



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

REPRESENTATION ORDER

RO0101 – RO0200

SEPTEMBER 2020

RO0101



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1012
13 MAY 2019

1. Your Details

(we will correspond via your agent)

Title: Miss
First Name: Lydia
Last Name: Barker
Organisation/company: _____
Address: 51 Gorsey Lane
Bold
St Helens
Postcode: WA94XA
Tel No: _____
Mobile No: _____
Email: _____

2. Your Agent's Details (if applicable)

Title: _____
First name: _____
Last Name: _____
Organisation/company: _____
Address: _____
Postcode: _____
Tel No: _____
Mobile No: _____
Email: _____

Signature: _____ Date: 11.3.19

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

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

☒ Yes (via email)

☐ No

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

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

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

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

RO0102

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 - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title:
First Name: <u>Robert</u>	First name:
Last Name: <u>Barker</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>51 Gorsey Lane</u> <u>Boid</u> <u>St Helens</u>	Address:
Postcode: <u>WA9 4XA</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:	Date: <u>11-3-19</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

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Telephone: **01744 676190**

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RO0103

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

Ref: LPSD

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

13 MAY 2019

1014

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title:
First Name: <u>Jacqueline</u>	First name:
Last Name: <u>Barker</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>51 Gorsey Lane</u>	Address:
<u>Bold</u>
<u>St Helens</u>
Postcode: <u>WA94XA</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	ail:

Signature: [REDACTED]	Date: <u>11/3/19</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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

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WA10 1HP**

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or by email to:

planningpolicy@sthelens.gov.uk

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Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

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RO0104



St. Helens
Council

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

Ref: LPSD

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

This form has two parts;


Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>ELLEN</u>	First name:
Last Name: <u>BARKER</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>Flat 3, Manor Court Clock Face</u>	Address:
Postcode: <u>WA9 4NW</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

21. 4. 19.

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

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

Yes ☒ (Via Email)

No ☐

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

RO0105

Representor Details

Web Reference Number	WF0033
Type of Submission	Web submission
Full Name	Mr Stephen Barker
Organisation	
Address	17 Sackville Road St Helens WA10 6JD
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 & 3HS
Paragraph / diagram / table	Paragraph 109
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.

It does not satisfy the requirement for sustainable development & transport.

It is not an effective use of land as it prioritises green space development over town centre development.

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

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

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

Response Date	3/13/2019 4:41:35 PM
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RO0106



St. Helens
Council

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

Ref: LPSD

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

1062

13 MAY 2019

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>Miss</u>	Title:
First Name: <u>Kelly</u>	First name:
Last Name: <u>Barlow</u>	Last Name:
Organisation/company: <u>Rutland House Vets</u>	Organisation/company:
Address: <u>13 South Avenue</u> <u>Prestatyn</u>	Address:
Postcode: <u>LL19 8TG</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

22.3.19

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

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

Yes ☐ (Via Email)

No ☒

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

RO0107



FW: Objection to the "St. Helens Borough Local Plan Submission Draft 2020-2035"

Anthony Baron

to:

planningpolicy@sthelens.gov.uk

04/03/2019 15:16

Hide Details

From: Anthony Baron

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

① - LPA08

② - LPA06

Sent: 04 March 2019 14:18

Subject: Objection to the "St. Helens Borough Local Plan Submission Draft 2020-2035"

I wish to object to the above in the following areas.

A) The plan states that a total of 7290 new build dwellings will be required over the 15 year period averaging 486 p.a.

The Office for National Statistics forecast that the population of the Borough will grow from 180708 in 2020 to a figure of 187336 by 2035. A forecast population growth of 6628 persons. At the current average household density of 2.4 persons per dwelling, this equates to a figure of 2762 dwellings. A reduction on the Plan figures of a staggering 263%. Given at present there are 935 long-term empty properties within the Borough, plus new build under construction, plus sites already granted planning permission, this figure would offset any reduction in the present number of residential properties due to demolition, change of use etc. The Housing Market within the Borough is static at present in the private sector, with supply roughly equating demand. All economic indicators show that this is the general trend for the future. The plan also shows that there will be a considerable number of persons migrating to the Borough as a result of "job opportunities" being created who will need housing. This I dispute, given the present mobility of labour, for the bulk of the type of jobs being created in the Warehousing and Distribution Sector. The influx of persons into the Borough would be a relatively small increase. In fact, if the proposed site on the former Parkside Colliery and Greenbelt environs was developed, it would be in far easier reach of the Warrington Borough cachement area rather than St. Helens. Especially if the proposed new road linking the site with the slip road to Junction 22 of the M6 in Warrington Borough and less than 3 kilometres from Warrington town centre was built. These facts, taken into account, show that the proposed amount of new build residential properties stated in the Plan is greatly exaggerated. I propose that the figures be revised to a much lower realistic figure. This would also alleviate the need to release the proposed amount of greenbelt stated in the Plan, developing Brownfield sites in a more sustainable planning policy.

①

B)

The proposed safeguard for industrial development for land to the Northeast of Junction 23 of the M6 motorway (Haydock Island).

To remove this site from Greenbelt, without prior consultation and approval from Highways England is against good planning practice.

Also this greenbelt forms a buffer not only between Haydock (St. Helens Borough) and Golborne (Wigan Borough) but also between the Metropolitan Areas of Mersyside and Greater Manchester.

②

I propose that this site remains as greenbelt within the lifespan of this Plan and not safeguarded for industrial development, as the Plan states. /

This Plan appears to be flawed in many aspects and in instances appears to contradict the need for an overall National Planning Strategy, of which it is one part. /

Yours Faithfully

Anthony Baron
2 Johns Avenue
Haydock.
WA11 0QB

RO0108

31

Ref: LPSD

27 FEB 2019

(For official use only)



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

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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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title:
First Name: <u>Susan</u>	First name:
Last Name: <u>Barr</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>17 Falkland Drive</u> <u>Garswood</u>	Address:
Postcode: <u>WN4 0SA</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
	Email:

Signature: [REDACTED]	Date: <u>19/2/19</u>
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☒ Yes (via email)

☐ No

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WA10 1HP**

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
LPAC5 IHA				
Other documents (please name document and relevant part/section)				

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

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

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

Please tick as appropriate

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

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

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

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

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

Brownfield sites meets there estimated demand. Where have you evidenced where population figures have come from. Railway Station no parking facilities. Traffic getting out of Garswood at peak times difficult. Small roads. No statement of common ground with neighbouring authorities. Village will need alot of infrastructure

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.

Delete this land from 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)

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

--

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

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

Please keep a copy for future reference.

RO0109

Representor Details

Web Reference Number	WF0140
Type of Submission	Web submission
Full Name	Mr John Barrow
Organisation	
Address	10 Newmarket Gardens WA9 5FR
Agent Details	

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

No

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

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Council are literally just about to finish works to try and resolve the issues at Windle Island on the A580 and they then want to release land from Green Belt which could see over 1000 homes built and bring all the chaos back again.

This stretch of road has seen a number of fatalities already, why tempt fate with what would probably be close to 2000 extra cars loading the road network?

I guess there might be fewer pedestrian deaths with less people walking given that building here would decimate 4 public rights of way/ footpaths.

In the Green Belt Review document 8HS is listed as being 59.79ha on the Purposes of GB review and 956 Net Developable Capacity on the Summary Sheet. At 30 dph it would equate to 1794 dwellings but at only 956 NDC it would equate to 53%. How can that be considered as 'Medium' developability? It must surely be 'Limited' and therefore should be discounted rather than Safeguarded.

The same applies to 3HS which is 49.37ha, so 1481 dwellings at 30 dph, meaning only 65% developable. However, it is recognised there are significant capacity and highway issues with this site meaning it being reduced by around 500 units, thus $456/1481 = \text{ONLY } 30\%$ developable!

As 3HS is pretty much land-locked by surrounding areas and existing road networks, it seems highly unlikely they will ever be resolved so those 500 units would not be delivered ever rather than just delayed.

8HS can only be accessed from a smaller country road, meaning a new large junction would be needed to serve it. Surely that could never be deemed safe given how close it would probably be to the existing Windle Island junction?

I would also disagree with scoring both those sites as 'Low' for their contribution to Green Belt. 3HS still provides a strategic gap between Rainhill and Nutgrove. Development in 8HS would absolutely be urban sprawl into the countryside.

Why are these sites looking to be released from Green Belt for so little return given the importance Government puts on Green Belt and the purpose it serves?

Especially in view of the excessive targets that are being aimed for which are based on out of date figures. To make the best decisions, you should use the most up to date information, not a figure that brings you closer to an arbitrary Government figure.

Congestion, air and noise pollution, access to GP's and dentists would all be made significantly worse by development at both 3HS and 8HS. Services are already stretched now and developing here would exacerbate the problem for existing residents as well as new.

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

Use of more PDL is needed.

Modify the plan to delete green belt usage.

The forecasted numbers are simply too optimistic.

A more conservative approach should be adopted during this period of uncertainty until Brexit is delivered and we know what position the country is in.

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

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

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

Response Date	3/12/2019 8:43:20 PM
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RO0110

Representor Details

Web Reference Number	WF0313
Type of Submission	Web submission
Full Name	Mrs Ann-Marie Barrow
Organisation	
Address	11 Lynton Way Windle St. Helens WA10 6EQ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

This version of the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council

are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

08

05

09

10

11

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

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

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

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

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

Response Date	3/7/2019 12:03:49 PM
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RO0111

Representor Details

Web Reference Number	WF0380
Type of Submission	Web submission
Full Name	mrs rita barrow
Organisation	
Address	94 Kiln Lane Eccleston WA10 4RJ
Agent Details	

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

Yes (via e-mail)

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

Policy	lpa 05 and lpa06
Paragraph / diagram / table	
Policies Map	8 hs
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.

plan is not sustainable in a congested area like this with reducing employment. car dependency will increase. it is not effective use of agricultural land when town centre sites could be used. NPPF(2018) will not be satisfied as there will be traffic growth which cannot be accommodated safely by local roads without expensive improvements. air quality and road safety will be negatively impacted.

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

rethink the whole plan in another area which would not encounter the problems i have outlined

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 4:38:40 PM
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RO0112

① - LPA05 ② - GEN

Representor Details

Web Reference Number	WF0382
Type of Submission	Web submission
Full Name	Mr derek barrow
Organisation	Mr
Address	94 Kiln Lane Eccleston wa10 4rj
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 & LPA06
Paragraph / diagram / table	
Policies Map	8HS
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 would be better served by town centre development with high densities thereby reducing car dependency from outskirts. employment is reducing in this town so extra housing is not sustainable. you are ignoring agricultural land needed for food crops. later forecasts of housing needs(ONS2016) could be accomodated by cleaned up brownfield sites. there will be horrendous traffic growth affecting air quality and road safety issues. overall it will not satisfy NPPF(2018)

①
②

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

the current plan should be abandoned and rethought giving consideration to my points at Q6.

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 4:13:48 PM
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RO0113

13 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.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>JEFF</u>	First name: _____
Last Name: <u>BARSTON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>64 SHOCK LANE</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0SN</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>10/3/19</u>
------------------	----------------------

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

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

☒ Yes (via email)

☐ No

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

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

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 Plan does this representation relate?									
Policy	LPA05 Site IHA.	Paragraph/ diagram table 		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

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

Delete this land from the proposed removal from the Green Belt.

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 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.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HA

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HA
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. Drainage in the area is very poor – site 1HA regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> 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.
See separate sheet attached

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.

Delete this land from the proposed
removed from the Green Belt.

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 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.

PART B – YOUR REPRESENTATION

LPA05 – SITE 1HS

2

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress.
There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

RO0114



St. Helens
Council

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

①-LPA06

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: JACQUELINE	First name:
Last Name: BARTLEY	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 76 ASHTON AVENUE RAINHILL MERSEYSIDE	Address:
Postcode: L35 0QR	Postcode:
	tel No:
	mobile No:
	email:

Signature: [Redacted]

Date:

6/3/2019

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

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

Yes ☒ (Via Email)

No ☐

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>			
Legally Compliant?	Yes <input checked="" type="checkbox"/>	DON'T KNOW	
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	DON'T KNOW
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	

Please tick as appropriate

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

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

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

Please See attached Separate sheets

: ① :

Rainhill is a small village which only has an A road the A57 this road is overly used at peak times the traffic is at a stand still the congestion adds lots of time on your journey. The road is gridlocked so motorists use the smaller B and C roads Kendal Drive, Stoney lane Mill Lane. Holt Lane, Longton Lane, View Road Blundells Hill Lane. These roads are a rat run for all the traffic including HGV the 3HS area Rainhill Road Portico Road and Two Butt Lane are always gridlocked these are country roads which cannot support the heavy traffic.

✓
①

The increased traffic generated by any new builds will only affect the air pollution and peoples safety.

] ①

The council would have to make major changes to facilitate all the extra traffic, and the old Rainhill Bridge (Skew Bridge) would be under major stress with the volume of extra traffic.

] ①

2

The St Helens area has a decline in population since 1981 its unclear where the people will come from to buy these houses which developers wish to build. Brexit may have a an outcome on who can afford these houses.

Table 4.6 shows that 7245 houses are needed this means that 1437 houses and 57 hectares of extra land is needed not 288 hectares which is show in table 4.5 .

The idea that local people can afford the houses is unrealistic as the decline of industries since the mid 1980s in the area of 3HS. There is a lot of unemployment and the houses which the developers wish to build on Eccleston Park Golf Club will not be affordable for local people .

The parcel of 3HS is green land which naturally seperates areas of Eccleston Park , Rainhill, Whiston, Thatto Heath, NutGrove .. If this land is built on there would be people living on top of each other which will cause unimagable amount of harm to the area and peoples identity will be destroyed.

The Natural green land provides an array of wild life and clean air and a sense of well-being which is detrimental to peoples health .

There is already flooding in the 3HS . due to new builds .

3HS is a confirmed zone two and three flood zone with a high-water table.

Building on the flood zone will dramatically affect the ability of the land around to drain, placing property along the existing brook. at risk of flooding. causing untold damage to peoples lives and property. There are already reports of gardens and roads flooding around the Whiston Hospital area .

3

The death rate in St Helens due to respiratory disease in the under 75's is the highest in the North West which is 51.9 and 44.3 for the NW and 33.1 for the rest of England.

The Hospital Whiston and St Helens cannot cope with more patients which new builds will bring to the area. Schools, G P's and Dentist are already over subscribed and have waiting lists.

EPGC is recognised by Sports England which have objected to the local plan stage 1. There are very few Golf courses in the area and St Helens Council has closed down the public Municipal course at Sherdly Park which is sadly missed by the community for recreational pass time.

4

St Helens has a shocking amount of empty properties which could be used for housing and the amount of brown field in the area could also be used to build on.] 10

This would make the area not only look more pleasing but also help to renovate building which if left will be demolished or left to deteriorate. /

I Give My Explicit Permission for My Name To Be Used In This Response

Charlotte Bartley



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 Council should abide by the National Planning Policy Framework (2019). The land should be deleted from the Proposed removal of the green belt.

St Helens Council should not consider removing this land from greenbelt to place in Safeguarded.

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 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.**

RO0115

EFO035

- ① - GEN
- ② - Para 1.7.2 DTC
- ③ - LPA06, SHS



Local Plan Representation
barton su
to:
planningpolicy
12/03/2019 11:28



1 Attachment



CRBarton Representation March19.doc

Please find attached my Representation on the Local Plan (2018). I would like an acknowledgement at the earliest convenience and trust that this will be forwarded to the Planning Inspector following the due process.

Clive R Barton



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Clive	First name:
Last Name: Barton	Last Name:
Organisation/company:	Organisation/company:
Address: 19 Brooklands Road Eccleston	Address:
Postcode: WA10 5HE	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 12/3/2019

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

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

Yes ☐ (Via Email)

No ☐

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 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 PART B of this form, setting out your representation/comment.

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

PART B – YOUR REPRESENTATION

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

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

Policy Local Plan 2018		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input type="checkbox"/> x
Justified?	<input type="checkbox"/> x
Effective?	<input type="checkbox"/> x
Consistent with National Policy?	<input type="checkbox"/> Which National Policy? I assume 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 support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Firstly, I will comment on the process of presenting and delivering the Local Plan to meet Legal requirements.

In December 2016, St Helens Council published their Preferred Options and asked for comment. This follows procedure and 5695 responses were received. These responses have been published in The Report of Consultation 2018. I will refer to this later and particularly to the land labelled HA16 (now 8HS).

Following several delays, the Proposed Version of the Local Plan (2018) was agreed by Council in December 2018. It was not unanimous.

The process of responding to this version has been difficult and off putting. The electronic version of the plan contains grammatical errors such as

U NO

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

Please read the guidance note for explanations of the tests of soundness.

The guidance notes are complicated for the general public and refer to seven different policies.

I attended a Drop In session to ask for assistance with this process where I spoke to four Council officers. I asked how the review of the representations would be undertaken and whether the Proposed Version could be altered as a result. Two officers said that minor modifications could be undertaken and one gave the example that housing figures could be altered. I do not believe this to be the case. The quality of advice from the Drop In was questionable and many questions could not be answered. However, St Helens Council appear to have undertaken the process of community involvement. There is little evidence that this was effective or that the Local Communities are being actively involved in the preparation and revision of this Plan.

Secondly I will address the Duty to Cooperate. I have reviewed a wide selection of Local Plans for the Liverpool City Region(LCR) including the LCR Shelma (2017) and compared the housing projections with ONS sources and those produced by GL Hearn for various authorities.

LA	Plan	Housing per year	Years	ONS 2014 SNNP	above baseline	GLHearn LCR Shelma 2017 Baseline Growth	above ONS 2014
Halton	PO 2018 Local Plan	466	2014-2037	254	140	326 565	212
Knowsley	2016 Local Plan	450	to 2028	280	179	271 373	170
Liverpool	2018	1739	2018-2033	1739	877	862 1791	0
St Helens	PSV 2018	486	2020-2035	416	89	397 855	70
Warrington	PSV 2019	945	to 2037	762	-4	949 973	183
West Lancs	PO2018	396 475	2019 - 2027 2027-2050	193	175	221 241	203
Total	Wlancs to 2027	4482		3644	1456	3026 4798	838

It can clearly be seen that all neighbouring authorities, other than Warrington at -4, are targeting above baseline growth. The target levels are based on data that has been superseded by the, more applicable, ONS (2016) – however government have, unfortunately, allowed the Councils to continue to use obsolete figures.

This table reveals that there is a possible regional housing oversupply of 1456, using Baseline data or 838 using the ONS (2014). The Duty to Cooperate has clearly not been fulfilled by the process and the St Helens Proposed Local Plan Version (2018) does not meet the test for Legality, other than by lip service. ②

The sources for the data are as follows

Reference

West Lancs <https://www.westlancs.gov.uk/media/544362/master-lpr-po-v41-final.pdf>
Warrington <https://www.warrington.gov.uk/news/article/2765/plan-set-out-for-warrington-s-future-development>
Knowsley <https://localplanmaps.knowsley.gov.uk/documents/knowsley-local-plan-adopted-core-strategy.pdf>
Halton <https://www3.halton.gov.uk/Pages/planning/policyguidance/pdf/newdalp/written.pdf>
Liverpool <https://liverpool.gov.uk/media/1357189/shlaa2017-volume-a-final-sept-2018.pdf>
West Lancs https://www.westlancs.gov.uk/media/503879/HEDNA_WestLancashire_Mar2017.pdf

My third, and final, issue regards the parcel of land labelled 8HS (formerly HA16).

During the Consultation process in late 2016/early 2017 residents raised relevant and key issues regarding the inclusion of this parcel and its suitability to be developed for housing.

Facts included: the parcel is Grade 1 and 2 agricultural land and currently farmed; the middle section includes a flood plain; it is adjacent to the A580 (a very busy two lane highway connecting Liverpool to Manchester) where pollution levels are high; there is a significant lack of infrastructure in the locality (primary and secondary schools are oversubscribed, there are very few buses, it is 3 miles to the nearest train station) and local highways problems have been declared unfixable. St Helens Council acknowledged these concerns by removing the immediate threat of building over 1000 houses on this unsuitable land and replied that, "As the site is proposed to be safeguarded rather than allocated it is not proposed to be developed within the Plan period. Its potential to be allocated would be subject to further consideration in a future Local Plan review." ③

This is contradictory to published guidance on removing land from Green Belt which must be based on "exceptional circumstances". The Council have openly stated that this land may never be required for development which effectively negates the exceptional circumstances issue as well as opening the door to a challenge from the developer who has already published plans for the parcel.

Finally, I have been grateful to the local group of volunteers who have worked hard to keep residents clearly informed of the process and would like to acknowledge their effort on my behalf.

I have read, and totally support and agree with, the submissions made by ECRA and that of the SHGBA made by Kirkwells.

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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.**

RO0116

EL0129

Site 8HA



St Helen Local Plan comments for submission
Carolyn Barton to: planningpolicy

12/03/2019 20:36

1 attachment



image1.jpeg

① - LPA05

② - PPA 1.7.2

③ - S.A.

Dear Sir or Madam,

Please find below my comments that We would like to form our representation for this submission.

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

①

②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SUGGESTION
MOD

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

③

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions (photo attached)

both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - for example see SHLAA 2016 site assessment ref 16m & 142

- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

①

• There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land. 30

I hope these comments are taken into consideration and acted on appropriately, many thanks for your time

Mrs Carolyn Barton
Mr Gregory Barton



232 Higher Lane
Rainford
St Helens
WA11 8NH



RO0117

ELO280



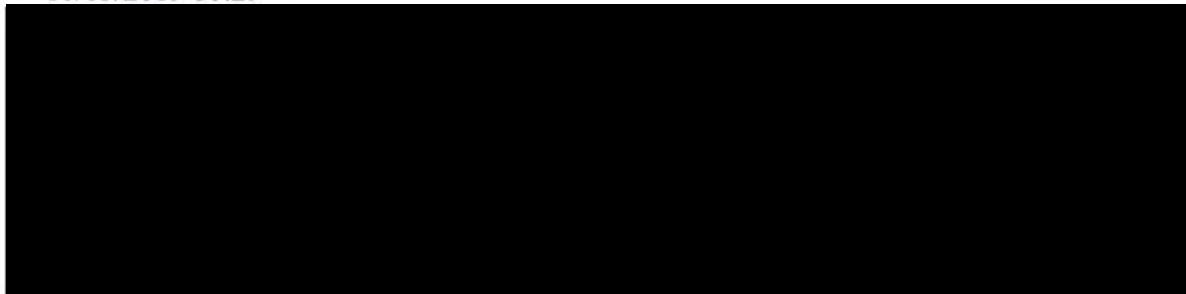
ECRA Response to SHLPSD(2018)

barton su

to:

planningpolicy

10/05/2019 10:29



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

- ① - LPA05
- ② - LPA07
- ③ - GENERAL
- ④ - LPA06
- ⑤ - PARA 1.7.2 DEC
- ⑥ - LPA04
- ⑦ - GBR
- ⑧ - 10P
- ⑨ - TABLE 4.6
- ⑩ - SA



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

INTRODUCTION

Eccleston Community Residents Association (ECRA) with Windle

ECRA (Eccleston Community Residents Association) was formed in 2016, primarily to oppose proposals to build on Green Belt sites included in the St. Helens Local Plan Preferred Options (2016). Residents from Windle supported this organisation and the two parishes joined together to campaign against overdevelopment in the Eccleston and Windle area. ECRA with Windle, (hereinafter to be referred to as ECRA) has responded to a groundswell of local opinion in favour of retaining Eccleston and Windle site 8HS as Green Belt - we trust our submission reflects the views of our community.

Over 5,500 St Helens residents and organisations responded to the SHLPPO 2016 consultation, with 90% objecting to the SHLPPO proposals. As a consequence of this, together with continued campaigning by ECRA and other local groups, the Local Plan Submission Draft (2018) revealed a significant reduction in the amount of Green Belt land to be taken for either development or "safeguarded" for future development. ECRA welcomes this reduction but is still opposed to the revised plan, in the following respects:

- Economic growth estimates are too optimistic, a more conservative approach would be pragmatic.
- The estimate for new homes appears to be based on a methodology which is being challenged and is over-optimistic.
- In the 30-year period of the plan, given the large percentage of brownfield and contaminated land in the Borough, both council and government would want to see a significant proportion of this land brought back into productive use for housing and employment. This would improve the environment, reduce deprivation, encourage sustainability and contribute to well-being in the Borough.
- There is a lack of clarity on the degree and scope of consultation with neighbouring councils. The consistency of methodologies used in formulating the plan, particularly the Green Belt review, is debatable.
- There has NOT been sufficient robust justification for "exceptional circumstances" to justify taking Green Belt sites for development across the Borough, given the relatively small amount of Brownfield/ contaminated land that would need to be made available in order to avoid Green Belt land being lost. The arguments against the latter appear to be those of cost rather than benefit. The presumption is that it is better to destroy grade 1 agricultural land than clean up the Borough.

ECRA believes the plan needs to be modified, specifically that the parcel of Green Belt 8HS in Eccleston and Windle should NOT be removed for development in the next 15 years or safeguarded for longer term development.

OVERALL
CONCLUSION

SUGGESTED
MODS

St Helens Green Belt Association (SHGBA)

ECRA will further develop some of the above points, taking account of its membership of the SHGBA who have commissioned three independent reports to look at economic, demographic and planning aspects of the SHLPSD. ECRA support the findings of the three reports. ✓

- ECRA, working in conjunction with Rainford Action Group (RAG) and Rainhill Save our Green Belt (RSOGB,) formed the St Helens Green Belt Association (SHGBA) to protect local Green Belt. ✓
- Due to the high level of concern and belief that the proposed building on local Green Belt was both unnecessary and unsustainable, local people have voluntarily funded experts to produce independent professional reports.
- ECRA support Local Plan led sustainable development. It is not against industrial and housing development where there is genuine need and it is justified and sustainable. However, ECRA are strongly opposed to unnecessary industrial and housing development on Green Belt land. It fully supports the view, in line with policies in the National Planning Policy Framework (NPPF) that Green Belt is essential to quality of life and the health and wellbeing of the community. ✓

Report from Kirkwells - SHGBA Response to SHLPSD

This report endorses and complements the SHGBA submission by Kirkwells Planning. The Local Plan Submission Draft (LPSD) is not consistent with national planning policy with regard to the following:

1. Exceptional circumstances do not exist for use of a method of calculating Objectively Assessed Need for Housing that departs from the Standard Method (SM). The Council should use the Standard Method.] ①
2. The Spatial Strategy fails to recognise the significance of Green Belt, the essential characteristics of Green Belt and the five purposes of Green Belt.] ②
3. The LPSD includes no conclusion to show that "exceptional circumstances" exist for review of Green Belt. ✓
4. Before concluding that "exceptional circumstances" exist to change Green Belt boundaries the Council should also be able to "demonstrate that it has examined fully all other reasonable options for meeting its identified need for development." (NPPF 137)] ③
5. The purpose of Green Belt to support urban regeneration is inadequately addressed, and by treating all sites as equal, the cumulative impact of large-scale Green Belt releases has not been considered. This will undermine urban regeneration efforts and is a further reason to support not removing land from the Green Belt.] ③
6. The LPSD approach to safeguarded land is tantamount to an allocation, since it has been reserved for housing development. Any land intended to be safeguarded should not have been designated for a particular future use. Land should be shown as unallocated or white land on the Policies Map.] ④
7. The Plan period for employment land should be consistent with other parts of the plan e.g. housing, 2016-2035. On this basis, using 4.9 hectares, the baseline OAN should be a total of 93.1 hectares.] ③
8. No statements of common ground have been made available. This makes the plan-making process less than transparent and is not consistent with national planning policy.] ③
9. It is not possible to assess if cross-boundary issues have been dealt with – no statements of common ground have been produced in supporting evidence. There is little or no evidence of agreements with other areas and by releasing Green Belt land unnecessarily the plan does not accord with the principles of sustainable development.] ③

10. The LPSD fails to meet the duty to co-operate. 15

Report from Dr Athey, Independent Economist

In 2018, St. Helens Green Belt Association, of which ECRA are a main partner, engaged Dr Glenn Athey to review the Economic data used by St Helens Council and the Liverpool City Region (LCR) to inform the St Helens Proposed Local Plan.

ECRA fully support the findings of Dr Athey which include

1. The forecasts for employment growth are far too optimistic, the baseline forecasts are twice the rate of growth of the most recent five-year period.
 2. In St Helens, jobs growth in Storage and Distribution has been more than offset by loss in Light Industrial jobs.
 3. The use of outdated statistics (2006) for the increase in Port Traffic from Liverpool City Region is questionable. The latest statistics (2019) indicate a lower forecast for port freight, which has significant implications for land use demand.
 4. The assumption that jobs in manufacturing will increase through the increased availability of employment land seems unjustifiable. The trend over 2011 – 2015 was a loss of 1500 jobs. The credibility of the Oxford Economic Model is questionable. Documentation would suggest that the forecasts are "policy led" and not "objectively assessed."
 5. There has been a lack of transparency in the LCR documentation base availability.
- 6

ECRA will not reproduce the discussion contained in Dr Athey's report but fully endorse his findings and recommendations. ✓

Report from Piers Elias, Independent Demographer

This report was commissioned in 2018 by SHGBA, of which ECRA is a main partner. It provides a review of the St Helens Local Plan Submission Draft (SHLPSD) and updated St Helens Strategic Housing Market Assessment (SHMA), giving full consideration to the demographic factors that have gone into calculation of housing need with a view to assessing the integrity of the inputs and the plausibility and consistency of the outputs from a demographic viewpoint.

ECRA considers that the analysis documented by Mr Elias reveals that the SHLPSD and St Helens SHMA are flawed. ECRA endorses these findings and recommendations:

1. St Helens housing need should be 360 dwellings per annum (Appendix 3)
 2. SHMBC should aim to reduce unemployment rates as a sustainable way to improve the economy without any additional infrastructure.
 3. SHMBC should develop policies to reduce commuting. Increasing local jobs for residents would reduce the number of new dwellings needed and reduce traffic emissions and congestion.
 4. SHMBC should aim to reduce housing vacancy rates as part of a sustainable housing policy.
 5. Annual Migration within the UK must balance. Local and strategic plans need to be compared to test for consistency and realistic assumptions on the use of UK migrants to satisfy dwelling and economic growth aspirations.
 6. New housing phasing is too ambitious and should be slowed down due to building industry capacity and skill shortage issues.
- 10 3 10

7. GL Hearn & Oxford Economics should re-assess their projection models to demonstrate consistency; the mix of methodologies produces results which should be robustly challenged. ✓
8. Ministries of Housing, Communities and Local Government (MHCLG) should be recommending the use of latest information and need to review their use and interpretation of projection data. The UK Statistics Authority advises the use of the latest information ✓
9. MHCLG will be reviewing the Standard Method and the use of national data over the next 18 months. This creates a period of uncertainty for planning local housing need. ✓
10. There is a clear disjoint in the relationship between jobs, dwellings and population projections. The methodology for the OE population projections should to be assessed and tested to ensure consistency between jobs, population and dwellings. ✓

ECRA has summarised the principle objections to St Helens Local Plan Submission Draft 2019 (SHLPD) taking these reports into full consideration.

ECRA, based on this evidence, demonstrate that:

- there are no exceptional circumstances to justify not using the standard method.
- the economic analysis is flawed and based on over-optimistic assumptions.
- the area of land needed for development is not as great as set out in the Local Plan.
- there are, therefore, no exceptional circumstances to change Green Belt boundaries.
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously-developed land. ✓
- the policy and process for progressing the identification and remediation of contaminated land in preparation for entry onto the Brownfield Register is not robust.
- These alternatives will have less impact on the environment and result in a reduced need for new infrastructure.
- The Green Belt Reviews are inconsistent and biased.
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

For these reasons, and unless the plan is significantly modified, it fails the legal tests and tests of soundness.

St Helens Council should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously- developed land. ✓

ECRA have made a strong case to contest the need to remove Green Belt across the Borough but will specifically address the parcel of land 8HS (formerly HA16). ECRA is concerned that the methodology used in the Green Belt Review (2018) is difficult to apply consistently. It will be explained why 8HS should remain in Green Belt. (Appendix 4) ✓

ECRA is concerned that the strategy and policy is for large scale housing developments at the rural fringe rather than town centre development. This does not comply with National Policy nor is it sustainable. ✓

ECRA's comments on the Local Plan

Housing Need (Appendix 3)

Table 4.6 of the SHLPSD indicates that capacity is required to be found on Green Belt land for 2034 dwellings to meet housing needs, requiring 88ha of Green Belt to be released.

ECRA dispute the figures in this table:

1. The starting point is based on a figure of 486 that is not consistent with the Standard Method figure of 468 and is applied across 19 years from 2016 to 2035; the figure is over-stated by 342 dwellings.
2. The small sites/windfall sites allowance of 93pa in the table is applied across only 15 years rather than the 19 years as per the housing requirement; the figure is under-stated by 372.
3. The 15% non-delivery figure is excessive given that there are currently only 289 of 7682 units not delivered from SHLAA 2017 (3.8%).
4. It is not acceptable to allow for a "failure to deliver" factor of 15% on the land that has been identified, is deliverable and is available for development.
5. Additionally, the 15% non-delivery reduction is being applied to the 93pa from small/windfall sites despite 93 being calculated from robust data over a 10-year period; at 15% the reduction is over-stated by 160 dwellings.
6. There is a second allowance of 20% applied to the "Required capacity to be found on Green Belt land" to allow for contingencies, one of which is "infrastructure provision". Allowance for infrastructure is already accounted for by the Net Developable Area factors as used by Keppie Massie within the EVA; typically, 100%, 90% or 75% dependent on gross site size.

Contaminated, Previously Developed and 'Brownfield' Land

ECRA calls upon the council to rigorously adopt policies to bring forward contaminated, previously-developed or 'brownfield' land, in the plan period, to ensure that both Sections 8 c) and 11 of the NPPF (February 2019) are satisfied (Appendix 1). There is a concern that the Brownfield First policy commitment of the council is weakened significantly by the addition of the wording: "as far as practicable."

ECRA calls upon the council to be proactive in the implementation of its documented strategies and joint working arrangements, as detailed in the SHMBC Contaminated Land Inspection Strategy, revised January 2017 (CLIS). This strategy (CLIS) highlights the fact that "contamination in St Helens is widespread, due to the area's industrial heritage and the nature of its past industries" (p.35 Contaminated Land Inspection Strategy Revised January 2017 CLIS). Furthermore, it is noted that "Tackling the historic legacy of contaminated land through the regeneration process is a sub-regional priority. Its importance is being flagged up through joint working arrangements at the sub-regional level including:

- Liverpool City Region Combined Authority and its future delivery of a Spatial Framework covering the City Region;
- The Local Enterprise Partnership (LEP);
- City Region Growth Strategy (LEP);
- EU Investment Plan 2014-2020 (LCR EU Structural and Investment Funds Strategy 2014-2020);
- Local Nature Partnership".

