but they chose not to as they decided that they met Green Belt policies.

ACCESS TO THE WIDER GREENBELT

The area in question contains a public footpath which is the access route to the wider greenbelt area, an important local amenity for leisure and recreation.

The access to the footpath should be kept in the Green Belt. It is well used by local residents and visitors to the area who enjoy walking in the countryside. It is an important free local amenity. The footpaths have only recently been upgraded. By turning this land into brownfield, it would mean that this access could be enclosed. It would then be not as accessible as it is now to the general public. This would have a detrimental effect on many users who either live locally or who choose to visit the area (of which there are many) because they enjoy walking in the countryside.

The NPPF states '141. Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.'

By changing the boundary, it would be putting the access to the wider Green Belt at risk for the many people who enjoy this for leisure and recreation. Therefore, this proposal does not comply with the NPPF paragraph 141 and cannot be considered to be 'positively' planned.

DETRIMENTAL EFFECT ON THE CHARACTER OF THE AREA

If the land at Barrows Farm were to be taken out of the Green Belt it would make development subject to different criteria from that on the rest of the site. That in itself could be harmful. It would also not be in keeping with the rural character of the area.

The councils own Trees and Woodlands Officer made the following key points (amongst others) in an objection to a planning application in late 2016 'The site lies just within the Arch Lane Slopes Landscape Character Area as identified in the Landscape Character Assessment for St. Helens 2006. It identifies a positive feature as its strong rural character comprising of strong field patterns and relatively intact, vegetated boundaries. It also identifies as a positive feature the experience of physical separation and contrast with the adjacent settled landscape. It identifies negative features as including the encroachment of urban elements and the loss of field boundaries and hedgerows. It is highly visible with low to moderate potential to mitigate through appropriate tree planting. The policy for this area is one of conserving and restoring it. It states there should be an avoidance of further urban features that reduces the strength of rural character.'

It appears that the councils' own policy is not being followed as to make part of the site Brownfield puts it at increased risk of further Urban Elements which will reduce the rural character and will cause harm. Research lescription supports the residents' views that the site is open and that openness and character needs to be maintained. The policy for the

area in the Landscape Character Assessment is to 'Conserve and restore' – This is because it is in the countryside. This council's actions here are not compatible to this 'conserve and restore' viewpoint. Therefore, this proposal does not comply with NPPF paragraph 133

BARROWS FARM SITE IS A SINGLE CONTINUOUS SITE - IT SHOULD NOT BE SUB-DIVIDED

The Barrows Farm site is one site. It makes no sense to split one site into part Green Belt and part brownfield. Under this proposal the greater part of the one site would be Green Belt. By allowing brownfield development on one section of the site would cause harm to the Green Belt on the other section.

In the St Helens UDP – under Farm Diversification it states under policy ENV17:

'Planning permission may be granted for small, farm-based developments where it can be demonstrated that:'

'the proposal does not involve the division of the proposed enterprise from the existing agricultural holding;'

'the enterprise is not a clear case of over development of the site and would not harm the objectives of the Green Belt'

'the activity, and any related building works or change of use is compatible with its immediate neighbours, in terms of general environmental consideration'

(Whilst this policy is detailed on the previous UDP It is our understanding that this policy was retained by St Helens Council on the existing local plan)

By changing the status of part of the site then this would mean dividing one site into part Green Belt / part brownfield. If this site was made partially brownfield, it would enable development that was not compatible with the rest of the site or indeed with the neighbours of Barrows farm (who include other farms). This would be harmful. The change that the council are proposing is not compliant with the policies they have themselves set and which they use to make decisions i.e. ENV17 because this change WILL mean the division of the site in planning policy terms.

I note that the map displayed in the local plan relating to AC06 is just of one section where the amendment is proposed. The area highlighted for removal is one section of a larger site. The wider part of the site is not shown in this respect. The majority of Barrows Farm even if this proposal is approved will remain in the green belt so it makes no sense to subdivide the site when there is no clear reason, justification or purpose to do so.

TRAFFIC PROBLEMS

If successful, this proposal, will make further development more likely. Any likely further development will have to use the same single access point which is itself being proposed to be re-designated to brownfield. Further development using this access point has already been cited by the council's own transport officer as being potentially dangerous. We quote directly from Transport Officer report re application P2012/0815 directly in relation to this access point.

Further to the comments made by in his memorandum of 11th May 2011. Those comments were made without knowledge of the full history of the site or of the

available parking arrangements and the following comments supersede them.

Carr Mill Road is a narrow road with a number of bends and substandard footways. The footway is limited to the eastern side of Carr Mill Road for most of its length and runs from extremely narrow to non-existent in places. Carr Mill Road is subject to significant on-street parking, particularly during school hours and is extremely busy at school start/finish times.

Carr Mill Road is considered to be inadequate by reason of its poor alignment, restricted width and substandard footway. The proposal if permitted would be likely to give rise to conditions detrimental to highway safety and contribute additional interference with the free and safe flow of traffic and would be contrary to Policies GEN 1 – Primacy of the Development Plan, GEN 2 – Good Environments and GEN 9 – Parking and Servicing of the adopted Unitary Development Plan.

Objection raised'

Therefore, the council is attempting to re-designate an acknowledged dangerous "blind" access point to brownfield resulting in likely further development on a narrow semi-rural road which contains 2 schools and has no pavement at all in parts. For the council to unilaterally propose this and make an existing dangerous situation potentially worse on the grounds of a "tidying up exercise" is to us beyond comprehension.

Final Summary

In summary, taking into consideration the NPPF policy document as a whole, we believe that the proposal to change the boundary is unsound as it does not comply with National Planning Policy. It does not comply with Local planning policy either. It cannot be considered Positively prepared as there is no objectively assessed requirement to change the green belt boundary. There are also errors on the Local Plan document in terms of who is affected.

The proposal cannot be considered justified as there is no necessity to do this and no Exceptional Circumstances. This is further backed up with case law examples provided. It is also Inconsistent with the NPPF, particularly in respect of Green Belt Policy.

Our representations are further supported by Case Law – Evidence Provided along with legal interpretation to enable understanding. These Examples and with specific reference to the law regarding 'exceptional circumstances' and 'green belt boundary changes' as such, we do not consider this proposal to be lawful.

The council's reasoning for this is weak and flawed and there appears to be multiple errors made both in terms of understanding and application of what is required in accordance to the NPPF. There is no clear objective to the proposal. The proposal is not compliant with the following NPPF policies; 16a, b, d, f,31,35 a-d,36,127c, green belt policies 133,134,135,136,137,138,139,141.

At this stage in the process, in view of all the aforementioned points and of no credible reason to justify 'exceptional circumstances' which is a major point in terms of green belt boundary reviews, we believe the correct and sensible thing would be to withdraw the proposal for the boundary change on AC06 altogether and leave the existing boundary line

as it is. Nothing would change as a result, the position in planning terms would still be the same as it was and no one would be in a better or worse position than before.

Appendix 1

An Overview of Case law - Gallagher Estates v Solihull Ltd (2014)

Comments provided by No.5 Chambers

Gallagher Estates challenged the inclusion of their site within the Green Belt as part of the Solihull Local Plan. The High Court (Mr Justice Hickinbottom) observed the following common ground principles:

" 124. There is a considerable amount of case law on the meaning of "exceptional circumstances" in this cont ext. I was particularly referred to Carpets of Worth Limited v Wyre Forest District Council (1991) 62 P & CR 334 ("Carpets of Worth"),

Laing Homes Limited v Avon County Council (1993) 67 P & CR 34 ("Laing Homes"), COPAS v Royal Borough of Windsor and Maidenhead [2001] EWCA Civ 180; [2002] P & CR 16 ("COPAS"), and R (Hague) v Warwick District Council [2008] EWHC 3252 (Admin) ("Hague").

125. From these authorities, a number of propositions are clear and uncontroversial.

i) <u>Planning guidance is a material consideration for planning plan-making and decision-taking.</u>
However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies.

ii) <u>The test for redefining a Green Belt boundary has not been changed by the NPPF</u> (nor did Mr Dove suggest otherwise).

a) In Hunston, Sir David Keene said (at [6]) that the NPPF "seems to envisage some review in detail of Green Belt boundaries through the new Local Plan process, but states that 'the general extent of Green belts across the country is already established". That appears to be a reference to paragraphs 83 and 84 of the NPPF. Paragraph 83 is quoted above (paragraph 109). Paragraph 84 provides:

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development...".

However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National quidance has always dealt with revisions of the Green Belt in the context of reviews of local plans (e.g. paragraph 2.7 of PPG2: paragraph 83 above), and has always required "exceptional circumstances" to justify a revision. The NPPF makes no change to this.

b) For redefinition of a Green Belt, paragraph 2.7 of PPG2 required exceptional circumstances which "necessitated" a revision of the existing boundary. However, this is a single composite test; because, for these purposes, circumstances are not exceptional unless they do necessitate a revision of the boundary (COPAS at [23] per Simon Brown L). Therefore, although the words requiring necessity for a boundary revision have been omitted from paragraph 83 of the NPPF, the test remains the same. Mr Dove expressly accepted that interpretation. He was right to do so.

iii) Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth.

iv) Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration. "

14. The Court then continued:

" 130.Mr Lockhart-Mummery particularly relied on COPA S, in which Simon Brown LJ, after confirming (at [20]) that, "Certainly the test is a very stringent one", said this (at [40]):

"I would hold that the requisite necessity in a PPG 2 paragraph 2.7 case like the present – where the revision proposed is to increase the Green Belt – cannot be adjudged to arise unless some fundamental assumption which caused the land initially to be excluded from the Green Belt is thereafter clearly and permanently falsified by a later event. Only then could the continuing exclusion of the land from the Green Belt properly be described as 'an incongruous anomaly'".

In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change and so the inclusion of the land in the Green Belt (see Hague at [32] per Collins J. Collins J in Hague held that, in addition to the undoing of an assumption on which the original decision was made, a clear error in excluding land from the Green Belt is sufficient, no such error is suggested here; and I need not consider that aspect of Hague further.)

131. COPAS is, of course, binding upon me. Mr Dove said that these cases are fact-sensitive, and the facts of that case were very different from this. That is true; but, in the passage I have just quoted from Simon Brown LI's judgment, he was clearly and deliberately determining, as a matter of principle, what "exceptional circumstances" required, as a matter of law, in a case such as this. It is expressly a holding, with which the whole court agreed. I am consequently bound by it. In any event, it seems to have been consistently applied f or over ten years; and, in my respectful view, is right.

132. In this case, following two inquiries, the 199 7 UDP defined the Green Belt to exclude the Sites. Although there were uncertainties as to when and even if either site would be brought forward for housing development, the Green Belt boundary then determined and approved through the statutory machinery was not in any way provisional or uncertain. Mr Dove was wrong to describe the Green Belt boundary – as opposed to development of the sites – as "contingent". As the Inspector found in 2005, despite the change in policy that meant that it was unlikely that these sites would be brought forward unless and until there was a change in (then) regional strategic policy, there was no justification for any change to the Green Belt boundary. That reflected the fact that Green Belt boundaries are intended to be enduring, and not to be altered simply because the current policy means that development of those sites is unlikely or even impossible. Indeed, where the current policy is to that effect, the amenity interests identified in the sites will be protected by those very policies as part of the general planning balance exercise. A prime character of Green Belts is their ability to endure through changes of such policies. For the reasons set out in Carpets of Worth (at

page 346 per Purchas LJ) it is important that a proposal to extend a Green Belt is subject to the same, stringent regime as a proposal to diminish it, because whichever way the boundary is altered "there must be serious prejudice one way or the other to the parties involved".

133. Those are the principles. Applying them to this case, what (if anything has occurred since the Green Belt boundary was set in 1997 that necessitates and therefore justifies a change to that boundary now, to include the Sites?

135.I am persuaded by Mr Lockhart-Mummery that the Inspector, unfortunately, did not adopt the correct approach to the proposed revision of the Green Belt boundary to include the Sites, which had previously been white, unallocated land. He performed an exercise of simply balancing the various current policy factors, and, using his planning judgement, concluding that it was unlikely that either of these two sites would, under current policies, likely to be found suitable for development. That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary."

(NB This judgment was appealed to the Court of Appeal and on 17th December 2014 the appeal was dismissed. Solihull Council lost the case. The court of appeal held that the council had erred in law by failing to demonstrate exceptional circumstances for amending the green belt boundary. As a result Solihill Council confirmed on 19.1.15 that the site in question was to be removed from the Local Plan.)

No5 chambers state 'In the current context, Green Belt extensions are comparatively rare, so the principal target is considered, properly justified removals are the primary issue.'

The test is exceptional circumstances – this applies to both removal of the land from the greenbelt and new inclusions into the greenbelt.

The official judgement and appeal documents have been viewed by ourselves online.

PO3875



Consultation on the Local Plan 2018-2033- Barrows Farm

0 5 MAR 2019

Dear

I object to the proposed boundary changes at Location 10 Barrows Farm for the following reasons

Government guidance states that the Green Belt should be preserved unless there are "special circumstances". There are no special or exceptional circumstances at this site, the countryside should be protected for future generations.

Reliable information indicates that no one from St Helens Planning Dept visited this site before producing this plan which was hidden away in the appendix of the larger "Local Plan". Perhaps had they done so they might have had a greater appreciation of the issues raised by many concerned local residents.

The current owners of the farm have been allowed to lease farm buildings to various commercial enterprises which has caused significant traffic, noise and disturbance. Your letter states that "these are not deemed to be characteristic of the Green Belt". Residents have complained at every stage of the numerous retrospective planning applications submitted by the owners but the Council has allowed development to take place. These buildings are barns and stables and could be restored to their intended use at any time, significantly the owners have recently described the site as a "wheat farm".

To address point 4 on your letter, the information detailed here is incorrect. There are in fact four not three residential properties on this plan. Should it be suggested that residential properties are not legitimately deemed to be on Green Belt land then the boundary on your map needs to be reviewed. The boundary should be strictly limited to the boundary around the houses. There is no need to include the entrance to the Farm and in consequence create a threat to the wider Green Belt.

Should the non residential land be removed from the Green Belt it will prevent access to the public footpath which is used by many walkers and visitors. Residents have no doubt that the current owners of the Farm would have little hesitation in developing the land for their own financial gain. There would be a threat to the "openness" of the wider Green Belt and plans such as their recent retrospective application for hard standing for heavy machinery would be impossible to prevent.

I request that you look carefully at this plan, take into account the history of the site and give great consideration to the implications/dangers of allowing this proposal to go ahead. It is an unnecessary proposal which if allowed will have a detrimental effect upon the area, not only on an area of open countryside but will inevitably increase the already significant traffic and congestion on a small, winding road with narrow footpaths. The road houses two schools and a nursery and the dangers to public safety have already been acknowledged by Planning Officers (P/2011/0894).

original letter sent by post was signed by my enfe

Mrs S Howard

65 Carr Mill Rd., Billinge (28.3.2017)

PO3876

Representor Details

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Address	75 CARR MILL ROAD
	BILLINGE
	NR. WIGAN
	LANCS WN5 7TX
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	GREEN BELT REVIEW
Paragraph / diagram / table	
Policies Map	AC06
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

There is no necessity or legal requirement to change the Green Belt boundary. Therefore is there any reason why this site needs to be changed at all.

The Council are proposing to take a chunk out of the Green Belt, there will still be green belt surrounding this proposed area. By removing this they are taking away the openness of the Green Belt.

This area is a farm site and as the owner continuously contravenes planning regulations, this change could pave the way for future inappropriate development not in keeping with the character of the area.

If the Council turn this land into Brownfield then this will do nothing to prevent urban sprawl. It will encourage more development and that would mean any development. It will enclose the land which has previously been kept open. This land is Green Belt and it should stay that way.

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

Remove the site from the local plan.

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 12:24:29 PM

PO3877

Representor Details

Web Reference Number	WF0300
Type of Submission	Web submission
Full Name	Mr Michael Bluck
Organisation	
Address	
Agent Details	Michael Bluck

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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Paragraph / diagram / table	
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Sustainability Appraisal / Strategic	
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This local plan is unsound and not lawful in relation to site AC06 in Billinge.

As a result, the only correct sensible modification would be to remove this proposal in its entirety from the Local Plan and Green Belt Review Document. There is no necessity to do this. It does not comply with the NPPF and is not lawful. This is a large site and there has been no proper assessment and no development has been proposed.

The proposal is not and cannot be justified at all.

Reasons are as follows:

No Exceptional Circumstances

To change the green belt boundary in these circumstances would be unlawful. There are No Exceptional Circumstances to justify this revision. There is no development proposal submitted and therefore no amendment can lawfully be made. It is not up to the local authority to decide where the green belt boundary should go, it has already been decided – only exceptional circumstances merit this change and there is nowhere in this document or in the comments made by the local authority that could be considered a justification for this.

Existing Boundary Line

The existing boundary line clearly follows the pattern of the road. This is the most appropriate permanent and visible feature to use. The boundary is meant to be permanent and enduring and not

to be changed on a whim. The boundary should not be redefined and if every household or business in Billinge decided that they wanted their boundaries redefining there would be absolute chaos. Openness

One of the key features of the Green Belt is its openness. To remove that from part of a wider farm site will cause harm to this and the neighbouring green belt sites which form part of the wider countryside. There has been permitted development in the form of a change of use of agricultural buildings however the site retains openness. Urban development would not be subject to the same planning criteria on other parts of the site or any neighbouring sites.

Character of the area

This is a rural area with lovely countryside and development that is not in keeping with the existing landscape would not be welcome and not in keeping with the area. There is already a history of retrospective applications and planning enforcement action concerning the Barrow Farm site. Why the council would propose such a change in designation is unclear. There would be no benefits to the community.

Traffic Issues

This proposal if successful will make further development more likely. Further development using the single access point has already been cited by the council's own transport officer as being potentially dangerous if the boundary were to change

Public Access

The public access path in the green belt which leads to the wider greenbelt is in the area proposed to be removed from the greenbelt. If the land were turned into brownfield then access to the wider area could be problematic.

As part of a wider Farm site, Barrows Farm should remain in the Greenbelt. The other two properties situated in the Green Belt would not be adversely affected by remaining in the Greenbelt -The decision would not impact them. The properties were built in accordance with planning policies. There is no need therefore to revise the boundary around them.

Overall, for the reasons given the plan does not meet the NPPF and is unsound. The harm caused by such a proposal would significantly outweigh any perceived benefit.

It is difficult to ascertain why the council have even contemplated a boundary review in light of the fact there is no development planned. There are certainly no strong, realistic arguments to justify any boundary change in law.

Green belt boundaries should be respected by all and certainly not re-routed for the few.

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

Site AC 06 should be completely remove from the local plan review for reasons stated above. It serves no purpose.

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

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PO3878

PF 1347



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

IN SON YAMEI

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:	First name:
Jodie	
Last Name:	Last Name:
Goulbourn	
Organisation/company: Self-builder	Organisation/company:
Address: The Lantern House	Address:
9 Frenchfields Crescent	
Clock Face	
St Helen's	Postcode:
Postcode: WA9 4FZ	
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 13/05/19

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 t	he Plan)
Yes 🚺 (Via Email)	No 🗌

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

RETURN DETAILS

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Local Plan

St.Helens Council

Town Hall

Victoria Square

St.Helens Merseyside WA10 1HP

or by hand delivery to:

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

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

Foreword and additions for the May 2019 representation:

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

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

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

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

For the May 2019 representation it should be noted that:

- 1. The National Planning Policy Framework (February 2019) Paragraph 177 states: "The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."
 - 1.1. The Sustainability Appraisal (SA) site assessment for HA4 scores: "Likely to generate negative effects" for SA1. To protect and enhance biodiversity SA2. To protect and improve land quality in St Helens
 - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (Lepus euro), Lapwing (Vanellus vanellus), Skylark (Alauda arvensis), Grey Partridge (Perdix perdix), Yellowhammer (Emberiza citronella), Tree Sparrow (Passer montanus) and Corn Bunting (Emberiza calandra); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.

 These species are a material consideration for planning.
 - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats.

 Under the BCT good practice guidelines 3rd edition (*Collins, 2016*), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
 - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) records to be submitted to the Merseyside Bio-Bank.

"If any allocations are made within the Bold Forest Park area in the new Local Plan, they will be based on a process that is consistent with Green Belt policy and exceptional circumstances will need to be demonstrated."

5.1. It has been argued throughout this document that the 2016/2017 LAP's proposals to remove some of HA4's constituent land parcels from the Green Belt were flawed. There is an even greater argument throughout this foreword section against the new proposals in 2018-19 for the removal and a massive new development across the whole site – and for that to happen now rather than to be reviewed in 2035. Members of the Community broadly welcomed the Bold Forest Park AAP and are concerned to see this substantial change.

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- 5.2. The AAP recognises that "There is an extensive equestrian sector in and around Bold with major yards at Bold Heath Equestrian Centre, Northfields, Old Brook Hall Farm and Tunstalls Farm and many more small DIY livery and grazing facilities. Consequently, much of the land is utilised for pasture and hay-cropping."
 - However, these properties surround and/or are part of GBP_074/HA4.
 - Removal of HA4 from the Green Belt and its consequential development directly affects these establishments.
 - The loss of pasture and hay production (through any compulsory purchase, for example) could lead to their demise as opposed to the remit of encouraging such businesses as set out in the AAP.

- The Tunstalls Farm livery is under particular threat. The property and its fields have been tenanted by the same family for 4 generations. It is well managed permanent pasture which (with the inclusion on LWS_108), takes up the whole of the land sub-parcel GBR_074c. It is owned by the council (a fact not declared in the Bold Forest Park AAP) and the loss of its grazing pastures (as put forward by the council) would, by definition, mean it would cease to exist.
- 5.3. The AAP sets out a vision for encouraging a green and open landscape and is committed to improving access to the countryside and recreational hubs for outdoor activities. It also reports the findings of "Consultation undertaken by URS21 suggests that the overwhelming activity need is for routes to facilitate walking, running and cycling."

 The AAP itself points out that the local community and visiting public want the ambience of the open countryside."3.2.9 The environmental quality of the area is of fundamental importance to the success

13

The proposals will materially affect these considerations.

6. IMPORTANT THINGS OF NOTE:

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6.1. Since the original report was produced in January 2017, the Bold Forest Park AAP has been approved (July 2017). This material fact, the records from Merseyside Bio-Bank - and the results of the recent Phase 1 habitat survey suggest the options put forward in the conclusion of the original document are now invalid.

These facts and findings appear to leave only one feasible option – that HA4/GBP_074 should not be removed from the Green Belt, nor should it be allocated for housing.

6.2. The wording within the Green Belt review 2018 and the Local Plan 2020 – 2035 regarding HA4 is misleading and disingenuous in places.

The description of the sub-parcel GBP_74d states that it "...has a strong boundary to the east ..." "...includes old coal mining buildings..." "...and a new development..."

W/

• The boundary to the east of the parcel has a simple post and wire fence around the grazing field, no hedge or fence at the farmer's side of the footpath, there is a ditch.

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- 6.3.1. Overall, this community has no expertise or experience and/or little opportunity either to compete on a level playing field in this planning process or to get their arguments heard.
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PO3879

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1. Your Details	2. Your Agent's Details (if applicable)
	(we will correspond via your agent)
Title: Mr	Title:
First Name:	First name:
John	
Last Name:	Last Name:
Goulbourn	
Organisation/company: Self-builder	Organisation/company:
Address: The Lantern House	Address:
9 Frenchfields Crescent	
Clock Face	
St Helen's	Postcode:
Postcode: WA9 4FZ	
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 13/5/19
////////	
Please be aware that anonymous forms cannot be accepted and that in order for your	
comments to be considered you MUST include yo	our details above.
Would you like to be kent undeted of future	ntages of the Ct Helene Develop I seel
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Yes (Via Email)	No \square
1.00 Li (rid Lindii)	· · · · · ·

PF1348 p**af**

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local populations.

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 - 6.3.3. This seems to make the process unreasonable and unfair.

PO3880



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



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?

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Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic	Please see accompanying representations
Environmental Assessment	
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



11

12

- 3.13 We have concerns that the Council's 'Spatial Strategy for meeting development needs' set out at paragraph 4.6.8 of the Local Plan does not indicate how the Council has sought to disaggregate development across the Key Settlements and other areas across the borough. The housing strategy simply seems to be the result of combining currently identified SHLAA Sites and a number of allocations across the borough. The Council has not made clear what its 'strategy' for distributing that growth is. It is not clear, therefore, whether each of the Key Settlements in particular can be assured of being allocated the development that they need as settlements.
- 3.14 We generally support the need for Green Belt release within the borough as set out within Local Plan and we support the need to identify Green Belt land for release further to a comprehensive review of the Green Belt; indeed we agree with the Council that it should maintain an effective Green Belt. However, without an indication of the levels of development that the Council considers should be met at each of the Key Settlements it is difficult to consider the case for exceptional circumstances for Green Belt release across the borough. In its simplest terms, how has the Council weighed harm to the Green Belt in a specific area against the need for development where it has not defined the need for development in that area.
- 3.15 As set out later within these representations our Client to our Site being discounted from the Green Belt Assessment in relation to the Site. We agree with the Green Belt Assessment which considers the Site (Site reference GBP_048) to be of "Low" value to all purposes of including land within the Green Belt; and overall makes a "weak" contribution to the Green Belt. However, the Site has subsequently been discounted from the Green Belt Assessment on the basis that its part designation as a 'Amenity Greenspace' is a prohibitive constraint to development. We disagree with that conclusion and address this later within these representations and within the attached Development Framework Document (DFD). We consider that the Site should be allocated for development and released from the Green Belt.

Policy LPA03 - Development Principles

3.16 We support the Council's aspirations for development to be guided by a number of development principles, and the need for the Council to address the challenges faced through population growth; economic well-being; contribution to inclusive

25

PO3881

(1)-LPAOS (2)- Green Bell- Review (3)- GEN

Representor Details

mepresentor betans	
Web Reference Number	WF0275
Type of Submission	Web submission
Full Name	Dr Deborah Pownall
Organisation	
Address	14 Villiers Crescent Eccleston St Helens Merseyside WA10 5HN
Agent Details	

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

Yes (via e-mail)

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

Policy	8HS\LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	The state of the s
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

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 believe the Local Plan is unsound due to it being based on flawed historical data that does not justify the aspiration targets included in the plan.

The housing needs for the local area does not use standard Methodology and no case for exceptional circumstances has been made. Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The increase in traffic proposed in the plan will have significant impact on air quality for the next generation. The access to local doctors is currently impossible and would be made much worse, the argument that more surgeries will open is not an adequate answer when GPs are retiring faster than being recruited or trained. There is no evidence of collaboration with the Hospital Trust, local CCGs or education Authorities. The Plan is not effective.

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

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

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

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

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

Response Date	3/10/2019 9:37:32 AM

(3)

PO3882

Representor Details

Web Reference Number	WF0384
Type of Submission	Web submission
Full Name	Miss Alison Macdonald
Organisation	
Address	181 Billington Avenue
	Newton-le-Willows
	Merseyside
	WA12 0AU
Agent Details	

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

Yes (via e-mail)

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

Policy	St Helens Borough Local Plan 2020-2035
Paragraph / diagram / table	The Green Belt Review 2018 Appendices B&C
	Part 3
Policies Map	GBP_053_C
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	
Other documents	GBP_053_C

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

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

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

Justified

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

The plan considers removing green belt land for development.

The plan with reference to GBP_053_C, is identified as making only a moderate contribution to preventing two settlements merging. However what it does not recognise is this is productive arable land, producing annual food crops.

Government data states the UK produces less than 50% of its food.

We therefore should not be removing our ability to continue using this valuable resource.

Additional to this, any development on the specified site will have an impact on the natural habitat and food sources of the wildlife in the area, including but not limited to birds of prey and bats that roost in the area and that are seen on a regular basis.

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

To only use brown field sites and sites that will have only limited impact on food-producing resources and limited impact of local wildlife, their habit and food-chains.

Do not include farmland that is currently in use or can be utilised again in the future.

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

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

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

Response Date	3/3/2019 1:48:28 PM
---------------	---------------------

PO3883



Proposed change to Green belt at site AC 03

Keith Atherton to: planningpolicy

12/03/2019 16:43

From:

Keith Atherton

To:

planningpolicy@sthelens.gov.uk

5101013

Sirs,

Our serious concern with a removal of the site from the green Belt is that, without the protection of the green belt, the way will be open for plans to be accepted for developments that will be out of keeping with the existing listed buildings and be extremely detrimental to at least six properties that back on to the site.

At this stage, we believe that it is not possible to make further specific comments about the proposal.

Yours faithfully,

W.K. and Mrs. M. Atherton 15 St. Marys Avenue Billinge Wigan WN5 7QL

Sent from my iPad

PO3884



Local Plan Representations on behalf of Story Homes - Email 1 of 7 Helen Hartley

to:

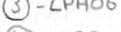
planningpolicy@sthelens.gov.uk

ELO208 Site 8HS O-LPAOS O-Table 4.6



5 Attachments





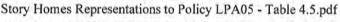
13.03.2019_FINAL DRAFT_Representation on behalf of Story Homes - Eccleston Vale .pdf



Story Homes Representations to Policy LPA05 - Housing Need.pdf



乙





Story Homes Representations to Policy LPA05 - Table 4.6.pdf Story Homes Representations to Policy LPA06.pdf

Dear Sir/Madam

Thank you for the opportunity to comment on the Submission Local Plan.

I am pleased to attach representations on behalf of Story Homes in relation to the following parts of the Plan specifically:

- Policy LPA05
- Policy LPA05 Table 4.5
- Policy LPA05 Table 4.6
- Policy LPA06

I will attach the following information over 7 separate emails due to file size:

- Representations Statement by Nexus Planning (Email 1)
- Representations Forms (Email 1)
- Appendix 1: Illustrative Masterplan (668-STO 002) (Email 2)
- Appendix 2: Vision Brochure: Eccleston Vale A Vision for Sustainable Family Living. Vision Brochure (August 2016) (Email 3,4,5)
- Appendix 3: Infrastructure and Delivery Statement: Eccleston Vale, St. Helens (January 2018)
 (Email 6,7)
- Appendix 4: Preliminary Ecological Appraisal (July 2016) (Email 2)
- Appendix 5: Recommended changes to SA Site Assessment Scoring (Email 2)
- Appendix 6: Story Homes SA Site Scoring (Email 2)

Given the large size of some of the files, I would be extremely grateful if you could confirm receipt of all 7 emails.

Kind regards Helen

Helen Hartley Principal Planner Nexus Planning is pleased to have been shortlisted by the RTPI as a finalist for **Planning Consultancy of** the Year 2019





Nexus Planning - Manchester Eastgate, 2 Castle Street Castlefield Manchester M3 4LZ



RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7 Helen Hartley

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:35

2 Attachments



Appendix 1 - Eccleston Vale, Windle, St Helens - Indicative Masterplan August 2017.pdf



Appendix 4, 5 and 6.pdf

Email 2 of 7

From: Helen Hartley

Sent: 13 March 2019 15:34

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

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Kind regards Helen **Helen Hartley** Principal Planner

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Nexus Planning - Manchester Eastgate, 2 Castle Street Castlefield Manchester M3 4LZ



RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7 Helen Hartley

to:

planningpolicy@sthelens.gov.uk 13/03/2019 15:37



1 Attachment



Appendix 2 - Eccleston Vale, Windle - FINAL August 2016 Document - Submission Version_Part1.pdf

Email 3 of 7

From: Helen Hartley

Sent: 13 March 2019 15:36

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley

Sent: 13 March 2019 15:34

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

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Kind regards Helen

Helen HartleyPrincipal Planner







Nexus Planning - Manchester Eastgate, 2 Castle Street Castlefield Manchester M3 4LZ





RE: Local Plan Representations on behalf of Story Homes - Email 4 of 7 Helen Hartley

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:38

1 Attachment



Appendix 2 - Eccleston Vale, Windle - FINAL August 2016 Document - Submission Version_Part2.pdf

Email 4 of 7

From: Helen Hartley

Sent: 13 March 2019 15:37

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7

Email 3 of 7

From: Helen Hartley

Sent: 13 March 2019 15:36

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley Sent: 13 March 2019 15:34

To: 'planningpolicy@sthelens.gov.uk' < planningpolicy@sthelens.gov.uk>

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

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RE: Local Plan Representations on behalf of Story Homes - Email 5 of 7 Helen Hartley

to:

planning policy @sthelens.gov.uk

13/03/2019 15:38



1 Attachment



Appendix 2 - Eccleston Vale, Windle - FINAL August 2016 Document - Submission Version_Part3.pdf

Email 5 of 7

From: Helen Hartley

Sent: 13 March 2019 15:37

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 4 of 7

Email 4 of 7

From: Helen Hartley

Sent: 13 March 2019 15:37

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7

Email 3 of 7

From: Helen Hartley

Sent: 13 March 2019 15:36

To: 'planningpolicy@sthelens.gov.uk' <<u>planningpolicy@sthelens.gov.uk</u>>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley Sent: 13 March 2019 15:34

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

Dear Sir/Madam

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- Policy LPA05 Table 4.5
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RE: Local Plan Representations on behalf of Story Homes - Email 6 of 7 Helen Hartley

to:

planningpolicy@sthelens.gov.uk 13/03/2019 15:41



1 Attachment



Appendix 3 - Eccleston Vale Infrastructure and Delivery Statement 22.01.2018_Part1.pdf

Email 6 of 7

From: Helen Hartley

Sent: 13 March 2019 15:38

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 5 of 7

Email 5 of 7

From: Helen Hartley Sent: 13 March 2019 15:37

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 4 of 7

Email 4 of 7

From: Helen Hartley Sent: 13 March 2019 15:37

To: 'planningpolicy@sthelens.gov.uk' <<u>planningpolicy@sthelens.gov.uk</u>>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7

Email 3 of 7

From: Helen Hartley Sent: 13 March 2019 15:36

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley Sent: 13 March 2019 15:34

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

Dear Sir/Madam

Thank you for the opportunity to comment on the Submission Local Plan.