(p.11 & p. 12 CLIS)

Two key strategic aims within this strategy suggest that STHMBC has an appetite to protect valuable Green Belt whilst acting to remediate sites which are currently deemed unsuitable for re-development:

- "to assist regeneration, improvement of the environment and protection of the Green Belt through effective links with wider Council and regional policies;
- to encourage, where appropriate having due regard to ecological importance, the reuse and remediation of brownfield land through the planning regime in accordance with the National Planning Policy Framework (NPPF) to ensure that new developments are suitable for use."

(p.36 CLIS)

However, there is a distinct lack of cohesion between these documented intentions and the Council's own evidenced activity, particularly when viewed in the context of the SHLPSD. The Contaminated Land Inspection Strategy states that "speed and progress during implementation of this strategy continues to be dependent on the resources available".

A rolling programme of detailed inspections commenced in 2009 and is reviewed annually. Notably the progress has been reactive rather than proactive; during the last 10 years the programme has been entirely as stated in the strategy, i.e. "Much of the action taken to deal with land contamination has been development-led, through the planning and development management process." (p.33 CLIS).

SHMBC published a statement of Contaminated Land (CL) sites, 2015, shown as Table 35 (Appendix 1) – Brownfield and Contaminated Land. The table illustrates that 3,170 ha of the lowest priority contaminated land exists in St Helens, whilst the SHLPSD states that 148 ha of Green Belt are in jeopardy of reclassification to become Safeguarded land, to fulfil a questionable housing need. **This area equates to less than 7% of the 3,170 ha CL. Hence the need for reclassification of Green Belt to Safeguarded land could be totally eliminated if the process outlined in the Strategy (CLIS) was rigorously adopted.**

It is not surprising therefore that the slow rate of progress is of great concern to ECRA and it is entirely wrong to risk the loss of Green Belt rather than implement a robust policy and efficient process for remediation.

SHMBC suggest that funding poses a barrier and the CLIS states:

"Local authorities are required to investigate potentially contaminated sites in accordance with the Statutory Guidance and, where necessary, at their own expense. Where sufficient evidence is obtained to conclude that sites are Contaminated Land, the "polluter pays" principle will apply, ... Where no responsible person(s) can be found, the local authority may be required to undertake this work at their own expense."

(p.49 CLIS)

Presumably with this in mind, Leader of the Council (SHMBC), Cllr Derek Long on national TV (June 2018), stated that two-thirds of St Helens was made up of contaminated land and that it would cost £40m to remediate. ECRA question why would the Council leave two-thirds of the borough to languish and blame a lack of central government funding when there is a regional funding underspend?

St Helens is part of the Liverpool City Region. Liverpool City Region (LCR) hold a Strategic Investment Fund (SIF) which, in February 2019, was reported, by the Liverpool Echo, to be £80m underspent. The newspaper quoted Mark Bousfield, Director of Commercial Development and Investment for the

LCR as follows: "The £80m that was not spent during the first phase is still available and has been rolled into our new £500m Strategic Investment Fund."

"The SIF will support projects that:

- "Unlock unviable housing sites in order to accelerate housing delivery in the City Region;
- ...are located in areas of strategic significance and deliver neighbourhood regeneration;
- include development of housing on Brownfield sites..."

ECRA question why would St Helens Council fail to apply, via the Combined Authority SIF, for redefinition monies? SHMBC and St Helens Chamber are eligible to bid into the SIF – why don't they collaborate; optimise their development team capacity and make viable bids to this fund?

This shows that vital funds, from the SIF, are within the Council's reach and could be used commensurate with the LCR's Sustainable Urban Development Strategy.

ECRA was pleased to hear the announcement, in February 2019, that SHMBC is taking part in a national pilot to look at innovative ways to bring small brownfield sites back into use. This is a study supported and funded by the Local Government Association, together with the consultancy firm – Local Partnerships. Cllr Derek Long (Leader of the Council) suggests "a renewed focus on a brownfield-first policy (where possible)". If this offers a vehicle to identify new models for bringing brownfield sites forward, then it is obviously welcomed. ECRA equally trusts that findings/outcomes of this pilot will mitigate the moves to safeguard land.

ECRA would support all viable means by which St Helens Council could identify and process more Brownfield and Contaminated land to make it available for development within the period of the plan.

ECRA's evidence shows that there can be a meaningful and sustainable change in policy to recover contaminated land during the next 15 years, and hence there is no requirement for any Safeguarding for development beyond the plan period, and no exceptional circumstances for removing land from the Green Belt.

ECRA is concerned that:

1. The SHLPSD ignores any provision in meeting the housing need from Unsuitable sites. These sites have been excluded on the basis that it is not possible to bring them forward for development during or beyond the period of the proposed SHLPSD.
2. Policy LPA06 of the SHLPSD sets out the council's view that Safeguarding is needed to ensure the long-term development needs for housing beyond 2035. However, ECRA understands that the acknowledgement within the SHLPSD that housing needs will be lower after 2035 effectively means that 2955 dwellings from Allocated sites (even using 468 units) would provide over 6 years supply.
3. Designating high quality agricultural land now, as development land for the period beyond 2035 (by which time circumstances and needs will have changed), does not accord with the principles of sustainability and is not an efficient custodianship of precious land resources.
4. Whilst remediation may be an expensive and complex process, the type, extent and cost of remediation of contamination will vary. Safeguarding land for future development will act as a disincentive for landowners to work in conjunction with developers to remediate and develop contaminated land. (Further exploration of this point can be found within Appendix 2)

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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.

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.

ECRA would question why the infrastructure question (SA Objective 16) is scored green and "likely to promote positive effects." 8HS can only be accessed from one side, Houghtons Lane, a small country lane, which would require significant infrastructure development to be undertaken, leading to a new junction at the A580 controlled either by lights or roundabout. One site access will be within 500m of the main Windle Island junction and considered likely to cause flow issues for traffic, leading to stationary idling vehicles.

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.

Windfall sites (SHLAA)

In just over 3 months, since the SHLPSD was published, land availability has come about for 222 units.

In real terms, that equates to 13% of the "Required capacity to be found on Green Belt land" detailed in Row-n of SHLPSD Table 4.6, 1695 units.

It is the view of ECRA that opportunities such as those listed in the table below exist across the borough and demonstrates that not all other options have been explored prior to release of Green Belt.

At the very least it highlights that the decision not to include a windfall allowance in the SHLAA for large sites should be revisited. (Appendix 2)

Plan Ref	Site Reference	Location	Category	Site Size (Ha)	Dwellings	Status	Comments
P/2019/0186/O2DPA	Crown Buildings	College Street	Town Centre	0.35	66	Plans Submitted	Area >0.25ha - Large Site Development >10 - Large Site
P/2018/0502/FUL	Our Mother of God Parish Centre	Fleet Lane	Parr	1.34	33	Under Construction	Area >0.25ha - Large Site Development >10 - Large Site Our Lady's Primary School was included in SHLAA and is part of this development (21 units) An additional 33 units are not counted in SHLAA
P/2019/0192/FUL	Listed building conversion	Newton Park Drive	Newton Le Willows	Unknown	35	Plans Submitted	Development >10 - Large Site
P/2019/0225/FUL	Fort Knox	Dentons Green Lane	Town Centre	0.15	20	Plans Submitted	Development >10 - Large Site
	Barrow House	Barrow Street	Town Centre	Unknown	28	Plans Submitted	Development >10 - Large Site
P/2018/0848/FUL	Thatto Heath Royal British Legion Club	Scholes Lane	Thatto Heath	Unknown	30	Plans Submitted	Development >10 - Large Site
P/2019/0215/FUL	Former 21-51 Pennine Close	Pennine Close	Parr	Unknown	10	Plans Submitted	Development >10 - Large Site
					222		

Duty to Co-operate

The council have a statutory duty to collaborate on cross-border issues with neighbouring and regional authorities.

ECRA question whether strategic decisions have been made by the Council in consultation with neighbouring authorities in accordance with the statutory *Duty to Co-operate* [and the *Statements of Common Ground* with neighbouring authorities] in developing the LPSD.

ECRA has concerns in relation to the following

1. Agricultural policy –the population increase being planned in St Helens and the region, ignores the need for food security in the SHLPSD and other Local Plans. However, the SHLPSD includes the permanent removal of high-quality farmland from food production.
2. Economic strategy - Local Planning Authorities in the North West all appear to be relying on large increases in population to justify the need for removing land from Green Belt in their local plans. The North West will only receive a proportion of the net increase of immigration into the UK. Local Authorities relying on figures for increases in population well above the national average can only achieve them by net migration into the Borough from other Local Authority areas.
3. Transport and travel – the North West road system is heavily congested, yet the respective local authorities are relying on large increases in population and industrial growth which are not commensurate with collective plans for developing transport infrastructure to deal with their projections.
4. Healthcare services – there is no evidence of any method for forecasting future healthcare demand for significant population growth with an increasing aged population. A robust regional forecasting system is needed to ensure healthcare services match demand in a manner similar to the housing delivery tests, between authorities and CCGs.

The above issues may impact on whether the Duty to Co-operate has been fully complied with in this respect.

ECRA's comments on GREEN BELT, specifically 8HS (formally HA16)

ECRA has previously commented on the strategic issues of the Local Plan. In the following section the issues specific to 8HS in Eccleston and Windle will be addressed. ✓

Background and History

St Helens has 8,844 hectares of designated Green Belt Land, 65% of the 13,600-hectare St Helens Borough, a fact that should be celebrated. No information is available about Green Belt Areas related to individual wards. ✓

The 2012 St Helens Core Strategy (SHCS) proposal envisaged no Green Belt development for housing or Employment. The Core Strategy covers a period from 2012 to 2027. In the first five-year Local Plan Review the position had changed significantly. ✓

The SHLPPO (2016) stated that St Helens can no longer meet its Housing and Employment Land Need from Brownfield or Previously Developed Land (PDL) alone and proposed significant development of the Green Belt. It was proposed to release 1,187 hectares of Green Belt for development reducing the Green Belt area to 7,657 hectares or 56% of the St Helens Borough Area. ✓

The SHLPSD 2018 has removed many of the SHLPPO (2016) housing allocations on Green Belt Land. It is now proposed that 24 sites totalling 695 Hectares are needed for Employment and Housing Land need, reducing the Green Belt to 8,149 hectares or 60% of the borough area. ✓

As well as reducing the current Green Belt area to be set aside for development during the Plan Period to 2035, the SHLPSD (2018) proposes Safeguarding sites currently in the Green Belt to ensure that housing targets can be met. Eight sites, including 8HS on the A580, totalling 148 hectares, are proposed as sites to be safeguarded for housing development beyond 2035 in addition to two safeguarded employment sites totalling 86 hectares. ✓

The NPPF (Chapter 11) encourages development in urban areas and town and village centres and promotes town centre regeneration and effective use of land. By focusing on sites which are edge of town, currently Green Belt and high-quality farming land (such as 8HS), rather than derelict land and underutilised sites the LPSD is not meeting the requirements of the NPPF with regard to sustainability. ✓

ECRA suggests that the circumstances justifying the removal of 8HS from the Green Belt proposed by the Council do not meet the "exceptional threshold" – the evidence for this conclusion is examined under the key areas outlined below –

- Agriculture and Sustainability.
- Transport – local and wider ranging impacts, including pollution.
- Local schools and the impact and effectiveness of on the Infrastructure Delivery Plan (IDP).
- Healthcare services.

Agriculture and Sustainability

The SHLPPO (2016) makes no reference to the local agricultural industry.

1. 8HS is mainly Grade 1 Agricultural land. The loss of high-grade agricultural land classification is to be discouraged and is not sustainable. It could be considered unwise given the increased population growth estimates.
2. Residents contend that 8HS, as high-quality agricultural land, has an important role to play as a contributor to food security. The situation is magnified as all city regions and neighbouring authorities have similar aggressive growth scenarios without consideration to agricultural need.
3. 8HS will contribute to an approximate increase of 40% in local population and this could be considered disproportionate & adversely affect the character of the community, failing the community objective of sustainable development.
4. The Local Plan promotes rural fringe development over Town centre/Edge of town development. This is not consistent with NPPF policy.
5. The notional housing Densities proposed are low and not consistent with NPPF section 11 for the effective use of Land. The parcel offers only 65% developability.
6. The proposals for the supply of 30% affordable housing is not guaranteed if developer profits are under threat, using viability rules.
7. The site is crossed by four public right of ways and is surrounded in part by established hedgerows. This is a network of well-used footpaths through open fields, providing recreation and contributing to the health and well-being of residents.
8. The site contains a flood plain, there is a Flood Risk.

Transport

The NPPF(2018) guidelines state that:

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Residential Traffic

1. The renowned Windle Island junction is situated North of St Helens and lies adjacent to the 8HS site. It is crossed by the A580 East Lancs Road (Liverpool to Manchester) and also by the A570 Rainford Road, which at this point becomes the Rainford by-pass. Windle Island is accessed, from Windle residential routes, via the B5201 Bleak Hill Road and the A570 Rainford Road 'T' junction. **These two junctions are intrinsically linked and have long standing intractable traffic problems pertaining to congestion and safety.** Resolution is constrained

- by the close proximity of residential and commercial properties alongside the routes and junctions.
2. The junction attracts traffic from Prescot and St Helens travelling north to Ormskirk and the M58. The junction cannot be controlled by traffic lights due to its close proximity to the Windle Island junction so queues form travelling north causing severe congestion particularly at peak periods.
 3. A580/A570 junction improvements which have been undertaken in 2018/2019 relate to the Superport access and egress corridors and are aimed at relieving queuing and reducing idling but will not resolve the issues at the Bleak Hill Road/Rainford Road 'T' junction.
 4. St Helens is geographically placed in the centre of the Northern Powerhouse Central Pennines Corridor and the cumulative negative effects of increasing warehousing and associated traffic is already being witnessed at Windle Island. This is all the more reason why we should protect and conserve the irreplaceable green spaces that remain.
 5. Estimates of increases in vehicle ownership resulting from the Local Plan proposals are made on the basis that 30% affordable homes will be provided. Hence, an average figure of 1.85 parking spaces per new dwelling is used in our analysis. (i.e. $70\% \times 2 + 30\% \times 1.5 = 1.85$). 8HS, as a site for 1000 homes, can be assumed to accommodate 1850 extra cars. This will compound existing local traffic problems - problems that have been discussed and remain unresolved mainly because the network of 'feeder routes' on the residential perimeter of 8HS are narrow; they are already heavily congested and cannot safely accommodate extra cars.
 6. With additional traffic comes a risk for safety. At peak times the traffic movement and parking issues, on roads serving our schools is dangerous. Pedestrian safety is already being compromised.
 7. Erosion of road surfaces and establishment of 'rat-runs' in 20 and 30 mph zones, to avoid congestion, are other facets of the problematic residential traffic situation which are not addressed in the Infrastructure Delivery Plan (IDP).
 8. The Council has a policy to reduce out-commuting. In the Traffic Impact Assessment (January 2019) 8HS is sited in a locality where 75 – 85% of people are known to commute by car. (Appendix 5). 8HS has a notional capacity of 1000 homes and, potentially, 1850 more cars, in the area most isolated from public transport and as such necessitates a high level of car dependency.

Public Transport

1. 8HS is remote from rail transport hubs and development here would have considerable negative impacts to the effectiveness of a sustainable transport strategy, directly because increased private car and taxi dependency would be inevitable. 8HS is approximately 2 miles from St Helens Central station and approximately 3 miles from Eccleston Park Station. There is no direct bus service to the latter, yet this is the station of choice for many Eccleston and Windle residents, since it is more convenient than a 'walk/wait/bus-ride/walk' option.
2. Bus services within Eccleston and Windle can be at best described as inconsistent, ranging from poor to non-existent. The timely linkage for rail connections to Liverpool and Manchester is questionable. There is absolutely no indication of how this might be remedied by the Infrastructure Delivery Plan (IDP).
3. The Green Belt Review (Appendix 4) does not give due consideration to the lack of public transport.

Commercial Traffic

1. The growth in commercial traffic across St Helens will be impacted upon by the Liverpool Superport and new logistics warehousing in the borough. A high proportion of this traffic uses the A580 adjacent to 8HS. Is it logical to build over one thousand houses after recent investment in developing the adjacent highway has been made to accommodate further traffic?
2. Liverpool SuperPort is intending to quadruple the number of LO-LO (load on – load off) TEUs (twenty-foot equivalent units) from 750,000 in 2014 to 3,000,000 by 2030 [table 4, section 2.5 of the Liverpool City Region SuperPort document] the majority of which will go by road. In addition to this there will be an increase in RO-RO (roll on – roll off) traffic to 1,047,700 units by 2030. 57% of this container traffic is destined for Merseyside and the North West, and forecasts from the *Transport for the North (TftN)* consultation document (2018), estimate that there will be at least 5,000 HGVs per day using the East Lancashire Rd (A580), by 2035 when 8HS is due for development. These will include 20' and 40' containers.
3. These commercial vehicles will be servicing the new large logistics warehouses being built on former Green Belt and mushrooming along the A580 from Knowsley to Florida Farm, Haydock and to the M6 and Manchester. The developers of these sites advertise easy access to Liverpool and to the M6 and Manchester, effectively offering the A580 as an alternative motorway and putting more pressure on local roads and busy intersections.
4. In addition to the growth of HGV freight, these logistics warehouses will drive a significant increase in Light Goods Vehicles (LGVs) traffic such as internet shopping delivery vans.
5. Transport for the North (TftN) have been set up by the government to support the Northern Powerhouse to look at strategic transport issues. TftN has no funds or authority to initiate projects. TftN aim in their Strategic Transport Plan (STP)¹ that 85,000 new jobs will be provided in the Northern Powerhouse region over 30 years.
6. The *National Infrastructure Commission (NIC)* in their September *National Infrastructure Assessment*² identified Manchester and Liverpool as the most congested cities outside London. The A580 is a major route between these two cities.
7. The IDP concentrates more on the current situation and does not outline in detail what impact the LPSD will have on the local road network nor how they propose manage that impact or fund it.

Transport Impact – Air pollution

Local Councils must consider local air quality as prescribed by the NPPF guidelines:

Para 170 – Conserving and enhancing the natural environment

“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.”

1. Air Quality England has no data for the area around 8HS, therefore it is difficult to make comparisons. However, such data would quickly be out of date if the growth of traffic continues unabated.

¹<https://transportforthenorth.com/stp/>

²<https://www.nic.org.uk/assessment/national-infrastructure-assessment/> September 2018

2. The stretch of A580 between the M57 and M6 motorway is 10.4 miles long and provides a direct and busy route to the industrial estates at Stonebridge Park, Kirkby, Knowsley Village to the west and Haydock and Florida Farm to the east of Windle. It has 17 junctions, roundabouts or traffic lights which impede the smooth flow of traffic in both directions.
3. 8HS is an essential clean air and noise buffer separating residential areas of Eccleston and Windle from this pollution. The site will require additional new access points. The more the traffic is forced to stop and idle, the more traffic pollution will be generated. If developed the site would be immediately adjacent to the extremely busy and polluted A580. This piece of land is the last remaining, accessible and irreplaceable, piece of Green Belt which sits between the residential areas and the highways. It is the vital green lung for the district.

Schools

1. Local primary and secondary schools have been oversubscribed for the past three years and Bleak Hill Primary has recently applied to increase pupil numbers to accommodate current need. Pressure from new large local housing developments have exacerbated this situation. Table 2.
2. Large numbers of pupils from Eccleston and Windle travel via Windle Island, by bus, to the oversubscribed secondary school in Rainford. House building in Rainford will reduce the capacity for these pupils to access their education of choice. Table 1.
3. It is almost certain that new primary and secondary schools will be needed to accommodate "8HS children" and there is no plan for this extra land that will be required. Pupil Allocation Numbers (PAN) have recently been increased to accommodate current demand.

School	PAN	Places Allocated	Balance	Waiting List
Cowley	250	250	0	22
De La Salle	240	227	13	0
Rainford	290	290	0	47

Table 1 - St Helens Council Secondary schools' data 2018

School	PAN	Places Allocated	Balance	Waiting List	Appeals Lodged (as at 18 May, 2018)
Bleak Hill Primary School	60	60	0	34	0
Eccleston Mere Primary School	60	61	-1	18	1
Julie's Catholic Primary School	35	35	0	9	3

Table 2 - St Helens Council Primary schools' data 2018

4. The latest available numbers for Nursery places in Eccleston and Windle indicate that there were no available places in Eccleston Mere Nursery in 2017 and only nine places at Rivington Primary. The nearest Primary school to 8HS is Bleak Hill Community Primary School which does not have nursery provision.
5. The IDP fails to explain fully the impact of the LPSD on Education. The current situation is touched on broadly, but the impact of the LPSD, and how this will be managed and funded is missing, not fully described or vague.

Healthcare

1. The IDP fails to explain fully the impact of the LPSD on Healthcare. The current situation is touched on broadly, but the impact of the LPSD, and how this will be managed and funded is missing, not fully described or vague.
2. GP Services - although consultation has been made with regards to CCG's on GP services there is no indication or reference to significant collaboration with St Helens and Knowsley Teaching Hospitals NHS Trust. The IDP gives an overview of the area Whiston and St Helens services but does not go on to say how the LPSD proposals will impact demand and how this demand will be accommodated and funded over the Plan period and beyond.
3. The IDP notes, that there is a registered NHS GP population of 196,627 and 64 practices. Para 4.29 notes that there are 52 GPs per 100,000 people or 1,923 people per GP, in St Helens CCG area. It also states that a quarter of GP's are over 55 and due for retirement during the Local Plan period. The National average is 65 GPs per 100,000 people or 1,538 people per GP. Staffing within the health service is reported to be a growing problem and St Helens may have difficulty attracting staff.
4. GP leaders have proposed to limit GP patients to 1,500 and 25 consultations per day. They also wanted to set an unsafe number of consultations of 35 per day or 2,100 patients per GP. At 1,923 patients per GP St Helens is approaching the unsafe limit, so increasing demand is something that cannot be dismissed within the Local Plan.
5. The new homes proposed in the LPSD over the Plan period and beyond will lead to a population increase of around 28,000 over the next 25 years. That translates to 16 more GPs to meet 14-19 extra GPs together with approximately 25 retirement replacement GPs all in a challenging recruitment market. Eccleston and Windle with a planned safeguarded housing need beyond 2035 of 1,983 homes (approx. 40 % increase on 2011 census of 4,800 homes) will increase the population of by about 4,500 requiring an extra 3 GPs and almost certainly another GP practice.
6. The IDP does not spell out these challenges are to be met or outline a strategy for provision and funding of GP services over the life of the Local Plan. It therefore fails to meet the NPPF para 8 b) for the social objective in Achieving Sustainable development.
7. The IDP para 4.35 outlines that Whiston and St Helens Hospitals provide services for 350,000 people across St Helens, Knowsley, Halton Liverpool and further afield. With the planned population growth across the areas served and a higher proportion of elderly people, it is difficult to see how the Hospital Trust can justify, with any certainty, that it sees no need to increase capacity and facilities.
8. The scale of population growth will require hospital expansion and improvements to provide safe emergency and general medical care. Patient appointments are disrupted and abandoned due to traffic congestion around both Whiston and St Helens Hospitals.
9. According to the St Helens and Knowsley Teaching Hospitals NHS Trust, (April 2019) Whiston Hospital's A & E department saw 10,021 attendances last month. This is up from 9,864 in March 2018 and is an increase from the 9,186 A & E attendances in February 2019. The IDP (4.38) has not highlighted any need to increase capacity.

ECRA Key points

- Agriculture and Sustainability.

ECRA is of the view that building on mainly Grade 1 Agricultural land at low densities is not an effective and sustainable use of resources, particularly in view of the availability of Brownfield and Contaminated land in St. Helens. Larger Windfall sites should also be included based on the recent trend data.

An increasing awareness of climate change and environmental issues from the government down appears entirely contradictory to bringing forward a Local Plan which destroys Green Belt and Agricultural land when there is a surfeit of other available land.

- Transport – local and wider ranging impacts, including pollution.

ECRA have shown that the Green Belt Review (2018) has not taken full account of the existing road network near 8HS. This is a mixture of A and B roads, narrow residential roads and country lanes. Congestion exists on all these routes and the IDP does not address the potential problems that a development of over 1000 houses will inevitably bring. These houses will infill a current pollution buffer zone and cause potential health problems.

- Local schools and the impact of the Infrastructure Delivery Plan (IDP).

ECRA have shown that the IDP has not acknowledged the lack of school infrastructure required to support a development of over 1000 houses. The nursery, primary and secondary schools which service the area around 8HS are regularly oversubscribed. There is no plan to increase school places to accommodate future need which will require land for additional schools.

- Healthcare services

ECRA 's evidence shows that the existing strain across all levels of healthcare facilities has not been addressed by the IDP.

ECRA suggest that the plan needs to be modified, specifically that the parcel of Green Belt, 8HS in Eccleston and Windle, should NOT be removed for development in the next 15 years or safeguarded for longer term development.

Appendices

Appendix 1 – Contaminated, Previously Developed and “Brownfield”

Appendix 2 – Land Availability

Appendix 3 – Housing Need

Appendix 4 – Green Belt Review

Appendix 5 – Sustainability Review

Appendix 1 – Contaminated, Previously Developed and ‘Brownfield’ Land

SHMBC Contaminated Land Inspection Strategy, revised January 2017 (CLIS).

ECRA has reviewed the SHMBC Contaminated Land Inspection Strategy, revised January 2017 (CLIS), in the context of the NPPF and the SHLPSD:

“8. Achieving sustainable development ... c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

“11. Making effective use of land

117. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”

This strategy (CLIS) highlights the fact that “contamination in St Helens is widespread, due to the area’s industrial heritage and the nature of its past industries” (p.35 Contaminated Land Inspection Strategy Revised January 2017 CLIS).

However, **ECRA show** that there is a lack of cohesion between these documented intentions and the evidenced activity, particularly when viewed in the context of the SHLPSD.

The Contaminated Land Inspection Strategy states that “speed and progress during implementation of this strategy continues to be dependent on the resources available”. This is borne out by the results shown in the table below:

Table 35 - St Helens Statement of Contaminated Land, 2015

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

Notes:- 1 km² is 100 Hectares.

SPOSH = Significant Harm and Significant Possibility of Significant Harm to Human Health

Site Category Grouping A is High priority and C is lowest priority – Inspection Strategy item 5.5

Appendix 2 – Land Availability

To give some perspective to 9105 sites mentioned in table 35 (Appendix 1), the 2017 SHLAA highlights 32 deliverable large sites, with planning permission, which have an outstanding capacity of 2235 units.

Finding another 32 sites from 9105 (just 0.35%) capable of delivering that quantity of units would mean no Green Belt release is required.

The SHLAA additionally documents an overall supply of 97 sites with an outstanding capacity of 6695 units - remediating just 1% of the 9105 sites would yield almost as many sites as currently detailed in the 2017 SHLAA.

Using an average yield of just 20 units, over 1800 units could be delivered and no Green Belt is required. (Note: the 97 SHLAA sites average over 80 units. Even removing those sites which deliver over 100 units, the average SHLAA site delivery is 30 dwellings).

Clearly just 2% of the 3170ha lowest risk derelict land would be needed to find land capable of delivering almost 2000 dwellings eliminating the requirement to use any Green Belt land.

The 2017 SHLAA includes an allowance for 'Small Sites' and Windfall sites.

The Core Strategy applied a windfall allowance of 85 dwellings per annum for large sites (large being 10+ dwellings) between years 11-15 of the Plan period. However, a revised approach was adopted in 2016 SHLAA to streamline the process such that, only sites above 0.25Ha have been assessed and for sites below this, an allowance has been made.

That allowance is based on robust historical data of 10 years and produces an annual figure of 93 dwellings per annum.

Further consideration was given to applying a windfall allowance to larger sites above 0.25Ha, but historical data demonstrated very few dwellings being delivered on such sites. An allowance was therefore not included for large windfall sites within the 2017 SHLAA, but this approach should be reviewed at the next updated SHLAA.

The Core Strategy deemed that a site capable of 10+ dwellings would be classified as a 'large site'.

The SHLAA 2017 additionally deemed that a site of greater than 0.25Ha would be classified as a 'large site'.

It is the view of ECRA therefore, that any developments that are planned to be delivered since the publication of the LPSD in December 2018, which are 10 or more dwellings OR on sites bigger than 0.25ha, which are not included on the Brownfield Register 2017, will not be counted in the overall housing delivery figures used in SHLPSD Table 4.6.

The table below details plans submitted since the approval of the LPSD by Councillors in December 2018.

In just over 3 months since the SHLPSD was published, land availability has come about for 222 units.

Plan Ref	Site Reference	Location	Category	Site Size (Ha)	Dwellings	Status	Comments
P/2019/0186/O2DPA	Crown Buildings	College Street	Town Centre	0.35	66	Plans Submitted	Area >0.25ha - Large Site Development >10 - Large Site
P/2018/0502/FUL	Our Mother of God Parish Centre	Fleet Lane	Parr	1.34	33	Under Construction	Area >0.25ha - Large Site Development >10 - Large Site Our Lady's Primary School was included in SHLAA and is part of this development (21 units) An additional 33 units are not counted in SHLAA
P/2019/0192/FUL	Listed building conversion	Newton Park Drive	Newton Le Willows	Unknown	35	Plans Submitted	Development >10 - Large Site
P/2019/0225/FUL	Fort Knox	Dentons Green Lane	Town Centre	0.15	20	Plans Submitted	Development >10 - Large Site
	Barrow House	Barrow Street	Town Centre	Unknown	28	Plans Submitted	Development >10 - Large Site
P/2018/0848/FUL	Thatto Heath Royal British Legion Club	Scholes Lane	Thatto Heath	Unknown	30	Plans Submitted	Development >10 - Large Site
P/2019/0215/FUL	Former 21-51 Pennine Close	Pennine Close	Parr	Unknown	10	Plans Submitted	Development >10 - Large Site
					222		

In real terms, this 222 units equates to 13% of the "Required capacity to be found on Green Belt land" detailed in Row-n of LPSD Table 4.6 which is 1695 units.

ECRA's evidence shows that opportunities such as those listed in the table above exist across the borough and demonstrates that not all other options have been explored prior to the release of Green Belt.

At the very least it highlights that the decision not to include a windfall allowance in the SHLAA for large sites could be questioned.

Appendix 3 – Housing Need

Table 4.6 of the SHLPD indicates that capacity is required to be found on Green Belt land for 2034 dwellings to meet housing needs, requiring 88ha of Green Belt to be released.

There are a number of reasons that ECRA dispute the figures in this table:

- The table uses multiple date ranges which appear to confuse the figures, with various additions and allowances being applied.
 - Plan period is 2020-2035
 - Housing requirement in the table is 2016-2035
 - SHLAA referenced is 2017-2035
- The PPG makes it clear that in decision making:
“unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green Belt”
- Why is it that in the Local Plan drafted in December 2018, STHC are including 486 dwellings per annum for the years 2016, 17 and 18?
 - If any of that housing need has been unmet, Green Belt should not be targeted to recover those ‘losses’
- The starting point is based on a figure of 486 that is not consistent with the Standard Method figure of 468 and is applied across 19 years from 2016 to 2035; the figure is over-stated by 342 dwellings.
- The small sites/windfall sites allowance of 93pa in the table is applied across only 15 years rather than the 19 years as per the housing requirement; the figure is under-stated by 372.
- The 15% non-delivery figure seems to be excessive given that there are currently only 289 of 7682 units not delivered from SHLAA 2017 (3.8%).
- Given there is the suggestion that land availability is the problem and why Green Belt is required, it is not acceptable to allow for a “failure to deliver” factor of 15% on the land that has been identified, is deliverable and is available for development.
- Additionally, the 15% non-delivery reduction is being applied to the 93pa from small/windfall sites despite that figure of 93 being calculated from robust data over a 10-year period; at 15% the reduction is over-stated by 160 dwellings.
- There is a second allowance of 20% applied to the “Required capacity to be found on Green Belt land” to allow for contingencies, one of which is “infrastructure provision”.
- Allowance for infrastructure is already accounted for by the Net Developable Area factors as used by Keppie Massie within the EVA; typically, 100%, 90% or 75% dependent on gross site size.
- ECRA would suggest it more reasonable to use a figure of 10% for this allowance to avoid any double counting; over-stated by 170 dwellings.
- Based on Appendix 2 above, an allowance should be included for large windfall sites at either a smaller figure for the 15-year plan period or possibly a larger figure for the longer-term supply period (11-15 years).
- Acknowledging the mixture of dates used in Table 4.6, the Local Plan period is 2020-2035 meaning a housing need of 15 years at 486 dpa → Total = 7290

- The latest Brownfield Register (2018) due for release at the latest by December 2018 was finally released in April 2019 and identifies availability for 6028 units.
- Given the Brownfield Register is 1 year out of alignment with the LP, simply increasing the 7290 by an additional 486 aligns the inputs → Total = 7776 (2019-2035).
- If previously developed land availability is an issue, why allow non-delivery of such magnitude?
- At 10% non-delivery, the 6028 from Brownfield would equate to 5425 units.
- This results in a residual capacity to be found of 2351
 - (7776 minus 5425)
- There is then the Small/Windfall Sites allowance of 93 units per annum → Total = 1488
- It is a fact that planning has been submitted or already approved on several Large/Windfall Sites between the LPSD publication in December 2018 and now, April 2019 → Total = 222
- There should be an allowance included within the plan for further sites of this nature and it would not be unreasonable to say 30 dpa over the period given that over 200 have been found within 4 months of the plan being published → Total = 480.
- This results in a final residual capacity to be identified of 161. (2351 minus 1488 minus 222 minus 480)
- Clearly, using the Standard Method figure of 468 would result in that 161 becoming a negative (surplus) figure.
- The requirement to find capacity for only 161 dwellings would not constitute exceptional circumstances and therefore no Green Belt Review should have been performed and no Green Belt should be released.

ECRA contend that during the next 15 years, St Helens Council should bring about change in its policies and procedures, and work to regenerate at least some of the 3170 ha of the lowest contaminated land in the borough.

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.

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.

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.

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.

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 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.

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 8HS is equally a medium.

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	SA4. Sustainably manage water resource	SA5. Mitigate against climate change	SA6. Minimise the risk of flooding	SA7a. Landscape sensitivity	SA7b. Distance to prominent ridge/line	SA8. Protect and enhance cultural heritage	SA9a. Access to open space and green space	SA9b. Public Rights of Way	SA12a. Access to GP	SA12b. Access to Leisure	SA13a. Access to Primary School	SA13b. Access to Secondary School	SA14. Access to employment opportunities	SA15. Support local economy	SA16. Access to housing	SA17. Reduce poverty and social exclusion	SA19. Reduce need to travel	SA20. Access to services
		SA13a- cant find it																							
52	GBP_058	Land South of Station Road	Haydock	Discard																					
53	GBP_060	Land at Florida Farm, Slegg Lane, Haydock, WA11 0UZ	Blackbrook	Site 2HA																					
54	GBP_070	Land west of Parr and Sutton	Parr	Discard																					
55-59	GBP_073	Land west of Neills Road, and south of Bold, north of Gorseley Lane	Bold	Site 4HA																					
64	GBP_074_b	Land south of Clock Face, north of the M62	Bold	Discard																					
65	GBP_074_c	Land south of Gartons Lane, Clockface	Bold	Site 5HA																					
66	GBP_074_d	Land south of Sutton Manor	Sutton Manor	Site 6HS																					
67	GBP_082_b	Land South of Sutton Manor	Sutton Manor	Discard																					
68	GBP_082_c	Land south of Sutton Manor	Sutton Manor	Discard																					
69	GBP_085_b	Land at hanging Bridge Farm, Elton Head Road	Rainhill	Discard																					
70	GBS_085_C	land south of Elton Head Road, adjacent to St. John Vianney Catholic Primary School	Thallic Heath	Site 7HS																					
71	GBP_087	Eccleston Park Golf Club, Rainhill Road	Eccleston	Site 3HS																					
72	GBP_088	Land North East of Eccleston Park Golf Club	Eccleston	Discard																					
73	GBP_089	Land north of the M62 and south of Mill Lane	Rainhill	Discard																					
75	GBP_098	Land south of A580 East Lancashire Road and east of Houghtons Lane, Windle	Windle	Site 8HS																					

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:

- protecting landscapes, geology, and soils considering the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land preventing soil, air, water, or noise pollution, or land instability from new and existing development

SA Objective 1 refers to Trees and Woodland and are marked RED - likely to generate negative effects.