I am pleased to attach representations on behalf of Story Homes in relation to the following parts of the Plan specifically:

- Policy LPA05
- Policy LPA05 Table 4.5
- Policy LPA05 Table 4.6
- Policy LPA06

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Nexus Planning - Manchester

Eastgate, 2 Castle Street Castlefield Manchester M3 4LZ





RE: Local Plan Representations on behalf of Story Homes - Email 7 of 7 Helen Hartley

to:

planning policy @sthelens.gov.uk

13/03/2019 15:40



1 Attachment



Appendix 3 - Eccleston Vale Infrastructure and Delivery Statement 22.01.2018_Part2.pdf

Email 7 of 7

From: Helen Hartley Sent: 13 March 2019 15:39

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 6 of 7

Email 6 of 7

From: Helen Hartley Sent: 13 March 2019 15:38

To: 'planningpolicy@sthelens.gov.uk' < planningpolicy@sthelens.gov.uk >

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 5 of 7

Email 5 of 7

From: Helen Hartley Sent: 13 March 2019 15:37

To: 'planningpolicy@sthelens.gov.uk' < planningpolicy@sthelens.gov.uk >

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 4 of 7

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To: 'planningpolicy@sthelens.gov.uk' < planningpolicy@sthelens.gov.uk >

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Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

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To: 'planningpolicy@sthelens.gov.uk' <<u>planningpolicy@sthelens.gov.uk</u>>

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

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Nexus Planning - Manchester Eastgate, 2 Castle Street Castlefield Manchester M3 4LZ

file:///C:/Users/GriffithsCh/AppData/Local/Temp/notes0C98C3/~web5577.htm



St Helens Borough Local Plan 2020-2035

Representations to the Submission Draft Plan January 2019

on behalf of Story Homes

March 2019





- 3.28 Enhanced opportunities for walking and cycling are also incorporated into the Illustrative Masterplan.

 In particular:
 - Footpath and cycle routes incorporated throughout the development, in particular along the proposed Watery Lane Green Corridor;
 - New cycle crossing facilities as part of the new A580/Houghton's Lane junction;
 - Footpath and cycle connections provided to the open countryside to the north of the Site through the improvement in the usability and attractiveness of connections via the existing A580 underpass.

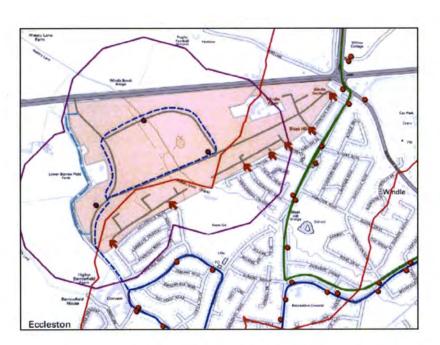


Figure 2: Extract of Bus Strategy showing extension to No. 37

GBR (2018) Comment: The Habitats Regulation Assessment process has identified that the parcel is likely to provide functionally linked habitat for bird species, connected with European protected sites in the wider area – any proposed development would need to be informed by a suitable ecological study, informed by wintering bird surveys. If species found – would need

Walking + Cycle Route

26



mitigation strategy (which may need to be of a substantial scale given the size of habitat which may be affected), probably using land which is outside the parcel. This process is likely to take a considerable period of time. Development would only be acceptable if a suitable and deliverable mitigation strategy is agreed.

- 3.29 Ecologists Urban Green have considered this issue specifically in light of this comment in the GBR. They raise concerns that the information contained within the St. Helens Habitats Regulation Assessment (HRA) is not wholly accurate. The HRA states the Eccleston Vale Site is located 7.8km away from the Mersey Estuary SPA and Ramsar site as the nearest European designated site. However, this does not appear to be an accurate measurement as the Multi Agency Geographic Information for the Countryside (MAGIC) maps shows the distance to be approximately 12.9 km. Furthermore, the HRA suggests the site is within the IRZ of a SSSI for pink-footed geese. However, the name of the SSSI is not provided and an assessment by Urban Green has found the closest SSSI with pink-footed geese as a qualifying feature appears to be Martin Mere SSSI, located approximately 17.8km to the north. Given these inconsistencies, more clarity is needed from the Council on the purported impact on designated sites and whether this concern is justified.
- 3.30 Whilst it is acknowledged that the Site may provide habitat for wintering birds, the arable habitat is not unique to the Eccleston Vale site, and is in fact very abundant in the wider region. It is therefore unlikely that the Site in itself is of such high significance to wintering birds that it will result in significant adverse effects as a result of habitat loss. Furthermore, given the Site is over 12km from the Mersey Estuary SPA, it is considered unlikely that any adverse effects of developing the site would be of a high enough significance that they could compromise the conservation objective of the international site.
- 3.31 There is more than enough time to undertake surveys and agree a mitigation strategy if necessary as part of the planning application process on the Site, and this is a process common to many development proposals. It is not reasonable to suggest such a requirement would risk delaying the development of the Site such that it could not come forward in the Plan Period. Indeed, this was not considered to be the case at the Preferred Options stage when the Council proposed the allocation of the Site. It is also not being suggested for other allocated/safeguarded Sites which have been identified as providing functionally linked habitat (Rookery Lane, Rainford and Land South of Leyland Green Road, Garswood).

HRA











PO3885

Representor Details

Web Reference Number	WF0323
Type of Submission	Web submission
Full Name	Mr Stephen Hall
Organisation	
Address	39 Hall street
	Clock Face, St Helens WA9 4XN
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?

or to which part of the Local Flan does this representation relate.	
Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic	
Environmental Assessment	
Habitats Regulation Assessment	Destruction of habitat
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.

Land to the rear of Crawford st and adjacent to gorsey lane.

Willful destruction of wildlife habitat nesting skylarks a protected species on the red list of species in decline.

Already happening by putting horses in said field to graze knowingly trying to force the birds from the field as they need a open field with realativly long grass

Prior to putting horses in the field there was at least 5 breeding pairs and there is no alternative close by that offered that type of habitat

There was also hunting barn owls regularly in an evening but since the horses have been there no sign of the owls also no sign of the brown hares that used to be seen regular, so the landowner/developer has achieved what they set out to do

Which is knowingly and willfully destroying a important habitat.

All in the sake of profit.

Plenty of brownfield sites and land other than greenbelt could be used Plenty of empty houses in and around st Helens.

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

The habitat should be protected.

And species allowed to return I have walked these fields for 30 plus years and the last 3-4 years have been the worst I have known it with regards 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	3/6/2019 5:51:08 PM

PO3886



EL0216



Representations on behalf of Jones Homes (North West) Limited - Submission Draft Lorraine Robertson

to:

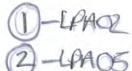
planningpolicy@sthelens.gov.uk

13/03/2019 15:49





27131.A3.VR Representations and Encl. by Jones Homes NW FINAL 13.03.19.pdf



Local Plan Team,

On behalf of our Client, Jones Homes (North West) Limited, please find enclosed representations to the Submission Draft Local Plan.

Please confirm receipt.

Many Thanks

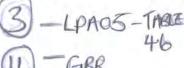
Lorraine

Lorraine Robertson

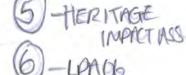
Senior Planner

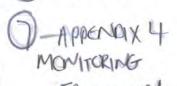
Ocnsider the Environment, Do you really need to print this email?

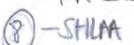
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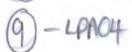














St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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.

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> 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	Your Agent's Details (if applicable) (we will correspond via your agent)		
Title:	Title: Mr		
First Name:	First name: Vincent		
Last Name:	Last Name: Ryan		
Organisation/company: Jones Homes (North West) Ltd	Organisation/company: Barton Willmore		
Address: c/o Agent	Address: Tower 12, 18/22 Bridge Street, Spinningfields, Manchester		
Postcode:	Postcode: M3 3BZ		

		-	
Signature:	Date:	13 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 update Plan 2020-2035? (namely submiss Inspector's recommendations and	ed of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the adoption of the Plan)
Yes 🛛 (Via Email)	No 🗌
Please note - e-mail is the Council address is provided, we will contact	's preferred method of communication. If no e-mail of you by your postal address.

RETURN DETAILS

Please return your completed form to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u> 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. If you still need assistance, you can contact us via:

Email:

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.

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

Now please complete <u>PART B</u> 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.

Policy	Paragraph	Policies	Sustainability	Habitats			
	/ diagram	Map	Appraisal/	Regulation			
	/ table		Strategic	Assessment			
			Environmental				
			Assessment				
Other documents (please name		e Heritage Im	pact Assessment (inc	HIA Addendum) for			
document a part/section	and relevant n)	GBP_044 L	GBP_044 Land East of Newlands Grange				
			Plan 2020-2035 is:	State Capture Control			
Please read	the Guidance note f	or explanations of L	egal Compliance and the	Tests of Soundness			
Legally Cor	mpliant?	Yes 🗆	No 🗆				
Sound?	all the Dubite	Yes 🗆	No 🗹				
Complies w Cooperate	vith the Duty to	Yes 🗆	No □				
Please tick as	s appropriate						
i icase tick at	s appropriate						
5. If you co	nsider the Local Pla	an is unsound is it	because it is not:	NORTH THE STATE OF			
Please read	the Guidance note for	or explanations of th	ne Tests of Soundness				
Positively F		☑.					
Justified?		N					
Effective?							
Consistent	with National Police	y? 🗆					
0 01							
or fails to co	omply with the duty	to cooperate. Ple	ocal Plan is <u>not legally c</u> ase be as precise as po	compliant or is unsound ossible.			
If you wish	to support the lega	I compliance or so	undness of the Local P	lan, please also use this			
	ate document.						
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			Please continue on	a separate sheet if necessa			

comprehate incap	ease set out what modification(s) you consoliant or sound, having regard to the matteres to soundness (NB please note that any pable of modification at examination). You local Plan legally compliant or sound. It will ested revised wording of any policy or text	r you ha non-cor will nee I be hel	ave identified at 6. above where this impliance with the duty to cooperate is d to say why this modification will make opful if you are able to put forward your
See :	separate document.		
			Please continue on a separate sheet if necessary
	porting information necessary to support / j ification, as there will not normally be a su		
Afteron n	esentations based on the original represent r this stage, further submissions will be natters and issues he/she identifies for your representation is seeking a modificati	etation a e only a examin	t the publication stage. t the request of the Inspector, based eation. you consider it necessary to participate all
Afteron n	esentations based on the original represent r this stage, further submissions will be natters and issues he/she identifies for	etation a e only a examin	t the publication stage. t the request of the Inspector, based ation. you consider it necessary to participate at
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Thank you for taking the time to complete and return this response form. Please keep a copy for future reference.

BIRMINGHAM
BRISTOL
CAMBRIDGE
CARDIFF
EBBSFLEET
EDINBURGH
GLASGOW
LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOUTHAMPTON



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

By Email: planningpolicy@sthelens.gov.uk

27131/A3/VR 13 March 2019

Dear Sir/Madam,

ST HELENS BOROUGH LOCAL PLAN 2020-2035 - SUBMISSION DRAFT CONSULTATION REPRESENTATIONS BY JONES HOMES (NORTH WEST) LIMITED

On behalf of our Client, Jones Homes (North West) Limited, we write to set out our representations to the above consultation.

These representations are intended to assist St Helens Council ("the Council") in finalising its Local Plan and evidence base in advance of submission to the Secretary of State, to ultimately ensure that the Local Plan is sound, in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF). We trust that these representations are of assistance to the Council.

Introduction

Jones Homes is one of the UK's leading housebuilders, creating high quality homes in desirable locations since 1959. Currently building more than 600 homes a year in the UK, Jones Homes offers an impressive portfolio of apartments, mews and townhouse residences, as well as spacious detached homes.

Jones Homes, which is part of The Emerson Group, boasts a strong record of delivering successful developments in St Helens. Recent housing schemes that have been delivered, or are in the process of being delivered, include:

- Newlands Grange 153 units
- Eccleston Grange 283 units
- Former Caremlite Monastery 12 units

Orbit Developments, also part of the Emerson Group, has completed a local centre at Eccleston Grange and Linkway West, a 67,602 sq.ft leisure and retail development in the centre of St Helens. These developments represent a £12.5 million investment across the local area.





representations. Such an easement is a commonly applied design mitigation when developing adjacent to a railway line. We can also confirm that our Client has delivered a number of successful developments adjacent to railway lines, including the West Coast Mainline, and is therefore well-versed in providing the necessary mitigation. We can therefore conclude that our Client's assessment of the potential yield of the Site, and the Illustrative Masterplan, already takes account of the necessary attenuation measures required to mitigate noise from the West Coast Mainline.



Development Potential - conclusions

On the basis of the above conclusions, and those set out within the enclosed documents, including the Development Framework and Highways Appraisal, we do not consider there to be a sound evidential basis for the Council's conclusions set out in Table 5.4 of the Green Belt Review. There are no constraints to the Site's development that call into question its developability. On this basis, the Site's Stage 2B score should be categorised as 'good', thereby scoring 3 out of 3 under the Stage 3A ranking.



Table 5.4 of the Green Belt Review concludes that the Site has strong defensible boundaries and is in a sustainable location. The enclosed Development Framework provides further evidence of the Site's sustainable location and its links to 2 x nearby railway stations, pedestrian linkages, shops and services and sources of employment. On this basis and having addressed the Council's conclusions in relation to developability, the Site should in fact score 6 out of 6 in the overall Green Belt Review assessment, placing it in Tier 1 in the tier ranking of overall scores. Whilst a score of 6 does not automatically mean that the Site should be allocated for housing, to do so would be consistent with the Council's approach to selecting site allocations set out within the Green Belt Review.



Development Area

As highlighted above, the Council has reduced the overall Site area of Land East of Newlands Grange from 15.56 hectares to 9.76 hectares, between the Preferred Options and SDLP documents. This follows as assessment of the potential impact of the development of the Site upon the Vulcan Village Conservation Area, to the west of the Site.



Table 5.4 of the Green Belt Review states that in response to the Preferred Options consultation, Historic England ("HE") expressed concerns about the impact that the development of the Site would have on the setting of the Conservation Area. As a result, the Council undertook a Heritage Impact Assessment ("HIA"), which concluded that the extent of any development would need to be limited to mitigate the impact upon the Conservation Area. This in turn resulted in a reduction in the Site area, which the Council considers to be justified in light of 'the need to address the issues raised by HE'. Having undertaken a review of HE's representations to the Preferred Options consultation (enclosed), we can confirm that the entire basis for the Council's review of this matter is completely false. The HE's representations make no reference whatsoever to our Client's Site. The Council's evidence base is therefore flawed in this respect and it can only be concluded that HE is in fact satisfied that the development of the full Site would not harm the setting of the Conservation Area.



Notwithstanding the above, there is a need to address the Council's HIA, which we note is not included within the Council's evidence base subject of this consultation.

The HIA is in two parts, consisting of the HIA and HIA Addendum. The outcome of the HIA process, is to remove an arbitrary section of the Site, broadly parallel to the Conservation Area. We consider the process for concluding that this is the most appropriate way to address the presence of the Conservation Area, is flawed. At no point within the HIA, or HIA Addendum, does the Council consider whether an alternative approach to the Site's delivery could result in the preservation and enhancement of the Conservation Area's setting, relying on development management policies and a well-conceived design.