SA Objective 2 acknowledges the landscape of 8HS, and it is given the identity RED - likely to generate negative effects.

SA Objective 6 is the reference for flooding constraints, and it was identified YELLOW - potentially negative effects which could be mitigated.

The landscape assessment document of 2006 regarding "Woodland Recommendations" states that the consultant findings are that "existing hedgerows and woodland blocks should be conserved".

Open Space and Recreation is unusually answered with the SA objectives 5 and 9 being likely to promote positive effects and unlikely to have significant effects, respectively.

A question posed on the template is whether the parcel is in an area of surplus or deficit for open space - clearly the area is not in surplus. The question is also asked as to whether development would lead to the enhancement of a derelict site, which this clearly would not.

It is also questioned whether any proposals for replacement provision are known and given that the parcel is already only 65% developable due to the cumulative constraints, it seems unlikely that provision will be made for open, greenspace within the development on the site.

The parcel also contains four public rights of way/ footpaths and if these are lost, the next closest access to open countryside would be on the west side of the A580.

ECRA would question why the infrastructure question (SA Objective 16) is scored green and likely to promote positive effects. 8HS can currently only be accessed from one side, a small country lane, which would require significant infrastructure development to be carried out, leading to a new junction at the A580 controlled either by lights or roundabout. One site access will be within 500m of the main Windle Island junction and considered likely to cause flow issues for traffic, leading to stationery idling vehicles.

Pipelines and an easement for them would restrict development, 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.

ECRA question why has SA Objective 16 been marked green?

Air and Noise pollution are the final area to question in regard to suitability and is questionably marked as unlikely to have significant effects.

The site is proposed to have a 40m buffer to mitigate noise from the A580, which is a busy four lane highway and will become more so with the planned warehousing and logistics facilities being built along its length. The fact that a buffer zone is proposed would suggest the parcel has at least potential negative effects which can be mitigated, although ECRA would dispute that and mark 8HS as likely to have negative effects.

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.
- The 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**

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 the north-western areas of Eccleston and Rainford being the notable 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.

- 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 medium 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

- 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 ten other parcels 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."

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.

No other GB parcels are being suggested for development on the scale of 8HS, without consideration of the infrastructure required.

3HS has a development restriction applied capping it to five hundred units unless the access issues can be resolved.

Typically, other Safeguarded sites are just one or two hundred units and therefore, not disproportionate in nature to their respective areas.

Development at 8HS would translate to growth, in excess of 20%, within the Eccleston and Windle area - growth of that magnitude must surely be considered disproportionate and unsustainable.

④

Appendix 5 – Sustainability Issues

The following are taken from various expert consultancy reports that St Helens Council have commissioned.

ECRA show that many of the recommendations and advisory comments have been ignored in the preparation of the SHLPSD.

Landscape Character Assessment – Land Use Consultants (LUC) (2006, quoted in Green Belt Review 2018)

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.

Landscape Management Issues & Opportunities

Landscape management should recognise the inherent strength of character and relatively intact landscape patterns and the relationship of open to enclosed space which should be conserved. Opportunity to restore areas of degraded landscape in particular along road corridor to strengthen the landscape.

ECRA does not see how development of approx. 1000 homes on 8HS can possibly conserve the landscape character or recognise the inherent strength of that character

Woodland Recommendations

The existing hedgerows and woodland blocks should be conserved. These can be enhanced through the increased planting of mixed broadleaf species and the reduction of conifer species within these blocks. There is an opportunity to create larger shelterbelts along the roads, tracks and field boundaries sympathetic to the underlying scale and landscape pattern and relationship of adjacent woodland blocks.

ECRA does not see how development of approx. 1000 homes on 8HS can possibly conserve existing hedgerow and woodland

Judgement about Potential to Accommodate Development

There is limited opportunity to accommodate development within the character area without altering or interrupting the existing balance of open to enclosed space and impacting on the inherently strong rural character.

The report itself advises little opportunity for development at 8HS without altering the existing strong rural character

SA Scoping Report – Land Use Consultants (LUC)

The document reinforces the **landscape sensitivity issues**, stating how they provide an important role in providing a landscape setting and contrast to urban areas as well as providing opportunities for recreation; 8HS has four Public Rights of Way passing through it, providing walking routes for locals.

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.

With respect to **flooding**, the scoping report advises that the Local Plan should avoid the highest risk locations when allocating sites for development; part of 8HS is located in flood risk zone 3.

Traffic Impact Assessment (Jan 2019)

Figure 14: Levels of Bus Usage in St Helens relative to the proposed Strategic Site Allocations

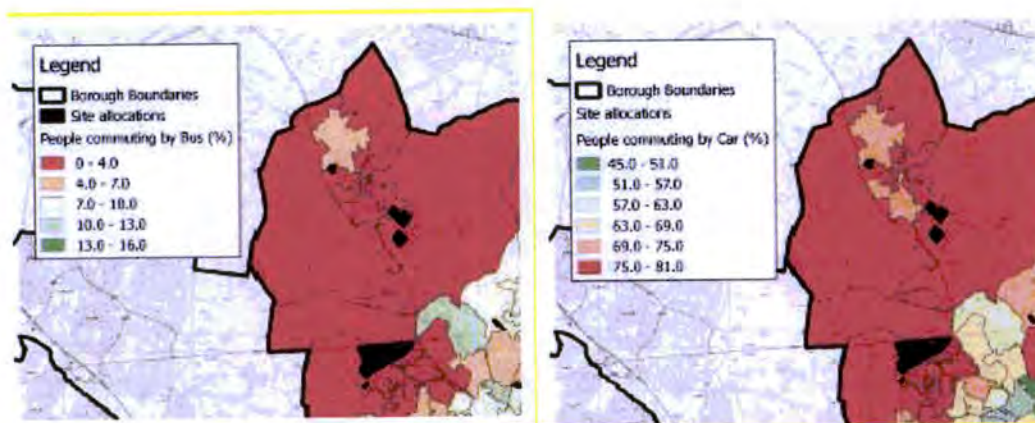


Figure 15: Levels of car usage in St Helens relative to the proposed Strategic Site Allocations

8HS has a notional capacity of 1000 homes and, potentially, 1850 more cars, in the area most isolated from public transport and as such necessitates a high level of car dependency.

Conclusions

ECRA strongly consider that the Council's interpretation of factors outlined by the commissioned experts, might be deemed to have been viewed subjectively rather than objectively. A subjective assessment/scoring on a number of factors would result in 8HS being safeguarded for development. A truly objective assessment, paying heed to the advice and evidence presented by the commissioned experts would have resulted in 8HS being discounted.

Unfortunately, objective analysis of the evidence collated and documented in the expert reports, leads ECRA to conclude that the Council, for reasons unknown, has ignored costly expert recommendations and this has resulted in the selection of 8HS for Safeguarding. Hence the essential considerations and recommendations in respect of: sustainability, infrastructure, the quality of Agricultural Land, the conservation of landscape, flood protection and potential re-use of contaminated sites have not been afforded their true weighting in the decision-making process. Indeed, they have been devalued and residents who form the communities of Eccleston and Windle are expected to read the Local Plan and accept that the Council can unequivocally prove that 'exceptional circumstances' have been met in order to justify the removal of 8HS from Green Belt.

ECRA, and the residents that it represents, have shown that this **IS NOT** the case.

RO0118

Representor Details

Web Reference Number	WF0109
Type of Submission	Web submission
Full Name	Mr Greg Barton
Organisation	
Address	232 Higher Lane, Rainford WA11 8NH
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 submission draft
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

This is an additional personal comment to add to those already made from this address (232 higher lane).

It has been stated that the land adjacent to the proposed site 9HA not be developed due to its proximity to the industrial site and the risk of noise and pollution (for example, the land between the Rainford bypass and the industrial estate) - it is worth pointing out that the prevailing wind in the UK is from the South West and so noise and pollution are more likely to impact across a site to the north of the industrial estate such as 9HA. If the other near-by sites are considered unsuitable then it is fair to state that 9HA is also unsuitable.

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

The above comment should be taken into account with others provided by the residents of St Helens to inform the decision as to where the most suitable sites to be developed are situated.

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 10:08:31 AM
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RO0119

①-LPA04 ②-LPA05 ③-LPA06 ④-IDP ⑤-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0478
Type of Submission	Web submission
Full Name	Mrs Susan Barton
Organisation	
Address	19 Brooklands Road Eccleston St Helens WA10 5HE
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?	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.

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.

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.

①

②

④

③

The Plan does not comply with NPPF(2018) as it was written prior to it's 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 planning to over supply housing which cannot be sustainable in this area of the North West.

182

5

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

Adopt the ONS(2018) housing need statistics and remove all Green Belt reallocation from the 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	2/16/2019 2:35:45 PM
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RO0120



St. Helens
Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>DR</u>	Title: _____
First Name: <u>JANET</u>	First name: _____
Last Name: <u>BARTON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>75, Springfield Park</u>	Address: _____
<u>Huydock</u>	_____
Postcode: <u>WAL6XP</u>	Postcode: _____
_____	Tel No: _____
_____	Mobile No: _____
_____	Email: _____

Signature: _____	Date: <u>2/3/2019</u>
------------------	-----------------------

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA05		Paragraph/ diagram table		Policies Map 2HA		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				Housing at Florida Farm South			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Not sure</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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

The council need to be sure of its population estimates and it isn't. The population of St Helens is in decline with the loss of Florida Farm this land is even more precious. The release of greenbelt is not warranted, not needed. There are many brownfield sites. The council leader says this himself but does not make developers use brownfield. Haydock has disproportionately lost greenbelt when compared to the rest of St Helens. Flooding is a problem.

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.

Haydock has disproportionately lost more greenbelt than any other ward. It is time to stop the greenbelt grab and devastation. Make developers and the council use brownfield first

Please continue on a separate sheet if necessary

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

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

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

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.

PART B - YOUR REPRESENTATION

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

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

Policy LPA04	Paragraph/ diagram table	Policies Map 2EA 5EA 6EA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)		Warehousing Liverpool Rd Haydock Lane and Liverpool Rd		

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

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

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Don't know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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

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

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

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

Not justified. Too near to residents houses - Infrastructure lacking to take the number of lorries. Already lost massive amount of greenbelt to warehouses on Florida farm north. Penny lane Disproportionate loss of greenbelt in Haydock compared to other wards. Significant harm to the greenbelt Further risk of flooding

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.

Delete this land from the proposed removal from the greenbelt.
It provides a natural boundary

Please continue on a separate sheet if necessary

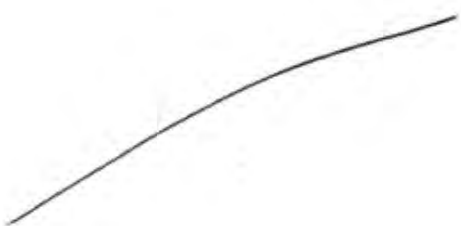
Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation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

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

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

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.

RO0121

①-LPA05 602
②-LPA04

12 MAR 2019

Ref: LPSD

(For official use only)



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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>JOHN R</u>	First name:
Last Name: <u>BARTON</u>	Last Name:
Organisation/company: <u>RETIRED</u>	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: <u>5.3.19</u>
------------	---------------------

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

☒ Yes (via email)

☐ No

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Town Hall
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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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Telephone: **01744 676190**

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setting out your representation/comment.**

**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA05				2HA					
Other documents (please name document and relevant part/section)				Housing on Florida Farm South,					

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

Please tick as appropriate

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

All Unsound.

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <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.	
<p>The amount of Greenbelt left if this proposal goes ahead would be less than 10% in the whole of Haydock & Seely Green</p> <p>St Helens therefore won't be satisfied until the whole of Haydock is just one big Industrial Estate, which it is almost now. No consideration whatsoever have been given to existing Residents</p>	

Please continue on a separate sheet if necessary

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

Greenbelt is being taken more and more in
Hoydock, Empty Industrial Units are empty
everywhere. All Foul and Surface Water Drainage
is more and more going onto existing Sewers, etc,
Just waiting to see any outcome from Sarkey
Brook/Ship In area.

Please continue on a separate sheet if necessary

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

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

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

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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map 2 EA 5 EA 6 EA		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				Warehouses Liverpool Road Haydock Lane (opposite)			

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> 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.	

Greenbelt again taken. [REDACTED]
[REDACTED] and this is getting worse.

As the Housing on Florida Farm South all the Surface Water from this site will make its way below the East Lanes & Haydock Lane, I await the outcome.? ie. Sankey Brook.

(2)

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

Omit this Greenbelt land from your proposed Planning of this area, as previously stated Existing Services out of date, including Road systems, Traffic, Pollution etc.

These Warehouses are a monstrosity to the landscape, overlooking Residential Housing

Please continue on a separate sheet if necessary

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

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

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

No

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.

RO0122

① - LPA05

603

12 MAR 2019

PFO554

② - LPA04

Ref: LPSD

(For official use only)



St. Helens
Council

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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

(we will correspond via your agent)

Title: MR

First Name: DAVID

Last Name: BARTON

Organisation/company:

Address: 42 ASHBURY DRIVE

MAYDOCK

ST. Helens

Postcode: WA11 0FA

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 5/3/2019

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

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

☒ Yes (via email)

☐ No

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

ART 1

Please ...

ART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?								
Policy LPA05		Paragraph/ diagram table		Policies Map 2MA		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				Housing at Florida Farm South				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Not sure?
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support the legal compliance or soundness of the Local Plan</u>, please also use this box to set out your comments.</p> <p>Flooding a problem already on Florida Farm South. Haydock <u>can not</u> cope with such an increase in population. Struggle to get doctors and dentist appointments already without this increase. Use Grownfield first!</p>

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

Haydock is taking a battering when it comes to the Council's greenbelt grab. Two giant warehouses have already caused destruction in Haydock and to people's lives. Which was built on the greenbelt. Make the developers and council use brownfield first!

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

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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.

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPAD4		Paragraph/ diagram table		Policies Map 2 EA 5 EA 6 EA		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				Warehousing Liverpool Road, Haydock Lane and Liverpool Road					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No NOT SURE?
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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

Too near ~~red~~ residential homes. Already seen the devastation caused with the two previous warehouses being built and ruining people lives and homes!

Haydock taking the full brunt of the greenbelt grab. Haydock is becoming one big industrial estate, it can not take any more warehousing.

Road Infrastructure cant cope already, nevermind with more lorries added.

Please continue on a separate sheet if necessary

2

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

Remove this land from proposed development. Haydock can not take any more industrial Units.

Far to near to residential property. It is not right.

Please continue on a separate sheet if necessary

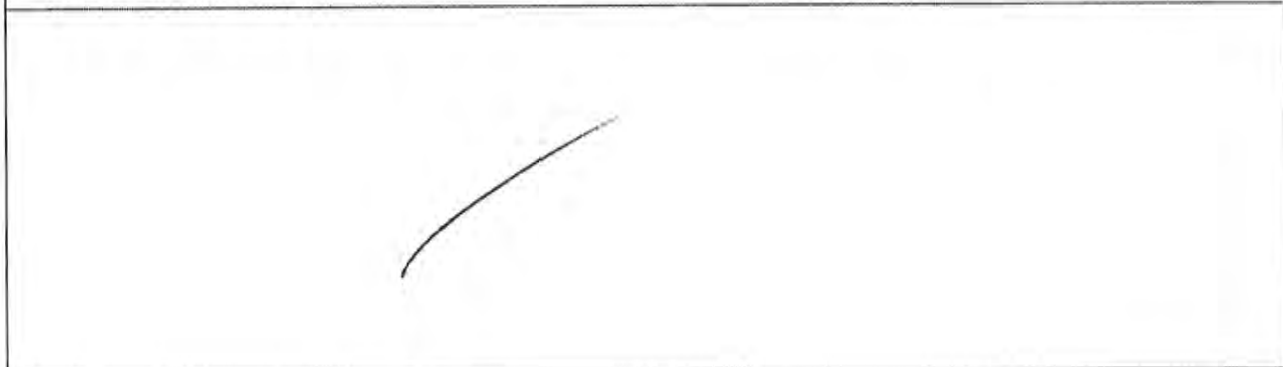
Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation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

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

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



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.

RO0123



St.Helens
Council

738

13 MAR 2019

Ref: LPSD

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

(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;

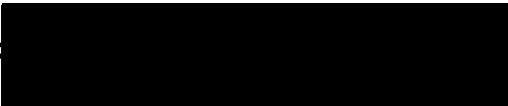
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>THOMAS WILLIAM</i>	First name:
Last Name: <i>BARTON.</i>	Last Name:
Organisation/company: <i>NONE</i>	Organisation/company:
Address: <i>22, CRAWFORD ST. CHOCKFACE. STHELENS</i>	Address:
Postcode: <i>WA9 4XP</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>12-03-19</i>
--	-----------------------

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

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

Yes ☐ (Via Email)

No ☒

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

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
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 PART B of this form, setting out your representation/comment.

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

WE HAVE HAD NO NOTIFICATION WHATSOEVER
NOIFICATION.

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

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

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



Yes, I wish to participate at the oral examination

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

BECAUSE WE HAVE NOT BEEN TOLD UP
TO THIS, AND NEED TO RECTIFY THAT.

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.

RO0124



St. Helens
Council

739

13 MAR 2019

Ref: LPSD

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: BARBARA	First name:
Last Name: BARTON	Last Name:
Organisation/company:	Organisation/company:
Address: 22, CRAWFORD ST CLOCKFACE, ST HELENS	Address:
Postcode: WA9 4XQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

10.3.19

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

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

Yes ☐ (Via Email)

No ☐

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

RETURN DETAILS

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

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Telephone: 01744 676190

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

GREEN BELT LAND
 ALREADY 2,500 HOUSES EMPTY IN THIS AREA
 OVER THREE MEETINGS, NOT ONE COUNCILLOR ATTENDED
 NO INFRASTRUCTURE TO SUPPORT ABOUT 12 THOUSAND PEOPLE.
 WILD LIFE IN ABUNDANCE, SOME ENDANGERED.
 PUBLIC FOOT PATHS OVER THE FIELDS
 GREEN BELT SUPPOSED TO BE SAFE TILL 2035
 I TOTALLY SUPPORT BOLD AND CLOCKFACE ACTION GROUP

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

☒

Yes, I wish to participate at the oral examination

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

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.

RO0125

SITE 8HS



St. Helens
Council

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

Ref: LPSD

12 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).

① - LPA02

② - LPA06

③ - IDP

④ - LPA05

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Ann	First name:
Last Name: Bate	Last Name:
Organisation/company: Chair, Windle Parish Council	Organisation/company:
Address: 45 Bleak Hill Road St Helens	Address:
Postcode: WA104RP	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11/3/19

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

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

Yes ☒ (Via Email)No ☐

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA05 LPA06		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/> X(No)- brownfield not considered
Justified?	<input type="checkbox"/> X(No)-the methodology used is unsound
Effective?	<input type="checkbox"/> X(No)-the plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> X(No) – it doesn't support objectives in 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 support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

We, Windle Parish Council believe that this Plan does not comply with **NPPF 2018**.

In particular it doesn't support;

Point 2 - Achieving Sustainable Development

- It doesn't pay enough attention to identifying and co-ordinating infrastructure
- It doesn't foster a safe built environment with accessible services and open spaces to support communities health, social and cultural well-being
- It is in direct conflict with the environment objective

Point 3 – Planning system should be plan-led

We suggest that these plans are landowner and developer led. Re: 8HS, there was a developer (Story Homes) and a name (Eccleston Vale) in place long before the Local Plan (LPPO2016) was produced for consultation.

Point 7 – Ensuring the vitality of town centres

There is no evidence to suggest that such a large developments on the edge of the Borough (in particular 8HS) will result in the regeneration of the town centre. Residents of a developed 8HS will, most likely, commute to Liverpool or Manchester rather than contributing to the local communities/ economy

Point 8 – Promoting healthy and safe communities

Removing green belt is in direct conflict with this aspiration.

Point 9- Promoting sustainable transport

Transport issues have not been addressed at the earliest stages of plan-making.

The plan promotes an increase in car numbers and dependency.

By their own admission (St Helens First publication), the Council state that 43,000 vehicles per day travel along the A580. If 8HS is removed from Green Belt and built on (1,000+ homes) the resulting increase in car numbers will have a catastrophic impact on already congested and dangerous junctions. This, together with the industrial units/housing (planned both in the Borough and neighbouring authorities) and the 'Super Port' in Liverpool, will result in unacceptable levels of traffic along the A580 and roads feeding into this already congested highway

Point 11 – Making effective use of land

Brownfield sites have not been fully investigated/exhausted in the Borough. Other sites that have planning permission are not developed and are allowed to stagnate indefinitely.

In addition, we believe that this plan is flawed in that;

- It ignores the fact that the land that comprises 8HS is Grade 1 & 2 agricultural land and is farmed producing vegetable and grain crops. These assets should be protected for future generations
- 8HS has many footpaths across it which are used by many groups to access and enjoy the benefits of a clean environment full of history and a varied wildlife
- 8HS has, just recently, had a major water pipeline laid across the plot, have the implications/problems of building over this been addressed?
- Across the Borough there are ongoing traffic problems, especially Windle Island and Bleak hill Road. These will most certainly be exacerbated with the development of 8HS. The Infrastructure Development Plan (IDP) does not indicate how these problems are to be resolved
- The Housing Need assessment of 486 houses per year is out of date. The latest figures from the ONS (2016) predicts that 383 is now the current estimate
- The increase in traffic will have a negative impact on air-quality, noise and general health. The location of 8HS is not served by good local bus routes (indeed this area of the borough has had a reduction in services) or rail links
- In the area surrounding 8HS the schools and medical facilities are oversubscribed. Bleak Hill School is being expanded to accommodate **existing** demand. Eccleston Mere has already been expanded. There is no way these schools could accept any further increase in population
- The economic analysis is flawed and based on over-optimistic assumptions therefore the level of land needed is not as high as suggested in the Plan. Therefore there are no exceptional circumstances requiring a change in Green Belt boundaries

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.

Green belt areas need to be protected and should not be sacrificed for the profits of landowners and developers.

They need to be protected for future generations. Brownfield sites should be exhausted before any Green belt is released.

It is not good enough to dismiss Brownfield development because of the cost to 'clean up'.

What does this plan support – the destruction and decimation of beautiful, clean open spaces and productive farm land leaving ugly, dangerous and stagnant plots of land instead.

A quote from The Local Plan:

1.2.1 St.Helens Council has worked for many years with other stakeholders to create a modern, distinctive, economically prosperous and vibrant Borough, in which key environmental assets are protected and enhanced. The Local Plan will play an important role in achieving these aims.

**We suggest this is not supported by the removal of Green Belt.
Save the Green Belt**

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 modification, as

8/16.
MOD.

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

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

Windle Parish Council is a statutory consultee on planning matters. We are also made up of councillors that represent the views and interests of Windle residents. Therefore, we feel it necessary for our elected members to participate in the oral part of the examination.

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

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

RO0126



St.Helens
Council

620
**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title: MR
First Name: EUNICE MAY	First name:
Last Name: BATE	Last Name:
Organisation/company:	Organisation/company:
Address: 182. RAINHILL RD. RAINHILL merseyside	Address:
Postcode: L35 4PL	Postcode:
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Date: 10th march 2019

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

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

Yes ☒ (Via Email)

No ☐

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

PART B – YOUR REPRESENTATION

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

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

Policy	LPA 36	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

The release of green belt land will cause a lot of problems to Rainhill.

We live in Rainhill Road, and the flow of traffic has increased considerably in the 31 years we have lived here.

To have more houses built on the Greenbelt, will cause a lot of problems with the increase of traffic to our health. Also the risk to children going to school, and the public trying to cross the road at peak times.

⑧ I do not wish to participate in the Oral Exam.

Please continue on a separate sheet if necessary

RO0127



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
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Ref: LPSD

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: RITA	First name:
Last Name: DATE	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 455 CHOCK FACE ROAD ST. HELENS	Address:
Postcode: WA9 4QH	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

31.03.2019.

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.

RO0128



St. Helens
Council

**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).

PART A – YOUR DETAILS

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR.</i>	Title:
First Name: <i>KEVIN</i>	First name:
Last Name: <i>BATE</i>	Last Name:
Organisation/company: <i>N/A</i>	Organisation/company:
Address: <i>455 CLOUGH ROAD, ST. HELENS</i>	Address:
Postcode: <i>WA94QL</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	mail:

Signature: [REDACTED]

Date:

31/3/2019

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Yes ☒ (Via Email)

No ☐

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RO0129

584

12 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>KATIE</u>	First name: _____
Last Name: <u>BATIE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>43 SPRINGFIELD PARK</u>	Address: _____
<u>HAYDOCK</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA11 0XP</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile: 	Mobile No: _____
Email: _____	Email: _____
Signature:  Date: <u>1/3/19</u>	

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☒ Yes (via email)

☐ No

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RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
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St Helens
WA10 1HP**

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

PART B - YOUR REPRESENTATION

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

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

Policy	LPA - 04 SITES 2EA SEA 6EA	Paragraph/ diagram/ table <div style="border: 1px solid black; border-radius: 50%; width: 40px; height: 40px; display: flex; align-items: center; justify-content: center; margin: 10px;">1</div>		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

1

- not justified, council should be put strict focus on the need of this development.
- increased risk of flooding from dypsey brook
- high volume of traffic, already high level of traffic
- council has already granted planning permission on the greenbelt site 2EA.

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.

Delete this land from the proposed removal from 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.

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

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

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.

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

Policy	LAA-05 SITE 2HA	Paragraph/ diagram table 2		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

Please tick as appropriate

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

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

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

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

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

2

- no justification for so many houses to be built on greenbelt.
- Brown belt should be built on first.
- empty houses should be used first.
- increased traffic
- poor access to East Lancs road - increased safety risk.
- increased housing in area puts added pressure on schools
- The fields already now - development might make it worse, unsafe to build on.

Delete this land from the proposed removal from the Greenbelt

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

X

Yes, I wish to participate at the oral examination

1800756M

RO0130



St Helens Borough Local Plan: Submission draft
 bebbington kathleen
 to:
 planningpolicy
 12/03/2019 17:12

EL0109
 ① - LPA04



Good afternoon

Thank you for your general letter sent to residents regarding the above proposals. I wish to object for the following reasons:-

- **Loss of Greenbelt land** and the subsequent loss of the wildlife and it's habitats in the area. Already, there has been the removal and destruction of a number of trees for the changes to the Penny Lane junction leaving the area looking bare. The loss of these trees (some of which were really mature) is disgraceful. More trees need to be planted to replace these and to disguise the horrendous warehouses already built on the Old Boston and help to reduce the noise and pollution from the site and the M6.
- **Increase in both air and noise pollution** – already have pollution from the traffic on the M6 and A580 and numerous HGVs going along the A49 and A58 through Ashton town centre. Plus with the addition of other similar sites being constructed in the area this will be dangerous, resulting in an **increase of respiratory disease**.
- **Congestion** on the adjacent roads and towns ie Ashton which already becomes gridlocked with normal traffic, Golborne and Haydock. Already get large lorries going to Three Sisters and Haydock Industrial Estate coming through Ashton. The roads cannot continue to take such heavy traffic. This development will impact more in the Wigan area than the St Helens area as it is on the outskirts of Merseyside.
- **The sites are too close to residential areas** – noise and disturbance from the vehicles entering and leaving the sites 24 hours a day is not acceptable. The area will become more of an industrial site rather than residential.
- **Too close to local schools** – there are 3 secondary schools almost adjacent to this area.
- **The loss of Greenbelt land** will be devastating to the surrounding area as a whole – this land could be used for farming, allotments leisure etc. Residents need these areas for clean air, wild life, trees etc for pleasure.
- The promise of jobs for the local area will only be short lived – automation etc will take over and the buildings will eventually be left to go to ruin once the incentives/ have run out leaving a huge blot on the landscape. There are plenty empty warehouses near the Costco site – evidence that firms move on and leave property to just deteriorate. Use these first.

Please give your consideration to these issues for the future of everyone.

Kind regards

Mrs K Bebbington

5 Chetwode Avenue,

Ashton-in-Makefield WN4 9PP

RO0131



St. Helens
Council

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

Ref: LPSD

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PART A - YOUR DETAILS

20 FEB 2019

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

1. Your Details

(we will correspond via your agent)

Title: MR
First Name: DAVID
Last Name: BECK
Organisation/company: NONE

2. Your Agent's Details (if applicable)

Title:
First name:
Last Name:
Organisation/company:
Address:
Postcode:
Tel No:
Mobile No:
Email:

Signature: Date: 17/2/19

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

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☒ Yes (via email)

☐ No

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Telephone: **01744 676190**

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>they both suffered from living under the wires (Pylons) along with neighbours all under the 330,000 volt wires.</p> <p>g believe any new houses should not be built under the wires on both either sides of the cables to prevent further suffering from the side effects emanating from the cables. its unfair on the next generation</p>	

Please continue on a separate sheet if necessary

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

make sure that no houses are built under the high voltage wires, good for roads and playing fields only. Please consider the facts about living in a high voltage area. Keep clear 100 metres from under and adjacent the cables.

Please [redacted] 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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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 would participate if I thought my actions would deter building under the cables. My thoughts are with young families sleeping and living under the cables with the horrible consequences to come in the future.

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.

RO0132

11.3.19.

628

12 MAR 2019

17 Rookery Drive
Rainford
WALL 8 88.

To Whom it may Concern,

This is my second letter regarding the building of New Homes on Rookery Lane near Rookery Drive.

Along with the other disturbances I'm sure others have voiced about lack of amenities, over crowded schools and doctors and more vehicles. The disturbance to the wild life ie. the Barn and Screech Owls ~~and~~ which are on the endangered list along with other flora and fauna and loss of crop growing fields.

I'm left wondering why the council 30 or 40 years ago found it prudent to pay for the Rainford By Pass? I had thought it was to take traffic away from the village! which is still needed as the collapse of the road near the brook clearly shows. With the road works on the East Lanes Rd bringing more traffic through Higher Lane and the accidents happening because of it shows the village roads do not need this or any more traffic using them.

On top of this my main concern is my home. Since I moved here [REDACTED] my property has been under water 4 times.

When it rains really hard the water on the road and foot path flows down the slight hill towards Rookery Lane.

My property being near the end of Rookery Drive is $2\frac{1}{2}$ foot lower than N°19, and my Drive Runs down towards the Linear Park at the rear. So, when

it rains hard the rain runs from the top of the Drive down the road and through my driveway under my home on through the garden and out on to the Linear Park.

My home is then under nearly a foot of water which goes under the house which has wooden floors I dread to think how this is affecting them.

The front of the property is constantly cold and damp and I believe [REDACTED] keeps his windows open all the time to compensate, but he's not as affected as my self. I have video of the floods and if I had been told about this at the time of purchase I wouldn't have bought the home.

I have been told by neighbours the problem is caused because the drains are not big enough for the volumes of water that sometimes has to pass through.

So. If New Homes are built so near and using the same drainage system as Rooking Drive and Lane, what is going to happen to property in the future?

yours.

Rosemarie Bedson.

RO0133



St. Helens
Council

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PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: KAREN	First name:
Last Name: BEESLEY	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 133 WINDLEHALL DRIVE ST. HELENS, MERSEYSIDE	Address:
Postcode: WA10 6QA	Postcode:
	Tel No:
	Mobile No:
	Email:

Sign

Date:

12-5-2019

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

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

Yes ☒ (Via Email)

No ☐

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RO0134

126

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01 MAR 2019
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Title: <u>MR</u>	Title: _____
First Name: <u>JAMES</u>	First name: _____
Last Name: <u>BECK</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>38 COLDSTONE DRIVE</u> <u>BARSWOOD</u>	Address: _____
Postcode: <u>WN4 0ZG</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>20-02-19</u>
------------------	-----------------------

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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 Regulations Assessment
SITE	IHS							
Other documents (please name document and relevant part/section)								

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

Please tick as appropriate

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Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST HELENS HAS BEEN IN DECLINE SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM ONE OF THE PURPOSES OF GREENBELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND USING GREENBELT FAILS TO ENCOURAGE THIS THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF GREENBELT. HOUSING IN THIS AREA IS NOT SUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTOR'S SURGERIES. BUS ROUTES AND OTHER SERVICES THE USE OF CARS IS BEING ENCOURAGED BECAUSE OF THE LACK OF FACILITIES</p>

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREEN BELT

Please continue on a separate sheet if necessary

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

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

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

--

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.

RO0135

130

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

Ref: LPSD
01 MAR 2019
(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MARY</u>	First name: _____
Last Name: <u>BEGG BEGG</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>38 COLDSTONE DR</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0RW</u>	Postcode: _____
Tel No: [REDACTED]	No: _____
Mobile: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Mail: _____

Signature: [REDACTED]	Date: <u>20/2/19</u>
-----------------------	----------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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 Plan does this representation relate?									
Policy LPA05 SITE IHA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

The council should be put to strict proof of its population estimates ST HELENS has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of develop and other urban land. Using green belt fails to encourage this. The release of greenbelt will cause significant harm to the purpose of the green belt. Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to the site on either Billinge Rd, or Garwood Road would be inadequate. Any necessary highways work must be funded by the developer and not the Council tax payers. There is no statement of common ground with neighbouring Authorities.

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.

DELETE THIS LAND from the proposed removal
from 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.

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

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

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

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

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

Please keep a copy for future reference.

RO0136



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

T: [REDACTED]

E: [REDACTED]

----- Forwarded by [REDACTED] on 20/01/2020 10:54 -----

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

They had sent them previously but only to [REDACTED] and my in box and it was not clear at that stage if they were the final comments.

Best Regards,

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

----- Forwarded by [REDACTED] on 16/04/2019 11:38 -----

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

I understand you wanted me to send our comments again.