Vulcan Village exists because it was constructed to house the workers and families of the adjacent former Vulcan Works. It was not constructed in this location due to its rural setting, or desire for "quietness", as inferred in the HIA. If the Vulcan Works had not been constructed, neither would the Village. We also question whether it would have been a quiet existence for its past residents,



given the proximity to the heavily industrialised foundry. With the Vulcan Works now gone, a main component of the Village's historical significance and setting has been lost. Furthermore, the replacement of the Vulcan Works with a modern housing development of circa 630 dwellings, wrapped tightly around the northern perimeter of the Village, has completely altered its setting to the extent that it is now part of suburban Newton-le-Willows. To therefore seek to avoid the development of a significant portion of our Client's Site on the basis of an alleged need to retain openness around the Village, is at odds with its established setting.

Notwithstanding this, the Village has a strongly landscaped eastern boundary, meaning that if our Client's Site were to be developed, it would maintain an internal sense of isolation in the Conservation Area – aside from the northern part of the Village, which is now consumed by modern housing. It is only on 'plan' view that there could potentially be any sense of encroachment.

The enclosed Development Framework includes at Figure 9 (Page 15) an Illustrative Masterplan. The Illustrative Masterplan was prepared having regard to the setting of the Vulcan Village Conservation Area. Alongside the strong visual boundary and containment already provided by the landscape, the Illustrative Masterplan shows a further heavily planted boundary, recreational route and public open space adjacent to the Conservation Area. The HIA makes no reference to the Development Framework or Illustrative Masterplan in order to assess the potential impact of future residential development at the Site. The HIA only considers a "no development" scenario, which in our opinion is overly simplistic and lacks vision and creativity. Allowing development closer to the Conservation Area, if designed appropriately, could better reveal, complement and enhance the character and appearance of the Conservation Area; however, such a scenario has not been tested in the Council's evidence base, which is a major flaw.

Enclosed with this letter of representation is a revised Concept Masterplan (Plan Ref: BW01 Rev V3). This version of the Concept Masterplan proposes a larger area of open space between the Conservation Area and housing development, demonstrating a further option for the Site's delivery. This version of the Concept Masterplan would yield approximately 260 dwellings, based on a density of 30 dwellings per hectare. The revised Concept Masterplan demonstrates that development is achievable throughout the full extent of the 15.56 hectare Site, without harm to the setting of the Conservation Area.

In conclusion on this matter, contrary to the Council's evidence base, and the Green Belt Review, HE has no objection to the extent of the Site as identified in the Preferred Options consultation document, and as promoted by our Client in the submitted Development Framework and enclosed revised Masterplan. The HIA fails to consider a range of potential approaches to addressing the impact of future development upon the setting of the Conservation Area, and only considers a 'no-development' scenario. Such a lack of option testing in our opinion is evidence of a lack of a thorough understanding of the Conservation Area's significance. A considered masterplan for the Site's development, as presented by our Client, clearly has the potential to make a more efficient use of land in a sustainable location, whilst at the same time protecting and enhancing the character and appearance of the Conservation Area. We therefore submit that the full extent of the Site that has been promoted by our Client should be reinstated, on the basis that the evidence base behind the Council's decision to physically curtail the Site is inadequate and the associated conclusions are not justified.

Exclusion of Council-owned Land

The exclusion of part of the Site from the Safeguarded Land allocation, as advocated in the HIA and as proposed in Table 5.4 of the Green Belt Review, includes the southern most part of the Site that is within the ownership of the Council. The exclusion of the Council's land is partly justified by the Council on the grounds of Conservation Area impact. We set out above why we believe that reasoning is flawed. In addition to this, Table 5.4 also states that the recreational ground 'would be unlikely to be developable in any event'. This conclusion is not justified within the Council's evidence base and there is no assessment provided as why it would not be 'developable'.

The fact that the recreational ground is within the ownership of the Council is not in itself a reason to conclude that it cannot be developed. In our Client's opinion, the recreational ground is under-

HRHMAN

TOWN PLANNING & URBAN DESIGN ARCHITECTURE LANDSCAPE PLANNING & DESIGN ENVIRONMENTAL PLANNING HERITAGE GRAPHIC COMMUNICATION PUBLIC ENGAGEMENT DEVELOPMENT ECONOMICS



St Helens Local Plan: Preferred Options

Representations on Behalf of Jones Homes (North West) Ltd

January 2017



Historic England representations to the Preferred Options Local Plan



Our ref:

PL00014549

PI 00052323

Development Plans Section Chief Executive's Department Town Hall Annexe Victoria Square St. Helens Merseyside WA10 1HP

20th January 2017

Dear

- 1. St. Helens Local Plan 2018-2033 Preferred Options: December 2016
- 2. Sustainability Appraisal Interim SA Report: December 2016
- 3. Draft Green Belt Review 2016

St. Helens Metropolitan Borough Council

Thank you for inviting Historic England to comment on the above suite of planning documents currently being consulted upon by St Helens Council. We are pleased to do so. We are also grateful for confirmation from your that we may make representations by letter. Our response should be read in conjunction with our letter of 1 March 2016 in which we provided generic advice on the Scoping Document preceding the Preferred Options Local Plan.

Overview

Following the publication of the National Planning Policy Framework (NPPF) in March 2012, the government's position on Local Plan-making and the historic environment is made clear. The NPPF requires Local Plans to enable the delivery of sustainable development, one of the core dimensions of which is the protection and enhancement of the historic environment (paragraph 7).

In order to satisfy the NPPF, development plans are required, in summary, to –

1. identify the historic environment as a strategic priority (paragraph 156),





- 2. contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment (paragraph 126),
- 3. contain a policy or policies for the conservation, enhancement and enjoyment of the historic environment that is/are clearly identified as strategic (paragraph 156)
- 4. demonstrate that they have been informed by a proper assessment of the significance of the heritage assets in the area, including their settings, and of the potential for finding new sites of archaeological or historic interest (paragraph 163), and there has been a proper assessment to identify land where development would be inappropriate because of its historic significance (paragraphs 129 and 157).

Where a Plan fails to address these matters it may be considered unsound. Historic England is of the opinion that in a number of fundamental respects the current draft Local Plan fails to satisfy these NPPF policies, is unsustainable, and therefore unsound.

1. The historic environment as a strategic priority

Paragraph 156 of the NPPF requires local authorities to set out in the Local Plan their strategic priorities for the area. There is an expectation that included within them should be the conservation and enhancement of the historic environment, including landscape.

In Chapter 2: *St. Helens Borough Profile* we are informed that the Borough's history is 'inextricably linked with the industrial revolution, coal mining and a world famous glass industry'. Rather than propose that this historic legacy be celebrated and acknowledged as a force for constructive conservation, however, we are told disappointingly that the decline of these industries has only led to those issues and problems thought to lie at the heart of the challenges currently facing the Borough.

The profile of the Borough in this section of the Local Plan inadequately describes the current state of the environment and remains completely silent with regard to the extent or condition of the historic environment of the area.

Chapter 3: *St. Helens in 2033*, paragraph 3.2 – the Vision for the Borough seeks an 'accessible built and natural environment' and a place where 'historic assets are recognised, well used and valued'. Whilst such intentions are welcomed, the Strategic Aims and Objectives which flow from that Vision make reference only to protecting and enhancing 'local character and distinctiveness', with no clear or specific commitment to conserving the historic environment and its heritage assets. The Strategic Aims and Objectives could be improved upon by incorporating the wording of Sustainability Appraisal (SA) Objective 8 '*To protect, enhance and make accessible for enjoyment the cultural heritage and historic environment*'.

Although Chapter 7: Environment and Resources contains a specific policy on the historic environment, and whilst there is occasional reference to heritage conservation elsewhere in the document, the Local Plan conveys no real sense that it is regarded by the Council as a strategic priority for the purposes of satisfying Paragraph 156 of the NPPF. In this respect the Local Plan is unsound.

2. Strategic policies for the conservation of the historic environment





Local Plans should include strategic policies to conserve and enhance the historic environment of the area (NPPF paragraph 156) and to guide how the presumption in favour of sustainable development should be applied locally (NPPF paragraph 15). Such policies need to be clearly identified as strategic otherwise they will risk being overridden by Neighbourhood Plan policies which are only required to be in general conformity with the strategic policies of the Local Plan (NPPF paragraphs 12 and 185). If the policies delivering heritage conservation may be overridden then the Plan cannot be confidently predicted to deliver development needs sustainably throughout the Plan period.

As set out, the Local Plan's strategic policies are contained within Chapter 4: *Strategic Policies*. Policy LP11: *Historic Environment* is not one of them.

The Local Plan does not include a policy for the conservation, enhancement and enjoyment of the historic environment which is clearly identified as 'strategic' for the purposes of NPPF paragraph 156. In this respect the Local Plan is unsound.

3. A positive strategy for conservation of the Historic Environment

In order to be compliant with the NPPF, the Local Plan should include a clear and positive strategy for the conservation and enjoyment of the historic environment in the area, including heritage assets most at risk through neglect, decay or other threats (NPPF paragraph 126). It may be derived from an understanding of the issues set out in the evidence base and response to those matters. The strategy should also seek positive improvements in the quality of the historic environment in the pursuit of sustainable development (NPPF paragraph 9).

Policy LPC11: *Historic Environment* contains a number of welcome commitments which can reasonably be regarded as positive in their intent. Preparing conservation area plans, preparing a list of locally important heritage assets, seeking enhanced access, education and interpretation, and tackling heritage at risk with landowners and Historic England are identified as such.

Apart from reference to a community project at Stanley Bank, however, there is nothing in the Local Plan as regards heritage conservation which is specific to the area; nothing that can clearly be seen to be derived from any evidence of the extent or state of the Borough's historic environment. Furthermore, the Local Plan remains silent with regard to how the historic environment can assist in the delivery of the Vision and other policy objectives seeking to secure the economic and social wellbeing of the community, despite numerous opportunities in it for such cross-cutting actions, some of which are identified in the Sustainability Appraisal: Interim Report at paragraph 7.10.23.

Historic England is not satisfied that, taking the Draft Local Plan as a whole, it can be regarded as amounting to a positive strategy for the conservation, enhancement and enjoyment of the historic environment consistent with the NPPF (paragraph 126).

Where opportunities exist for the historic environment to positively assist with the delivery of other Local Plan policies (thereby helping to further develop the positive strategy for it required of the NPPF) we have identified them under 'Additional comments and observations on the Local Plan' below.

4. Gathering evidence





To be found sound the Local Plan should be based on adequate up-to-date evidence about the historic environment, used to assess the significance of heritage assets (both designated and non-designated) and the contribution they make to the local area (NPPF Paragraphs 158 and 169). It should also entail where appropriate an assessment of historic landscape character.

This requirement is especially relevant as regards areas of significant planning intervention and site allocations where it is important to inform decision-making by undertaking:

- (i) an assessment of the significance of those heritage assets on, or in the vicinity of, the sites concerned
- (ii) an assessment of the extent to which the significance of any assets might be harmed or lost as a consequence of development (or better revealed)
- (iii) an assessment of the extent to which any public benefits might, or might not, outweigh that harm or loss.

Local planning authorities are required by NPPF paragraph 129 to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including any significance derived from its setting). This involves more than identifying known heritage assets on, or within, a given distance of the site in question, but rather a more holistic process which seeks to understand their significance and value to the community. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk while, conversely, an allocation some distance from a heritage asset may cause harm to its significance, thereby reducing its suitability in sustainable development terms.

Furthermore, there needs to be an assessment of the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future (NPPF paragraph 169), and it is also necessary for the authority to identify any heritage assets outside of their administrative area where setting impacts may be caused by potential development proposals.

Historic England's approach to dealing with this requirement of the NPPF is set out in our Advice Note No.3: *Site Allocations* (HEAN3) and is available on our website. It contains a step by step guide to site selection in order to safeguard and enhance the historic environment.

In our response of 1 March 2016 we drew attention to the need for the Council, before proposing key interventions and/or site allocations, to undertake some evaluation of the impact which development might have upon any elements (including their setting) that contribute to the significance of those heritage assets thought to be affected. However, from an examination of the document library supporting the Local Plan it is not evident that the Council has followed the process, outlined in HEAN3, of establishing wherein lies the significance of the heritage assets identified as being within scope, understanding what contribution the site makes, if any, to the significance of those assets, what impact the proposals might have on that significance, and what actions might be needed to avoid/mitigate harm to, or better reveal, those assets.





Without demonstrating that this process has been followed, and without this understanding of the historic environment of the area and an assessment of the extent to which the significance or value of its heritage assets may be harmed or lost (or improved) by the plan's proposals, the local authority cannot demonstrate that the objectively assessed development needs of the area will be met in accordance with the presumption in favour of sustainable development (NPPF paragraph 14). There would consequently remain a danger that the local distinctiveness and character of the area may be lost.

On the basis of the evidence supporting the Local Plan, Historic England concludes that assessments of the impacts of its site allocations upon the area's heritage assets lack the logic and consistency necessary to demonstrate that they would be sustainable and therefore NPPF-compliant.

Besides a failure to comply with NPPF policy and follow Historic England guidance, the site assessments focus unduly on a proximity principle (Sustainability Appraisal: Interim Report: Appendix II: *The Site Appraisal Framework* – SA Objective 8 refers). Topic Paper 8 of the same report unhelpfully conflates consideration of the built and natural environments, thereby giving rise in a number of cases to positive effects in respect of the natural environment 'neutralising' negative effects on the built (historic) environment. Indeed, Chapter 07 of the Sustainability Appraisal: *Appraisal of the Draft Plan*, dealing with the various policy areas in the Local Plan, makes no reference whatsoever in many instances to the historic environment under the heading of the 'built and natural environment' yet concludes that effects on it would be 'negligible'.

The Technical Appraisal containing Site Assessments identifies numerous sites on which, or near to which, there exists heritage assets. The findings, however, are confusing, and in some cases inaccurate. For example:

GBS_006 – listed buildings lie close to the site. Effects are considered likely, but we are given no information as to wherein lies the significance of those assets, how that significance might be harmed or enhanced by development of the site, or what mitigation if any might be necessary, nor is there any summary findings outlining why any harm would be outweighed by public benefits which cannot be met in any other way.

GBS 023, GBS 112, GBS 145, GBS 058/059, GBS 089, - as above.

GBS_028 and GBS_028.1 – both sites contain listed buildings, and 'effects' are considered likely but could, it is argued, be mitigated. Given the proposed use to which these sites could be put it is perhaps possible that demolition would be required, but nowhere in the assessment is this taken into account or articulated.

GBS_033 – this site adjoins a conservation area and is close to a Scheduled Ancient Monument. Effects are thought to be potentially negative. GBS_034 lies even closer to the monument and contains part of the same conservation area, yet here effects are not thought to be significant. The logic of this assessment is not explained in terms recognisable in respect of the approach advocated by government in the NPPF and Historic England as set out in HEAN3.





GBS_071 – because the Scheduled Ancient Monument lies more than 50m from the site effects are thought unlikely. There is no assessment of the extent if any to which this monument relies upon the housing site for its significance and no explanation as to why the distance of 50m is relevant to that significance.

GBS_069, GBS_077, GBS_080 and GBS_129 – these sites lie close to conservation areas. Their physical distance to them is considered relevant, which it is to a degree, but the assessments fail to articulate the extent to which these conservation areas rely if at all upon the proposed site allocations for their significance, or how it might be impacted upon.

GBS_136/160 – listed buildings lie close to this site allocation. Their setting is thought likely to be affected, thereby giving rise to negative effects. These effects are not explained in accord with the advice in HEAN3.

GBS_164 – this site contains a listed building. Again, these effects are not explained in accord with the advice in HEAN3.

GBS_104 – a listed building is described as being 183m from the site allocation. Its setting is thought vulnerable to harm, but there is no explanation of the nature of this harm, nor is there any summary findings outlining why any harm would be outweighed by public benefits.

Historic England is not yet satisfied, and the Council has not yet demonstrated, that it has identified and assessed the particular significance of any heritage assets that may be affected by its proposed site allocations and key areas of intervention in accordance with the requirements of paragraphs 158 and 169 of the NPPF and our Advice Note No.3: Site Allocations (HEAN3).