Michael

From: Bell, Michael

Sent: 13 March 2019 11:37

To: [REDACTED]
[REDACTED]

Subject: Warrington Response to St Helens Local Plan NTLS

[REDACTED]

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

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

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

regards

Michael Bell

Planning Policy and Programmes Manager

Planning Policy and Programmes

Growth Directorate

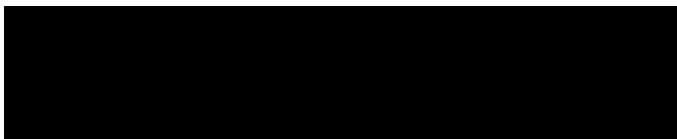
Warrington Borough Council

New Town House

Buttermarket Street

Warrington

WA1 2NH



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

① - LPA04

④ - LPA06

② - LPA05

⑤ - APPENDIX 5

③ - DEC

⑥ - APPENDIX 7

⑦ - LPA10

**WARRINGTON**

Borough Council

⑧ - LPA04

- 8EA

Andy Farrall

Executive Director

Economic Regeneration, Growth and Environment

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

Town Hall
Sankey Street
Warrington
WA1 1UH

13 March 2019

Dear [REDACTED]

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

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

① - ②

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

③

Site 1EA - Omega South Western Extension

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

④

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

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

⑤

network will be placed under considerable pressure when the current extent of the Omega site is fully developed.

Therefore it would be for any future planning application for this extension to Omega to demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8. Any highway mitigation measures shown necessary would require appropriate contributions payable towards either the Council's programme of transport improvements and / or to Highways England.

If it is not possible to mitigate the additional traffic generation through the existing access arrangements, then this would potentially require a new access onto the M62 to be constructed – either catering for all traffic movements or as a minimum with west facing slip roads.

The Council therefore requests that the following wording is added to the site requirements in Appendix 5 of the Plan to ensure that the Local Plan is sound:

- *a future planning application for this extension to Omega must demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8.*
- *If it is not possible to mitigate the additional traffic generation through the existing access arrangements, then this would potentially require a new access onto the M62 to be constructed – either catering for all traffic movements or as a minimum with west facing slip roads*

Site 1ES - Omega North Western Extension

Warrington does not believe that this scale of expansion can be accommodated by the existing access arrangements and a new access onto the M62 will be required.

The scale of this future extension, facilitated by a new access to the M62, would have a different relationship with Warrington and the Council therefore does not consider that this future extension could contribute to Warrington's future employment land supply.

The Council therefore requests that the following wording is added to the site requirements in Appendix 5 of the Plan to ensure that the Local Plan is sound:

- *Any development of this site will require major new connections to the strategic and local road network to be agreed with Warrington Borough Council and Highways England.*

Site 8EA - Parkside West

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

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

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

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

Site EA9 - Parkside East EA9

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

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

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

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

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

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

Site – LHA4 Bold Forest Garden Suburb

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

the motorway network at M62 Junction 8. There will also be the need to identify measures for sustainable access to connect the potential Garden Suburb by public transport, walking and cycling to the employment opportunities at Omega

Warrington is committed to working constructively with St Helens as the proposals and mitigation measures for Bold Forest Garden Suburb are worked up in detail. The Council therefore requests that the following wording is added to the site requirements in Appendix 5 of the Plan to ensure that the Local Plan is sound:

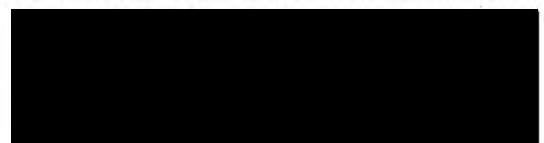
- *The Area Action Plan for Bold Forest Garden Suburb must demonstrate the impact of the additional traffic on the current local and strategic road network, including the operation of M62 Junction 8 and additional traffic through Burtonwood.*
- *It is likely that required transport improvements will include major new connections to the strategic and local road network to be agreed with Warrington Borough Council and Highways England*
- *Measures to enhance accessibility between the Garden Suburb and Omega by walking, cycling and public transport should form part of any overall transport plan for the development.*

I trust the above confirms Warrington's position at this stage of the Local Plan process, but if you require any further information, please do not hesitate to contact me.

Yours sincerely,



Michael Bell
Planning Policy & Programmes Manager



②

② & ⑤

Suburban

Moss

RO0137

PFO463

① - LPA05
② - LPA06

510

12 MAR 2019

Ref: LPSD

(For official use only)



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

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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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>IAN</u>	Title: _____
First Name: <u>BELL</u>	First name: _____
Last Name: _____	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>50 CHURCHLANDS LN</u> <u>STANDISH</u>	Address: _____
Postcode: <u>WN6 0XU</u>	Postcode: _____
	No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>3/3/19</u>
------------------	---------------------

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

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

☐ Yes (via email)

☒ No

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

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setting out your representation/comment.**

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

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

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

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

Please tick as appropriate

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

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

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

Delete LAND from proposed
Remove from Greenbelt

Please continue on a separate sheet if necessary

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

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

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Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
145 LP A06		Billings B. Bunker							
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't Know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Brownfield Site should be used first Doctors / Dentist / School cannot cope LAPWINGS NEST.</p>

(2)

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

delete LAND for proposed
removal for greenbelt

Please continue on a separate sheet if necessary

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

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

Please keep a copy for future reference.

RO0138

① - LPA06
4HS

② - LPA06
2HS

③ - LPA04
8EA, 9EA

④ - IDP

Page 1 of 1

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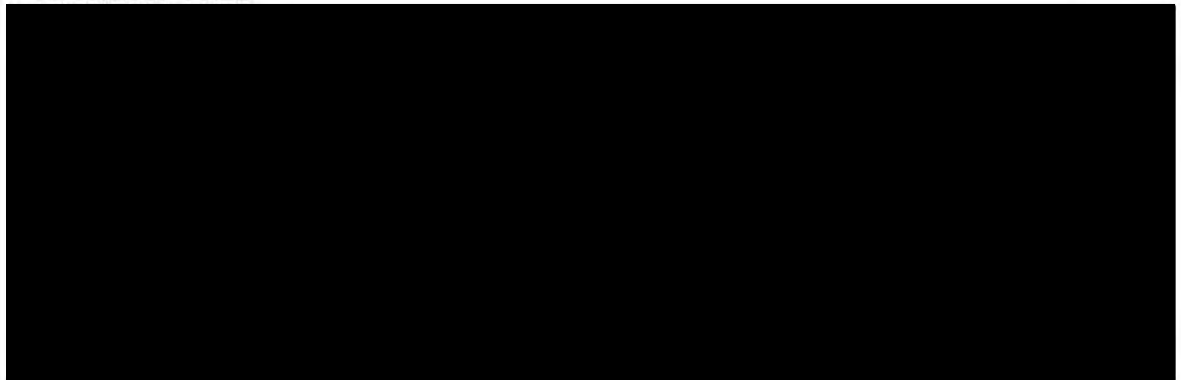
Local Plan Consultation

Seve Gomez-Aspron

to:

planningpolicy@sthelens.gov.uk

12/03/2019 11:22



2 Attachments



Local Plan Feedback 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.

Working together for a better Borough



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.

Infrastructure

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



RO0139



St. Helens
Council

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Part B – Your Representation(s).

01 MAR 2019

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name: Lisa	First name:
Last Name: Bennett	Last Name:
Organisation/company:	Organisation/company:
Address: 432 Garswood Rd GARSWOOD, Wigan Lancashire	Address:
Postcode: WN4 0XJ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 28.2.19.
-----------------------	----------------

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Yes ☒ (Via Email)

No ☐

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

Policy LPAD51HA	Paragraph / diagram / table LP50		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)								

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

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

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

Please tick as appropriate

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

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

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

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

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

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

Yes, I wish to participate at the oral examination

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Council

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>ms</i>	Title:
First Name: <i>LISA</i>	First name:
Last Name: <i>Bennett</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>432 Garswood Rd Garswood, Wigan Lancashire</i>	Address:
Postcode: <i>WN4 0XJ</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

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

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Yes ☒ (Via Email)

No ☐

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3. To which part of the Local Plan does this representation relate?									
Policy	LPSD LPA06 IHS	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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RO0140



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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: Lauren	First name:
Last Name: Bennet	Last Name:
Organisation/company:	Organisation/company:
Address: 432 CASHWOOD RD	Address:
Postcode: WN4 0XJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email: [REDACTED]

Signature: [REDACTED]	Date: 28.2.19
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Yes ☐ (Via Email)

No ☒

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Policy LPA05	LPSD IHA	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

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Please tick as appropriate

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Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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2049

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X

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

Yes, I wish to participate at the oral examination

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

• • • • •

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First Name: Lauren	First name:
Last Name: Bennett	Last Name:
Organisation/company:	Organisation/company:
Address: 430 Garswood RD.	Address:
Postcode: WN4 0XJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	

Signature: [REDACTED]	Date: 28.2.19
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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

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FURTHER INFORMATION

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Telephone: 01744 676190

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy	LPA05 PSD	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
	LPA06 IHS						
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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

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

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train

Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

3094
3099

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.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

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

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



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

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

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

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.

RO0141



St. Helens
Council

142

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

Ref: LPSD

01 MAR 2019
(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>12 KATHLEEN</u>	First name: _____
Last Name: <u>BENNETT</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>114 VICTORIA RD</u> <u>BARNSWOOD</u>	Address: _____
Postcode: <u>WN4 0SZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: <u>118</u> _____	Email: _____

Signature: _____	Date: <u>20/3/19</u>
------------------	----------------------

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

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

☒ Yes (via email)

☐ No

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

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

**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

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

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

Policy WPA06 ST 145		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

To Release of Greenbelt will cause significant harm to the purposes of the Greenbelt
Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes, and other services. The use of cars is being encouraged because of lack of facilities, not environmental friendly

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.

Delete this land from the proposed removal from 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.

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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	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.

RO0142

12 MAR 2019

Ref: LPSD

(For official use only)



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

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: Alicia

Last Name: Bennett

Organisation/company: _____

Address: 35 HILLBECK CRESCENT
GARSWOOD

Postcode: WN4 0RP

Tel No: _____

Mobile No: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: _____

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

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

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PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA	04 (A)	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1 Not Justified - The Council should be put to strict proof of the need for this type of development in this position and on this scale. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.</p> <p>The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.</p> <p>2 There is no statement of common ground with neighbouring authorities</p>	

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

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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

✓

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

Yes, I wish to participate at the oral examination

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

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St. Helens
Council

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

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>Alicia</u>	First name:
Last Name: <u>McCabe</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>35 HILLBECK CRESCENT</u> <u>GARSWOOD</u>	Address:
Postcode: <u>WN4 0RP</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: Date:

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

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

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3. To which part of the Local Plan does this representation relate?									
Policy LPA06		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
	SITE 1HS								
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
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<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not Justified the Council should be put to strict proof of its population estimates. The population of St Helens has been decline since 1981. Where are all the extra people coming from?</p> <p>Housing in this area isn't sustainable because of the lack of @school places doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The release of Greenbelt will course significant harm to the purposes of the Greenbelt.</p> <p>High volumes of predicted traffic will be added to the area which will in the long term will make the road network worse.</p>

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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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555

12 MAR 2019

Ref: LPSD

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

1. Your Details

(we will correspond via your agent)

Title: MRS Alicia

First Name: Alicia

Last Name: McCabe

Organisation/company: _____

Address: 35 HILBECK CRESCENT
GARSWOOD

Postcode: WN4 0RP

Mobile No: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: _____

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

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3. To which part of the Local Plan does this representation relate?									
Policy LP05 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not Justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981, where are the people coming from. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.</p> <p>The access to the site is inadequate, a left in/left out from the East Lancashire Rd is not safe and the proposal for a junction at Liverpool Rd and Vicarage Rd put additional traffic on an already overstretched highway system. There are ^{would} be problems of Rat runnings</p>

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

Please keep a copy for future reference.

RO0143

Representor Details

Web Reference Number	WF0178
Type of Submission	Web submission
Full Name	Mrs Lisa Bennett
Organisation	
Address	8 Begonia Gardens St Helens Wa94ft
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:

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 have been no plans to consider the impact to schools, doctors, or transport links that so many homes could have.

The development date has been moved by 15 years without local consultation.

More importantly we value our green belt land and the wildlife it supports, it is disgraceful to build on this land, when you could better redevelop abandoned industrial and residential areas!

7. Please set out modification(s) you consider are necessary**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

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

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

Response Date	3/12/2019 4:43:43 PM
---------------	----------------------

RO0144

935

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

10 MAY 2019

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>HELEN</u>	First name: _____
Last Name: <u>BENTHAM</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>ROSEHILL ROAD</u>	Address: _____
<u>DOUGLAS AVE</u>	_____
<u>BOLD</u>	_____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>14/3/2019</u>
------------------	------------------------

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p>
<p>There are lots of 'brown' land in St Helens that should be utilised for building and not the green belt. These areas probably present more problems for development rather than nice green field.</p>

Please continue on a separate sheet if necessary

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

I thought that the Govt had stipulated that green belt was not to be available for building whilst 'brown' land was available. Also we bought our properties because of the green belt surrounding us

Please continue on a separate sheet if necessary

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

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

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

--

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.

RO0145

270

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

Ref: LPSD

04 MAR 2019

(For official use only)

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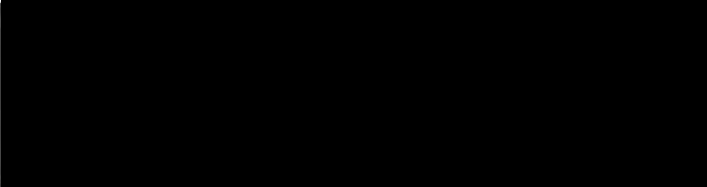
This form has two parts;

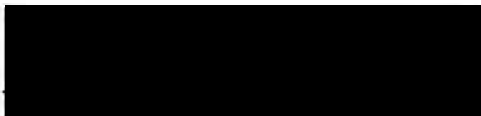
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: _____
First Name: <u>BARBARA ANN</u>	First name: _____
Last Name: <u>BENTHAM</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>33 WASHINGTON RD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0SG</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>26/2/19.</u>
--	-----------------------

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

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

☒ Yes (via email) YES

☐ No

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

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setting out your representation/comment.**

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA05 1 HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>It is problematic to introduce so many more people into the area due to lack of facilities. (e.g. schools, doctors, shops + transport facilities) The increase in car travel will introduce more pollution into the area and more congestion, which is already a problem. The Florida Farm Complex and the proposed loss of green belt around Ashton Cross have contributed to the anxiety that the whole area is going to become one large urban sprawl. (HAYDOCK - ? SWFALL - GARSWOOD) Government policy states that Green Belt land should only be released in exceptional circumstances. St-Helens has a falling population. The council's register shows brown field land for 12 yrs supply of houses..</p>

Please continue on a separate sheet if necessary

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

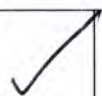
Delete this land from the proposed removal from the Greenbelt

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.

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



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

Yes, I wish to participate at the oral examination

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

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

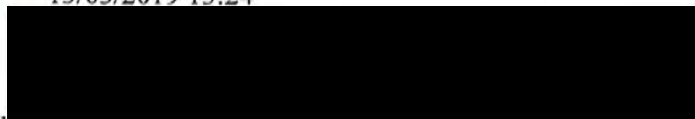
Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0146



Re: Representation
Mel Benyon
to:
planningpolicy
13/03/2019 13:24



1 Attachment



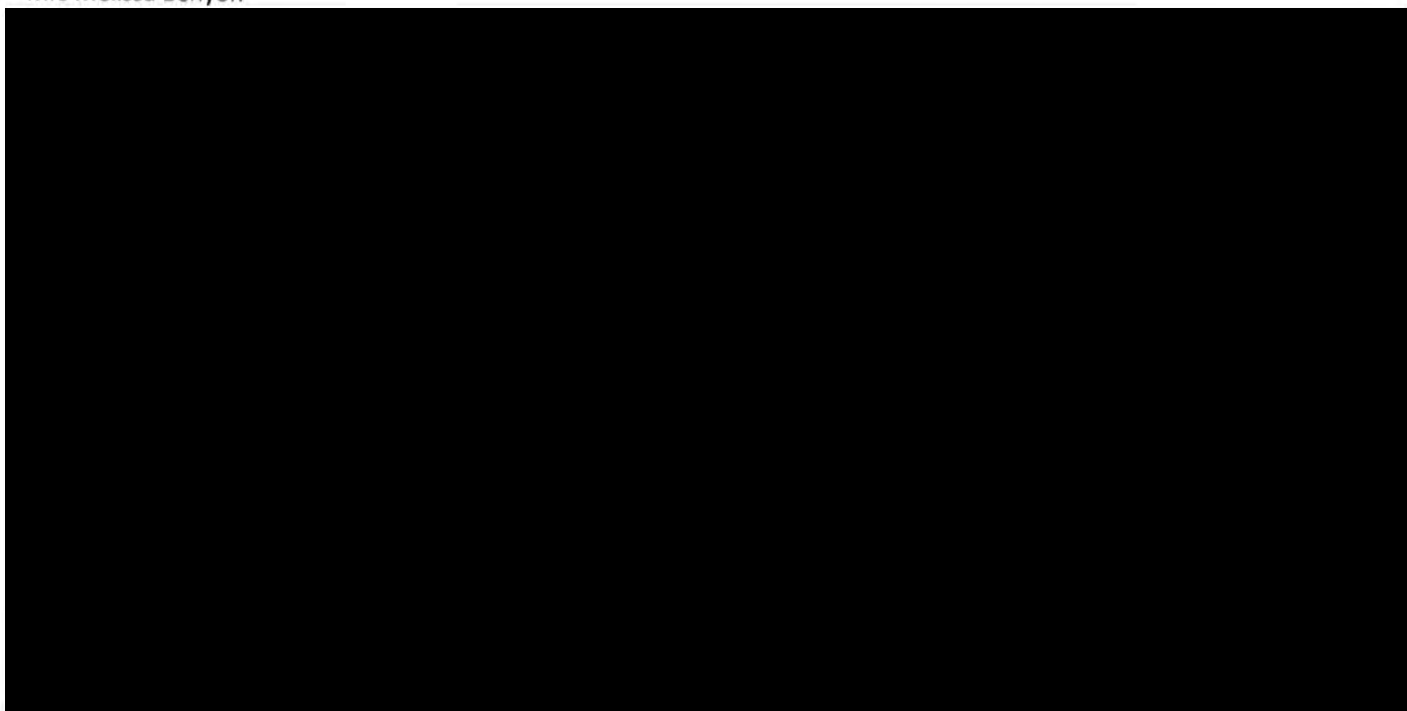
OBJECTION LETTER.docx

Dear Sirs

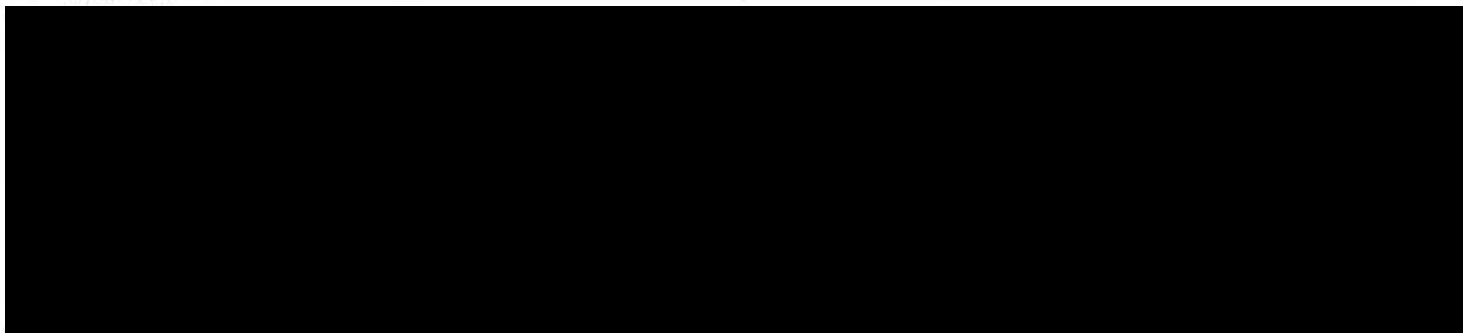
Please find attached my representation for the current Local Plan to development WA10 8HS 'Eccleston Vale'.

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 being 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. 01

Putting that to one side, the Council's 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 288Ha of land for housing. 02

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. 03

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 does not even begin to look at other sites not on the register due to contamination issues. 04

The plan makes little to no mention of Brownfield or Previously Developed Land that is not yet available or included in the register. The council's 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. 05

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. 06

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.

08

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.

10

11

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

RO0147



St.Helens
Council

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

Ref: LPSD

05 MAR 2019

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: MR
First Name:	First name: MARK
Last Name:	Last Name: BENYON
Organisation/company:	Organisation/company:
Address:	Address: 11 ECCLES FIELD RD ECCLESTON, ST. HELENS
Postcode:	Postcode: WA10 5LD
Tel No:	
Mobile No:	
Email:	

Signature: [Redacted]	Date: 4/3/19
-----------------------	--------------

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 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

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Email: planningpolicy@sthelens.gov.uk
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3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				USE OF GREEN BELT LAND WHILST BROWN FIELD SITES REMAIN UNDEVELOPED AND SCAR THE AREA					

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

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

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

Please tick as appropriate

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

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

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

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

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

- (1) FORECAST OF NEED FOR 486 HOUSES IS ABOVE OTHER ESTIMATES OF WHAT IS REQUIRED.
- (2) NUMEROUS BROWN FIELD SITES ARE AVAILABLE FOR HOUSING BUT ARE REJECTED ON CONTAMINATION GROUNDS. THESE SITES SHOULD BE MADE AVAILABLE FOR HOUSING BEFORE WE USE GREEN BELT. IF DEVELOPERS CAN MAKE THESE SITES 'PAY' FOR HOUSING THEN WHY NOT USE? I CAN PROVIDE AN EXAMPLE!

Please continue on a separate sheet if necessary

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

REDUCE THE NEED TO DEVELOP THE GREEN BELT BY
REDUCING FORECAST FOR HOUSING NEEDS AND
DEVELOP BROWN FIELD SITES FIRST. THESE
BROWN FIELD SITES NEED TO BE DEVELOPED
OTHERWISE THEY WILL CONTINUE TO 'SCAR' THE
AREA.

Please continue on a separate sheet if necessary

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

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

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

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

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

IT WILL MAKE MY REPRESENTATION MORE POWERFUL.

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.

RO0148



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Paul	First name:
Last Name: Berar	Last Name:
Organisation/company: NWAS	Organisation/company:
Address: 40 Malvern Road	Address:
Postcode: WA9 2EY	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

26-3-19

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

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

Yes ☐ (Via Email)

No ☐

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

RO0149

ELO206

HS20



St Helens Borough Local Plan 2020 - 2035 Submission Draft Representations

Daniel Strobe

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:26

① - LPA05

② - GJR

③ - TABLE 4.7



1 Attachment



PWA Representations to Submission Draft Local Plan_Rainford.pdf

Dear Sir/Madam

Please consider the attached document as a formal submission to the St Helens Local Plan Submission Draft representations. The online representations form has been completed and submitted to accompany the attached document.

I would be grateful if you could confirm safe receipt of the attached and we are kept updated of future stages of the Local Plan.

Kind regards,

Daniel Strobe | Graduate Planner

2 Lockside Office Park, Lockside Road, Preston, PR2 2YS

www.pwaplanning.co.uk

Paul Walton Associates and PWA Planning are trading names of Paul Walton Associates Limited, a company registered in England with number 8605706.

Representor Details

Web Reference Number	WF0055
Type of Submission	Web submission
Full Name	Mr & Mrs J & M Berry (landowners)
Organisation	and Seddon Homes (prospective developer)
Address	C/O agent C/O agent
Agent Details	Mr Paul Walton PWA Planning 2 Lockside Office Park Lockside Road Preston, PR2 2YS

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 LPA05, Policy LPA05.1 & 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?	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 supporting representations statement produced by PWA Planning which will be provided by email.

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

Please see supporting representations statement produced by PWA Planning which will be provided by email.

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 explain in further detail the case put forwards within the supporting representations statement.

Response Date	3/13/2019 3:17:17 PM
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ST. HELENS LOCAL PLAN 2020-2035: SUBMISSION DRAFT

LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE,
RAINFORD

Representations on Behalf of Mr & Mrs Berry
(landowners) and Seddon Homes (prospective
developer)

March 2019

REPORT CONTROL

Document	St. Helens Local Plan Submission Draft Representation
Project	Reeds Farm, Rainford
Client	Mr and Mrs J & M Berry & Seddon Homes
Job Number	17-325
File storage	\PWA_Planning\PWA Planning\Client files\17-316-17-600\17-325 Reeds Farm, Rainford\Submission Draft Local Plan

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Primary Author:	Daniel Strode	Initialled:	DS
Contributor:		Initialled:	
Reviewer:	Paul Walton	Initialled:	PW

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2	SITE CONTEXT
3	SUBMISSION DRAFT LOCAL PLAN
4	RESPONSE TO SUBMISSION DRAFT LOCAL PLAN
5	CONCLUSIONS

Appendices

1	Location Plan
2	St Helens Local Plan Preferred Options Representations

/1 INTRODUCTION

- 1.1. PWA Planning is retained by Mr & Mrs Berry (landowners) and Seddon Homes (prospective developer) to make representations on the St. Helens Local Plan 2020 – 2035 Submission Draft, published January 2019. ✓
- 1.2. In particular we seek to promote a housing-led allocation of land located to the south of Higher Lane and to the west of Mill Lane, Rainford as outlined in the Location Plan provided as Appendix 1. ✓
- 1.3. This site was the subject of previous representations made by PWA Planning in 2017 and 2018 in response to the St. Helens Local Plan 2018 - 2033 Preferred Options paper, a copy of which is provided in Appendix 2. The land in question was identified within the Preferred Option paper as a potential site for removal from the Green Belt to be allocated as 'Safeguarded Land' (Reference HS20: Land South of Higher Lane and west of Mill Lane, Rainford). ✓
- 1.4. The representations to the Preferred Options paper were accompanied by a number of technical reports which demonstrated that there are no technical or environmental constraints which would prevent HS20 to be brought forward as a housing allocation within the plan period. ✓
- 1.5. Within the St Helens Borough Local Plan 2020 – 2035 Submission Draft, published in January 2019, the site is not brought forward as a Housing Allocation nor as Safeguarded Land and therefore within the emerging plan, the site would remain as Green Belt land. ✓
- 1.6. PWA Planning are of the opinion that the site in question should be brought forwards as a Housing Allocation within the plan period 2020 to 2035. A Housing Allocation on the site would be consistent with the NPPF in terms of providing deliverable and developable land to assist St Helens in meeting its housing need during the plan period.] ①

Developer Statement

- 1.7. Seddon Homes, part of the Seddon Group, is a quality residential developer that has successfully delivered new homes for the past 50 years throughout the North West and Midlands. They are currently active in a number of adjacent Local Authorities and markets, such as West Lancashire, where they are currently on site delivering 128 dwellings in Banks, near Southport. A nearby scheme in Westbrook, Warrington is about to commence on a previously allocated employment site for 81 dwellings, which was permitted consent in December 2018 and Wigan, where a planning application is currently pending for 98 dwellings off Sovereign Fold Road, Leigh. ✓
- 1.8. Seddon Homes currently build up to 200 dwellings per annum, and are looking to mature their business organically to 400-450 homes per annum over the next 3 years with a mixed portfolio of strategic sites and immediate purchases. Their developments are a higher than average internal and external specification and this has been recognised through numerous awards and recognitions with regards to the design quality of their developments. ✓
- 1.9. Seddon Homes and the Seddon Group are working with the landowners of the site at Rainford to see its early release for housing development and then a phased development for housing over the early parts of the plan process. Seddon has the capacity to deliver this site and sees this as an area of strong demand where development will help to build and extend existing communities and where development will help to meet the housing needs of all sections of the local community. ①
- 1.10. Seddon will continue to support the landowner in its endeavours to see the site removed from the Green Belt and instead allocated for other uses, as was provided for within the preferred options version of the Local Plan. ✓

12 SITE CONTEXT

- 2.1. As described within the Local Plan Preferred Options Representations submission, the site is located to the east of the centre of Rainford and extends to approximately 16ha. The site is bounded by the B5205 Higher Lane to the north, beyond which are a small number of properties and open fields. To the east is Mill Lane, off which are located a number of residential properties. To the south of the site is the Rainford Industrial Estate.
- 2.2. Within the St Helens Submission Draft Local Plan, land adjacent to the west of the site has been identified as removal from the Green Belt to be allocated as a Housing Allocation with a total site capacity of 259 dwellings (8HA: Land South of Higher Lane and east of Rookery Lane, Rainford).
- 2.3. The wider surrounding area to the north, east and south is semi-rural in nature, comprising agricultural fields, farmsteads, individual and groups of dwellings, together with pockets of woodland. The site is located approximately 1km to the northeast of the A570 Rainford by-pass, from which the A580 and M58 are easily reached.
- 2.4. The site is considered to be a sustainable location for development. There are shops, services, schools, health care facilities and employment opportunities within walking distance of the site. Existing bus services route past the site along Higher Lane from where services to St. Helens and Ormskirk are frequently available. The Rainford Linear Park runs to the immediate south of the site providing pedestrian access to the centre of Rainford, located approximately 1.5km away.

Technical and Environmental Issues

- 2.5. Assessment work undertaken and provided as part of the Local Plan Preferred Options representations demonstrated that there are no major technical or environmental constraints to development. The following assessments and supporting information were undertaken on the site and are provided within Appendix 2:

- Ecology Assessment
- Arboricultural Assessment
- Phase 1 Geo-technical Assessment
- Flood Risk Assessment
- Surface Water and Foul Water Drainage Assessment
- Utilities Statement
- Transport and Access Technical Note
- Site Masterplan

2.6. In addition, it appears that there are no constraints preventing the delivery of the site in question in conjunction with the adjacent Housing Allocation within the Submission draft (ref. 8HA). The site is considered to be well contained in landscape and visual terms (alongside 8HA), bound by development to the south as far as the site extends to Mill Lane, and to the east. It is considered that the development of the land would be limited to localised impacts which could be mitigated by local landscape enhancements.

2.7. There do not appear to be any insurmountable technical or environmental constraints which would preclude the site being brought forward for housing at this stage.

/3 SUBMISSION DRAFT LOCAL PLAN

- 3.1. The St Helens Borough Local Plan 2020 - 2035 Submission Draft sets a housing requirement of 486 dwellings per annum and identifies 10 Housing Allocations to provide a total capacity of 4,085 dwellings until the end of the plan period. This requirement figure has been based on the St Helens SHMA (January 2019) which identifies a range of housing needs figures based on different economic scenarios. The requirement of 486dpa is based on 'Sensitivity Option 3, Economic Scenario 2'.
- 3.2. This is a significant reduction from the housing requirement identified within the St Helens Local Plan Preferred Options of 570 dwellings per annum, which was based on the adopted Core Strategy (2012). The Preferred Options Plan also identified a greater number of Housing Allocations. There were a total of 16 Housing Allocations identified within the Preferred Options Draft Plan and only 6 have been carried forward as Housing Allocations within the Submission Draft, whilst 1 has been allocated as Safeguarded Land and the remaining 9 have been removed from the Local Plan and are to remain as Green Belt land.
- 3.3. There has been some notable additions within the Submission Draft of the following large Housing Allocations:
- 4HA – *Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb)* – 133ha, 480 dwellings within Plan period, 2988 capacity. This site was allocated as Safeguarded Land within the Preferred options (HS03).
 - 6HA – *Land East of City Road, Cowley Hill, Town Centre* – 31.09ha, 540 dwellings within the Plan period, 816 capacity.
 - 10HA – *Moss Nook Urban Village, Watery Lane, Moss Nook* – 26.74ha, 802 dwellings within Plan period, 802 capacity.

3.4. Land adjacent to the site subject to this submission, known as HA15 (Land South of Higher Lane and East of Rookery Lane, Rainford) within the Preferred Options Plan has been retained as a Housing Allocation for the Submission Draft:

- 8HA - *Land South of Higher Lane and East of Rookery Lane, Rainford* – 11.49ha, 259 dwellings within the Plan period, 802 capacity. ✓

3.5. Within the Preferred Options Plan there was a total of 24 sites allocated as 'Safeguarded Land' to meet the longer-term housing needs beyond the plan period. This included the site in question at Land South of Higher Lane and West of Mill Lane (ref. HS20). Of those 24 sites designated as Safeguarded Land, only 4 were carried forward as safeguarded land within the Submission Draft. HS20 was removed from the Submission Plan. ✓

3.6. There are only 8 sites for Safeguarded Land within the St Helens Submission Draft and notable additions include large sites with a high dwelling capacity, which includes:

- 3HS – *Former Eccleston Park Golf Club, Rainhill Road, Eccleston* – 49ha, 956 dwellings capacity. ✓
- 8HS – *Land South of A580 between Houghtons Lane and Crantock Grove, Windle* – 52.69ha, 1027 dwellings capacity.

Green Belt Review (December 2018)

3.7. As part of the preparation for the new Local Plan, St Helens Council identified that there was a shortfall of suitable land within its existing urban areas and in urban areas of near authorities to meet the Borough's housing needs. A Green Belt review was undertaken in 2018 which identified where development could be accommodated whilst causing least harm to the purposes of the Green Belt. ✓

- 3.8. Within this Green Belt review, the site in question was considered for residential development (ref. GBP_019b Land south of Higher Lane, Rainford). The site was considered as part of a sub-parcel of a wider site, which included the land adjacent to the west (ref. GBP_019b). The site was reviewed with a potential capacity of 367 dwellings and was given an overall score of 3 (sites allocated were given a score of 6) and was therefore discounted.
- 3.9. The review indicates within the commentary on page 80 that although the site was proposed by the Council as a safeguarded site at LPPO stages, *"a number of constraints affect the sub-parcel that limit its suitability for new development"*. It is noted that there are more sustainable sites which would meet the future housing needs of the Borough.
- 3.10. The constraints of the site noted within the Green Belt Review are as follows:
- *The sub-parcel is bounded by highways to the north and east, Rainford Industrial Estate to the south, and a band of mature trees to the west. However, it is considered to have a lower degree of visual enclosure than the neighbouring sub-parcel GBP_019a. It is also further away from the village core of Rainford, and is a significant distance from the nearest primary school and convenience shop (approx. 1.45km). Due to its location, development of the sub-parcel would not represent a sustainable spatial approach to meeting housing needs.*
 - *The sub-parcel has a Medium to High landscape and visual sensitivity, and is classed as mixed agricultural land including Grade 1.*
 - *UU has advised that a main surface water sewer and a pressurised water main (and associated easements) exist to the north and south of the sub-parcel, which would need to be afforded due regard in any development proposal. A buffer would be required alongside the south-west boundary of the sub-parcel, due to air quality and noise pollution issues related to the adjacent Rainford Industrial Estate.*

- *The 2018 SA (Sustainability Assessment) concluded that development of the parcel would have a mixed impact on the achievement of SA objectives, with a number of negative effects likely with regard to biodiversity, landscape sensitivity and access to education and health facilities.* ✓

14 RESPONSE TO SUBMISSION DRAFT LOCAL PLAN

- 4.1. PWA Planning support the removal of land to the south of Higher Lane and West of Mill Lane, Rainford from the Green Belt as the site represents a logical Housing Allocation to help meet the housing needs of the borough over the plan period. The reasoning for not including the site as either a Housing Allocation or Safeguarded Land within the Submission Draft Local Plan appears to be a result of the decision to reduce the overall housing requirement for the borough, and in doing so to focus on larger yet fewer strategic sites. ✓

Housing requirement figure

- 4.2. It is the view of PWA Planning that the housing requirement as identified within the St Helens Submission Draft Local Plan is too low to support St Helens' growth aspirations. The significant reduction in the housing requirement figure, from the Preferred Options plan, conflicts with the earlier economic growth agenda of the Council. ①
- 4.3. Central to the NPPF is a presumption in favour of sustainable development, which is set out at Paragraph 11. It is stated that strategic policies as a **minimum** should provide for objectively assessed needs for housing. The standard method for assessing housing need is to ensure local authorities have a consistent starting point when understanding how many homes are needed in their local area. Planning Practice Guidance makes it clear that the standard method does not produce the housing requirement for the Local Authority. ①
- 4.4. The housing requirement figure of 486 dwellings per annum identified within the Submission Local Plan is only just above the standard methodology using the 2014-based Household Projections and latest affordability ratio, which is a figure of 482 (SHMA January 2019). ①
- 4.5. The NPPF has a strong focus on increasing the supply of new housing and Section 5 promotes the Government's objective to significantly boost the supply of new homes. ✓
The Submission Draft Local Plan which sets a housing requirement of just above the

standard method risks the Local Plan underdelivering on its housing requirements and would also not ensure the economic growth agenda of the Council can be achieved.

- 4.6. It is therefore considered that the plan is not sound as it fails to demonstrate adequate housing provision and delivery in order to meet the housing needs of the borough over the plan period.

- NOT SOUND

Size of allocations

- 4.7. The significant reduction in the range and geographical spread of strategic housing sites in favour of a small number of much larger green belt releases within the Submission Draft Plan is not considered to be good practice.

- 4.8. The reliance on releasing fewer yet larger sites from the Green Belt may result in significant issues if some of these larger sites experience any delays and a slower build out rate than anticipated. The requirement for extensive surveys, remediation, comprehensive master-planning, or infrastructure improvements could lead to delays in their delivery and may have significant implications on the Local Authority meeting their housing requirements.

- 4.9. Paragraph 73 of the Framework states that local planning authorities should include a trajectory illustrating the expected rate of housing delivery over the plan period. Looking at the Housing Trajectory within the Submission Local Plan, there is an assumption that most of the allocated Strategic Housing sites will be developed within the plan period. As there is a requirement for the local planning authorities to monitor the progress of housing delivery to ensure that in the previous three years the delivery has not fallen below 95%, there is therefore a concern that if there are delays and a slower build out rate than expected, this would result in failing of the Housing Delivery Test.

- 4.10. As stated with paragraph 67 of the NPPF "*planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*". This includes both deliverable sites for years one to five of the plan

period as well as *"developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan"*. The NPPF supports the allocation of an appropriate mix of sites and highlights within Paragraph 68 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"*. ✓

- 4.11. It is therefore considered that the Local Plan should include a greater mix (scale / location) of sites to meet the meet the Local Plan's housing requirement and the housing needs of the Local Authority and the communities they serve. As NPPF Paragraph 11 states, plans should *"seek opportunities to meet the development needs of the area and sufficiently flexible to adapt to rapid change"*. The reliance on a smaller number of larger Housing Allocations would not ensure that any future changes would be accounted for and would not see the Borough's housing needs met. ①

- 4.12. As there has also been a reduction in the amount of Safeguarded Land identified within the Submission Draft Local Plan for larger and a fewer number of sites, this may require further green belt reviews sooner than anticipated and this would also make the Local Plan unsound. ①

Suitability of the site

- 4.13. The Green Belt Review conducted of the site concluded that there are constraints to the delivery of homes on the site. As discussed in depth within the representations submitted in response to the Preferred Options (Appendix 2), there would be no technical constraints preventing the delivery of the site. Although mentioned within the Green Belt Review, it has been demonstrated that there would not be any negative effects on the biodiversity or landscape sensitivity of the site, and it lies within a sustainable location for development with schools and health care facilities within walking distance of the site. ②

- 4.14. When testing the site against the purposes of including the site within the Green Belt, as stated within Paragraph 134 of the NPPF, the benefits of removing the site from the Green Belt would outweigh its continued inclusion as Green Belt land. The site would ②

lie adjacent to the Housing Allocation 8HA on the eastern edge of Rainford with the Rainford Industrial estate directly to the south of the site. Therefore, it would not result in unrestricted sprawl of large built up towns nor towns merging into one another. In terms of the visual enclosure of the site, the site is considered to be well contained in landscape and visual terms, with the site bound by the industrial estate to the south which extends along Mill Lane. ②

- 4.15. Seddon Homes are working with the landowners to support the removal of the site from the Green Belt and the delivery of a residential-led scheme which can begin to deliver homes to meet the needs of all sections of the community within the early years of the plan period. The allocation of land at the site in question offers a very sensible means of achieving a better balance and increasing supply in the short and medium term and would help to address the unsoundness evident in the current plan. ①

15 CONCLUSIONS

- 5.1. PWA Planning is retained by Mr & Mrs Berry (landowners) and Seddon Homes (prospective developers) to make representations on the St. Helens Local Plan 2020 – 2035 Submission Draft. ✓
- 5.2. PWA Planning are of the opinion that the allocation of the site at land located to the south of Higher Lane and to the west of Mill Lane, Rainford should be allocated for housing within the emerging Local Plan and is consistent with the NPPF in terms of providing deliverable and developable land to assist St Helens in meeting its housing need during the plan period. ①
- 5.3. In summary, in response to the St Helens Local Plan Submission Draft, it is considered the following:
- The significant reduction in housing requirement figure conflicts with the Council's earlier economic growth agenda; ①
 - The significant reduction in the range and geographical spread of housing sites in favour of a small number of much larger green belt releases is not good practice; ①
 - The reduced amounts of safeguarded land may require further green belt reviews sooner than anticipated; ①
 - The allocation of the site offers a sensible means of achieving a better balance and increasing supply in the short and medium term; ①
 - Seddon Homes are working with the landowners to see the land released from the Green Belt and the delivery of homes to meet all needs of the community within the early years of the plan period; ①
 - Technical and environmental reports have shown that there are no insurmountable barriers to the delivery of the site for housing and there are no ②

constraints preventing the development of this site in conjunction with the Housing Allocation 8HA. (2)

- 5.4. Given the importance of ensuring that the St Helens Local Plan 2020 - 2035 is able to identify an adequate supply of housing for the plan period, PWA Planning support the removal of this site from the Green Belt and its allocation for housing development.] (1)



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APPENDIX 1 – Location Plan

Location plan showing the site (red) and adjacent Housing Allocation 8HA (blue)



APPENDIX 2 – St Helens Local Plan Preferred Options Representations

ST. HELENS LOCAL PLAN 2018-2033 PREFERRED OPTIONS

SITE REF. HS20: LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE, RAINFORD

REPRESENTATIONS ON BEHALF OF MR AND MRS J & M BERRY

February 2018

PWA_17_325LP

Report Control

Document: St. Helens Local Plan Preferred Option Representation: HS20

Client: Mr and Mrs J & M Berry

Job No.: 17-325

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Primary Author:	Louise Leyland	Initialled:	LL
Contributor:		Initialled:	
Reviewer:	Paul Walton	Initialled:	PW

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Issue	Date	Status	Checked for issue
1	05.02.18	DRAFT	LL
2	09.02.18	FINAL	LL
3			
4			

1. INTRODUCTION

- 1.1. PWA Planning is retained by Mr and Mrs J and M Berry to make representations to St. Helens Council on the St. Helens Local Plan 2018 - 2033 Preferred Options paper published in 2016, with specific reference to sites promoted within that document.
- 1.2. In particular we seek to promote the allocation of land located to the south of Higher Lane and to the west of Mill Lane, Rainford as outlined in the Location Plan provided as Appendix 1. This site was the subject of previous representations made by PWA Planning in 2017 in response to the St. Helens Local Plan 2018 - 2033 Preferred Options paper. The land in question is identified within the Preferred Option paper by reference HS20 (Land South of Higher Lane and west of Mill Lane, Rainford), see extract provided as Appendix 2.
- 1.3. Site HS20 is identified as a potential site for removal from the Green Belt to be allocated as 'Safeguarded Land' in the Preferred Options paper. The purpose of allocating Safeguarded Land sites is to protect such sites from permanent forms of development for the duration of the plan period in order to provide a reserve of potential sites to meet longer term development needs (after 2033) and so protect the permanence of the Green Belt.
- 1.4. HS20 sits adjacent to a site identified with the reference HA15 (Land South of Higher Lane and east of Rookery Lane, Rainford). HA15 (see extract provided as Appendix 3) is identified for removal from the Green Belt to be allocated for housing in the Preferred Options paper.
- 1.5. PWA Planning are of the opinion that site HS20 should be brought forward as a housing allocation within the plan period 2018 2033, either as an extension to site HA15, or as a separate allocation. This document together with a number of technical reports (listed below) will demonstrate that there are no technical or environmental constraints which would prevent HS20 being brought forward as a housing allocation within the plan period.
- 1.6. This document should be read in conjunction with the following:
 - Appendix 1 – Location Plan
 - Appendix 2 – HS20 allocation
 - Appendix 3 – HA15 allocation
 - Appendix 4 – Ecology Assessment
 - Appendix 5 – Arboricultural Assessment
 - Appendix 6 – Phase 1 Geo-technical Assessment
 - Appendix 7 – Flood Risk Assessment
 - Appendix 8 – Surface Water and Foul Water Drainage Assessment
 - Appendix 9 – Utilities Statement
 - Appendix 10 – Transport and Access Technical Note
 - Appendix 11 – Site Masterplan

2. SITE CONTEXT

- 2.1. Site HS20 extends to approximately 16ha and is currently allocated as Green Belt as per the St. Helens UDP Proposals Map. The site is located to the east of the centre of Rainford and directly adjacent to the east of site HA15, separated by a belt of woodland. The site is bounded by the B5205 Higher Lane to the north, beyond which are a small number of properties and open fields. To the east is Mill Lane, off which are located a number of residential properties, including a cluster of 26 modern dwellings off The Manor and Meadow View to the southeast of the site. To the south of the site is the Rainford Industrial Estate which extends the length of the site and beyond to the south of HA15. HS20 is therefore effectively bounded to the south and much of the east by existing development, and would be bound to the west by the development of HA15.
- 2.2. The wider surrounding area to the north, east and south is semi-rural in nature, comprising agricultural fields, farmsteads, individual and groups of dwellings, together with pockets of woodland. The site is located approximately 1km to the northeast of the A570 Rainford by-pass, from which the A580 and M58 are easily reached. The Rainford Linear Park runs to the immediate south of the site providing pedestrian access to the centre of Rainford, located approximately 1.5km away. There are shops, services, schools, health care facilities and employment opportunities within walking distance of the site. Existing bus services route past the site along Higher Lane from where services to St. Helens and Ormskirk are frequently available. Both HS20 and HA15 are considered to be located sustainably in the context of the NPPF.
- 2.3. HS20 is considered to be well contained in landscape and visual terms (alongside HA15), bound by development to the south as far as the site extends to Mill Lane, and to the east. It is considered that the development of the land would be limited to localised impacts which could be mitigated by local landscape enhancements.
- 2.4. Constraints relating to flood risk and drainage, utilities, ecology, trees, land contamination/geo-technical issues and transport/highways will be addressed in section 4 of this statement. In summary, there do not appear to be any insurmountable technical or environmental constraints which would preclude the site being brought forward for housing at this stage. In addition, it appears that there are no constraints preventing the delivery of HS20 in conjunction with HA15.

3. COMPLIANCE WITH NATIONAL PLANNING POLICY

- 3.1. The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to deliver sustainable development. There are three dimensions to sustainable development; economic, social and environmental, which give rise to the need for the planning system to perform a number of roles. Within the economic role there is a need to contribute to a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. The social role includes the need to support strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations, whilst the environmental role includes contributing to protecting and enhancing the natural, built and historic environment.
- 3.2. Paragraph 14 of the NPPF sets out the presumption in favour of sustainable development. For plan making, this means that:
- *“Local planning authorities should positively seek opportunities to meet the development needs of their area;*
 - *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *Specific policies in this framework indicate development should be restricted.”*
- 3.3. Paragraph 17 sets out the NPPF’s core planning principles, amongst which are that planning should:
- “Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.”*
- 3.4. Section 6 of the NPPF states that, in order to boost significantly the supply of housing, local planning authorities should:
- *“Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework [NPPF], including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
 - *Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the*

market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

- *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11 – 15.*
- *For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.”*

3.5. With regards to what is considered ‘deliverable’ and ‘developable’, footnotes states that:

“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years and in particular that the development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

“To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.”

- 3.6. The Preferred Options paper identifies a need for 10,830 new dwellings in St Helens as a minimum to be delivered during the period 1st April 2014 to 31st March 2033, which equates to an indicative annual average of 570 houses per year.
- 3.7. Since the publication of the Preferred Options, the Liverpool City Region SHELMA (Strategic Housing and Employment Land Market Assessment) has been published (January 2017). This identifies the objectively assessed need (OAN) for St Helens as 416 houses per year, reduced from the previous figure of 451. The OAN is based purely on predicted demographic changes. The SHELMA provides further housing needs figures based on an ‘Economic Baseline Scenario’¹ and an ‘Economic Growth Scenario’². The economic baseline figure is 397, whilst the growth scenario predicts that 855 new homes per year will be required in St Helens.
- 3.8. The September 2017 consultation paper on housing in England ‘*Planning for the right homes in the right places*’, which set out a proposed standard method for calculating local authorities’ housing need, stated that St Helens would need to provide 504 new homes per year.
- 3.9. It is noted that three of the four annual housing requirement options (considered and rejected) earlier in the Local Plan preparation included an annual requirement figure in excess of that proposed, and in two cases, considerably so. It seems apparent that the chosen figure of 507 more closely reflects constraints to development which have been apparent in the district, rather

¹ Economic Baseline Scenario – based on Oxford Economics baseline model

² Economic Growth Scenario – based on information provided by local authorities.

than a figure which seeks to positively respond to the economic growth and population rebalancing agenda of the authority, with reference to the growth figure referred to above. It is therefore likely that a higher annual requirement figure would be more appropriate.

- 3.10. It is considered that even the identified need of 570 homes per year may not be adequately met through the proposed allocations and that there is a significant risk that there will be insufficient allocated housing sites which will allow the authority to meet its short-term (rolling five-year supply) housing needs, as well as those over the longer term. In such circumstance it seems apparent that the release of safeguarded land will be necessary at an early stage in the Local Plan period, as being the only realistic way in which the Council can boost short term supply.
- 3.11. Policy LPA05: Meeting St Helens Housing Need in the Preferred Options paper states that in situations where there is an under-delivery due to a lack of land supply the allocated 'safeguarded sites' will be considered for release, as part of a review of the Local Plan. It is the opinion of PWA that this suggestion ignores the fact that such an approach will require significant time, and this will leave the authority prone to planning applications on land that the Council could struggle to defend. We believe it far more preferable to release suitable sites from the Green Belt now, so that obligations under the NPPF to ensure that sufficient deliverable and developable land is available to meet housing needs during the plan period are met.

4. TECHNICAL AND ENVIRONMENTAL ISSUES

- 4.1. In order to demonstrate that the land identified as HS20 is deliverable and developable, our client has commissioned a number of technical specialists to investigate any site constraints which might prevent the site being brought forward for housing in the Plan period. The assessment work undertaken has also looked at the adjacent HA15 allocation, albeit to a lesser extent.
- 4.2. Following this, an indicative layout for the site has been developed, together with a concept plan of how the site could work in conjunction with HA15. This is presented in Section 5 of this report.

Ecology

Site HS20

- 4.3. An Ecological Assessment has been undertaken for the HS20 site (see Appendix 4), comprising a desk based review of relevant ecological information and an Extended Phase I Habitat Survey. The assessment has found that the site, comprising arable land, does not form part of any statutory site designated for nature conservation and has no functional habitat links to designated sites in the wider area. Boundary habitats, such as the woodland and hedgerows, do provide some local wildlife value and are likely to be retained as part of any development.
- 4.4. The assessment has looked at the potential for harm to protected species. No issues are anticipated in respect of birds provided typical mitigation measures are employed such as avoiding construction during the bird breeding season and ensuring that nesting habitats are checked prior to clearance/construction.
- 4.5. The majority of habitats on site are considered to provide limited interest for bats, and the loss of the majority of these features would be anticipated to have a negligible impact on local bat populations. Although the majority of the trees within the woodland between the two sites provided little or no bat roost potential, a small number support some low suitability features, and it is therefore recommended that trees are retained where possible, or checked further for bat roost potential if removal is necessary.
- 4.6. No badger setts have been identified within or immediately adjacent to the site and the lack of evidence of badger activity in the area suggests this species is unlikely to be impacted.
- 4.7. The site is considered to provide unsuitable habitat for water vole and otter. The presence of the stream running through the woodland between the sites should be retained and protected as part of any development.
- 4.8. With regards to amphibians and reptiles, although there are a number of ponds locally, none lie within the site and are separated by major roads and other built development, considered to present a barrier to amphibian dispersal. Although no records of great crested newts have been found within a 2km radius, the site's boundary habitats provide potential habitat and as such presence/absence surveys for great crested newts are recommended as a precaution. Depending on the outcome of any great crested newt surveys, it is considered that construction works could adopt Reasonable Avoidance Measures to ensure that there would be no adverse impacts on such amphibians. No impacts are anticipated on lizards.

Site HA15

- 4.9. The Ecology Assessment has had regard to the potential development of the adjacent HA15, although no walkover survey of this site has been undertaken. The assessment concludes that the development of the adjacent HA15 would not materially alter the findings of the main assessment as the neighbouring fields are also intensively managed agricultural land.

Constraints and Recommendations

- 4.10. The site does not present any serious constraints to development. It is recommended that the woodland between the two sites and boundary habitats are retained and strengthened. Habitat connectivity and diversity on site can also be strengthened and enhanced as part of overall biodiversity benefits through additional landscaping planting, provision of bird and bat boxes and creation of a pond on site.

Arboriculture

- 4.11. An arboricultural constraints report has been provided for site HS20 to identify development constraints and help inform the indicative layout for the site. A Tree Constraints Plan is also provided (see Appendix 5).
- 4.12. The woodland belt between HS20 and HA15 is assessed as being of retention category A, indicating that trees are of high quality with an estimated remaining life expectancy of at least 40 years. This group of trees has also been identified as the subject of a Tree Preservation order (TPO) and it is recommended that the majority of these trees are retained where possible.
- 4.13. All other trees and hedgerows within the site, which are exclusively located in the site boundaries, are either category B (trees of moderate quality, with a remaining life expectancy of at least 20 years), or category C (trees of low quality, with a remaining life expectancy of at least 10 years, or young trees with a stem diameter of below 150mm).

Constraints and Recommendations

- 4.14. Where possible, all trees should be retained.

Geo-Environmental and Land Contamination

- 4.15. A Phase I Geo-Environmental Assessment has been undertaken for the HS20, and regard has been had to the conditions on the adjacent HA15 (see Appendix 6).

Site HS20

- 4.16. The assessment has considered the potential for contaminated land and geotechnical liabilities associated with a proposed future residential development. No major issues have been identified with the site, however further investigative works are recommended as outlined below.
- 4.17. There are no landfill sites located within influencing distance of the site, and there are no issues with regards to radon.
- 4.18. A coal mining assessment has been undertaken as part of the assessment which has identified the Arley coal seam outcropping within the north-eastern corner of the site. Additional mine entries are known to be located within the vicinity of the site associated with the Arley seam. The site is therefore deemed to be at high risk in terms of the potential presence of shallow mine

workings. Detailed intrusive works are therefore be recommended in this area of the site depending on the location of development proposed.

- 4.19. With regards to geotechnical issues, the topography of the site indicates that significant earthworks could be required to create a level development platform. In addition, it is likely that there may be limited made ground fill deposits and obstructions. If further investigations reveal that these deposits are deep, there may be a requirement for an abnormal foundation solution. Neither of these issues are considered to be prohibitive to development.
- 4.20. The assessment has looked at potential contamination sources. The site is considered to present a low risk to human health during construction and as a residential end-use, however further investigation would be required to confirm this and inform any mitigation measures. Investigative works would also reveal and issues in terms of controlled waters and ground gas, and how potential issues could be mitigated. There are no issues regarding potable waters.

Site HA15

- 4.21. A desk-based assessment of the adjacent site shows that the contaminant sources are likely to be the same as at HS20. Again, there are no issues in terms of landfill or radon. Coal mining is less of an issue as the seam outcropping at HS20 dips away, therefore intrusive investigations are unlikely to be required.

Constraints and Recommendations

- 4.22. The assessment has not identified any major barriers to development associated with the site. The presence of coal mining in the area, and particularly in the north-eastern corner of HS20 will need further investigation, as will potential sources of contamination associated with the site. There are considered to be mitigation solutions available to any issues raised.

Flood Risk

- 4.23. A Flood Risk Assessment (FRA) has been undertaken for both sites (see Appendix 7). The assessment identifies that HS20 and HA15 lie within Flood Zone 1, the lowest risk which is identified as land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (<0.1%). Both sites are at very low risk of surface water flooding except for an area of HA15 along its southern boundary, which is at high risk.
- 4.24. The risk of flooding from fluvial sources, canals, reservoirs and other artificial sources, ground water, sewer and pluvial runoff and development drainage, is low.

Constraints and Recommendations

- 4.25. A development specific FRA would be required to accompany any future planning application. Any masterplanning of HA15 would need to take account of possible surface water flow, which should be positively drained to the watercourse between the sites.

Surface Water and Foul Water Drainage Strategy

- 4.26. A surface water and ground water drainage strategy has been produced for HS20 which includes a preliminary surface water drainage design, with the adjacent HA15 also taken into account (see Appendix 8).

Site HS20

- 4.27. The nature of the local geology means that infiltration of surface water runoff back into the ground is not feasible. Surface water runoff from the developed HS20 would discharge, where site levels permit, into the watercourse that flows to the south between the two parcels of land. A restricted discharge will be made equivalent to pre-development runoff.
- 4.28. It is proposed that surface water runoff from the area of HS20 that cannot discharge into the watercourse would be restricted to a minimum flow of 5 l/s and discharge into the public surface water sewer that lies within Sandwash Close. The preliminary surface water drainage design has catered for surface water runoff generated by all rainfall events up to the 100 year critical rain storm plus 30% on stored volumes and demonstrates, at this stage, that it can be accommodated within the indicative masterplan. The additional 30% is to allow for climate change and has been included in the surface water volume.
- 4.29. Foul water discharges from the site would be allowed to drain unrestricted to the public combined / foul sewer network, the preferred point of discharge being to the public combined / foul sewer located within Mill Lane and / or Sandwash Close.

Site HA15

- 4.30. It is expected that surface water runoff from HA15 would also be attenuated to pre-development runoff rates and discharge into the watercourse that flows between HS20 and HA15. The preferred point of discharge from HA15 is the public foul sewer located within Rookery Lane.

Constraints and Recommendations

- 4.31. A surface water and foul water drainage strategy would be required to accompany any future planning application for the development of HS20 and/or HA15. No issues are anticipated in terms of drainage.

Utilities

- 4.32. A Utilities Statement has been produced which primarily addresses site HS20, and also takes account of the adjacent HA15 (see Appendix 9). The purpose of the statement is to give an initial overview of the utility infrastructure available for potential residential development of the two sites.
- 4.33. Services relating to electricity, gas, water, drainage, cable and telecoms has been considered. As presented in the statement, it has demonstrated that should both sites be developed for residential purposes of the indicative size considered, they would be capable of being adequately serviced by the utility companies outlined in the report.

Transport and Access

- 4.34. A technical assessment of HS20 and HA15 for residential development has been undertaken which considers the proposed access points for HS20, junction and highway capacity in the vicinity of this site, and the sustainability of the site in terms of proximity to local services.
- 4.35. The assessment has found that both sites are accessible by a choice of transport modes and that local facilities are accessible by means other than private car, leading to the conclusion that the sites are in a sustainable location for residential development.

- 4.36. High levels of visibility are typically available on Higher Road, and the proposed HS20 access junctions can be provided with visibility splays substantially exceeding the required standards. It is considered that traffic demand is sufficiently low that only simple priority junctions are required to serve HS20.
- 4.37. The existing junction of Higher Lane/Mill Lane, at which a small accident cluster is located, has sub-standard visibility splays and it is considered that the development of HS20 may present an opportunity to improve the visibility at this junction.

Constraints and Recommendations

- 4.38. It is considered that the local highway network has sufficient capacity to accommodate the development of both HS20 and HA15 for residential development. Site access points have been identified for HS20 which are considered to be acceptable in visibility and capacity terms. It is expected that similar analysis of the junctions required to access HA15 would need to be undertaken prior to a proposal coming forward for that site.

Land Ownership

- 4.39. Site HS20 is in the ownership of one landowner; Mr and Mrs Berry, on behalf of whom this representation is made. The owners are keen for the land to be developed and as such there should be no barrier to development in this regard.

Conclusions

- 4.40. The assessment work undertaken as summarised above has demonstrated that there are no major technical or environmental constraints to development. Additional work would be required with regards to ecology, land contamination and coal mining, and to inform mitigation to address any potential issues.

5. SITE LAYOUT

- 5.1. The above assessment work has helped to inform the indicative layout provided for site HS20, and the conceptual layout for site HA15 (see Appendix 10 for layouts). Both layouts have had regard to the indicative dwelling numbers and densities provided in the Preferred Option paper.
- 5.2. The indicative layout for HS20 comprises 429no. dwellings (against a recommendation of c 415no. dwellings in the Preferred Options paper). The following has influenced the layout design and /or been incorporated:
- Housing typically runs along the contours of the site to reduce costly cut and fill exercises and maximise potential for open views across the site and surroundings;
 - Site entrances are as per those recommended as part of the initial highways assessment;
 - Important habitats and landscape features preserved through retention of woodland buffer between sites and retention of trees and hedgerows along the site boundaries;
 - Landscape buffer to existing northern highway boundary to set the scheme into its semi-rural setting;
 - Landscape buffer to industrial / southern boundary;
 - A number of public open spaces are spread across the site, notably in the north-eastern corner of HS20 where the potential for issues in relation to previous coal mining activities exist, reducing potential for costly mitigation works;
 - Attenuation pond in the southeast corner of the site, influenced by the findings of the drainage assessment;
 - Internal road network and turning heads allow sufficient manoeuvring space around the site;
 - Ample opportunity for green corridors / linkages in keeping with the semi-rural setting; and
 - Orientation of units provide good solar aspect to gardens / external spaces.
- 5.3. It is considered that the indicative layout for HS20 sufficiently demonstrates that, when all constraints are taken into account, the site is capable of delivering the number of houses indicated in the preferred options paper.
- 5.4. The applicants have not had access to HA15 to consider any constraints in detail. However, the high-level assessment presented has led to the formulation of a conceptual layout as provided in Appendix 10, which would deliver c 175 no dwellings as suggested in the Preferred Options Paper.
- 5.5. In terms of the two sites working together, the analysis undertaken has indicated that the woodland buffer between the two sites should be retained, effectively separating the sites into two separate parcels. As demonstrated, the sites are subject to a number of similar constraints, with some differences in terms of surface water drainage and coal mining identified.

- 5.6. One of the key issues in terms of both sites being delivered is with regards to the impacts on the local highway network. In this regard, the assessment work has shown that there is sufficient capacity to deliver both sites for the number of houses indicated in the Preferred Options Paper.

6. CONCLUSIONS

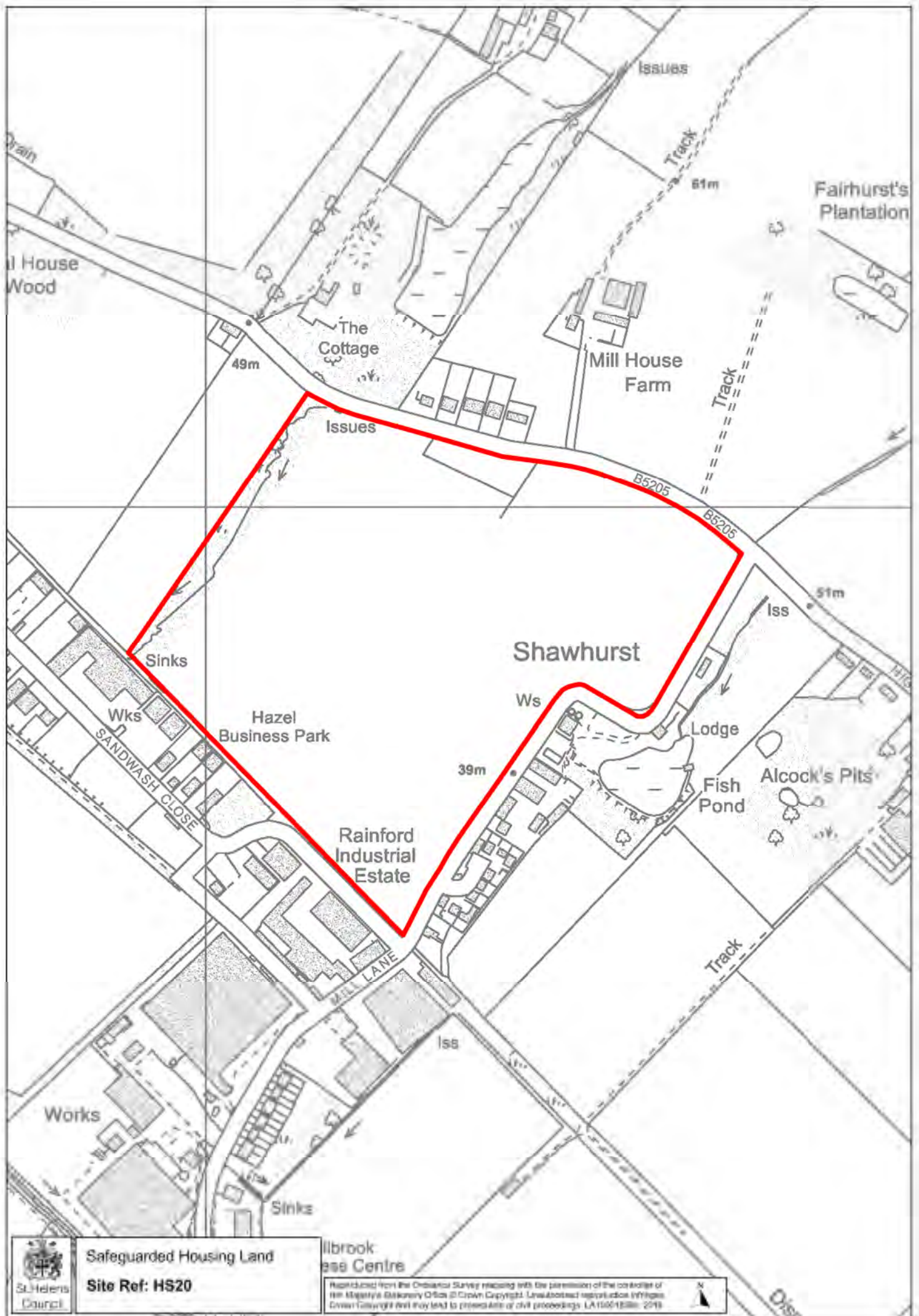
- 6.1. PWA Planning is of the opinion that the allocation of site HS20 for housing development as part of the emerging Local Plan is consistent with the NPPF in terms of providing deliverable and developable land to assist St Helens in meeting its housing need during the plan period.
- 6.2. The site is located adjacent to housing allocation HA15 in the Preferred Options paper, and is considered to be well contained by the existing physical boundaries of development to the south of the site in the form of Rainford Industrial Estate, and the development to the east of the site on Mill Lane.
- 6.3. It has been demonstrated, with reference to the technical and environmental reports provided with this representation, that there are no insurmountable barriers to the delivery of the site for housing. In addition, there are no constraints preventing the development of HS20 in conjunction with HA15.
- 6.4. **Given the importance of ensuring that the St Helens Local Plan 2018 - 2033 is able to identify an adequate supply of housing for the plan period, it is considered that site HS20 should be allocated for housing development at this stage, rather than as safeguarded land.**

Appendix 1: Location Plan

Appendix 1 - Location Plan showing sites HS20 and HA15



Appendix 2: HS20 Allocation



Safeguarded Housing Land
Site Ref: HS20

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Appendix 3: HA15 Allocation



Appendix 4: Ecology Assessment

Land off Higher Lane, Rainford
on behalf of PWA Planning Ltd.
Ecological Assessment



Document Control				
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Figure 1: Phase 1 Habitat Plan

Appendix 1: Photographic Record

1 INTRODUCTION

1.1 Background

- 1.1.1 This report has been prepared by Avian Ecology Ltd. on behalf of PWA Planning Ltd., and provides an assessment of ecological effects in relation to the proposed residential development on land off Higher Lane, Rainford, Lancashire.
- 1.1.2 The Site is defined as the red-line boundary as shown on **Figure 1**.
- 1.1.3 The objectives of the Assessment are to:
- Provide baseline information on the current habitats and ecological features both within the Site and in the immediately surrounding area;
 - Identify the proximity of any designated sites for nature conservation interest and provide an assessment of any potential effects the proposed development may have on these;
 - Identify the presence or potential presence of any protected species or habitats and provide an assessment of any potential effects the proposed development may have on these based on available information; and,
 - Provide recommendations for further pre-construction checks and / or mitigation measures, if required, and provide an outline of proposed habitat enhancements, if applicable.
- 1.1.4 The Assessment has been informed through a desk based review of relevant ecological information and an Extended Phase 1 habitat survey (incorporating a preliminary bat roost assessment).
- 1.1.5 The Assessment refers to relevant legislation, planning policy and guidance as appropriate.

1.2 Site Overview

- 1.2.1 The Site comprised of two arable crop fields with no significant dividing boundary bordered by broadleaved woodland and hawthorn hedgerows. The Rainford industrial estate borders the Site to the south and the B5205 Higher Lane is located to the north. Surrounding land comprises open arable land, deciduous woodland and residential developments.

1.3 Legislative Framework, Planning Policy and Guidance

- 1.3.1 Reference has been made to the following key pieces of legislation, planning policy and guidance listed in **Table 1.1**.

Table 1.1: Key legislation, planning policy and guidance.

European
<ul style="list-style-type: none">• Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (hereafter referred to as the 'Habitats Directive'); and,• Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds (codified version of Directive 79/409/EEC as amended) (hereafter referred to as the 'Birds Directive').
National
<ul style="list-style-type: none">• The Conservation of Habitats and Species Regulations 2010, as amended (hereafter referred to as the 'Habitat Regulations');

<ul style="list-style-type: none"> • The Wildlife and Countryside Act 1981 (as amended); • Countryside and Rights of Way Act 2000; • Protection of Badgers Act 1992; • Hedgerow Regulations 1997; • Natural Environment and Rural Communities (NERC) Act (2006); • The National Planning Policy Framework (NPPF); • ‘Birds of Conservation Concern 4’ (Eaton <i>et al.</i>, 2015)¹; • The United Kingdom Biodiversity Action Plan (UK BAP); • The Bat Conservation Trust - <i>Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Ed.)</i>. (Collins <i>et al.</i>, 2016²); and, • BS 42020:2013 Biodiversity – Code of Practice for Planning and Development.
Local
<ul style="list-style-type: none"> • Lancashire Biodiversity Action Plan³.