Sustainability Appraisal

As is the case with many sustainability appraisals and site assessment methodologies, design or archaeological investigation at a later date is often cited as the means by which any (often unspecified) harm might be mitigated, or else impacts are adjudged to be unknown or unquantifiable at this stage of the plan and left unassessed, notwithstanding that the proper conservation of that archaeology might prohibit any development or impact upon its attractiveness to developers. This sustainability appraisal is no different.

Although a number of sites examined in the appraisal process are not now to be taken forward, it is nevertheless worth commenting on the approach taken in respect of them. Throughout the appraisal heritage assets are identified as being affected by a number of proposed site allocations, yet we are advised that no mitigation is required or else that effects on setting are 'unlikely'.

In respect of numerous sites (some of which are identified above) we are advised that unspecified mitigation is required to avoid harm to the historic environment. In respect of each no Heritage Impact Assessment appears to have been carried out, and the Sustainability Appraisal omits to articulate wherein lies the significance of the heritage assets identified, what contribution the site makes to the significance of those assets, or what impact the proposals might have on that significance, and consequently what





actions might be needed to avoid harm to or better reveal those assets. As a result the Sustainability Appraisal cannot say whether or not those site allocations are sustainable and compliant with NPPF paragraph 14.

Mitigation, including archaeological evaluation, is often thought of as something to be dealt with at a later stage through, for example, Environmental Impact Assessments associated with planning applications. Mitigation, however, may not always be appropriate or desirable. There may be cases where the principle of development brings with it such harm to, or loss of, the significance of heritage assets that it cannot be mitigated, in which case it should be refused unless development is necessary in order to achieve overriding public benefits. We all acknowledge the value of developer certainty. It would serve no benefit, for example, for a site to be allocated only for archaeology of national significance to subsequently preclude or severely hamper implementation.

If the Sustainability Appraisal is unable to identify what is significant about a heritage asset (and what contribution its setting makes to that significance) it cannot properly assess the extent to which that significance might be harmed or lost as a consequence of a site being allocated for development. The appraisal would therefore fail in its ability to assess whether the development would satisfy SA Objective 8 '*To protect*, *enhance and make accessible for enjoyment the cultural heritage and historic environment*'. If it cannot do this, and uncertainty in this regard remains, the Council would be unable to demonstrate that such harm or loss of heritage significance is necessary to achieve wider public benefits that cannot be met in any other way. This will cast doubts on the site allocation being justified, deliverable and, ultimately, sustainable.

Draft Green Belt Review 2016

The Green Belt Review concludes that Green Belt purpose No.4: *To preserve the setting and special character of historic towns* can be disapplied, on the grounds that the Borough has no nationally recognised historic towns or villages (paragraphs 3.12 and 3.13). The Review recognises, however, that some areas have historic links and qualities (such as listed buildings) and we are advised that these assets will be recorded as part of the assessment of constraints but undertaken separately.

Historic England concurs with the Council's screening assessment, although for the sake of completeness, however, the Council should assess whether or not the Borough's Green Belt performs this function in respect of any historic towns or villages lying in adjoining local authority areas. However, even where it is ultimately considered appropriate/acceptable to remove a parcel of land from the Green Belt the local authority would continue to have a duty to safeguard the historic environment and its heritage assets (formally designated or otherwise) in line with government policy and sectoral advice. This requirement will be of considerable importance in relation to the need to properly assess the potential for development sites to cause harm to or benefit the historic environment across the Borough as a whole.

Additional comments and observations on the Local Plan

Policy LPA01 – Section 3(I) of this policy is not NPPF-compliant as regards heritage protection. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990





confers a general duty in respect of listed buildings. Paragraph (1) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have *special regard* to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Paragraph (2) states that a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings.

In consequence even development causing harm to a designated historic asset which is judged to be 'less than substantial' must still be outweighed by public benefits or run the risk of not being sustainable and therefore contrary to NPPF policy.

Policy LPA02 – Historic England would urge the Council to have regard to viability issues and appropriate thresholds for developer contributions when considering schemes which include for the constructive use of heritage assets. We are anxious to ensure that the historic environment of St. Helens is appropriately safeguarded through the Local Plan, as well as through investment decisions contained within, and encouraged by, the Infrastructure Delivery Plan intended to assist its success, and facilitated in turn by any Section 106 Agreement or Community Infrastructure Levy (CIL) receipts.

Public realm is now generally taken to be the publicly accessible parts of the environment, be it 'physically and/or visually'. In consequence a great many heritage assets 'accessible' to the public could legitimately be regarded as part of the public realm and therefore be the recipient of or focus for special attention in the form of investment through or relief from charging. The range of heritage assets to be found in the public realm includes, for example, art galleries, railway stations, schools, hospitals, churches, canal structures etc.

In going forward, the Council has the opportunity to take a number of pro-active steps to assist the wider protection of the historic environment and avoid unintended harm to it.

These steps might include -

- 1. acknowledging and identifying a broad range of infrastructure types of a historic nature that could benefit from appropriate investment
- 2. positively encouraging development to sites and areas where heritage is known to be 'at risk'
- 3. asserting in any charging schedule that relief may be provided for developments that involve (wholly or in part) the conservation of heritage assets where viability might be threatened by having to meet the full amount of the levy (in much the same way as providing relief to ensure viability in respect of previously developed land)
- 4. asserting in any charging schedule that relief may be provided where, in order to meet the levy, an increased quantum of development is required to maintain





viability which in itself could threaten to harm the significance of historic assets on or otherwise affected by the development of the site.

Historic England believes that in addressing more directly the conservation of the historic environment in this way the Council can do much to add to the appearance, quality and reputation of the Local Plan area with the objective of attracting new residents, employees and visitors through a properly safeguarded and appropriately enhanced historic environment.

Through such an addition to the policy there exists an opportunity to positively assist with safeguarding the historic environment, thereby helping to further develop the positive strategy for it required of the NPPF.

This policy and supporting paragraph 4.4 promotes the protection and enhancement of the natural environment, but remains silent with regard to the historic environment. Paragraph 7 of the NPPF accords the natural and historic environment equal weight and consideration in the planning process. In this respect the policy is not NPPF-compliant.

Policy LPA03(6) – making best use of existing built (historic) fabric is an important means by which waste reduction and lower energy consumption can be achieved. Building repair, adaptation and reuse can reduce the amount of material to be taken to landfill and reduce the energy costs associated with the manufacture of new building materials and their transportation to site.

Policy LPA04(5) – suggests in its wording a welcome focus on the reuse of existing older or vacant buildings, which appears to contrast with paragraph 4.81 which appears to focus on demolition and rebuild.

Policy LPA04(7) narrowly regards historic and cultural assets as only being of value to the tourism industry or in respect of rural enterprise, whereas it is generally acknowledged to be of considerable value to a much broader range of economic sectors.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPA04.1(EA9) – policy and associated commentary in respect of Parkside West makes no reference to the fact that this site (and Parkside East) both contain and lie in close proximity to designated heritage assets, namely a Scheduled Ancient Monument and various grade II listed buildings – this despite the identification of them in the Sustainability Appraisal and its conclusion that effects upon the historic environment are likely. The NPPF makes clear that substantial harm to, or loss of, a Scheduled Ancient Monument should be 'wholly exceptional' and such harm or loss to grade II listed buildings should be 'exceptional'. Whilst the Council might be able to demonstrate that the public benefits of developing the site are sufficient to outweigh any harm to the historic environment, it is still necessary for the harm to be justified in relation to NPPF policy and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.





Policy LPA05 – it should be acknowledged that some older (terraced) housing in the Borough could be adjudged to be of historic value, and as a consequence there would be a need to safeguard any significance it possesses and to weigh the public benefits of any proposed interventions against any loss of significance.

An opportunity exists for this policy to positively assist with safeguarding the historic environment, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPA05.1 – not only is it necessary for these strategic sites to comply with heritage policy, it is necessary for their inclusion in the Local Plan to demonstrate that where there would be adverse effects upon the historic environment their development is necessary to achieve public benefits which cannot be met in any other way. A failure to do so would render those sites unsustainable as far as NPPF policy is concerned. Site HA8: *Land at Eccleston Park Golf Club* and accompanying commentary, for example, makes no reference to the nearby listed building despite the fact that the Sustainability Appraisal recommends screening in mitigation.

Policy LPA08 – see comments above in respect of developer contributions.

Policy LPA09 – it should be acknowledged that some green infrastructure is of heritage value in its own right. Conservation areas and historic parks & gardens are such examples, along with cemeteries, canals etc. Their conservation should be an integral part of enhancing the green infrastructure of the Borough.

An opportunity exists for this policy to positively assist with safeguarding the historic environment, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPA10 – see comments in respect of Policy LPA04.1.

Policy LPB02 – Historic England welcomes the intention to produce an Area Action Plan or Town Centre Masterplan to, amongst other things, maintain and enhance the town's built heritage.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPC03 – whilst Historic England is satisfied that the sites currently identified for Gypsies, Travellers and Travelling Showpeople would not impact materially upon any heritage assets, the policy should contain a criterion safeguarding the historic environment from unjustified harm in order to guide any future sites which may come forward during the plan period.

Policy LPC05 – this policy should recognise that many forms of open space are possessed of historic interest. Cemeteries, and parks and gardens, for example, may be registered as





Historic Parks & Gardens; some might contain listed buildings; some might be important to conservation areas and the setting of other heritage assets.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF. The policy could give additional definition and protection to historic and archaeological resources and assets in the same way that Policy LPC07 seeks to do.

Policy LPC07 – see above.

Policy LPC09 – the commentary accompanying this policy makes welcome reference to the European Landscape *Convention*, but in doing so fails to recognise that its definition of landscape protection is to 'conserve and maintain the significance or characteristic features of a landscape, justified by its heritage value derived from its natural configuration and/or from human activity'. Additionally, St. Helens is covered by the Merseyside Historic Landscape Characterisation project but neither the policy nor its accompanying text make any reference to it.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPC10 – this policy and associated commentary fail to recognise that many trees and areas of woodland are of heritage conservation value in their own right. Some may be crucial to the character and appearance of conservation areas and other heritage assets such as Historic Parks & Gardens; some may benefit the setting of listed buildings; some may lie along historic rights of way.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPC11 – point (2) should seek to 'safeguard' the significance and distinct quality of the built and historic environment.

Point (3) proposals should be refused where they would result in unjustified harm to the significance of heritage assets, that is, where public benefits which cannot be met in any other way are insufficient to outweigh the harm.

Point (4) should seek the preparation and updating of Conservation Area Character Appraisals *and* Management Plans.

Point (7) is equally applicable to proposed site allocations in the Local Plan.

Point (9) – the NPPF makes clear that even 'less than substantial' harm to either designated or non-designated heritage assets will be unsustainable if it is not outweighed by public benefits. This clause is not NPPF-compliant and therefore unsound.





Historic England welcomes the intention to work with landowners etc to tackle heritage at risk. The identification of grade II listed buildings at risk would be of considerable assistance in this regard and would constitute a further strand to a positive strategy for the historic environment.

Policy LPC12 – new development in inappropriate places may alter the hydrology of other areas, thereby potentially giving rise to concomitant threats to buried archaeology.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.

Policy LPC13 – the NPPF makes clear that even 'less than substantial' harm to either designated or non-designated heritage assets will be unsustainable if it is not outweighed by public benefits. Clause (1)(c) is not NPPF-compliant and therefore unsound.

Clause (5) should reference the Merseyside Historic Landscape Characterisation project.

Policies LPD01 and LPD02 – whilst these policies require development to be 'sympathetic' to surrounding land uses and 'respectful' of existing buildings, they convey no clear requirement for development to be respectful of the status and significance of heritage assets and the context in which they are found. Nor do these policies require development to actively consider how it will enhance or better reveal their significance (NPPF policy 137).

Policies LPD04 and LPD05 – see above.

Policy LPD07 – the use of the word 'normally' is unnecessary. It provides no additional control over such development, nor does it clarify the circumstances in which the policy will be overridden.

Criterion (iv) - see above. In order to be NPPF-compliant, apparatus is required to avoid harm to the significance of any and all heritage assets (not just conservation areas and the setting of listed buildings) unless public benefits outweigh that harm.

Policy LPD11 – the historic environment has the potential to improve the health and wellbeing of the residents of St. Helens. Conservation of its cherished heritage assets can be a focus for community cohesion and action: historic parks and gardens, and even cemeteries, for example, can provide spiritual uplift in the form of both physical activity and quiet contemplation.

An opportunity exists for the historic environment to positively assist with the delivery of this policy, and vice versa, thereby helping to further develop the positive strategy for it required of the NPPF.

We trust these representations and comments are of assistance to you. Should you wish to discuss any of the matters raised I or one of my colleagues will be happy to.





Yours sincerely,



Karl Creaser Historic Places Team Principal Historic England





PO3887



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

Ref: LPSD

1 2 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

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.

Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: MRS	Title: NORTHERN TRUST LAND EXEC
	First name: STEPHEN
Last Name: RATCLIFFE	Last Name: GLENN
Organisation/company:	Organisation/company:
LAND OWNER	NORTHERN TRUST
	Address: LYNTON HOUSE
RAINFORD	ACKHURST PARK, CHORLEY
	LANCS
	Postcode: PRT 1NY
Signature:	Date: 11 March 2019
Please be aware that anonymous forms cannot considered you MUST include your details above	be accepted and that in order for your comments to be ve.
Would you like to be kept updated of future so (namely submission of the Plan for examination adoption of the Plan)	stages of the St Helens Borough Local Plan 2020-2035? I, publication of the Inspector's recommendations and
Yes (via email)	□ No
Please note - email is the Council's preferred rew will contact you by your postal address.	nethod of communication. If no email address is provided,

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

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

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

Email: 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

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 Pla	an does this repre	sentation relate?				
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment	~		
Other documents (please name document and relevant part/section)			SITE AT REAR OF SZY FLEET LAME, PARR ST. HELENS WAY INS				
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Item 6

When the local plan was proposed for consultation in December 2016 the piece of land that I own with my family was proposed as a LWS90.

My husband went into the planning office in early January 2017 to object to taking the land for a wildlife site. A meeting was arranged between my husband and my cousin with your council representative has been designated since 2003 as a wildlife site.

In discussions he stated that St Helens Council might consider taking it out if we could find 22 acres that could be designated as a wildlife site. He also stated that St Helens Council would take a dim view if we did any work on the site and told us we would have to get our own surveys done. Considering we are the legal owners of the land and we have letters from the council regarding the land, but there was never any mention or more importantly formal notice from SHMBC confirming designation of my property as a wildlife site.

At no time in 2003 or any time after that have the council or their agents, either formally or informally, informed the owners about the wildlife designation or asked permission to go on the site and undertake surveys of any kind. I would raise serious questions as to whether or not any surveys have ever been undertaken on behalf of SHMBC and furthermore whether or not a management plan has ever been prepared or implemented. It should be noted that at no time during the last 15 years has permission to enter the land been requested by anyone purporting to act on behalf of SHMBC.

Since the end of January 2017 our agents have been putting proposals to St Helens Council and have carried out all the necessary surveys. These are totally different to what St Helens Council has proposed.

My information from the consultants has been forwarded under separate cover with their information and results. The only time we have received any co-operation from St Helens Council is in the last couple of weeks from

I honestly think the way our objection has been dealt with by St Helens Council has been unfair. Even up to the end of February the details of the wildlife site we are objecting to has not been on the website. Surely this should have been on the website at the beginning of the consultation.

In conclusion I am of the opinion that over the last two years our consultants and I have put a lot of time, effort and money into trying to resolve this issue. The costs to date are approx. St Helens Council have totally ignored our findings and based their results on one A4 sheet of paper that says a survey was carried out in 2003. There has been no monitoring or up to date information obtained. St Helens Council has still gone forward in their 2019 proposals designating the site as a wild life site.

This has caused problems as certain members of the Council will not speak to me about it. They are taking St Helens Council version to be correct.

It currently feels as if St Helens Council are trying to acquire the land by stealth, possibly for the purposes of extending the adjacent Bold Forest designation at no cost to them.

Item 7

If item 6 is accepted surely it would be prudent to consider taking the land out of green belt because it is not contributing or fulfilling any of the basic greenbelt objectives or tests.

Such a move would enable the footpath to be completed to the Bold Forest , provide opportunities to create and enhance nature conservation and in addition it would stop the very real problem of local people using the land as a rubbish dump and as area for other anti-social uses.

Item 9

As of yet St Helens Council have not given us satisfactory proof that the area should be designated as a wildlife site. Their information is at least 16 years old, out of date, and they are ignoring current professional ecological surveys prepared over the last 2 years.