- 1.3.2 The ‘UK Post-2010 Biodiversity Framework’ succeeds the UK Biodiversity Action Plan (UK BAP) and ‘Conserving Biodiversity – the UK Approach’. The lists of priority species and habitats agreed under UK BAP still form the basis of much biodiversity work and are therefore considered within this report in the context of the objectives of the Biodiversity Framework. BAPs identify habitats and species of nature conservation priority on a UK (UK BAP) and Local (LBAP) scale. UK BAPs formed the basis for statutory lists of priority species and habitats in England under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, and so are also relevant in the context of this legislation.

2 METHODOLOGY

2.1 Desktop Study

- 2.1.1 A desktop study was undertaken to identify any known existing features or species of ecological importance within the study area (as defined below).
- 2.1.2 The desk study included a review of relevant policy and guidance and sought to identify any statutory designated sites for nature conservation through a review of the JNCC and Multi Agency Geographic Information for the Countryside (MAGIC)⁴ Websites. A 2km search radius was adopted for all statutory designated sites.
- 2.1.3 Biological records data were obtained from the Biobank Merseyside for all protected and notable species and non-designated sites within a 2km radius from Grid Reference: SJ 491 999.

¹ Eaton, M., Aebischer, N., Brown, A., Hearn, R., Lock, L., Musgrove, A., Noble, D., Stroud, D. and Gregory, R (2015). Birds of Conservation Concern 4: the population status of birds in the UK, Channel Islands and Isle of Man. *British Birds*, 108, pp708-746.

² Collins, J. (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd Edition*. Bat Conservation Trust, London

³ Accessed <https://ftps.lancashire.gov.uk/Web%20Client/ListDir.htm>

⁴ <http://www.magic.gov.uk> (Accessed February 2017), www.jncc.defra.gov.uk.

- 2.1.4 Reference was made to Ordnance Survey maps of the wider area and online aerial images (www.google.co.uk/maps) in order to determine any features of nature conservation interest in the wider area.

2.2 Field Survey

Extended Phase I Habitat Survey

- 2.2.1 A Extended Phase 1 habitat survey was undertaken by Z Hinchcliffe MRes on the 1st November 2017.
- 2.2.2 During the survey, weather conditions were overcast with a light westerly wind and no precipitation.
- 2.2.3 The survey followed UK industry standard Joint Nature Conservation Committee (JNCC) Phase 1 Habitat Methodology (JNCC, 2010) and with reference to the Chartered Institute of Ecology and Environmental Management (CIEEM), Technical Guidance Series *Guidelines for Preliminary Ecological Appraisal* (CIEEM, 2013).
- 2.2.4 Habitats within the survey area were mapped and described using a series of 'target notes' (TNs). The survey was extended to include the additional recording of specific features indicating the presence, or likely presence, of protected species, invasive species and other species of conservation significance.

Limitations of Survey

- 2.2.5 An Extended Phase 1 habitat survey does not constitute a detailed botanical survey or faunal species list or provide a full protected species survey but, enables competent ecologists to ascertain an understanding of the ecology of the Site in order to:
- Broadly identify the nature conservation value of the Site and assess the significance of any potential impacts on habitat/species recorded; and/or,
 - Confirm the need and extent of any additional specific ecological surveys that are required to identify the true nature conservation value of the Site (if any).
- 2.2.6 The survey visit was undertaken in November and therefore not within the optimal period for botanical surveys (approximately April to September). However, due to the lack of notable or extensive habitats present, the survey could adequately identify and describe site conditions and no constraints to the survey were experienced in relation to its objectives.

3 BASELINE

3.1 Designated Sites for Nature Conservation

Statutory Designated Sites

- 3.1.1 A review of MAGIC confirmed that the Site is not located within any statutory designated site for nature conservation. No designated sites are located within at least 2km of the proposed development.
- 3.1.2 The review of MAGIC identified that the Site is located within the Site of Special Scientific Interest (SSSI) Impact Risk Zone (IRZ) of Stanley Bank Meadow SSSI. The development meets the criteria '*residential development of 10 units or more*' whereby Natural England would be consulted by the LPA in relation to planning applications.

Non-Statutory Designated Sites

- 3.1.3 Data records returned from Merseyside BioBank identified eight non-statutory sites within 2km of the Site
- 3.1.4 Information on non-statutory sites is presented **Table 3.1**.

Table 3.2: Non-statutory designated sites (LWS: Local Wildlife Site)

Non-statutory designated site	Distance and direction	Details
Rainford Brook LWS	0.43km southwest	A stretch of brook designated for its population of water voles.
Black Brook, Kings Moss LWS	1.9km northeast	A stretch of Black Brook designated for its population of water voles <i>Arvicola amphibius</i> .
Hill Top Farm woodland LWS	0.8km southwest	Scots pine dominated plantation important for breeding willow tit <i>Parus montanus</i> and turtle dove <i>Streptopelia decaocto</i> .
Holiday Moss LWS	1km northeast	Restored landfill site with the creation of woodland, grassland and wetland habitats. Designated for the regionally important plant species found on Site; yellow-wort <i>Blackstonia perfoliata</i> , eyebright <i>Euphrasia officinalis</i> , bog-myrtle <i>Myrica gale</i> and adder's-tongue fern <i>Ophioglossum vulgatum</i> .
Kings Moss Plantation LWS	0.75km northeast	A coniferous plantation on lowland raised bog. The site contains a range of habitats including woodland, marshy grassland, marginal vegetation. The modified bog habitat is immediately adjacent to the plantation. The site contains both regionally and locally important plant species such as; heath spotted-orchid <i>Dactylorhiza maculata</i> , bog-myrtle and burnet rose <i>Rosa spinosissima</i> .
Moss Plantation LWS	1.56km southwest	A mixed deciduous and coniferous plantation on mossland which provides habitat for red squirrel <i>Sciurus vulgaris</i> and contains regionally and locally rare habitats and locally rare plant species, greater tussock sedge <i>Carex paniculata</i> and imperforate St John's-wort <i>Hypericum maculatum</i> .
Randles Brook LWS	2km northwest	A stretch of Randles Brook which provides habitat for water voles.
Sand pit west of Berrington's Lane LWS	1.1km south	A mosaic of nationally, regionally and locally important habitats including acid grassland, unimproved grassland and sand dune habitat. The site contains a number of locally uncommon plant species; bristle club-rush <i>Isolepis seracea</i> , hybrid rush <i>Juncus x kern-reichgeltii</i> , long-headed poppy <i>Papaver dubium</i> and great mullein <i>Verbascum thapsus</i> .

3.2 Habitats and Flora

- 3.2.1 This section should be read in conjunction with the Phase 1 Habitat Plan presented as **Figure 1**, Target Notes (TNs) presented in Table 3.2 and photographs presented in **Appendix 1**.
- 3.2.2 The Site is almost entirely occupied by arable land, with small areas of encroaching common arable weeds at the periphery including common hogweed *Heracleum sphondylium*, herb robert *Geranium robertianum*, common nettle *Urtica dioica*, Yorkshire fog *Holcus lanatus*, perennial rye grass *Lolium perenne* and hedge bedstraw *Galium mollugo*. At the time of the survey, the northern half of the field was tilled with the southern half being a crop of *Brassica sp.*
- 3.2.3 Along the northern boundary of the field, there is an area of improved grassland dominated by perennial rye grass, Yorkshire fog, cock's foot *Dactylis glomerata* and creeping buttercup *Ranunculus repens*, with scattered dove's-foot cranesbill *Geranium molle*, common nettle, common ragwort *Jacobaea vulgaris*, creeping thistle *Cirsium arvense*, broad-leaved dock *Rumex obtusifolius*, cow parsley *Anthriscus sylvestris* and dandelion *Taraxacum agg.* The south east corner of this grassland area is damp with patches of soft rush *Juncus effusus*.
- 3.2.4 The northern boundary comprises a species-poor, 1.5m high hawthorn *Crataegus monogyna* dominated hedgerow which is largely intact, and included new planting intended to fill any remaining gaps. The hedge also includes sycamore *Acer pseudoplatanus* and dog rose *Rosa canina*.
- 3.2.5 The eastern boundary includes species-poor 2.5m tall hawthorn hedgerow along the southern half and at the northern end of the boundary, irregularly planted sycamore and pedunculate oak *Quercus robur*. None of these trees have any bat roost potential.
- 3.2.6 The southern boundary of the site comprises a 3m tall hedge with deciduous trees up to 12m tall. The hedgerow is dominated by hawthorn, bramble, hazel *Corylus avellana* and hedge bindweed *Calystegia sepium* with silver birch, elm *Ulmus sp.*, sycamore, beech and pedunculate oak. At the eastern end of the boundary, there is scattered scrub of gorse *Ulex sp* and bramble
- 3.2.7 Broadleaved woodland borders the western end of the site with a 320 x 45m plantation strip. The woodland is dominated by sycamore with additional beech *Fagus sylvatica*, pedunculate oak, silver birch *Betula pendula*, ash *Fraxinus excelsior*, alder *Alnus glutinosa* and hawthorn. Ground flora includes bramble *Rubus fruticosus*, holly *Ilex aquifolium*, wood sorrel *Oxalis acetosella*, ivy *Hedera helix*, bracken *Pteridium sp*, herb Robert, common nettle, campion *Silene dioica* and large areas of rhododendron *Rhododendron sp.* In addition, there is a narrow 4m tall hawthorn hedgerow running along the western boundary of the woodland and the Site. A narrow stream of 30-60cm width and 3-10cm depth runs through the woodland. The slopes are moderately steep with no vegetation along them. At the southern end of the woodland, there is a man-made concrete and metal drain.
- 3.2.8 There are a number of ponds within the wider area, but none lie within the Site.

Table 3.2: Target Notes

Target Note	Comment
TN1	Old woodpigeon <i>Columba palumbus</i> nest in beech tree.
TN2	Ash tree. 15m tall, old woodpecker holes, broken limbs. Negligible-Low Bat Roost Potential (BRP).
TN3	Sycamore – 18m tall, thick ivy covering, possible broken limbs higher up. Low Bat Roost Potential.
TN4	Ash – 15m tall, very thick ivy covering, almost all of trunk covered. Low Bat Roost Potential.
TN5	Damp area of grassland with soft rush <i>Juncus effusus</i> growing in patches.

3.3 Fauna

Birds

- 3.3.1 The data search carried out by Merseyside BioBank returned existing records of both protected and notable bird species within 2km of the Site, including species protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), priority species listed on the UK Biodiversity Action Plan (UKBAP), species listed as a priority species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and / or red or amber listed 'Birds of Conservation Concern' (BoCCs) (Eaton *et al.*, 2015).
- 3.3.2 Records of species associated with farmland habitats were returned from the data search, including; barn owl *Tyto alba*, greylag goose *Anser anser*, corn bunting *Emberiza calandra*, grey partridge *Perdix perdix*, skylark *Alauda arvensis*, yellow wagtail *Motacilla flava* and yellowhammer *Emberiza citrinella*.
- 3.3.3 The Site and adjacent habitats are likely to support a suite of breeding birds typical of the region and habitats, including widespread species associated with farmland and semi-urban areas. The Phase 1 habitat survey recorded pink-footed goose *Anser brachyrhynchus*, buzzard *Buteo buteo*, woodpigeon *Columba palumbus* (including an old nest along the southern boundary), great spotted woodpecker *Dendrocopus major* (old holes found in trees in woodland suggesting breeding onsite), wren *Troglodytes troglodytes*, robin *Erithacus rubecula*, grey wagtail *Motacilla cinerea*, meadow pipit *Anthus pratensis*, mistle thrush *Turdus viscivorus*, blackbird *Turdus merula*, song thrush *Turdus philomelos*, treecreeper *Certhia familiaris*, blue tit *Cyanistes caeruleus*, house sparrow *Passer domesticus*, magpie *Pica pica* and jackdaw *Corvus monedula*
- 3.3.4 Due to the location and size of the site, a particular effort was made consider the site's potential to be used by pink-footed goose. Whilst pink-footed geese were seen in large numbers (four flocks totalling 390 birds), they were all flying north east over the site, and none were observed on site. There is an abundance of suitable feeding habitat for this species in the surrounding area and the Site, being smaller and rather more enclosed by trees and built development nearby, is unlikely to be used by geese species generally other than by occasional small numbers of individuals.

Bats

- 3.3.5 The BioBank Merseyside dataset identified records of common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *P. pygmaeus*, noctule bat *Nyctalus noctula*, whiskered bat *Myotis mystacinus*, brown long-eared *Plecotus auritus*, daubenton's bat, natterers's bat *Myotis nattereri* and Brandt's bat *Myotis brandtii* within a 2km radius of the Site.

- 3.3.6 No records were identified within or adjacent to the Site.
- 3.3.7 The plantation woodland along the western site boundary supported few mature trees with any bat roost potential. In total three trees were identified as having Low potential.
- 3.3.8 The hedgerows, woodland edge, woodland and public footpath running parallel to the southern boundary of the site provide suitable foraging habitat and flightlines for bats if present in the locality.

Badger

- 3.3.9 No records of badger *Meles meles* were identified from the Merseyside BioBank data search. No field evidence indicating any badger activity was identified during habitat survey.

Water vole / otter

- 3.3.10 The data search returned multiple records of water vole *Arvicola amphibius* for the area, predominantly along Rainford Brook. No records of otter *Lutra lutra* were returned.
- 3.3.11 There is only one small watercourse on site, running within the strip of woodland along the western boundary. This is not considered to provide suitable habitat for water vole or otter; due to its shallow banks, lack of potential holt locations or aquatic vegetation, shallow depth and 100% shading. Otter, being a highly mobile species may move along this or other ditches and watercourses in the area as part of a wider territory.

Amphibians and Reptiles

- 3.3.12 The data search returned records of common frog *Rana temporaria*, common toad *Bufo bufo*, smooth newt *Lissotriton vulgaris* and common lizard *Zootoca vivipara* within 2km of the Site. Records of common lizard were returned from Kings Moss LWS and Holiday Moss LWS, 0.75km and 1km distant respectively. No records of other reptile species, or of great crested newt *Triturus cristatus* were returned.
- 3.3.13 There are several ponds in the locality, but none lie within the Site. A number of these ponds are separated from the Site by intervening roads, houses and industrial buildings which are considered likely to present at least partial a barrier to amphibian dispersal on to the Site.
- 3.3.14 The arable land on Site provides low suitability terrestrial habitat for amphibians and reptiles with some areas of higher value habitat provided by the boundary woodland and hedgerow bases.

Other Notable Species

- 3.3.15 The Merseyside BioBank returned records of hedgehog *Erinaceus europaeus*, brown hare *Lepus europeus*, red squirrel *Sciurus vulgaris* and white-clawed crayfish *Austropotamobius pallipes* within 2km of Site.
- 3.3.16 The intensively managed arable land within the Site is unlikely to be regularly used by any other protected or notable species; the possible exception would be hedgehog (a priority species listed under Section 41 of the NERC Act 2006), and brown hare may use the boundary habitats. No habitat is present on or adjacent to the Site which is suitable for red squirrel. The small stream along the Site boundary is unsuitable for crayfish, being very shallow and lacking a stony substrate or aquatic vegetation cover.

3.4 Invasive Non-native Species

- 3.4.1 The data search returned records Japanese knotweed *Fallopia japonica*, rhododendron *Rhododendron ponticum* and grey squirrel *Sciurus carolinensis* within 2km of Site
- 3.4.2 Within the Site several areas within the woodland were dominated by rhododendron.

4 DISCUSSION

4.1 Overview

- 4.1.1 This section seeks to identify potential effects on habitats and on protected and notable species. There are no statutory designated sites within at least 2km (none in fact within 5km). Eight non-statutory designated site were highlighted during the data search. Measures are proposed for the protection of sensitive habitats throughout the construction phase of development and recommendations are made for further pre-construction surveys and mitigation, if required.
- 4.1.2 This section also introduces opportunities for post-development habitat enhancement as part of the proposed project for the benefit of local biodiversity.

4.2 Designated Sites and Habitats

- 4.2.1 The Site does not form part of any statutory site designated for nature conservation. The proposed development will occupy arable land with no functional habitat links to designated sites in the wider area. No direct effects on any designated site or their qualifying interest species will occur. The potential for indirect effects is considered unlikely and it is considered that this could be suitably avoided and mitigated through a Construction Environment Management Plan (CEMP) and implementation of standard pollution prevention and control measures.
- 4.2.2 The Site is dominated by arable land of low ecological value. Boundary habitats (woodland, hedgerows and small stream which provide some local wildlife value), will be retained and protected as part of the proposed development. Habitat mitigation and local enhancement can be provided as part of the development. As shown on the current masterplan for the Site, a new pond will be provided, along with areas of greenspace, to be planted with native species trees, shrubs and marginal vegetation appropriate to the area. This provision will maintain habitat connectivity around the Site and created improved structural and species diversity along these boundary areas.
- 4.2.3 Although not surveyed, adjacent land which is also understood to be proposed for development The proposed development layout provides opportunities to provide local biodiversity benefit through planting and ongoing management.

4.3 Protected and Notable Species

Birds

- 4.3.1 Depending on the timing of construction, there is potential for birds present within and adjacent to the Site to be displaced by the construction of the development. Habitats within the Site have limited value for most birds; however trees, scrub vegetation and potentially buildings adjacent to the site are likely to support a suite of species typical of semi-rural areas albeit in relatively small numbers, including some potentially of local conservation concern (Eaton *et al.*, 2015). In addition, ground nesting farmland species, although not present during the Phase 1 habitat survey, may use the open field to nest when agricultural land management provide suitable conditions. The proposed development may therefore remove some potential ground nesting habitat however the effects of

this are considered to be negligible, given the agricultural management of the Site, existing levels of disturbance by farm vehicles and dog walkers along public rights of way and the extent of better quality habitat in the wider landscape.

- 4.3.2 In order to avoid impacts on nesting birds and to ensure compliance with the provisions of the Wildlife and Countryside Act 1981 (as amended), it is recommended that construction and any associated vegetation removal (i.e. scrub and trees) takes place outside of the bird breeding season (March-August inclusive). If vegetation works or demolition of built structures are necessary during the breeding season suitable nesting habitat should be hand-searched by a suitably experienced ecologist prior to works commencing. Only when the ecologist is satisfied that no offence will occur under the legislation will works be permitted to proceed.
- 4.3.3 The landscape planting scheme, with the inclusion of a suitable range of nest boxes provides an opportunity to deliver enhanced nesting and foraging resources for a range of species.

Bats

- 4.3.4 The majority of the habitats on Site (dominated by an arable field) were considered to provide limited interest for bats and loss of these features would be anticipated to have a negligible effect on local bat populations.
- 4.3.5 Although the majority of the trees within the woodland provide little to no bat roost potential, a small number support some low suitability features for roosting bats. It is recommended that trees on site should be retained where possible and any trees where removal is unavoidable must be checked for bat roosts. The identified trees in this report along with of any trees identified for removal will need further inspection by a competent ecologist to confirm presence/absence of bats before removal of trees.
- 4.3.6 Once complete, the gardens associated with the proposed development are likely to provide some foraging opportunities for bats, particularly species such as common pipistrelle that are frequently found in urban areas. A landscape scheme incorporating new tree and shrub planting will also provide favourable foraging opportunities.
- 4.3.7 The boundaries of the site are likely to be used by bats for commuting and foraging, so it would be advised to keep artificial light to a minimum along the boundaries of the site.
- 4.3.8 The inclusion of permanent bat roost features as part of the residential developments would enhance roost opportunities at the Site and contribute to net biodiversity gain. It is proposed that a number of enclosed bat boxes will be incorporated into the development (e.g. the Ibstock enclosed bat box).

Badger

- 4.3.9 No setts or any other signs of badger activity were identified within or immediately adjacent to the Site.
- 4.3.10 Due to the lack of evidence of badger presence, badger is not considered likely to be present. However, the woodland and site boundaries provide suitable breeding and foraging habitat for badger, so a pre-construction survey is recommended to confirm no new badger setts have been created before commencement of works. Should badger presence be confirmed, suitable protection, avoidance or mitigation measures would be required.

Water vole / otter

- 4.3.11 No evidence of water vole or otter was found and the Site is largely unsuitable for these species. With the small stream running through the woodland to be retained and protected as part of the

development, and construction activity set back from the stream banks and the woodland, no effects are anticipated on either otter or water vole.

Amphibians & Reptiles

- 4.3.12 There are a number of ponds in the locality, but none lie within the Site and several are separated by major roads and other built developments which are considered to present a barrier to amphibian dispersal. The nearest ponds to the Site lie within higher value terrestrial habitat than is present within the proposed development Site, whose intensively managed agricultural land provides low suitability for amphibians. As a result any amphibians present and associated with the neighbouring ponds would be expected to favour the immediately adjoining terrestrial woodland/shrub habitat.
- 4.3.13 No records of great crested newts were returned from a 2km radius and the intensively managed arable field and small area of improved grassland provides low suitability habitat for this species, providing few foraging or refuge opportunities. The Site boundary habitats, namely hedgerow bases and the woodland provide some foraging and refuge potential for amphibians, but these features can be safeguarded during the proposed development to maintain habitat connectivity around the Site. Provision of a new waterbody as part of the development, if suitably designed with associated marginal terrestrial habitat, would provide a local biodiversity benefit to amphibians and other species.
- 4.3.14 As a precautionary approach, an environmental DNA (eDNA) methodology great crested newt presence/absence survey of accessible ponds within 250m is proposed to inform the development.
- 4.3.15 Lizards are considered to be present within 2km at two Local Wildlife Sites, however the arable and improved grassland habitat on Site offers very low suitability habitat and this species is not considered likely to be present.
- 4.3.16 The proposed development is not considered likely to have an adverse effect on amphibian or reptile populations in the wider area, and it is likely that, depending on the outcome of the great crested newt survey, construction works for the proposed development could adopt Reasonable Avoidance Measures (RAMs) as part of the Construction Environment Management Plan (CEMP). This will ensure that any individual reptiles (or amphibians) potentially present can be protected. Should great crested newts be found to be present locally, development of the Site would need to incorporate suitable mitigation measures to ensure no detrimental effect on the favourable conservation status of this species.

Other species

- 4.3.17 Rhododendron is present within the woodland. It can be very invasive and will out-compete most plants. Only trees growing above the height of the Rhododendron will survive, which affects the structural and species diversity of the woodland. Consideration could be given to managing and removing Rhododendron from the woodland as part of a management plan to enhance its biodiversity and landscape value. Measures should also be set in place as part of the CEMP to prevent the accidental spread of this plant during works on site.

5 CONCLUSIONS

- 5.1.1 The Site has low ecological interest comprising intensively managed agricultural (largely arable) land. No significant ecological constraints are identified in relation to the proposed development (as shown on the current Masterplan) with retention of boundary hedgerow and woodland as part of the proposals. Although there are no records of great crested newts in the wider area, the proximity of several ponds to the Site and the fact that the majority of the Site will be occupied by residential buildings and associated infrastructure means that confirmation of the presence or likely absence of this protected species is likely to be necessary to inform a planning application. It is considered that

an eDNA survey could be undertaken early in the survey season if access permission to neighbouring ponds can be granted. The results of this survey would inform necessary next steps including what mitigation measures may be required.

- 5.1.2 In relation to other development proposals on adjacent land, this is not likely to materially alter the current findings, as the neighbouring fields are also intensively managed agricultural land at present. So long as the boundary woodland strip (with stream) is retained and strengthened between the two development areas, a key features providing habitat connectivity can be maintained. Habitat connectivity and diversity on Site can also be strengthened and enhanced as part of overall biodiversity benefits through additional landscape planting around the Site, provision of bird and bat boxes and creation of a new pond. Other biodiversity enhancements may also be incorporated into development proposals such as amphibian hibernacula near the pond or improvements to the stream within the boundary woodland.

6 SUMMARY - ECOLOGY PRIORITY MATRIX

Feature	Status / Legal Protection	Recommended Further Actions	Recommended Mitigation / Enhancement Measures
Designated Sites	SPA, Ramsar site, SSSI, BHS, DWS	n/a	n/a
General Habitat	n/a	n/a	Protection of retained trees. Installation of a stand-off buffer along woodland and stream. Landscape planting and subsequent management and maintenance to enhance woodland and other habitat value.
Birds	Annex 1, WCA, S41, UKBAP, LBAP	Nest searches / pre-commencement surveys if construction works including site clearance activities are proposed during breeding/nesting season (01 st March to 31 st August).	Vegetation clearance to avoid breeding season. Landscape planting and provision of bird boxes to enhance nesting opportunities.
Bats	WCA, Habitat Regs. 2010, LBAP	n/a	Landscape planting and provision of bat boxes to enhance roosting opportunities.
Badger	Protection of Badgers Act 1992	Pre-construction survey	n/a
Reptiles and Amphibians	WCA, Habitat Regs. 2010, LBAP	Great crested newt presence/absence survey of accessible ponds within 250m.	Mitigation measures to be determined by survey findings. Adoption of RAMs during construction works.
Non-native invasive species	WCA, EPA		Control measures to remove/prevent the spread of Rhododendron
Other Species	S41, UKBAP	n/a	Landscape planting

Ecology Priority Matrix Key

SPA – Special Protection Area

Ramsar site - Important wetland habitat

SSSI – Site of Special Scientific Interest

LNR – Local Nature Reserve

BHS – Biological Heritage Site

DWS – District Wildlife Site

Habitat Regs. 2010 – Listed on Schedule 2, 3, or 4 of the Habitats Regulations

S41 – Species listed on Section 41 of the NERC Act

UK/LBAP – UK/Local Biodiversity Action Plan

Annex 1 – Listed on Annex I of the Birds Directive

WCA – Listed on Schedule 1, 5, 8 or 9 of the
Wildlife and Countryside Act 1981 (as amended)

EPA - Environmental Protection Act 1990

FIGURES

Figure 1:
Phase 1 Habitat Survey

FIGURE 1



APPENDIX 1: Photographs



Photo 1

Arable land occupying the majority of the Site



Photo 2

Narrow strip of deciduous woodland along western boundary



Photo 3

TN1 - Old woodpigeon *Columba palumbus* nest in beech tree.



Photo 4

TN2 - Ash tree. 15m tall, old woodpecker holes, broken limbs. Negligible-Low Bat Roost Potential (BRP).



Photo 5

TN3 - Sycamore – 18m tall, thick ivy covering, possible broken limbs higher up. Low Bat Roost Potential.



Photo 6

TN4 - Ash – 15m tall, ivy covering, almost all of trunk covered. Low Bat Roost Potential.



Photo 7

TN5 – wet area of improved grassland with soft rush. Ploughed field forming part of the Site in background.



Photo 8

Rhododendron growing in woodland

Appendix 5: Arboricultural Assessment

Arboricultural
Constraints Report

**Land to South of Higher Lane
Rainford
St Helens**

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1. Introduction

1.1. Project outline

- 1.1.1. This report has been produced in accordance with *British Standard BS5837: 2012 Trees in relation to design, demolition and construction* to achieve a harmonious and sustainable relationship where tree retention or planting is proposed in conjunction with nearby construction (site-based operations with the potential to affect existing trees).

1.2. Scope of this report

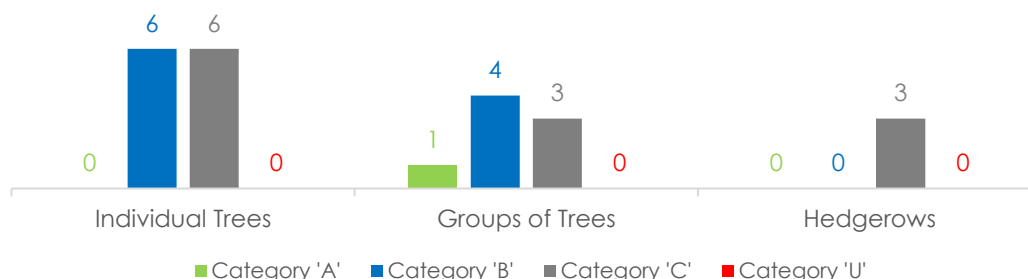
- 1.2.1. This report has been produced to comply with planning requirements where trees are to be considered as part of a proposed development. To achieve this, arboricultural constraints have been identified and a detailed plan (*Tree Constraints Plan*) has been produced showing the location, root protection areas and retention category of trees within the site.
- 1.2.2. This report does not form part of a tree safety inspection. To manage the safety and risk from trees it is advised that trees are inspected in detail for this purpose by an arboriculturist using a suitable risk management strategy.

1.3. Data collection

- 1.3.1. A ground level inspection was undertaken by Godwins Arboricultural Limited on 12th December 2017. As recommended by *BS5837*, the position of all trees within the site with a stem diameter of 75 mm or more, measured at 1.5 m above highest adjacent ground level are recorded. The position of trees with an estimated stem diameter of 75 mm or more that overhang the site or are located beyond the site boundaries within a distance of up to 12 times their estimated stem diameter were also recorded. For individual trees the crown spread taken at four cardinal points; for woodlands or substantial tree groups the overall extent of the canopy was recorded.
- 1.3.2. Tree positions were plotted using a topographical plan supplied by the client, which is the basis for which the *Tree Constraints Plan* has been prepared.

2. Arboricultural Constraints

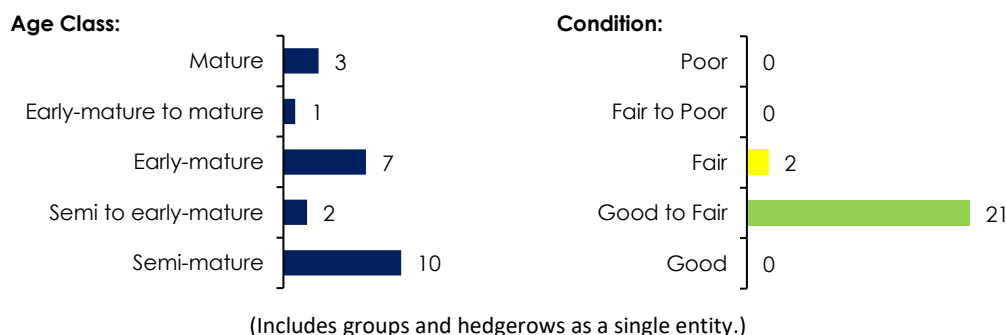
2.1. Tree retention categories



2.1.1. Twelve individual trees, eight groups of trees and three hedges were recorded. In accordance with *BS5837:2012 Trees in relation to design, demolition and construction* one group of trees was recorded as retention category 'A'; six individual trees and four groups of trees were recorded as retention category 'B'; and a mixture of six individual trees, three groups of trees and three hedges were recorded as retention category 'C'.

2.1.2. The trees within woodland group **G1** were collectively recorded as a category A group. However, individually many of these trees are good or low quality, and several specimens were noted to be dead.

2.2. Tree age class and condition



2.2.1. The trees were generally found to be in a good to fair condition and no trees were classified as retention category 'U' (unsuitable for retention). However, several individual trees within woodland group **G1** were noted as being dead or in decline.

2.2.2. Please see *Appendix 1* for the detailed list on existing species, age class, dimensions and condition of trees within the site, and *Appendix 2* for an explanation of retention category criteria. Tree locations can be seen on the *Tree Constraints Plan* at the rear of this report (*Drawing 1*).

- 2.2.3. The inspection of several trees and groups was restricted as detailed at *Appendix 1*. However, sufficient tree related data was collected to fulfil the requirements detailed within the scope of this report.

2.3. Root Protection Areas

- 2.3.1. The tree Root Protection Area (RPA) is a layout design tool indicating the area around a tree that, along with the tree stem and branches, must be considered during development. The protection of the roots and soil structure within the RPA should be treated as a priority. The RPA of each tree or group is marked on the *Tree Constraints Plan* at the rear of this report.

2.4. Tree protection status

- 2.4.1. A statutory tree protection enquiry was made with St Helens Council on 13th December 2017. We are still awaiting the results of the enquiry, and will forward them once they are available.
- 2.4.2. **In the meantime, it is essential that no works are undertaken to any trees within the site prior to consideration and approval of the proposed works by the local planning authority regardless of whether the trees are currently protected or not.**

Client: PWA Planning
Project No: ACR.12760
Issue: 01

Date Issued: 13th December 2017
Status: FINAL

Signed for on behalf of Godwins Arboricultural Limited:

R Godwin

Robert Godwin MSc MArborA.
Arboriculturist

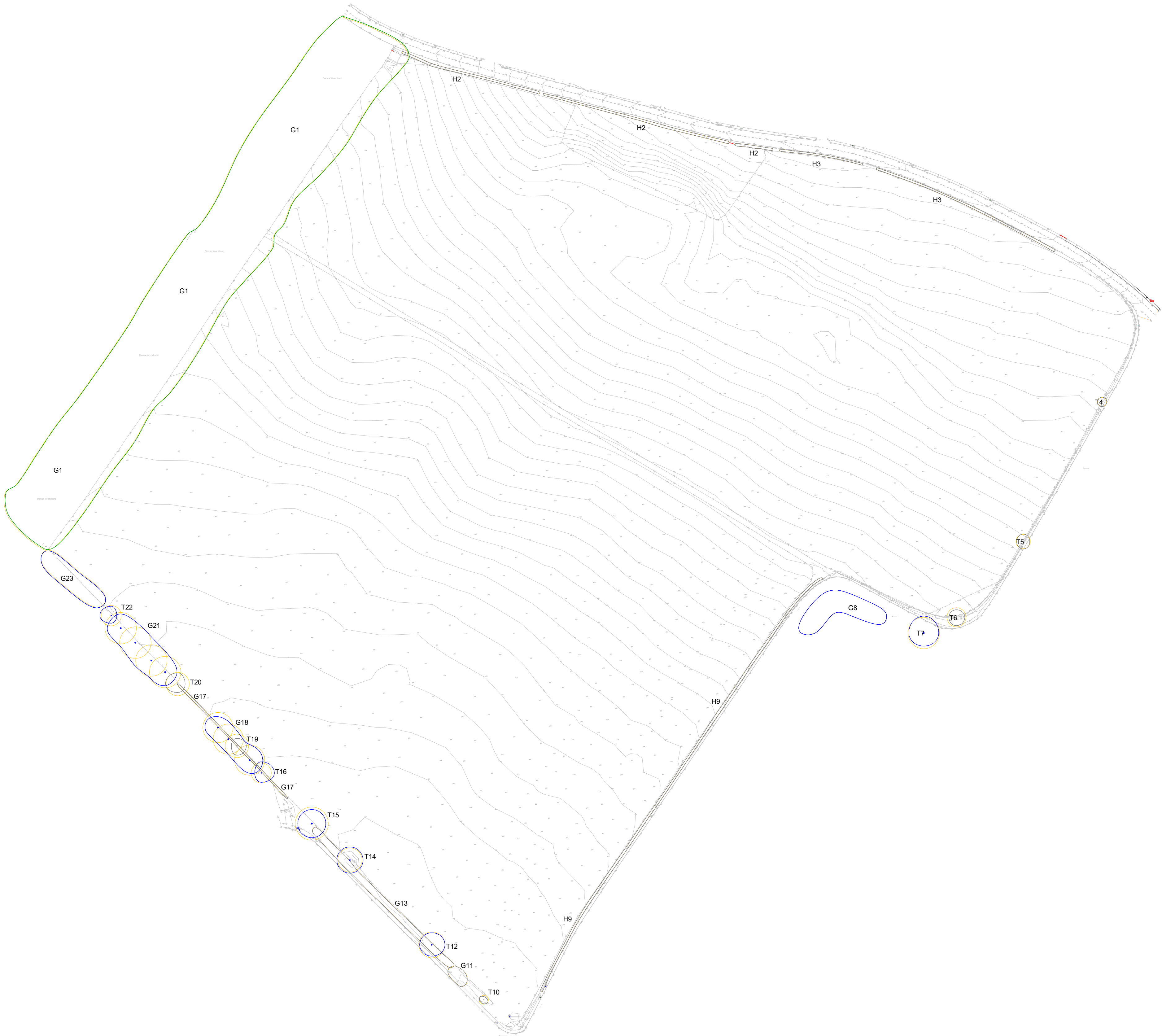
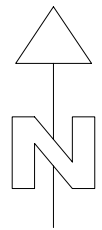
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Drawing 1. Tree Constraints Plan



T	G	H	W	S
INDIVIDUAL TREE	GROUP OF TREES	HEDGEROW	WOODLAND GROUP	SHRUB

EXISTING LAYOUT

TREE QUALITY ASSESSMENT CATEGORY	
	CATEGORY 'A' HIGH QUALITY
	CATEGORY 'B' MODERATE QUALITY
	CATEGORY 'C' LOW QUALITY
	CATEGORY 'U' UNSUITABLE FOR RETENTION

Based on British Standard 5837:2012 Table 1.
Please refer to Appendix 2 of the arboricultural report for more detailed category definitions.

ROOT PROTECTION AREA (RPA)

The Root Protection Area (RPA) is a layout design tool highlighting the underground tree constraints. Along with the tree stem and branches the RPA must be considered prior to and during development.

Written consent must be obtained from Godwins Arboricultural Limited before copying or using the data within this drawing other than for the purpose it was originally supplied.
Do not scale from this drawing.

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PROJECT TITLE:		
Higher Lane, Rainford		
DRAWING TITLE:	SCALE:	ISSUE DATE:
TREE CONSTRAINTS PLAN	1:1250 @ A1	13/12/17
DRAWING NUMBER:	REVISION:	DRAWN BY:
TCP.12760	.01	RG

Appendix 1. Tree Schedule

Tree No.	Species	Age	Stems at 1.5m	Stem Dia	Height (Crown Hgt)	FSB (D)	Branch Spread (m)				Observations	Cond	Life Exp	Tree Work Recommendations	Root Protection Area (RPA)		Retention Category
				(mm)	(m)	(m)	N	E	S	W					Radius (m)	Area (m²)	
G 1	Sycamore, Birch, Oak, Beech & Ash	Early-mature to mature	1	300 to 700	20(3)	3(E)	6	6	6	6	Woodland group. Not inspected. Understorey of Hawthorn, Brambles, Rhododendron & Elder. Occasional dead specimen. Dense stem Ivy on trees to north. Several established trees along woodland edge.	Good to Fair	40+	Remove individual dead specimens from within group..	8.4	221.70	A
H 2	Crataegus monogyna (Hawthorn)	Semi-mature	1	75	2.5(0)	0(S)	0.75	0.75	0.75	0.75	Linear boundary hedge. Well maintained.	Good to Fair	40+	No action required.	0.9	2.55	C
H 3	Crataegus monogyna (Hawthorn)	Semi-mature	1	70	1.2(0)	0(S)	0.5	0.5	0.5	0.5	Linear boundary hedge. Well maintained.	Good to Fair	40+	No action required.	0.84	2.22	C
T 4	Acer pseudoplatanus (Sycamore)	Semi-mature	4	100	6.5(2.5)	2.5(W)	2.5	2.5	2.5	2.5	Balanced crown. Self-seeded specimen. Multi-stemmed from ground level.	Fair	40+	No action required.	2.4	18.10	C
T 5	Quercus robur (Common Oak)	Semi-mature	1	320	9(3.5)	4(W)	4	3.5	4	3.5	Balanced crown. Occasional pruning wounds.	Good to Fair	40+	No action required.	3.84	46.33	C
T 6	Acer pseudoplatanus (Sycamore)	Semi-mature	2	300	10(5)	5(W)	4	4.5	4.5	4	Balanced crown. Occasional pruning wounds. Twin-stemmed from ground level.	Good to Fair	40+	No action required.	5.09	81.40	C
T 7	Quercus robur (Common Oak)	Mature	1	700	20(8)	8(N)	9	8	7	8	Asymmetrical crown. Occasional pruning wounds. Limited inspection - situated on adjacent land. Crown overhangs site boundary.	Good to Fair	40+	No action required.	8.4	221.70	B
G 8	Tilia X europaea (Common Lime)	Early-mature	1	400	16(8)	8(NW)	5	5	5	5	Limited inspection - epicormic growth & situated on adjacent land. Individuals crowns restricted by group. Linear boundary group.	Good to Fair	40+	No action required.	4.8	72.39	B
H 9	Crataegus monogyna (Hawthorn)	Semi-mature	1	75	2.5(0)	0(S)	0.5	0.5	0.5	0.5	Linear boundary hedge. Well maintained.	Good to Fair	40+	No action required.	0.9	2.55	C
T 10	Crataegus monogyna (Hawthorn)	Semi-mature	4	100	6(1)	1(N)	1.5	2.5	2	2.5	Asymmetrical crown. Multi-stemmed from ground level. Limited inspection - dense undergrowth.	Good to Fair	40+	No action required.	2.4	18.10	C

Tree No.	Species	Age	Stems at 1.5m	Stem Dia	Height (Crown Hgt)	FSB (D)	Branch Spread (m)				Observations	Cond	Life Exp	Tree Work Recommendations	Root Protection Area (RPA)		Retention Category
				(mm)	(m)	(m)	N	E	S	W					Radius (m)	Area (m²)	
G 11	Alnus glutinosa (Common Alder)	Semi-mature	1	200	8.5(3.5)	4(N)	3.5	3.5	3.5	3.5	Limited inspection - dense undergrowth. Individuals crowns restricted by group.	Good to Fair	40+	No action required.	2.4	18.10	C
T 12	Betula pendula (Silver Birch)	Early-mature	4	300 300 300 250	15(5)	5(N)	6.5	7	6	6.5	Balanced crown. Multi-stemmed from ground level. Limited inspection - dense undergrowth. Tree RPA located within ground level change.	Good to Fair	40+	No action required.	6.92	150.46	B
G 13	Crataegus monogyna (Hawthorn)	Semi-mature to early-mature	1	120	5(0.5)	0.5(N)	1.5	1.5	1.5	1.5	Multi-stemmed from ground level. Limited inspection - dense undergrowth. Linear boundary group.	Good to Fair	40+	No action required.	1.44	6.52	C
T 14	Fagus sylvatica (Beech)	Early-mature	3	200 400 300	15(6)	6(N)	7	7	7	7	Balanced crown. Limited inspection - dense undergrowth. Tree RPA located within ground level change.	Good to Fair	40+	No action required.	6.47	131.53	B
T 15	Fagus sylvatica (Beech)	Early-mature	6	400 300 300 350 200	16(6)	6(N)	7.5	7.5	7.5	7.5	Balanced crown. Limited inspection - dense undergrowth. Tree RPA located within ground level change.	Good to Fair	40+	No action required.	8.84	245.53	B
T 16	Betula pendula (Silver Birch)	Early-mature	5	200	14(6)	6(N)	6	7	5	3.5	Asymmetrical crown. Multi-stemmed from ground level. Limited inspection - dense undergrowth.	Good to Fair	40+	No action required.	5.36	90.27	B
G 17	Crataegus monogyna (Hawthorn)	Semi-mature	1	75	3(0)	0(N)	0.75	0.75	0.75	0.75	Limited inspection - dense ivy on stem/base. Linear boundary group.	Good to Fair	40+	No action required.	0.9	2.55	C
G 18	Fagus sylvatica (Beech)	Mature	5	300	18(6)	6(N)	8	8	8	8	Multi-stemmed from ground level. Limited inspection - dense undergrowth & dense ivy on stem/base. Individuals crowns restricted by group.	Good to Fair	40+	No action required.	8.05	203.61	B
T 19	Fagus sylvatica (Beech)	Early-mature	3	300	14(6)	6(N)	4	5	5	3	Unbalanced crown. Multi-stemmed from ground level. Limited inspection - dense undergrowth & dense ivy on stem/base.	Good to Fair	40+	No action required.	6.24	122.34	C
T 20	Fagus sylvatica (Beech)	Early-mature	3	300	12(6)	6(N)	6	4	4.5	6.5	Unbalanced crown. Crown - minor deadwood (less than 50mm). Multi-stemmed from ground level. Limited inspection - dense undergrowth.	Fair	20+	No action required.	6.24	122.34	C

Tree No.	Species	Age	Stems at 1.5m	Stem Dia	Height (Crown Hgt)	FSB (D)	Branch Spread (m)				Observations	Cond	Life Exp	Tree Work Recommendations	Root Protection Area (RPA)		Retention Category
				(mm)	(m)	(m)	N	E	S	W					Radius (m)	Area (m²)	
G 21	Fagus sylvatica (Beech)	Mature	1	700	18(6)	6(N)	8.5	8.5	8.5	8.5	Multi-stemmed from ground level. Limited inspection - dense undergrowth & dense ivy on stem/base. Individuals crowns restricted by group.	Good to Fair	40+	No action required.	8.4	221.70	B
T 22	Quercus robur (Common Oak)	Semi-mature	1	450	15(7)	7(NW)	5	3	4	6	Asymmetrical crown. Limited inspection - dense undergrowth.	Good to Fair	40+	No action required.	5.4	91.62	B
G 23	Fagus sylvatica (Beech), Populus alba (White Poplar)	Semi-mature to early-mature	1	400	17(6)	6(N)	6	6	6	6	Multi-stemmed from ground level. Limited inspection - dense undergrowth & dense ivy on stem/base. Individuals crowns restricted by group.	Good to Fair	40+	No action required.	4.8	72.39	B

Appendix 2. Explanatory Notes

A2.1. Tree statistics and measurements

Survey record	Description
<i>Tree No.</i>	Unique tree reference number. (T) = Individual tree, (G) = Group of trees or woodland that form cohesive arboricultural features, (H) = Hedgerows and substantial internal or boundary hedges.
<i>Species</i>	Species listed by scientific name, with (common name).
<i>Age</i>	Life stage – Young, Semi-mature, Early-mature, Mature, Over-mature and Veteran.
<i>Stem Count</i>	Number of stems recorded at 1.5m above ground level.
<i>Stem Diameter</i>	Stem diameter recorded in millimetres at 1.5 meters above ground. Where the tree is multiple stemmed, each stem has been recorded.
<i>Height (Crown Height)</i>	Height of the tree in metres – to the closest 0.5m. Average canopy height in brackets, e.g. 10(3).
<i>First Significant Branch</i>	Existing height above ground level of first significant branch and direction of growth, e.g. 3(N)
<i>Branch Spread</i>	Branch spread, taken as a minimum at the four cardinal points – North, East, South and West.
<i>Observations</i>	General observations, particularly of structural and/or physiological condition (e.g. the presence of any decay, physical defect or historic pruning).
<i>Cond</i>	Condition of the tree recorded as Good, Good to Fair, Fair, Fair to Poor, Poor or Dead.
<i>Life Exp</i>	Life Expectancy - classed as less than 10 years, 10 plus years, 20 plus years, or more than 40 years.
<i>Tree Work Recommendations</i>	Recommended tree works – including those made to enable the proposed development.
<i>RPA Radius</i>	Radius of the root protection area, when plotted as a circle centred on the base of the stem.
<i>RPA Area</i>	Total area of RPA in metres squared, e.g. 100m ² .
<i>Retention Category</i>	See below – A2.2.

A2.2. Tree retention categories

Retention category and definition	Criteria
<i>U (marked in red on the Tree Constraints Plan) = trees for removal.</i>	Trees in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years.
<i>A (marked green on the Tree Constraints Plan) = Trees of high quality</i>	Trees of high quality with an estimated remaining life expectancy of at least 40 years.
<i>B (marked in blue on the Tree Constraints Plan) = Trees of moderate quality</i>	Trees of moderate quality with an estimated remaining life expectancy of at least 20 years.
<i>C (marked in grey on the Tree Constraints Plan) = Trees of low quality</i>	Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm.

Appendix 3. Report Limitations & General Guidelines

- A3.1 Where the inspection of trees was limited (*see Appendix 1*), the 'Tree statistics and measurements' (*Appendix 2.1*) are estimated, and observations, condition and life expectancy are based on an inspection from the available vantage point.
- A3.2 It is recommended that qualified and experienced companies are sought when appointing tree work contractors and they should be approved under the Arboricultural Association Approved Contractors scheme. It is essential that all appointed tree work contractors have adequate Public Liability, Products Liability and Employers Liability Insurance. All tree works must conform to the current BS 3998 "*Recommendations for Tree Work*".
- A3.3 Godwin's Arboricultural Ltd will not accept liability for works undertaken by third party companies. All necessary checks must be made by the appointed tree work contractor prior to undertaking any works to ensure that no statutory tree protection measures or relevant laws are contravened.
- A3.4 The validity, accuracy and findings of this report are directly related to the accuracy of the information made available prior to and during the inspection process. No checking of independent third party data will be undertaken. Godwin's Arboricultural Ltd will not be responsible for the recommendations within this report where essential data are not made available, or are inaccurate.
- A3.5 The assessment and works recommendations relate to conditions found at the time of our inspection. Any significant alteration to the site post our site inspection but pre submission for planning that may affect the trees present, or have a bearing on the planning implications (including level changes, hydrological changes, storms, extreme climatic events or site works) will necessitate a re-assessment of the trees and the site.
- A3.6 This report has been carried out in order to inform the planning process, and not to assess the potential hazards and risks posed by trees. Where clear and obvious hazards have been observed to accessible trees, these have been addressed in the works recommendations. Where inspections were limited by restrictions such as stem ivy, understory vegetation, limited access, epicormic growth or being located on adjacent land, any form of tree condition assessment was restricted. A full assessment of the levels of risk posed by trees can only be informed by considering site use together with assessing any hazards present within a tree.
- A3.7 Trees are dynamic structures that continue to develop and decline; in addition, changes in site use are likely to occur during and as a result from the proposed development. On this basis, regular tree risk assessments are advised.
- A3.8 Godwin's Arboricultural Ltd plans are to scale whenever possible but care should be taken when measuring from a plan without first checking the original data.

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Tree Surveys and Tree Reports

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8/4/T.5

LANCASHIRE COUNTY COUNCIL

TREE PRESERVATION ORDER 1956 No. 3

Relating to the preservation
of woodland areas east of
Rainford

SEALED 19.2.57

CONFIRMED 13.6.57.

County Hall,
Preston.

LANCASHIRE COUNTY COUNCIL

TOWN AND COUNTRY PLANNING ACT, 1947

THE LANCASHIRE COUNTY COUNCIL (RAINFORD URBAN DISTRICT) TREE PRESERVATION ORDER, 1956 No. 3

THE LANCASHIRE COUNTY COUNCIL (in this Order called "the authority") in pursuance of the powers conferred in that behalf by Section 28 of the Town and Country Planning Act, 1947, and subject to the provisions of Section 13 of the Forestry Act, 1951, hereby make the following Order: -

1. In this Order -

"the Act" means the Town and Country Planning Act, 1947; "owner" means the owner in fee simple, either in possession or who has granted a lease or tenancy of which the unexpired portion is less than three years; a lessee (including a sub-lessee) or tenant in possession, the unexpired portion of whose lease or tenancy is three years or more; and a mortgagee in possession; and "the Minister" means the Minister of Housing and Local Government.

2. Subject to the provisions of this Order and to the exemptions specified in the Second Schedule hereto, no person shall, except with the consent of the authority and in accordance with the conditions, if any, imposed on such consent, cut down, top, lop, or wilfully destroy or cause or permit the cutting down, topping, lopping, or wilful destruction of any tree specified in the First Schedule hereto or comprised in a group of trees or in a woodland therein specified, the position of which trees, groups of trees and woodlands is defined in the manner indicated in the said First Schedule on the map marked "The Lancashire County Council (Rainford Urban District) Tree Preservation Order, 1956 No. 3", signed by the Deputy Clerk of the Authority and deposited for inspection at the office of the Clerk of the County Council, County Hall, Preston, and a certified copy of which has been similarly deposited at the office of the Clerk of the Rainford Urban District Council, Council Offices, Rainford, which map shall, for the purpose of such definition as aforesaid, prevail where any ambiguity arises between it and the specification in the said First Schedule.

3. An application for consent made to the authority under Article 2 of this Order shall be in writing stating the reasons for making the application, and shall by reference if necessary to a plan specify the trees to which the application relates, and the operations for the carrying out of which consent is required.

4. - (1) Where an application for consent is made to the authority under this Order, the authority may grant such consent either unconditionally or subject to such conditions (including conditions requiring the replacement of any tree by one or more trees on the site or in the immediate vicinity thereof), as the authority may think fit, or may refuse consent.

Provided that where the application relates to any woodland specified in the First Schedule to this Order the authority shall grant consent so far as accords with the principles of good forestry except where, in the opinion of the authority, it is necessary in the interests of amenity to maintain the special character of the woodland or the woodland character of the area, and shall not impose conditions of such consent requiring replacement or replanting.

(2) The authority shall keep a register of all applications for consent under this Order containing information as to the nature of the application, the decision of the authority thereon, any compensation awarded in consequence of such decision and any directions as to replanting of woodlands; and every such register shall be available for inspection by the public at all reasonable hours.

5. Where the authority refuse consent under this Order or grant such consent subject to conditions they may when refusing or granting consent certify in respect of any trees for which they are so refusing or granting consent that they are satisfied -

- (a) that the refusal or condition is in the interests of good forestry; or
- (b) in the case of trees other than trees comprised in woodlands, that the trees have an outstanding or special amenity value.

6. - (1) Where consent is granted under this Order to fell any part of a woodland then unless -

- (a) such consent is granted for the purpose of enabling development to be carried out in accordance with a permission to develop land under Part III of the Act, or
- (b) the authority with the approval of the Minister dispense with replanting,

the authority shall give to the owner of the land on which that part of the woodland is situated a direction in writing specifying the manner in which and the time within which he shall replant such land and where such a direction is given and the part is felled the owner shall subject to the provisions of this Order replant the said land in accordance with the direction.

~~Provided to be inserted~~

(2) Any direction given under paragraph (1) of this Article may include requirements as to -

- (a) species;
- (b) number of trees per acre;
- (c) the erection and maintenance of fencing necessary for protection of the replanting;
- (d) the preparation of ground, draining, removal of brushwood, lop and top; and
- (e) protective measures against fire.

7. The provisions set out in the Third Schedule to this Order, being provisions of Part III of the Act adapted and modified for the purposes of this Order, shall apply in relation thereto.

8. Subject to the provisions of this Order, any person who has suffered damage or has incurred expenditure in consequence of any refusal of consent under this Order or of any grant of any such consent subject to conditions, shall, if he makes a claim on the authority within the time and in the manner prescribed by this Order, be entitled to recover from the authority compensation in respect of such damage or expenditure

Provided that no compensation shall be payable in respect of damage suffered or expenditure incurred by reason of such refusal or grant of consent in the case of any trees the subject of a certificate in accordance with Article 5 of this Order.

9. In assessing compensation payable under the last preceding Article or under Section 22 of the Act as applied by this Order account shall be taken of:

- (a) any compensation or contribution which has been paid in respect of the same trees under the terms of this or any other Tree Preservation Order under Section 28 of the Act or under the terms of any Interim Preservation Order made under Section 8 of the Town and Country Planning (Interim Development) Act, 1943, or any compensation which has been paid or which could have been claimed under any provision relating to the preservation of trees or protection of woodlands contained in an operative scheme under the Town and Country Planning Act, 1932, and
- (b) any injurious affection to any land of the owner which would result from the felling of the trees the subject of the claim.

10. - (1) A claim for compensation under this Order shall be in writing and shall be made by serving it on the authority such service to be effected by delivering the claim at the offices of the authority addressed to the Clerk thereof or by sending it by prepaid post so addressed.

(2) The time within which any such claim shall be made as aforesaid shall be a period of twelve months from the date of the decision of the authority, or of the Minister, as the case may be, or where an appeal has been made to the Minister against the decision of the authority, from the date of the decision of the Minister on the appeal.

11. Any question of disputed compensation shall be determined in accordance with the provisions of Section 110 of the Act.

12. Any person contravening the provisions of this Order is guilty of an offence under subsection (6) of Section 28 of the Act and liable on summary conviction to a fine not exceeding fifty pounds: and if in the case of a continuing offence the contravention is continued after conviction he is guilty of a further offence thereunder and liable on summary conviction to an additional fine not exceeding forty shillings for every day on which the contravention is so continued.

* Insert on opposite page

Provided always that any such direction given by the authority specifying the manner in which the owner shall replant any riparian land shall apply subject to the requirements of a River Board established under the River Boards Act, 1948, or a Drainage Board constituted or treated as having been constituted under the Land Drainage Act, 1930, under any Land Drainage Bye-laws.

FIRST SCHEDULE

TREES SPECIFIED INDIVIDUALLY

(Encircled in black on the map)

N O N E

TREES SPECIFIED BY REFERENCE TO AN AREA

(Within a dotted black line on the map)

N O N E

GROUPS OF TREES

(Within a broken black line on the map)

N O N E

WOODLANDS

(Within a continuous black line on the map)

Number on Map	Description of Trees	Situation Plots referred to are Ordnance Survey Plot Nos. on 25" sheets - Lancashire C.3, 4 and 8. (Editions of 1927)
W.1	Stand of mixed Hardwoods consist- ing mainly of Sycamore, Horse Chestnut, Beech, Oak, Ash & Elm	<u>In the Rainford Urban District</u> In Plot No. 735
W.2	Stand of mixed Hardwoods consist- ing mainly of Sycamore, Oak, Beech, Horse Chestnut, Ash, Elm, Lombardy Poplar, Willow, Lime and Birch	In Plot No. 677
W.3	Stand of mixed Hardwoods and Soft woods consisting mainly of Sycamore, Elm, Ash, Beech, Birch, Alder and Scots and Corsican Pine	In Plot Nos. 348, 351 and 351b.
W.4	Stand of mixed Hardwoods consist- ing mainly of Sycamore, Ash, Elm and Birch	In Plot No. 296.

SECOND SCHEDULE

This Order shall not apply so as to require the consent of the authority.

- (1) to the cutting down, topping or lopping of any tree that is dying or dead or has become dangerous;
- (2) to the cutting down, topping or lopping of any tree -
 - (a) in compliance with an obligation imposed by or under an Act of Parliament;
 - (b) in pursuance of the power conferred on the Postmaster General by virtue of Section 5 of the Telegraph (Construction) Act, 1908;
 - (c) in pursuance of the powers conferred by Section 24 of the Regulation of Railways Act, 1868;
 - (d) for the purpose of preventing or abating a nuisance;
 - (e) in the case of a statutory undertaker where the land on which the tree is situated is operational land as defined by the Act and either works on such land cannot otherwise be carried out or the cutting down, topping or lopping is for the purpose of securing safety in the operation of the undertaking;
 - (f) by or at the request of an Electricity Board within the meaning of the Electricity Act, 1947 where such tree obstructs the construction by the Board of any main transmission line or other electric line within the meaning respectively of the Electricity (Supply) Act, 1919 and the Electric Lighting Act, 1882 or interferes or would interfere with the maintenance or working of any such line.
 - (g) where immediately required for the purpose of carrying out development authorised by a planning permission granted on an application made under Part III of the Act, or deemed to have been so granted for any of the purposes of that Part.
 - (h) by or at the request of a River Board established under the River Boards Act, 1948, or a Drainage Board constituted or treated as having been constituted under the Land Drainage Act, 1930, where the tree interferes or would interfere with the exercise of any functions of the Board in relation to the maintenance, improvement or construction of water courses or of drainage works.

THIRD SCHEDULE

Provisions of Part III of the Act as adapted and modified to apply to this Order.

Reference
of applica-
tions to the
Minister.

15. (1) The Minister may give direction to the authority requiring that any application for consent under the Order, or all such applications of any class specified in the directions, shall be referred to the Minister instead of being dealt with by the authority, and any such application shall be so referred accordingly.

(2) Where an application for consent under the Order is referred to the Minister under this section, the provisions of Articles 4 and 5 of the Order shall apply in relation to the determination of the application by the Minister as they apply in relation to the determination of such application by the Authority.

Provided that before determining any such application the Minister shall, if either the applicant or the authority so desire, afford to them an opportunity of appearing before and being heard by a person appointed by the Minister for the purpose.

(3) The decision of the Minister on all applications referred to him under this section shall be final.

Appeals
to the
Minister.

16. (1) Where application is made to the authority for consent under the Order and that consent is refused by that authority or is granted by them subject to conditions or where any certificate or direction is given by the authority, then if the applicant is aggrieved by their decision on the application, or by any such certificate, or if the person directed is aggrieved by the direction, the applicant or that person, as the case may be, may, by notice in writing served within 20 days from the receipt of notification of their decision, certificate or direction, or such longer period as the Minister may allow, appeal to the Minister.

(2) When an appeal is brought under this section from a decision certificate or direction of the authority, the Minister may allow or dismiss the appeal or may reverse or vary any part of the decision of the authority, whether or not the appeal relates to that part, or may cancel any certificate or cancel or vary any direction, and may deal with an application as if it had been made to him in the first instance, and the provisions of the last foregoing section shall apply, subject to any necessary modifications in relation to the determination of an application by the Minister on appeal under this section as they apply in relation to the determination by the Minister of an application referred to him under that section.

(3) Unless within two months from the date of receipt of an application for consent under the Order, or within such extended period as may at any time be agreed upon in writing between the applicant and the authority, the authority either -

(a) give notice to the applicant of their decision on the application; or

- (b) give notice to him that the application has been referred to the Minister in accordance with the directions given by him under the last foregoing section;

the provisions of sub-section (1) of this section shall apply in relation to the application as if the consent to which it relates had been refused by the authority, and as if notification of their decision had been received by the applicant at the expiration of the said period of two months or the extended period agreed upon as aforesaid, as the case may be.

Revocation
or
modification
of consent
under the
Order.

21. (1) Subject to the provisions of this section, if it appears to the authority that it is expedient that any consent under the Order granted on an application made in that behalf should be revoked or modified, they may by order revoke or modify the consent to such extent as appears to them to be expedient as aforesaid.

Provided that no such order shall take effect unless it is confirmed by the Minister, and the Minister may confirm any order submitted to him for the purpose either without modification or subject to such modifications as he considers expedient.

(2) Where an authority submit an order to the Minister for his confirmation under this Section, that authority shall furnish the Minister with a statement of their reason for making the order and shall serve notice of the making of the order on the owner of the land and on any other person who in their opinion will be affected by the order, and if within the period of 28 days from the service thereof any person on whom the notice is served so requires, the Minister shall, before confirming the order, afford to him and to the authority an opportunity of appearing before and being heard by a person appointed by the Minister for that purpose.

(3) The power conferred by this section to revoke or modify a consent may be exercised at any time before the operations for which consent has been given have been completed.

Provided that the revocation or modification of consent shall not affect so much of those operations as has been carried out before the date on which the order was confirmed as aforesaid.

(4) Where a notice has been served in accordance with the provisions of sub-section (2) of this Section, no operations or further operations as the case may be, in pursuance of the consent granted, shall be carried out pending the decision of the Minister under sub-section (1) of this Section.

Supple-
mentary
provisions
as to
revocation
and modi-
fication.

22. (1) Where any person is affected by an order under the last foregoing Section, or by a notice served on him under sub-section (2) of the foregoing Section in a case where the order is not confirmed, then if on a claim made to the authority within the time and in the manner prescribed by Article 10 of the Order it is shown that he has incurred expenditure in carrying out work which is rendered abortive by the revocation, or modification, or stay of operations, as the case may be, or has otherwise suffered loss or damage which is directly attributable to the revocation, modification or stay of operations, the authority shall pay to that person compensation in respect of that expenditure, loss or damage,

(2) For the purposes of this Section any expenditure incurred on matters preparatory to acting on the consent shall be deemed to be included in the expenditure incurred in carrying out that work, but except as aforesaid, no compensation shall be paid under this Section in respect of any work carried out in the period after the making of the Order and before the grant of consent which is revoked or modified, or in respect of any other loss or damage (not being loss or damage consisting of the depreciation in value of any interest in land) arising out of anything done or omitted to be done during that period.

GIVEN under the Common Seal of the County Council for the
County Palatine of Lancaster this nineteenth day of February One
thousand nine hundred and fifty seven.

(Signed) C.P.H. McCALL

Deputy Clerk of the County Council.

L.S.
20015

P.4391

The Minister of Housing and Local Government hereby confirms
the foregoing Order subject to the modifications shown in red ink
thereon.

Given under the official seal of
the Minister of Housing and Local
Government this thirteenth day of
June nineteen hundred and fifty-seven

L.S.

(Signed) A.H.T. WILTSHIRE

Assistant Secretary,
Ministry of Housing and Local
Government

Certified a true copy.

C.P.H. McCall

Deputy Clerk of the County Council.

LANCASHIRE COUNTY COUNCIL

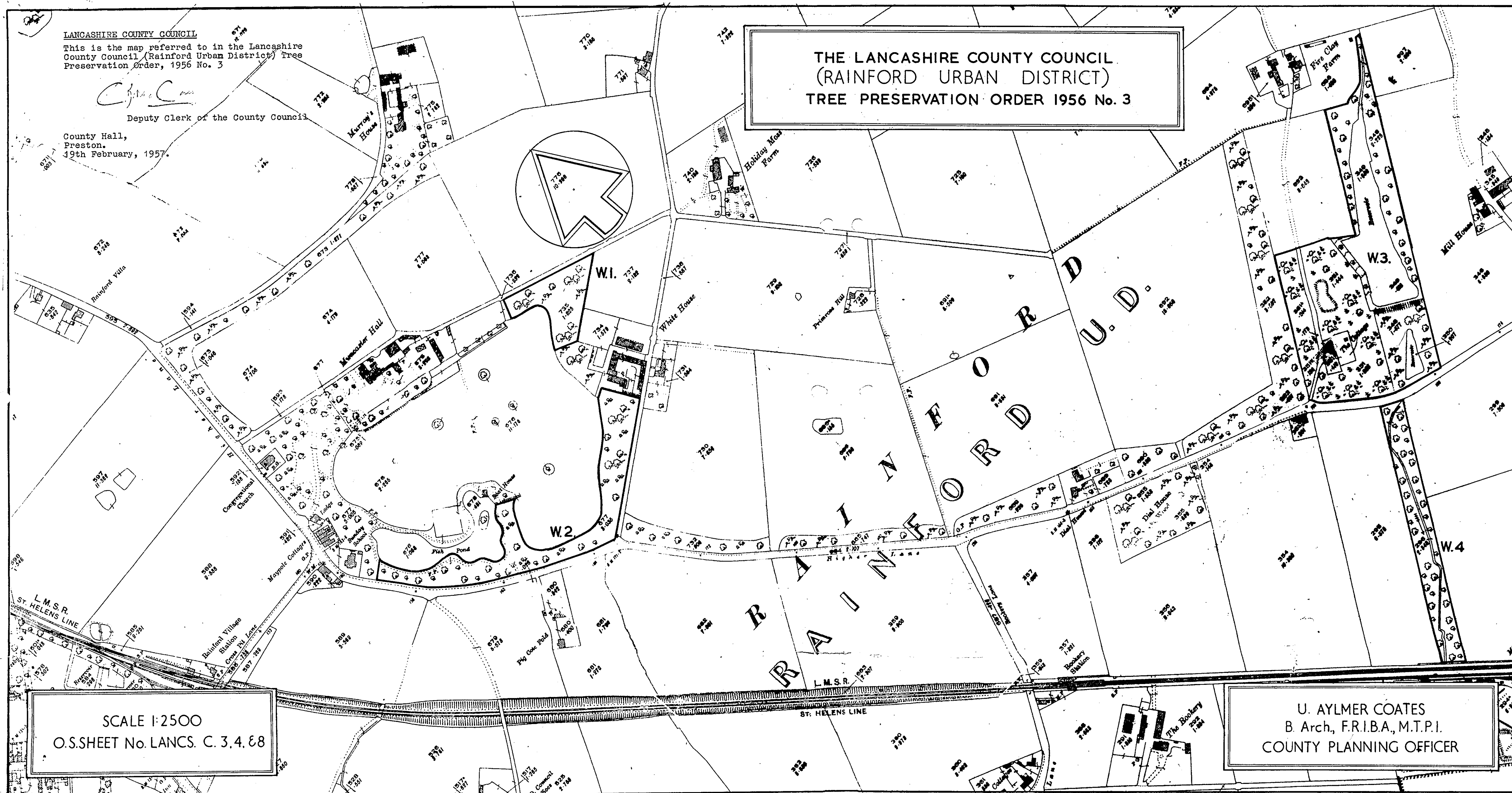
This is the map referred to in the Lancashire
County Council (Rainford Urban District) Tree
Preservation Order, 1956 No. 3

C. M. C.

Deputy Clerk of the County Council

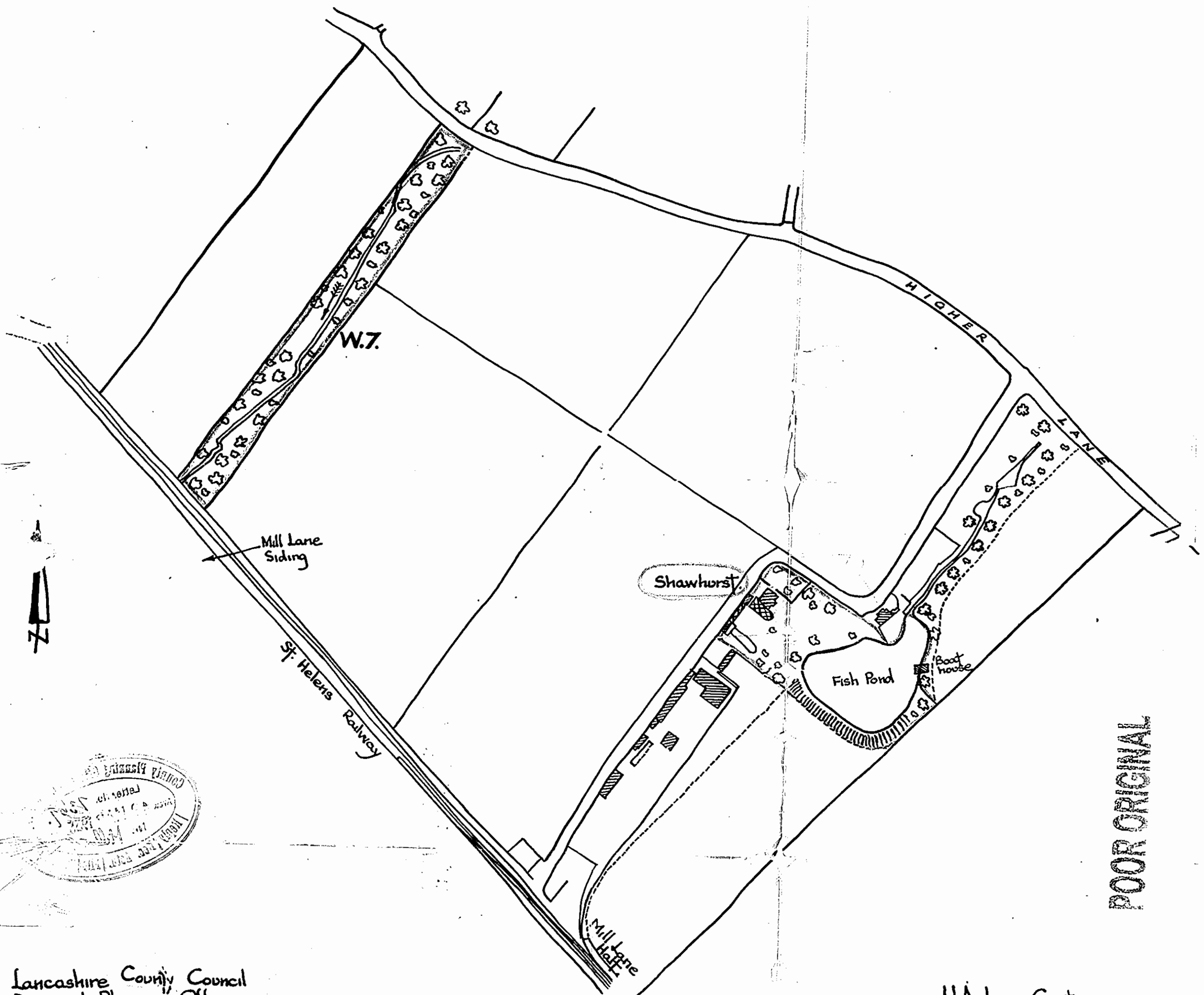
County Hall,
Preston.
19th February, 1957.