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Sinc 8HS

EF0029



St Helens Borough Local Plan 2020-2035 (Submission Draft) - Representation by

Pamela Milligan Pamela Milligan

to:

planningpolicy@sthelens.gov.uk

11/03/2019 21:20

Hide Details

From: Pamela Milligan

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 Attachment



lpsd-representation-formpm110319.doc

Dear Sir/Madam

Please find attached my completed representation form in respect of the above.

My details:

Pamela Milligan 132 Bleak Hill Road Windle St Helens

I would be obliged if an acknowledgement of receipt could be provided.

Yours faithfully

Pam Milligan

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

Ref: LPSD

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This form has two parts:

Part A - Personal Details

Part B - Your Representation(s).

PART A - YOUR DETAILS

1. Your Details	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title: N/A
First Name: Pamela	First name:
Last Name: Milligan	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 132 Bleak Hill Road Windle St Helens	Address:
Postcode: WA10 6DN	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:
Signature:	Date: 11.03.19
omments to be considered you MUST in Would you like to be kept updated or	f future stages of the St Helens Borough Local of the Plan for examination, publication of the
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Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to:

Local Plan

St.Helens Council

Town Hall

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

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01744 676190

NEXT STEPS

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

PART B - YOUR REPRESENTATION

Paragraph

/ diagram

Consistent with National Policy?

Policy

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.

Sustainability

Appraisal/

Sustainability

Appraisal:

Habitats

Regulation

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

Map

Policies

8HS

LPA05	/ table	- V 9-	Environmental Assessment	Jan 2019	Assessment
Other documents (please name document and relevant part/section)		Green Belt R	nning Policy Framev Review (2018) e Delivery Plan	vork (2019)	
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	with the Duty to	6		No x□	ie.
Please tick a	as appropriate				
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	Prepared?	x□			
Justified?		x□		1	
Effoctive?		_\			

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 <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

National Planning Policy Framework, Feb 2019 (NPPF) - Objectively Assessed Need

NPPF requires that the SHLPSD (local plan) must be positively prepared; justified; effective and consistent with national policy.

I believe that the local plan outlines excessively high aspirational growth rates for housing need which is driven by over optimistic employment forecasts. This is not supported by our documented historical growth trends and these are not appropriately acknowledged, nor is there suitable adjustment for the declining working age population. The local plan growth projection assumes a net inward migration yet the area has a higher than average unemployment level which deserves priority for redress. Realisation of these questionable projections is also heavily dependent upon the performance of the Liverpool super-port and data is should be tempered by the adverse, strident nature of automation in the warehousing and logistics sector.

The plan relies heavily upon a web of circular arguments and aggressive economic growth projections which are not robust or transparent enough to justify the aspirational housing targets. Growth scenarios are presented but can be challenged as to whether they are positively prepared, justified and effective because of the selected and mixed methodologies. Statistics used to forecast growth are taken from the LCR SHELMA, published in 2006. I believe that these factors show the plan to be unsound.

The council have deviated from the standard methodology to inform their local plan's housing need assessment. Housing projections are thus subject to question. There is much ongoing debate about the use of MHCLG 2014 housing figures rather than the use of 2016 ONS figures. This debate continues and our district should not be saddled with an outdated and uplifted projection together with detrimental, yet avoidable consequences, whilst the argument progresses. SHBC have opted to use 2014 data and in doing so have further uplifted the annual figure to 486, rather than applying the standard 468 defined in the 2014 stats. I believe this shows that the plan is unsound.

Planners could be more prudent by selecting 2016 OAN of 383 which would reflect more realistic demographic and economic projections for St Helens. Interestingly a relatively recent press release from the National Audit Office gives voice to widespread concern against the decision to use 2014 data/methodology.

"...flawed methods for assessing the number of houses required, to the failure to ensure developers contribute fairly for infrastructure, it is clear that the planning system is not working well. The government needs to take this much more seriously and ensure its new planning policies bring about the change that is needed".

Amyas Morse, Head of NAO – 08.02.19.

<u>Green Belt Review 2018 - Unnecessary Reclassification of Green Belt land, defined as</u> 8HS in the local plan, to become Safeguarded land.

I am absolutely opposed to the release of Green Belt land for either industrial or housing development, as identified within this local plan and the Green Belt Review, 2018, primarily because the need for changing the Green Belt boundaries is unequivocally dubious. The local

The requirement for Sustainable Development in the context of NPPF, Green Belt Review, Sustainability Appraisal Report and Infrastructure Delivery Plan continued...

<u>Sustainability Consideration – Traffic, a local perspective, (NPPF, Sustainability Appraisal Report and Infrastructure Delivery Plan) continued...</u>

Private vehicle ownership across the borough will grow significantly due to the increased housing development and additionally neighbouring authorities, pursuing the same growth strategies will contribute to traffic volume. Numbers of HGVs and lighter delivery vans will grow commensurate with Liverpool Super port output and the associated logistics and warehousing activity along the A580 (Liverpool to Florida Farm, Haydock M6 junction and beyond).

At peak times the traffic congestion on roads serving our schools is dangerous and would be made more so. Pedestrian safety, especially for children and elderly, is at stake. Traffic management to prevent parking on pavements and on junctions is absent. The emergence of 'rat runs' has, as predicted by resident groups, come to fruition. These alternative routes are now well established and the inherent vehicle volume and speed in 20mph safety zones and 30 mph areas is not controlled.

Road surfaces on 'side roads' and country lanes have been eroded as greater numbers of motorists, attempt to evade the 'improvement area'. The legacy of this is costly remedial works, and will require redress. Suffice to say that this is not a prominent feature within the local plan's Infrastructure Delivery Plan. Indeed the Infrastructure Delivery Plan, cannot be regarded as robust nor positively prepared.

Given that public transport in the area is so limited it is interesting to note that many Windle and Eccleston residents who want to visit Liverpool or Manchester, by train, will drive to the Eccleston Park Railway station, because it is a much quicker option than waiting for a bus into St Helens town centre. Car parking at the Eccleston Park and St Helens Central stations are at this time limited. Imagine the impact if just 100 more commuters decided that they would like to travel in this way on a daily basis.

Sustainability - Schools, A Local Perspective

The local Primary and Secondary schools are oversubscribed. New schools will be required and there is nowhere to build them. Expansion of Bleak Hill Primary School has recently been agreed to accommodate children, to a great extent, from the 'new' Eccleston Grange Estate. The school is at capacity now. It will be at capacity when extended.

Sustainability Conclusion:

Development on 8HS will be unsustainable because there is already inadequate infrastructure (in all of its guises) and this will incur negative impact on the health, well-being and safety of the community.

For all of these reasons I consider the plan to be unsound.

Representation Overall Conclusion:

8HS should be removed from the 'safeguarding for development' category and maintained as Green Belt for all the reasons outlined above.

Cont.

Retain all Green Belt areas for the future well-being of St Helens communities.

The Brownfield First and Contaminated Land Policies should be strengthened and prioritised so that previously used sites can be redeveloped for the good of the community. We have excellent examples of how this has been done and should continue.

The Council should take steps to rebuff approaches by prospective developers (namely Story Homes in the case of 8HS) since their proposals are contrary to the well -being of the existing communities.

I agree with the representations made by ECRA and SHGBA.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consi doneder 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.

Change 8HS from Safeguarded land and maintain its Green Belt status so that the local plan will no longer be open to criticisms of failing to be positively prepared; failing to be justified; failing to be effective and failing to be consistent with national policy (namely NPPF 2019).

Retain and protect all Green Belt areas for the benefit of St Helens people now and in the future.

Remediate and redevelop brownfield sites. Use examples of best practice in the borough and elsewhere in the country to optimise the regeneration that is needed.

Prevent house builders from land banking and curtail the temptation for councillors to look towards council tax revenue from the Green Belt, rather than promoting sustainable developments near to our town and transport hubs.

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 participat	e at
the oral part of the examination? (the hearings in public)	

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

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

Please no who have	marcated trial	tor will determi they wish to p	articipate at	the oral pa	art of the ex	amination	
	Thank you f	or taking the ti Please ke	me to compl ep a copy fo	lete and ret r future refe	urn this res erence.	ponse form	1.
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PO3889

)-Green Belt Review 2018 (3)-LPAOS (5)-IDP Page 1 of 1)-LPAO6, 8HS (4)-GEN (6)-Paga 1.7.2 EF0037



Response to Local Plan 2019 Peter & Frances Murphy planningpolicy 12/03/2019 13:05



1 Attachment



MFM lpsd-representation-form Example 1.doc

Dear Sir/Madam

Please find attached my response, as an Eccleston resident, to the Local Plan 2019.

Yours sincerely

MF Murphy



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

Ref: LPSD

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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	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Mary Frances	First name:
Last Name: Murphy	Last Name:
Organisation/company: Eccleston Resident	Organisation/company:
Address: 56 Millbrook Lane Eccleston St Helens	Address:
Postcode: WA10 4QY	Postcode:
100100001111111111111111111111111111111	Tel No:
	Mobile No:
	Email:
Signature:	Date: 12/03/2019
lease be aware that anonymous forms cannot omments to be considered you MUST include yould you like to be kept updated of future Plan 2020-2035? (namely submission of the F	your details above. e stages of the St Helens Borough Local
Inspector's recommendations and adoption of	
mapector a recommendations and adoption of	

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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.

Policy	LA05	Paragraph / diagram / table	Policies Map	Map Appraisal/ Re Strategic As Environmental Assessment			
	ent and r	ts (please name elevant	Green Belt I	Review (2018)			
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The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision-to include this parcel in the review leads to significant doubt that the Plan has been positively

prepared.		
Recognising that St Helens Council has used the ONS(2014) statistics upon government is disappointing when later, and more accurate, statistics (ON available. The Council are aware of the reduction in housing need but still economically based uplift to the older figures, resulting in unnecessarily high Reducing the identified need to the truer figure will reduce the requirement Belt. The Plan is not justified.	S(2016)) are choose to add an gh housing targets.	le so
The lack of infrastructure and the poor education offer means that St Heler place to live. The Plan does not address these essential areas of need and instead, on house building and low skilled employment. The problem is exallocating Green Belt for housing in areas where there is a lack of suitable type of houses will not meet the housing need. The Plan is not effective.	d concentrates, acerbated by	
Predetermined employment growth is based on unreasonable assumptions evidence base. There is nothing to underpin these aspirational figures. Thi supply of housing. The figures quoted should be replaced by the ONS (20° current data. St Helens Council have stated in public arenas and the local building is needed to provide Council Tax income. The use of old data is to Hence the plan is not positively prepared.	s results in an over 18) which uses more press that house	
St Helens has adequate Brownfield and Contaminated land which could ean need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultu "safeguard" this land for 15 years supports the fact that this Local Plan doe reallocate Green Belt. This Plan is not justified.	ral land, and then to	
The Infrastructure Delivery Plan is weak. In the areas suggested for housing are already schools shortages and major transport problems. In particular, main arterial route from Liverpool to Manchester(A580) and will cause furth well as removing the green lung that currently protects the locality from the this road. The Plan is not effective.	8HS sits beside the ner traffic problems as	
The Plan does not comply with NPPF(2018) as it was written prior to public consider the more accurate and true housing and employment statistics in Duty to cooperate has been weak and neighbouring authorities are also ov plans which cannot be sustainable in this area of the North West.	ONS(2018) figures.	J
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elat nca he L	ease set out what modification(s) you consider pliant or sound, having regard to the matter yes to soundness (NB please note that any note pable of modification at examination). You will accal Plan legally compliant or sound. It will be gested revised wording of any policy or text.	ou have identified at 6. above where this in-compliance with the duty to cooperate is il need to say why this modification will make a helpful if you are able to put forward your
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Thank you for taking the time to complete and return this response form. Please keep a copy for future reference.								
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PO3890

1 - Green Belt Review 2018 3 2 - LPAOG, 8HS 4-

(4)-GEN

6- Para 172

Page 1 of 1



Response to Local Plan 2019 Peter & Frances Murphy to: planningpolicy 12/03/2019 13:09



1 Attachment



PM lpsd-representation-form Example 1.doc

Dear Sir/Madam

As a resident and Council Tax payer of Eccleston, I wish to submit the attached response to the Local Plan 2019.

Yours sincerely

P Murphy



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

Ref:	LPSD	

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Title: Mr	Title:
First Name: Peter	First name:
Last Name: Murphy	Last Name:
Organisation/company: Eccleston Resident	Organisation/company:
Address: 56 Millbrook Lane Eccleston, St Helens	Address:
Postcode: Wa10 4QY	Postcode:
SOURCE CONTRACTOR OF THE SOURCE CONTRACTOR OF	Tel No:
	Mobile No:
	Email:
Signature:	be accepted and that in order for your
omments to be considered you MUST include	
Would you like to be kept updated of future	Plan for examination, publication of the
Inspector's recommendations and adoption of	f the Plan)

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

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Policy	LA05 / diagram / table		Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
	ent and r	ts (please name elevant	Green Belt	Review (2018)		
4. Do yo	ou consi	der the St Heler Guidance note for	ns Borough Local explanations of Le	Plan 2020-2035 is:	Tests of Soundness	
	Complia		Yes □	Nox 🗆	Nox □x	
Sound?		13-20 (1-12-2)	Yes 🗆	No x□	No x□x	
Complies with the Duty to			Yes	Nox [Nox □x	
		no Duty to	103 -	110%		
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box to set out your comments

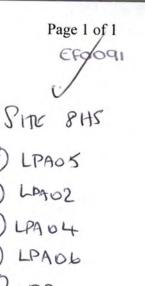
The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively

prepared.	
Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.	3
The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.	9
Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is not positively prepared.	3
St Helens has adequate Brownfield and Contaminated land which could easily meet housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified.	
The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.	(5)
The Plan does not comply with NPPF(2018) as it was written prior to publication. Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also over supplying housing plans which cannot be sustainable in this area of the North West.	10
Please continue on a separate sheet if necessary	

and remove all Green Belt reallocation
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Please continue on a separate sheet if necessar accinctly all the information, evidence and tify the representation and suggested equent opportunity to make further tion at the publication stage.
ramination. i; do you consider it necessary to participate at public)
Yes, I wish to participate at the oral examination
examination, please outline why you consider

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PO3891





{In Archive} LOCAL PLAN roughley pamela planningpolicy 20/02/2019 20:24

1 Attachment



formECRA.doc

Please find attached a completed Representation Form - my apologies if I have now sent this twice - finger-trouble.

P. ROUGHLEY



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

Ref: LPSD

(For official use only)

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

Please ensure the form is returned to us by no later than <u>5pm on Wednesday 13th March</u> <u>2019</u>. Any comments received after this deadline <u>cannot</u> 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	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name: P	First name:
Last Name:ROUGHLEY	Last Name:
Organisation/company:	Organisation/company:
Address: 24 MILLFIELDS ECCLESTON	Address:
Postcode:WA10 5NS	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 20/02/2019 rms cannot be accepted and that in order for your
omments to be considered you MU	
Plan 2020-2035? (namely submis	red of future stages of the St Helens Borough Local sion of the Plan for examination, publication of the
Inspector's recommendations and	adoption of the Flam

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 <u>5pm on Wednesday 13th March</u> <u>2019</u> 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

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Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

Now please complete <u>PART B</u> 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 w	hich part	of the Local P	lan does this repre	esentation relate?		
Policy	ALL OF IT	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other docume part/sec	ent and re	s (please nam elevant	е			
4. Do y	ou consid	der the St Hele	ns Borough Local	Plan 2020-2035 is:		
Please I	read the G	Guidance note fo	r explanations of Le	gal Compliance and the	Tests of Soundness	
Legally	Complia	nt?	Yes	No X (NO)	
Sound?			Yes		No X (NO)□	
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Please r Positive Justified Effective	ead the G ly Prepa d? e?	red?	□ □ X (NO) the pout-of-date in □ □ X (NO) the p	e Tests of Soundness Plan is based on flawe formation Plan is unrealistic and	not deliverable	
Consist	ent with I	National Policy	? │□X (NO) the p	lan does not comply	with NPPF 2018	
f you w	o comply ish to sur	with the duty	to cooperate. Plea	cal Plan is not legally cose be as precise as pos	ssible.	
exception The late meet ho	nal circu st estima using ne	mstances has ate produced b eds in St.heler	been made. y the ONS(2016) p s. The council are	ndard Methodology and predicts that 383 houses e using an older forecas usly Developed Land t	s/yr will be required to	

available or included on the Brownfield Register.

Economic growth predictions are based on flawed historical information and do not justify the targets included in the plan. There are very few employment opportunities in St.Helens, town centre shops are closing at an alarming rate, even market stall in the various markets are sporting as many empty as used stalls.

The St.helens council statement of "Contaminated Land sites" (2015) indicates that 3,170 ha of

the lowest priority contaminated land exists in St.helens.

Two Green Belt sites of 56.6 and 148 ha are being reclassified as safeguarded and included in the plan to fulfil housing need – this is less than 7% of the 3,170 ha available, if it were to be remediated. By cleaning up this 7% two Green Belt sites could be released from the "safeguarded" register, thus saving part of the Green Belt. ***

The St.helens council in conjunction with LCRCA have no policy for bringing unsuitable sites

outside the Brownfield register back into use.

It is NOT reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period and are, thus, not being considered.

THE LOSS OF GRADE 1 AND 2 AGRICULTURAL LAND THAT COMPRISES MOST ALLOCATED AND SAFEGUARDED SITES IS NOT MENTIONED. THIS IS DISGRACEFUL WHEN SUCH LAND IS PLANNED TO BE USED FOR HOUSING WHEN OTHER ALTERNATIVES ARE POSSIBLE – SEE *** ABOVE.

Also the negative impact on farming and distribution jobs in a town with high unemployment

should be considered as a priority.

The borough has long term intractable problems at Windle Island, Bleak Hill, Skew Bridge, M6 to name a few, and the IDP has not outlined how local and borough-wide road improvements are to be made and funded.

Indeed, the plan promotes unsustainable traffic growth causing severe traffic problems

that will not satisfy the NPPF(2016).

The IDP fails to explain the impact on HEALTHCARE, EDUCATION, AIR QUALITY AND POLLUTION.

There is no indication or reference that collaboration with the Hospital Trust, local GPs, Dentists, CCGs or education authorities has taken place to obtain their views on the additional loads they will all have to absorb if this plan goes ahead, or how such additional demands will

be managed and funded.

The new medical centre at Millfields is almost complete but this has been built to service existing local needs, has extremely limited car parking facilities, and has an inadequate bus service for non-driving residents. Bus services in the area will, therefore, be impacted and need to be reviewed as things now stand, and more so with a future possible influx of thousands of new residents

The IDP acknowledges that there is a high proportion of GPs now over 55. Given that the population increase expected from the Plan requires between 10-16 new GPs plus replacements, how does the IDP propose they will be provided and funded?

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

A urgent review of the housing requirements in St.Helens needs to be completed based on reasonable and up-to-date information, giving full consideration to the current infrastructure and to the steps needed to ensure it is adequate to service the additional housing which is being planned. This should also be supported by plans to enhance the infrastructure where required and a Finance Plan to support the enhancements

In addition, a thorough examination of the brownfield and contaminated sites needs to be undertaken, and plans put in place to clean up these sites in the future which could then release green belt sites from the "safeguarded for future development" plan. This would be a more realistic approach to the use of "cleaned-up" contaminated sites instead of simply ignoring the problem.

Why use good agricultural land when the town comprises a number of "eye sores" which will never be addressed if the Council ignores these "eye sores" and simply uses up the Green Belt.

The Plan as outlined seems not to have been thought through properly, leaving many issued unaddressed and unplanned for – a case of build now and pick up the pieces later – a very unattractive and unsatisfactory proposition for the residents of Eccleston and Windle, and some potentially massive headaches for St.Helens Council in the future.

IN SUMMARY, ECRA WITH WINDLE BELIEVE THAT THIS VERSION DOES NOT SATISFY:

- The requirement for sustainable development

 The criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs

15

 Sustainable housing, targets proposed are based on aspirational employment growth predictions i.e. unrealistic

Effective land use by concentrating on Green Space development over town centre development with higher densities

Food security by ignoring Agricultural Land Quality

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.

10	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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If you wish to participate is to be necessary:	e at the oral part of the exa	amination, please outline why	you consider

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.

PO3892



{In Archive} Representation Ken Roughley

planningpolicy 21/02/2019 16:27



1 Attachment



lpsd-representation-form (3).mht

Dear Sirs, Please find attached my representation form. Thank You

KenR

SITE 8HS

0- LPAO2 0- LPAO4



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	Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Kenneth	First name:
Last Name: Roughley	Last Name:
Organisation/company:	Organisation/company:
Address: 13 Rainford Road Dentons Green St Helens	Address: Postcode:
Postcode:WA10 6BT	
	Tel No:
	Mobile No:
	Email:
Signature:	Date: 21/02/2019

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) Yes	No 🗌	
Please note - e-mail is the Council's address is provided, we will contact	s preferred method of communication. I you by your postal address.	f no e-mail

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

PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph	***************************************	Policies		Sustainabilit	у	Habitats	
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Positive			TL]					
Justified	?			X (NO) th	ne plan	is based on f	lawed met	hodology	
Effective	?			X (NO) the Plan is not deliverable					
Consistent with National Policy?		X(NO) it does not comply with NPPF 2018							
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 <u>support</u> the legal compliance or soundness of the Local Plan, please also use this					S				
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		satisfy the require dictions for St Hele					s not justify th	e aspirational targets	
included in									ري
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The Housing Need assessment does not use standard Methodology, and no case for exceptional circumstances has been made.

The plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not(yet) available or included on the Brownfield Register.

The loss of Grade 1 and 2 Agricultural Land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. The Borough has significant long term and intractable problems at Windle island, Bleak Hill Road.

The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF(2016) The increase in traffic proposed in the plan will have significant impact on air quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

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

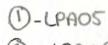
With reference to the Green Belt the council records 2/3rds of the Borough area is contaminated. Council records support this and indicate that less than 7% of the total area of the lowest level contaminated sites needs to be made available for development to remove ALL Green Belt and safeguarded land from consideration, this must be reconsidered.

With the uncertainty resulting from Brexit, why build on productive farmland and destroy this valuable asset.

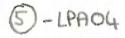
The North-West has recently been identified as the most congested area outside of London, a fact most of us have experienced So with the growth of the super-port and logistics warehousing HGV,LGV and residential traffic will demand massive highway infrastructure improvements. The *Infrastructure Delivery Plan (IDP)*, however does not indicate how this is to done, outside of the current ongoing improvements.

DI		Please continue on a separate sheet if necessary
	se note your representation should cover su orting information necessary to support / just	
	fication, as there will not normally be a subse esentations based on the original representat	
After		nly at the request of the Inspector, based
100101000000000000000000000000000000000	our representation is seeking a modification ral part of the examination? (the hearings in	; do you consider it necessary to participate at public)
X NO	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
	/ou wish to participate at the oral part of the one one cessary:	examination, please outline why you consider
	se note the Inspector will determine the mos have indicated that they wish to participate a	t appropriate procedure to adopt to hear those t the oral part of the examination
	Thank you for taking the time to comp	
	Please keep a copy fo	or future reference.

PO3893







Page 1 of 1 **ELOOIS**



LOCAL PLAN RESPONSE Maureen B to: planningpolicy@sthelens.gov.uk 06/03/2019 08:47

1 Attachment



LOCAL PLAN EMB.docx

PLEASE FIND ATTACHED MY RESPONSE TO LOCAL PLAN 2020-2035 SUBMISSION DRAFT

I have chosen to respond by letter as your online form is not user friendly.

Hard copies of the form do not provide sufficient space for considered response.

ELLEN M BARKER 1 THE NOOK WINDLE ST HELENS WA10 6EN



6 FEBRUARY 2019

LOCAL PLAN
ST HELENS COUNCIL
TOWN HALL
VICTORIA SQUARE
ST HELENS
WA10 1HP

Dear Sir/Madam

Reference: St Helens Local Plan Green Belt Review (2018) Policy LPA05

I have chosen to respond by letter as your online form is not user friendly. Hard copies of the form do not provide sufficient space for considered response.

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on being realistic or use of the latest figures.

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

The council further then claim the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha for development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required.





The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That doesn't even begin to look at other sites not on the register due to contamination issues. The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period. Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound. A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that. The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring. The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP. The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues. The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities. The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided. The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal

document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs!

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

YOURS FAITHFULLY

ELLEN M BARKER (MRS)



Eccleston Parish Council Response to Local Plan Eccleston Parish Council

planningpolicy@sthelens.gov.uk 11/03/2019 10:54



1 Attachment



ECCLESTON PARISH COUNCIL RESPONSE.pdf

Hi

Please find the response from Eccleston Parish Council to the Local Plan.

Regards

Janet Anderson Clerk to Eccleston Parish Council

ECCLESTON PARISH COUNCIL

CLERK TO THE COUNCIL

Janet Anderson



6 Gorsey Croft Eccleston Park PRESCOT L34 2RT

11 March 2019

Local Plan St Helens Council Town Hall Victoria Square St Helens Merseyside WA10 1HP D-LPA06

2) - LPA04

3) - LPAOS

(4)-10P

S-LPAOS

Please see below comments from Eccleston Parish Council regarding the St Helens Local Plan – PLEASE ACKNOWLEDGE RECEIPT.

Section 3: To which part of the Local Plan does this representation relate?

- LPA05
- LPA06
- LPA07
- LPA08

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

- Legally Compliant? No
- Sound? No
- Complies with the Duty to Cooperate? No

Section 5: If you consider the Local Plan is unsound, is it because:

- Positively Prepared? No Plan does not consider Brownfield sites
- Justified? No Plan based on flawed methodology
- Effective? No Plan is not deliverable
- Consistent with National Policy? No Plan does not comply with NPPF 2018

Section 6 and 7: 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

And

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.

General Overview

Positively prepared?

Eccleston Parish Council believes that the predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over-supply of housing. The figures quoted in the plan (ONS 2014) should be replaced by the more up-to-date ONS (2016) which uses more current data.



The Local Plan is unsound because it has not been positively prepared.

Justified?

St Helens has more than enough land (previously developed brownfield and contaminated land) to meet local housing need. Therefore, there is no need for the land South of A580 between Houghtons Lane and Crantock Grove (8HS) in Eccleston and Windle & the former Eccleston Park Golf Club site (3HS) to be removed from the Green Belt and so-called "safeguarded".

The very fact that the land is proposed to be "safeguarded" for 15 years supports this statement, with enough land in place to provide this Borough's housing requirement during the Local Plan period (2020 – 2035). There are no exceptional circumstances for the land to be released from the Green Belt and it should remain so, until evidence can be provided to support such exceptional circumstances.



The Local Plan is unsound because it is not justified.

Effective?

The Infrastructure Delivery Plan is particularly weak. In the areas suggested for housing development, there are already school's shortages and major transport problems. In particular, the 8HS and 3HS sites have considerable highways and local infrastructure issues, which are highlighted within the St Helens Green Belt Review 2018 document and as such, no development should be considered on either site.



The Local Plan is unsound because it is not effective.

Consistent with National Policy?

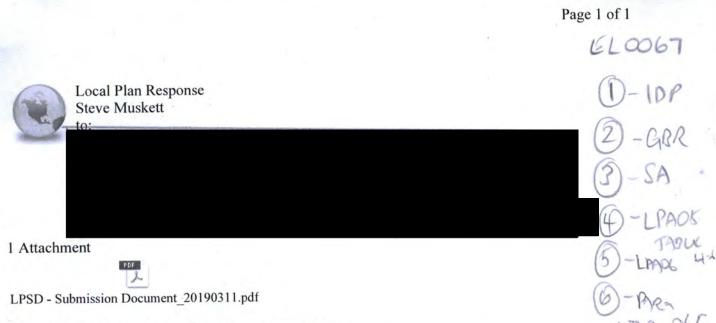
The Plan does not comply with NPPF (2018) as it was written prior to publication. Neither does it consider the more accurate and up-to-date housing and employment statistics in ONS (2016) figures. Furthermore, St Helens Council has not provided any evidence to date that they have satisfied their 'duty to cooperate', which is essential, especially within the context of neighbouring local authorities, who are also bringing forward their own Local Plan's, such as Warrington, West Lancs and the Wirral.



The Local Plan is unsound because it is not consistent with National Policy.

Conclusion

Taking all of the above cumulatively, Eccleston Parish Council believe that the local plan in its current form – when examined by the Planning Inspector, cannot be justified, effective,



Please find attached my response to the Local Plan.

I would kindly request acknowledgement of this email and receipt/ acceptance of my response to avoid unnecessarily printing and hand delivering to the Town Hall.

Many thanks,

Steve Muskett 12 Hamilton Road Windle St Helens WA10 6HG

St Helens Borough Local Plan 2020-2035 (Submission Draft)

PART A

Title:

MR

First Name: STEVE

Last Name: MUSKETT

Address:

12 HAMILTON ROAD, WINDLE

Postcode:

Yes X (Via Email)

WA10 6HG

Signature:	Date: 11th March 2019
Would you like to be kept updated	of future stages of the St Helens Borough Local n of the Plan for examination, publication of the

No 🗌

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

1. PART B - INFRASTRUCTURE DELIVERY PLAN

Summary of points, please see "Appendix A" for detailed analysis

- 1.1. I'm not entirely sure what the Infrastructure Delivery Plan document is as it doesn't really appear to be a plan at all.
- 1.2. Nor does appear to be a document that delivers infrastructure.
- 1.3. It details some infrastructure projects that are currently underway for the problems of today, but doesn't actually appear to plan anything for the Local Plan.
- 1.4. I see dozens of "TBC's" listed in it
- 1.5. There is much listed as "not confirmed"
- 1.6. There are many "anticipated" funding sources
- 1.7. The council will "seek" developer contributions but doesn't seem to state that they will be a requirement in order for development to go ahead.
- 1.8. Developer contributions "would normally be sought" again, this plan does not confirm that they will be.
- 1.9. The whole IDP is extremely flaky and lacking in substance.
- 1.10. It cannot and should not be called a 'Plan'; in fact it insults the definition of the word 'plan'.
- 1.11. This document is more like a wish-list and hope of how infrastructure might be delivered rather than an actual plan of how it will be delivered.
- 1.12. In summary, whatever this IDP document is meant to be, it is not a plan, not even close to a plan. It is totally masquerading as a plan or a document that delivers infrastructure.
- 1.13. It is nothing more than a list of current projects that are already underway and therefore nothing to do with this new Local Plan. It then also highlights all of the issues that delivering this Local Plan will bring about but doesn't really provide any solutions to those problems.
- 1.14. Policy Context (Para 2.6) states that the Local Plan should make clear, for at least the first five years, what infrastructure is required and who is going to fund and provide it. It does not achieve that. It states where it will be sought or where they normally seek contributions from, but does not make clear who *IS* going to fund it.
- 1.15. This entire document appears to use the second portion of that paragraph for the whole IDP, namely, for the latter stages of the plan period less detail may be provided. The council have taken that on-board and applied it to the initial five years too.

7. Appendix – A (IDP)

- 7.1. New Railway station at Carr Mill (Para 3.40)
 - 7.1.1. This is "being considered".
 - 7.1.2. It's not happening yet, it's just being thought about.
 - 7.1.3. That is not a plan.
- 7.2. Re-instatement of the rail link between St Helens Central and Junction (Para 3.41)
 - 7.2.1. A long standing "intention to investigate"
 - 7.2.2. Not a long standing intention to re-open, just to investigate it.
 - 7.2.3. That is not a plan.
- 7.3. Active Travel (Para 3.45)
 - 7.3.1. "where appropriate the provision of active cycle routes will be sought"
 - 7.3.2. Not demanded
 - 7.3.3. Not a requirement
 - 7.3.4. Just requested or sought
 - 7.3.5. That is not a plan
- 7.4. Highway Network (Para 3.5 & 3.7)
 - 7.4.1. This doesn't really seem to make any logical sense
 - 7.4.2. On the one hand the IDP states that car ownership has increased and yet...
 - 7.4.3. We're expected to believe that vehicle journeys have reduced
 - 7.4.4. How bad can the highway network around the borough be if journeys have fallen but the congestion and pinch points continue to get worse?
- 7.5. TIA and STIA (Para 3.1)
 - 7.5.1. The IDP had previously suggested that vehicle journeys had reduced so why is the traffic growth forecast expected to exacerbate the level of operation at key junctions?
 - 7.5.2. 9 pressure points identified in this table
 - 7.5.3. 4 of them have an unknown potential for improvement at this stage
 - 7.5.4. This is not a plan this is list of known issues that have no plan
- 7.6. Windle Island Junction/A580 Improvements (Para 3.26)
 - 7.6.1. Windle Island improvements are for today's issues.
 - 7.6.2. 1000s more vehicles through this junction will make the £7million a waste of time.
 - 7.6.3. The A580 stretch of road is being 'sold' and 'marketed' as a Logistics, Warehousing and Distribution growth area
 - 7.6.4. Hundreds of HGV's will deliver goods thousands of smaller trucks will then distribute
 - 7.6.5. Directly onto the A580 and through Windle Island junction
 - 7.6.6. The Liverpool port expansion plans will undoubtedly route traffic through this junction to Manchester and across the entire North West.
 - 7.6.7. This simply has to be a very deep red point as there is absolutely no plan to manage this expansion only to resolve today's problems.
- 7.7. Road improvement schemes detailed in the IDP are all items happening now
 - 7.7.1. Problems that need to be addressed now, never mind any growth aspirations this Local Plan may have

7.7.2. This IDP does not deliver any sort of plan at all to manage the employment and residential growth that is being assumed.

7.8. Rail Services (Para 3.33)

- Once again, the IDP details all the development happening now, for today's problems.
- 7.8.2. It does not address a single issue for the future
- 7.8.3. It beggars belief that this document has included the word 'plan' within its title.

7.9. Public Right of Way, Footpaths and Bridleways (Para 3.48)

- 7.9.1. Nice of the IDP to recognise the public rights of way
- 7.9.2. Although the plan can't be that concerned about them given they plan to develop across 4 of them at 8HS

7.10. Future Plans (Para 3.51)

- 7.10.1. The implementation of future transport schemes is largely dependent on funding Wow, astounding insight there from the Council in this Local Plan. I mean, really!
- 7.10.2. So, its dependent on funding but the trouble is, the council currently has no idea where this funding will come from.
- 7.10.3. Plenty of 'seeking' and 'anticipated' and 'will be sought' but right now have no idea and therefore zero plan of where the money will come from or how they plan to deliver this remarkable growth they are aspiring too.

7.11. Wastewater and Drainage (Para 3.69)

- 7.11.1. Table 2 states in regard to 8HS: A brook runs through the site, UU would expect surface water to be disposed via this watercourse. WHY?
- 7.11.2. It doesn't today as the site is Flood Zone 3.
- 7.11.3. Also, Bleak Hill School and Hamilton Road flood and the brook passes right by them.

7.12. Primary Schools (Para 4.11/13)

- 7.12.1. The IDP talks about the expansion plans for Bleak Hill School, but that is for today's problems, not 1000 extra houses.
- 7.12.2. Once again, the council are trying to sell 'todays' fixes as their plans to deliver infrastructure for this incredible growth they seem to be aspiring too.

7.13. Infrastructure Delivery Schedule (Section 7)

- 7.13.1. Estimated Cost how many TBC?
- 7.13.2. Anticipated funding source how many TBC?
- 7.13.3. Additional funding required how many TBC's?
- 7.13.4. Once again, this is not a plan or delivery schedule.
- 7.14. This is a complete wish list, simply highlighting all of the problems with absolutely no idea how to solve, how much it will cost or who will pay for it.



Local Plan Consultation Seve Gomez-Aspron to: planningpolicy@sthelens.gov.uk 12/03/2019 11:22



2 Attachments





Local Plan Feedbank final version.pdf ATT00001.htm

Hi,

Please find our local plan consultation input attached.

Thanks

Sev



St. Helens Borough Council

Newton-le-Willows Ward Councillors Democratic Services Town Hall Victoria Square St Helens Merseyside WA10 1HP

Dear Sir/Madam.

Please find attached our representation as Ward Councillors in relation to the latest version of the draft Local Plan which is currently out to consultation.

We feel that most of the points we made in our initial input were carefully considered and listened to, which will make this supplementary correspondence much shorter.

The only points that we feel we need to make are;

Safeguarded land 4HS

As one of the largest developments of brownfield land in the borough, the former Vulcan Works site will accommodate over 600 houses when complete. The indicative capacity of 4HS will increase this by a further 256 houses.

There are only currently 2 ways out of the existing Vulcan site. All traffic must either leave and head along Wargrave Road, through the town centre to join any of the motorways or A580, or the traffic turns south and leaves the town through Alder Root and the Vulcan Village, which causes a backlog due to single bridges and tunnels on the country roads to Warrington.

To remove the need for over 900 houses to clog town centre roads once 4HS is completed, then other access and egress should be considered using existing infrastructure.

Both a tunnel under the West Coast Railway (single width) and a bridge over the West Coast Railway exist already to serve the farm traffic. Any provision to develop 4HS should include the requirement to link the development directly to the A49/Winwick Road over these access routes so that traffic can get more direct access to the motorways and Parkside Link Road without having to pass through the town centre.









Safeguarded land 2HS

There is already a demonstrable requirement to link Vista Road and Ashton Road with a new highway which is shown by the amount of people who currently use the existing landfill road to access Haydock Island.

If a new road across this field was installed, then it could serve as the primary HGV route into Earlestown which would be almost 2 kilometres shorter, reduce pollution around the AQM areas on Newton High Street, pass over a hundred fewer houses, remove the requirement for HGVs to pass Hope Academy and St Mary's Infant School (which has experienced a fatality in the past involving a pupil and a HGV) and would, in reverse, provide direct access to Junction 23 for the whole of Newton-le-Willows west area removing the requirement for them to use local roads.

The business case for this road should be explored much sooner as a piece of key infrastructure for the borough, improving accessibility to Earlestown Town Centre and Sankey Valley Industrial Estate. This should be explicitly stated in the Local Plan.

Parkside Development

No form of access or egress from the Parkside development should be permitted onto the A49 once the new link road is installed for vehicles weighing more than 20 tonnes. This should be explicit in the Local Plan.

There is simply no requirement for this to happen.

Sustainable development is not the same as development at all costs. The High Street, and already congested A49 should be clearly designated as a no access route for HGVs into the Parkside site.

This could be achieved by imposing a weight restriction from the junction of the new Parkside Link Road with the A49 up to the first junction with the first industrial unit on the site. This will prevent the lag between sat navs being updated to include the new road meaning traffic for the site will use the A49 by default.

That way, the road could still be used as a public highway to access Junction 22, no material changes would have to be made to the A49 which would allow it still to operate as a relief route for the M6, no HGV traffic associated with the Parkside development would need to pass through any of the AQM zones along the A49 and HGVs servicing Newton High Street would still have unimpeded access.

If the A49 is still considered a viable access route for the Parkside site, then the viability to develop sites along the A49 such as 7HA and 5HS need to be called into question when considering the cumulative impact on the A49 as a key route.

If Wigan Borough Council and Warrington Borough Council can impose weight restrictions and defensive measures to mitigate the impact of Parkside on their borough's, then our Council can do the same.

<u>Infrastructure</u>

To improve public confidence, it needs to be made much more explicit about when key services such as NHS, Schools, leisure, will be expanded to accommodate growth, even in line with existing policy.

Yours faithfully,

Councillors Bell, Dyer and Gomez-Aspron

Working together for a better Borough















Page 1 of 2

EL0105



Local plan Lorna Chana planningpolicy 12/03/2019 16:36

58 Springfield Lane Eccleston St Helens WA105HA

11 March 2019

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on being realistic or use of the latest figures.

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

The council further then claim the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha for development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required.

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That doesn't even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any







exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound.

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring. —

The plan promotes unsustainable traffic growth which will cause severe traffic—issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues.

The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities.

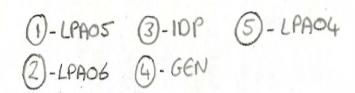
The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs!

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified; effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

Yours Sincerely,

Lorna Chana





URGENT - Representation in response to Local Plan Submission Draft (LPSD)

Sue Lea-Jones to: planningpolicy

12/03/2019 20:28

1 attachment



objections.docx

Please find attached my Representation in respect of the above local plan. Please acknowledge safe receipt as I note the deadline is 13th March 2019.

Many thanks

Mrs Lea-Jones

Susan Lea-Jones 32 Crantock Grove Windle St Helens WA10 6EJ

11th March 2019

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The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1^{st} April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That doesn't even begin to look at other sites not on the register due to contamination issues.

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Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound.

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

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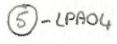
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Yours Sincerely,

Mrs Susan Lea-Jones

()-LPAOS

3-10F



Page 1 of 3

EL0137



Representation in response to local plan Dave Twentyman

to:

planningpolicy@sthelens.gov.uk 12/03/2019 22:25

Please see below my representation in response to local plan. However, I would just like to express my disappointment in the presentation of the online form. The form is simply not practicable and the terminology used is a deliberate attempt to baffle, confuse and ultimately obstruct ordinary taxpayers from articulating their objections to this plan. It is quite obvious that this is an attempt to reduce the number of objections and no doubt will be quite successful in doing so.

David Lea-Jones

32 Crantock Grove

St Helens

Merseyside

WA10 6EJ

12th March 2019

Reference: St Helens Local Plan

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2

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(1)

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound.

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3

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.



The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has _



	rage 5 of 5	
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-	The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, ranquillity and health in general. The IDP does not address these issues.	
1	The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the DP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities.	
i	The IDP acknowledges that a high proportion of GP's are over 55. The proposed population norease envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.	
t	The economic growth predictions for St Helens seem to be based on flawed historical data which loes not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new imployment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal ocument it even uses farmland as a rationale for providing local employment to a new residential evelopment; a development that itself would have just been built on hectares of Grade 1 farmland esulting in the loss of jobs!	
I	Taking all of the above cumulatively, the Local Plan in its current form when examined by the clanning Inspector cannot be considered to be justified, effective, consistent with National policy or ositively prepared. As a consequence it must surely follow that it cannot be considered sound.	
,	Yours Sincerely	

David Lea-Jones

Sent from Yahoo Mail for iPhone

O-Green Belt Review, Stage ZB

(4) - Green Belt Review, 845

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2-landscape Character Assessment Report 5-S.A 3-SA scoping report 6-10P



Local Plan Submission joanne Smith

planningpolicy@sthelens.gov.uk 12/03/2019 22:25



1 Attachment



Local_Plan_Submission_2019_03_11.docx

To whom this may concern,

Please find attached a copy of my objection letter in regards to the councils local plan submission.

Can I please have confirmation that you have received this email.

kind regards Joanne Smith Joanne Smith 12 Hamilton Road Windle St Helens WA10 6HG

11th March 2019

To whom this may concern,

Please find enclosed my response to the recent Local Plan publication. Almost all of the points of reference I make in this response relate to 8HS as that is the one I have most scrutinised, but it wouldn't surprise me at all if the flaws in this version of Local Plan can be equally applied across all parcels of land being threatened with removal from Green Belt.

The online form asks if I consider the plan to be legally compliant. I doubt anyone in the borough can truly answer that without some formal legal training and in-depth knowledge of local plans and national policy. However, in the absence of said training and knowledge, I would assume that for something to be legally compliant it must at least be accurate, factual, trustworthy and complete; something this plan appears to fall short of in several areas.

The Green Belt Review document is a significant portion of this plan submission, but it appears to be completely missing the Stage 2B pro-forma documents detailing the development potential of each parcel of land. It is therefore impossible for residents to review how the Council arrived at its 'Good', 'Medium' and 'Limited' outcomes for those pieces of Green Belt land. There is no reasoning or rational findings detailed for each parcel to explain why they have been categorised in such a way, as they have done at Stage 1B when assessing their contribution towards Green Belt aims and purposes.

Additionally, the omission of this major section of the Green Belt Review document must also bring into question the 'duty to cooperate' question that is also posted on the response form. The absence of these pro-formas is a glaring omission and must surely question the integrity and validity of the review if nobody is able to dissect the findings. In a worst case scenario, the outputs of Stage 2B could have been completely chosen in order to match a predetermined decision to remove certain parcels from Green Belt.

This document is not complete. Therefore the plan cannot be considered complete. Feedback and responses cannot therefore be complete or properly scrutinised. It should therefore follow that the plan cannot be legally compliant.

There are several reports that are referenced within the Local Plan; reports written by consultants at great expense no doubt. I find it hard to understand how this plan can be sound or demonstrate a duty to cooperate when those findings or recommendations appear to be ignored.

Landscape Character Assessment – Land Use Consultants

This document identifies the agricultural land in Eccleston as having high landscape sensitivity and additionally a medium visual sensitivity. It goes on to further state the strategy in this area should be one of 'Conserve and Restore'. The judgement of LUC is that given the unique landscape character, further development should be avoided.



SA14 is apparently an objective to ensure local residents have access to employment opportunities. The rationale here of being 1.56km to Catchdale Moss / Farming is almost laughable given that the Council are seemingly okay with the irreversible destruction of 60 hectares of Grade 1 farmland on site 8HS. I'm not sure how this farming at Catchdale Moss will support the employment for almost 1200 new homes and will therefore be likely to promote positive effects. The reality is that the majority of the new employment opportunities, should they materialise, are over 6km away with no readily available public transport route available. Once again, this will promote a greater dependency on cars, through one of the busiest junctions in the borough (Windle Island), thus undoing the good work and millions of pounds currently being spent to solve today's issues.

That brings us onto SA19 which relates to the reduction in the need to travel or encouraging alternatives to the car. The rationale for scoring this as likely to generate positive effects is apparently because the site is 85m to the bus stop and once more this seem very deceiving. Yes, there is a bus stop around 85m away, if you live the one house in the very North-Eastern corner of the parcel of land. Let's not forget, this is a low frequency service that operates currently. The truth is that much of this site will be 1km from the bus stop. This is further evidence that this is being portrayed in a better light than is the reality.

Finally SA20 and the access to and use of basic goods, services and amenities in a town or local centre. I'm not sure what constitutes a local centre in the immediate vicinity to 8HS but possibly the closest that could possibly be considered one might be the facilities available around Dentons Green Road. The scoring once again for this objective is simply misleading; it might be accurate but is entirely inappropriate and deceitful. The rationale provided is that the site is within 45m of a convenience store, a Service Station no less. That should sound alarm bells itself, but when you look properly, yes there is a convenience store within 45m of one very specific point on the site – if you want to negotiate 4 lanes of the extremely busy A580, and climb over the central reservation! How can anybody possibly score this point as green? It can only have been justified with this rationale with a clear intent to deceive the reader/ inspector. Using the Tesco at Windle Island would be a more appropriate rationale but even that means navigating the busy junction of A580/ Rainford/ Bleak Hill Roads. Quite simply this objective should be scored at nothing more than amber; negative impact that might be mitigated.

Infrastructure Delivery Plan

Next we have the IDP, with infrastructure being a huge concern of mine in the Windle area. I was assured by my local councillors that through their efforts infrastructure is referred to throughout the Local Plan, including in detail in the IDP. Once again though, it appears local councillors have failed miserably. This so called 'plan' is nothing or the sort. It documents in detail the existing projects which are happening, but they are nothing to do with the grossly inflated growth the Local Plan seems to be aspiring to. This document is nothing more than a wish list and certainly should not be referred to as a 'plan'. The IDP is simply a set of dreams written down and are therefore only "goals" rather than any sort of plan.

St Helens Council has a history of ineptitude when it comes to the road networks within the borough; they cannot maintain the existing structure, let alone any new infrastructure they might dream of. This plan is entirely indicative of their approach to infrastructure and totally lacks any

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substance or real meat on the bone to be truly considered a plan. It does specifically outline how these improvements will be made or funded; there are plenty of "TBC" and "unknown" within the document. The plan promotes unsustainable traffic growth which will cause severe traffic issues which will not satisfy the NPPF. It actually promotes increased car dependency with edge of town developments, which are remote from transport hubs.

The IDP also fails to explain the impacts on Education and Healthcare. They are mentioned within the IDP but only quite vaguely and in regard to the current structure rather than the future plans. It's almost as if they are touched on broadly just so that there might be the illusion of the Council "having it covered".

The NPPF states that the Local Plan should make clear, for at least the first five years, what infrastructure is required and who is going to fund and provide it. The IDP plan does not achieve that and merely mentions where it will be "sought" or where they would normally "seek" contributions from, but does not make it clear who **IS** going to fund and provide it.

- The plan should be modified to use more up to date information.
- It should also publish all data utilised and be fully transparent to residents.
- The scoring used in the green belt review and SA objectives should be re-evaluated and performed properly, using factual and truthful answers.
- The economic data is highly optimistic and it appears Oxford Economics have barely been correct in their projections for more than a decade.
- They council have not evidenced enough ALL reasonable alternatives and should do so prior to performing the green belt review.

Yours faithfully,

Joanne Smith

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