THE LANCASHIRE COUNTY COUNCIL
(RAINFORD URBAN DISTRICT)
TREE PRESERVATION ORDER 1956 No. 3



SCALE 1:2500
O.S. SHEET No. LANC. C. 3.4. & 8

U. AYLMER COATES
B. Arch., F.R.I.B.A., M.T.P.I.
COUNTY PLANNING OFFICER



Lancashire County Council
Divisional Planning Office
19 Old Hall Street Liverpool.

Scale: 1/2500.

U. Aylmer Coates
B. Arch., F.R.I.B.A., M.T.P.I.
County Planning Officer.

POOR ORIGINAL

POOR ORIGINAL

Revision of 1925 with additions in 1947.

PROVISIONAL EDITION.

LANCASHIRE. SHEET C. N. E.
INCE CO CONST.

ORMSKIRK CO. CONST.

BILLING AND WINSTANLEY UD
BILLING AND WINSTANLEY PH

If this margin is removed
for mounting paste this
diagram on back.

HUYTON CO CONST
WHISTON & D
WINDLE PH.

1000	09	10	19	29
900	08	09	18	28
800	07	08	17	27
700	06	07	16	26
600	05	06	15	25
500	04	05	14	24
400	03	04	13	23
300	02	03	12	22
200	01	02	11	21
100	00	01	10	20

THE NATIONAL GRID

To refer to a particular point - (1) Read for each half of the reference the double figures printed in large type in the margins, which denote tens of Kilometres and Kilometres. (2) Then, to obtain reading to nearest 100 metres, measure position of point in tenths from the grid lines, which are 1000 metres apart.

THUS TO GIVE A NORMAL NATIONAL GRID REFERENCE ON THIS SHEET

EXAMPLE MILL LANE HALL

East Take west edge of square in which point lies and read the large figures printed opposite this line on north or south margin. Measure tenths Eastwards.

North Take south edge of square in which point lies and read the large figures printed opposite this line on east or west margin. Measure tenths Northwards.

Reference 492996

Similar references occur at intervals of 100 Kilometres in each of the figured

The altitudes of bench marks and surface heights are given in Feet above the mean level of the sea at Newlyn, and are based on the revised primary levelling of 1912-21.

Altitudes indicated thus (+ B.M. 54.7) refer to bench marks on buildings, walls, &c., those marked thus (-) preceded or followed by the height, to surface levels.

The contours on this map are referred to the old Ordnance Survey Datum i.e. assumed mean sea level at Liverpool, and are not based on the revised primary levelling of 1912-21.

There may thus be discrepancies of some inches between the contours and the bench marks and spot levels.

N.B. - The representation on this map of a Road, Track, or Footpath, is no evidence of the existence of a right of way.

Printed and Published by the Director General of the Ordnance Survey, Chislington, Surrey, 1951

Scale - Six Inches to One Statute Mile or 880 Feet to One Inch = 10560
30 Chains = 0 10 20 30 40 50 60 70 80 Chains
1000 Feet = 0 100 200 300 400 500 600 700 800 900 1000 Feet
1 Furlong = 0 10 20 30 40 50 60 70 80 90 100 Furlongs

CHARACTERISTICS AND SYMBOLS

Antiquities, Site of
Borough Constituency Boundary
District Boundary
Contour
Sketches

Antiquities, Site of
Arrow showing direction of flow of water
Instrumental
Contour
Sketches

Antiquities, Site of
Arrow showing direction of flow of water
Instrumental
Contour
Sketches

Antiquities, Site of
Arrow showing direction of flow of water
Instrumental
Contour
Sketches

Antiquities, Site of
Arrow showing direction of flow of water
Instrumental
Contour
Sketches

LANCASHIRE COUNTY COUNCIL

This is the map referred to in the Lancashire
County Council (Rainford Urban District) Tree
Preservation Order, 1956 No. 3.

(Sd.) C.P.H. McCall

Deputy Clerk of the County Council.

County Hall,
Preston.

19th February, 1957.

(Sd.) A.H.T. Wiltshire

Assistant Secretary,
Ministry of Housing and
Local Government.

13th day of June, 1957.

Certified a true copy.

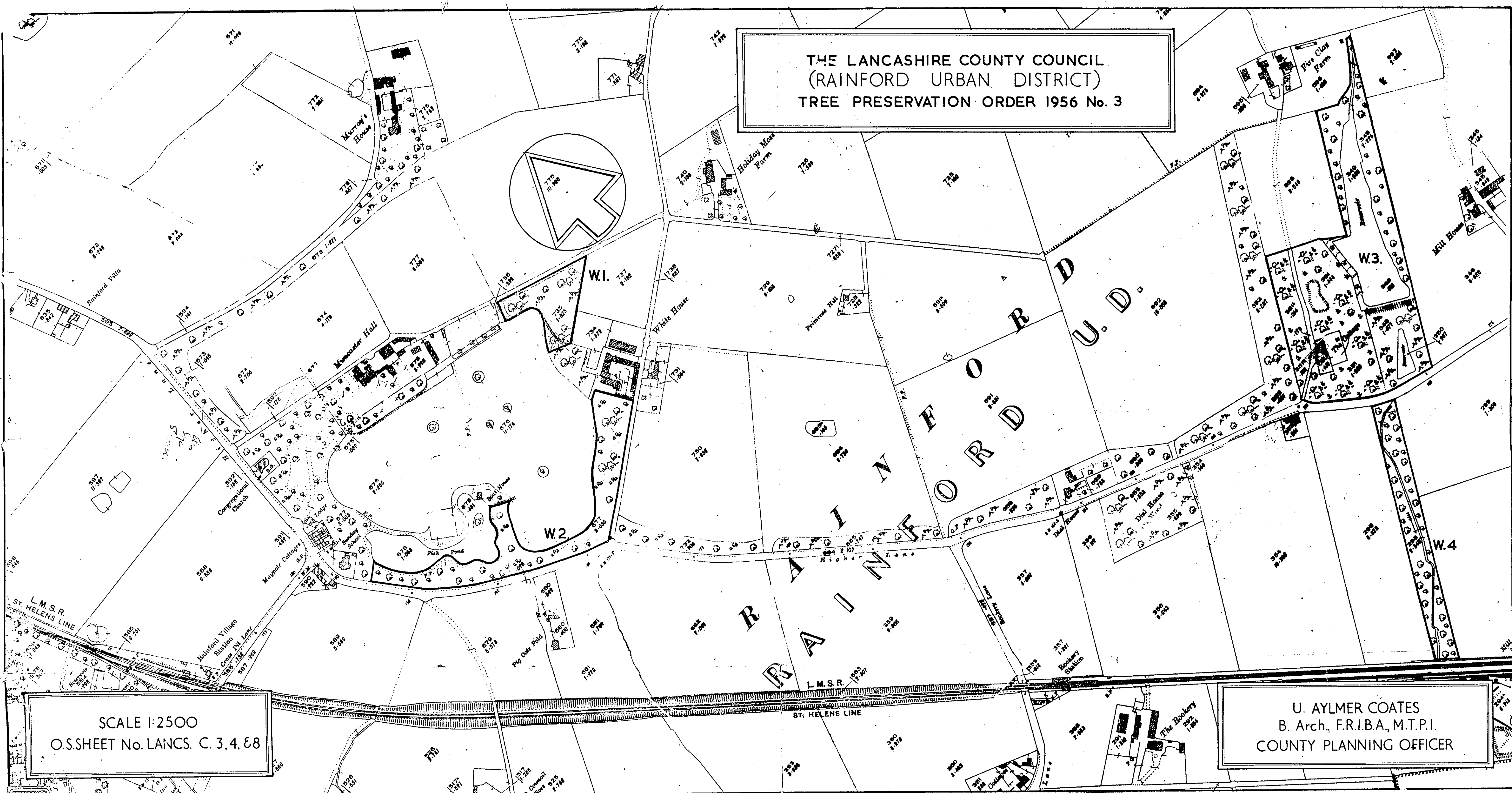
Deputy Clerk of the County Council.

**THE LANCASHIRE COUNTY COUNCIL
(RAINFORD URBAN DISTRICT)
TREE PRESERVATION ORDER 1956 No. 3**

SCALE 1/2500
O.S. SHEET No. LANCs. C. 3.4. & 8

U. AYLMER COATES
B. Arch., F.R.I.B.A., M.T.P.I.
COUNTY PLANNING OFFICER

THE LANCASHIRE COUNTY COUNCIL
(RAINFORD URBAN DISTRICT)
TREE PRESERVATION ORDER 1956 No. 3



SCALE 1:2500
O.S. SHEET No. LANCS. C. 3.4. & 8

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Revision of 1925 with additions in 1947.

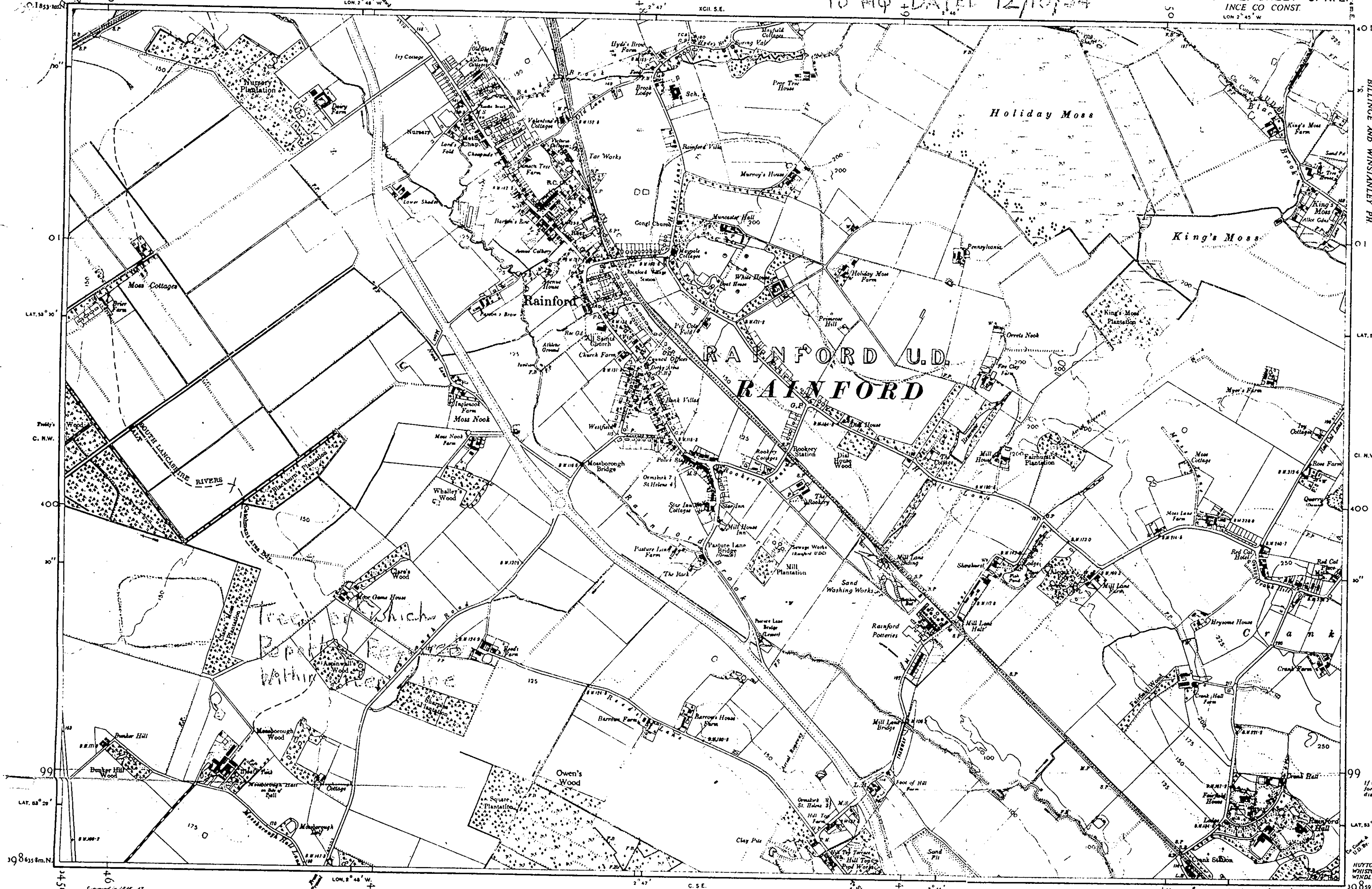
RAINFORD
ORMSKIRK CO. CONST.

PROVISIONAL EDITION.

MAP RELATING TO MEMO
TO HQ DATED 12/10/54

LANCASHIRE. SHEET C. N.E.
INCE CO CONST.
LON 2° 45' W

BILLING AND WINSTANLEY U.D.
BILLING AND WINSTANLEY PH.



Surveyed in 1845-47
Re-levell'd in 1926.
Boundaries Revised to 1.5.1950.
B

Scale - Six Inches to One Statute Mile or 880 Feet to One Inch = 10560

CHARACTERISTICS AND SYMBOLS

County Boundary	Antiquities, Site of
County or Borough Constituency Boundary	Arrow showing direction of flow of water
Rural District Boundary	Instrumental
Parish Boundary	Contours
Catchment Area Boundary	Triangulation Station
The Catchment Area Boundaries are administrative, and are decided by the Minister of Agriculture and Fisheries.	Ministry of Transport Road No.

For other information see Characteristics Sheet.

Price 2/- net.

The altitudes of bench marks and surface heights are given in Feet above the mean level of the sea at Newlyn, and are based on the revised primary levelling of 1912-21. Altitudes indicated thus (+ B.M. 54-7) refer to bench marks on buildings, walls, &c., those marked thus (-) preceded or followed by the height, to surface levels. The contours on this map are referred to the old Ordnance Survey Datum i.e. assumed mean sea level at Liverpool, and are not based on the revised primary levelling of 1912-21. There may thus be discrepancies of some inches between the contours and the bench marks and spot levels.

H.D. - The representation on this map of a Road, Track, or Footpath, is no evidence of the existence of a right of way.

Printed and Published by the Director General of the Ordnance Survey, Chessington, Surrey, 1951.

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EXAMPLE		WILL LANE HALL	
East	Take west edge of square in which point lies and read the large figures printed opposite this line on north or south margin.	North	Take south edge of square in which point lies and read the large figures printed opposite this line on north or south margin.
49		99	
492		996	
Reference		492996	

Similar references occur at intervals of 100 Kilometres i.e. in each of the figured squares in the diagram. The figure indicating the square should be added where necessary; thus as the point is in square 33 it may be referred to as 33492996.

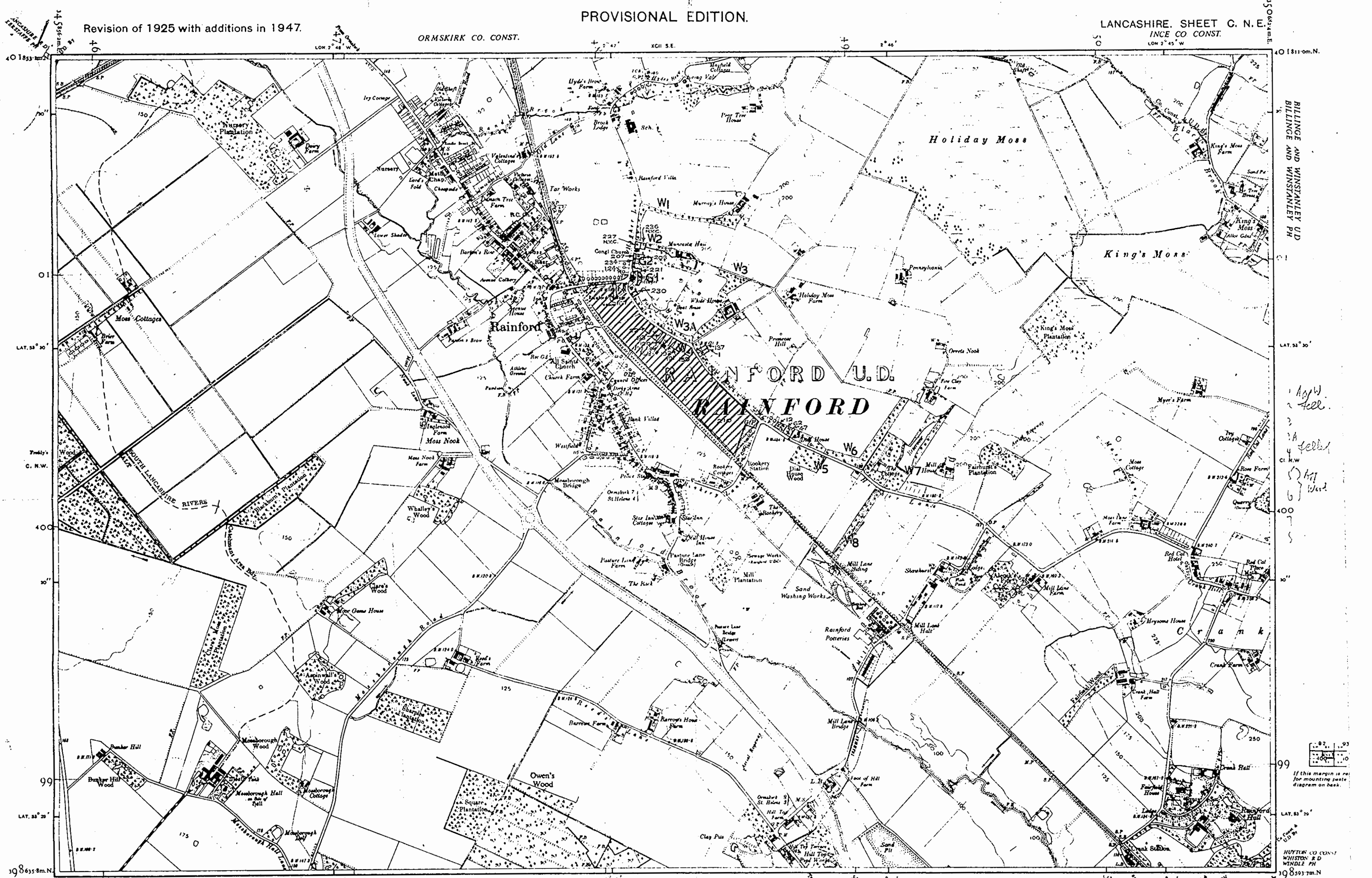
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900	08	48	28	98	48	50	60
800	07	47	27	97	47	50	60
700	06	46	26	96	46	50	60
600	05	45	25	95	45	50	60
500	04	44	24	94	44	50	60
400	03	43	23	93	43	50	60
300	02	42	22	92	42	50	60
200	01	41	21	91	41	50	60
100	00	40	20	90	40	50	60
0	00	40	20	90	40	50	60

PROVISIONAL EDITION.

Revision of 1925 with additions in 1947.

ORMSKIRK CO. CONST.

LANCASHIRE. SHEET C. N. E.
INCE CO CONST.
LOW 2° 45' W



BILLINGE AND WINSTANLEY UD
BILLINE AND WINSTANLEY PH

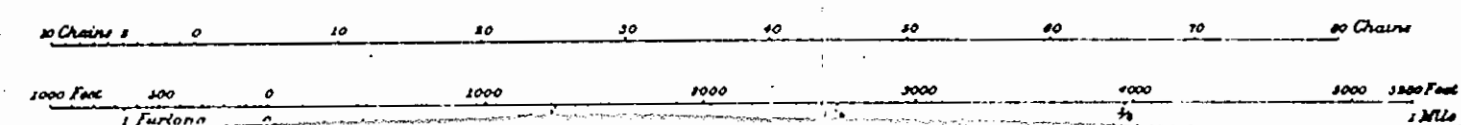
1 Ag. W.
2 Ag. W.
3 Ag. W.
4 Ag. W.
5 Ag. W.
6 Ag. W.
7 Ag. W.
8 Ag. W.
9 Ag. W.
10 Ag. W.

If this margin is not
for mounting paste
diagram on back.

HUYTON CO CONST
WHISTON RD
WINDLE PH

Surveyed in 1845-47
Re-surveyed in 1926.
Boundaries Revised to 1.5.1950.

Scale - Six Inches to One Statute Mile or 880 Feet to One Inch.



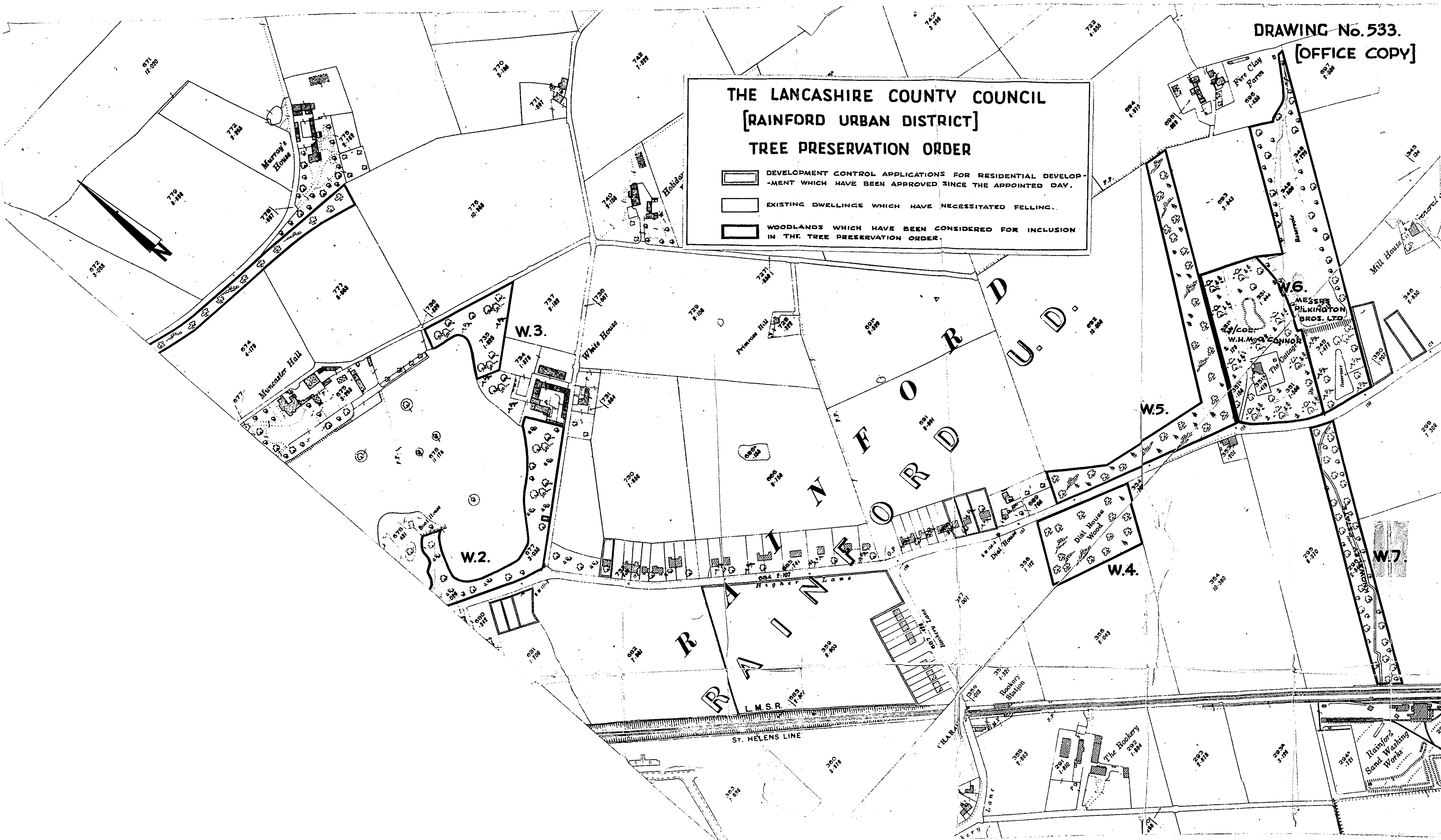
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CHARACTERISTICS AND SYMBOLS

THE LANCASHIRE COUNTY COUNCIL
[RAINFORD URBAN DISTRICT]
TREE PRESERVATION ORDER

- DEVELOPMENT CONTROL APPLICATIONS FOR RESIDENTIAL DEVELOPMENT WHICH HAVE BEEN APPROVED SINCE THE APPOINTED DAY.
- EXISTING DWELLINGS WHICH HAVE NECESSITATED FELLING.
- WOODLANDS WHICH HAVE BEEN CONSIDERED FOR INCLUSION IN THE TREE PRESERVATION ORDER.



Appendix 6: Phase 1 Geo-technical Assessment



PHASE I GEO-ENVIRONMENTAL SITE ASSESSMENT

Land off Higher Lane
Rainford
St Helens

Prepared for:

Mr J and Mrs M Berry
Reeds Farm
Reeds Lane
Rainford
St Helens
WA11 7JN

Report Ref: 12-110-r1
Date Issued: November 2017





E3P

Heliport Business Park,
Liverpool Road,
Eccles,
Manchester,
M30 7RU

Tel : + 00 (0) 161 707 9612
<http://www.e3p.co.uk>

Registered in England
No.: 807255262

QUALITY ASSURANCE

REMARKS	Final
DATE	November 2017
PREPARED BY	S. Cox
QUALIFICATIONS	BSc (Hons), FGS, PIEMA, MEnvSci, CEnv
SIGNATURE	
CHECKED BY	D. Cox
QUALIFICATIONS	BSc (Hons), FGS, PIEMA, AMEnvSci
SIGNATURE	
AUTHORISED BY	M. Dyer
QUALIFICATIONS	BSc (Hons), FGS, PIEMA, MEnvSci, CEnv
SIGNATURE	
PROJECT NUMBER	12-307
IMS Template Reference: QR011	

EXECUTIVE SUMMARY

Site Address	Land off Higher Lane, Rainford, St Helens, WA11 8BJ	
Grid Reference	E349230, N399860	
Site Area	15.91 Hectares	
Current Site Use	<p>The subject site is an irregular shaped parcel of land located to the south of Higher Lane. The site entirely comprises undeveloped grassed land, split into two main agricultural fields. There was evidence during the site walkover that the northern field had been recently ploughed with the land to the south covered in grasses, suggesting both parcels are alternated for crop growth.</p> <p>The site generally falls in topography from the north to the south on a gentle decline. There are also undulations across the site within the landform. The site level meets with the level of the roadways on all boundaries.</p>	
Proposed Development	<p>E3P understands that it is intended to apply to remove Site 1 area from the Green Belt and allocation as Safeguarded land to bring it forward for low rise residential development. No masterplan exists for the site as yet however it is assumed the proposed development will comprise a series of low rise residential dwellings (415 No. on Site 1) with associated gardens, landscaped areas, driveways, roadways and utility infrastructure.</p>	
Environmental Setting	Drift Geology	Geological mapping indicates the sites are underlain predominantly by the Glaciofluvial Deposits (Sand and Gravel) with Glacial Till in the south eastern sector.
	Bedrock Geology	Pennine Lower Coal Measures Formation (Mudstone, Siltstone, Sandstone).
	Hydrogeology	Undifferentiated aquifer strata overlying a Secondary A Aquifer (Bedrock Geology).
	Hydrology	A drainage ditch is present along the western boundary of the site leading towards Rainford Brook located circa 400m to the south west.
	Flood Risk	No flood risk recorded.
	Compressible Ground and Subsidence Hazards	No hazard identified in data searches.
Site History	<p>The site has always been undeveloped grassed land split into fields, with two small ponds located in the north eastern sector which have since been infilled.</p>	
Utility Locations	<p>A formal GPR survey has not been completed, however a review of online records indicates service infrastructure is located adjacent to the site.</p>	
Landfill Sites & Ground Gases	<p>There are no landfill sites located within influencing distance of the site.</p>	
Invasive Plant Species	<p>No invasive plant species were identified during the site walkover however some areas of the site however the survey was not undertaken during the growing season therefore any new growth cannot be ruled out. A full detailed Habitat Survey is likely to be required.</p>	
Radon	<p>Unaffected – No special precaution required.</p>	

EXECUTIVE SUMMARY



Coal Mining / Land Stability

The Arley seam is shown to be outcropping within the north eastern corner of the site, dipping in an easterly direction with probable and known workings indicated within the seam. Furthermore, six mine entries are located within the immediate vicinity of the site with further mine shafts located at a greater distance, associated with the Arley coal seam. With this in mind, it is likely that the Arley coal seam has been worked which may mean a potential presence of shallow coal workings beneath the site.

The site is deemed to be **High Risk** in terms of the potential presence of shallow mine workings that have the potential to cause ground instability. With this in mind, a detailed intrusive coal mining risk assessment will be required to determine the presence of any workings and whether grouting stabilisation will be required.

Geotechnical Risk

Based on the desk study information, the following geotechnical assessment has been made:

-  Given the predominantly undeveloped nature of the site, it is likely there will be limited Made Ground fill deposits and obstructions. However, in the positions of the two infilled ponds in the northern sector of the site, these may be a potential source of deep Made Ground and / or deep alluvial silts, which may result in the requirement for an abnormal foundation solution; and,
-  The site is undulating and decreases in topography from the north to the south. In order to construct low rise residential development, significant earthworks will be required to create a level developable platform.

Contaminated Land Risk Assessment

Human Health

Any Made Ground, if present, represent potential localised sources of heavy metal, polycyclic aromatic hydrocarbon (PAH), asbestos, and ground gas. Considering the potential for direct contact during development works and within proposed gardens and landscaping areas, these potential sources of soil and groundwater contamination represent a low risk to construction workers and residential end users. An intrusive ground investigation to identify, and assess for the presence of these contaminants is required to facilitate further risk assessment, and determine appropriate remediation and / or mitigation measures.

Controlled Waters

Any Made Ground, if present, represent potential localised sources of mobile contamination. Considering the underlying Secondary A Aquifer and surface watercourses in the vicinity of the site, a moderate risk to controlled waters is identified, albeit there are limited sources of contamination present on the site. Furthermore, although not identified and may therefore be redundant, a former well was present in the northern sector which may present a preferential pathway to underlying aquifer. Intrusive investigation with chemical analysis of soil and groundwater samples is recommended to assess the presence of mobile contaminants and facilitate further risk assessment.

Ground Gas

Made Ground, if present, represents a source of hazardous ground gases. Carbon dioxide and methane have associated asphyxiation and explosive risks respectively. If present, the risks can be appropriately mitigated through the careful design of building structures.

Recommendations

A detailed Phase II intrusive Geo-Environmental Ground Investigation should be undertaken in order to confirm the findings of the initial conceptual site model and value engineer a development solution.

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APPENDICES

Appendix I Limitations

Appendix II Glossary

Appendix III Drawings

Drawing No 12-110-001 – Site Location Plan

Drawing No 12-110-002 – Historical Features Plan

Appendix IV Photographs

Appendix V Historical Maps

1. INTRODUCTION

1.1 Background

E3P Ltd has been commissioned by Mr and Mrs Berry to undertake a Phase I Geo-Environmental Site Assessment at land off Higher Lane in Rainford, St Helens.

This report is required to determine potential contaminated land and geotechnical liabilities associated with a proposed future residential development.

1.2 Proposed Development




E3P understands that it is intended to apply to remove Site 1 area from the Green Belt and allocation as Safeguarded land to bring it forward for low rise residential development. No masterplan exists for the site as yet however it is assumed the proposed development will comprise a series of low rise residential dwellings (415 No. on Site 1) with associated gardens, landscaped areas, driveways, roadways and utility infrastructure. A snapshot of the Site 1 boundary is indicated in Figure 1.1 below:

Figure 1.1 Snapshot of Site Boundary




1.3 Objectives

The objectives of the Geo-Environmental Investigation are to:

-  Review historical plans, geology, hydrogeology, site sensitivity, flood-plain issues, mining records and any local authority information available in order to complete a Desk Study in line with Environment Agency (EA) document Model Procedures for the Management of Contaminated Land (Contaminated Land Report 11 (CLR11));
-  Assess the implications of any potential environmental risks, liabilities and development constraints associated with the site in relation to the future use of the site and in relation to off-site receptors;
-  Assess the desk study information and where possible, provide preliminary recommendations in relation to foundations, pavement construction and floor slabs; and,










-  Provide recommendations regarding future works required and undertake a preliminary pre-construction cost appraisal.

1.4 Limitations

The limitations of this report are presented in Appendix I.

1.5 Sources of Information

Background information was sought from the following sources:

-  Envirocheck Search;
-  Historical mapping dated 1850 to 2017. A selection of historical maps are reproduced in Appendix V;
-  On-line planning records held by St Helens Council;
-  Consultations with representatives of the St Helens Council;
-  Environment Agency Groundwater Vulnerability Map (www.environment-agency.gov.uk/wiyby);
-  Radon: Guidance on protective measures for new buildings (BRE Document BR 211, 2007); and,
-  British Geological Survey Map.

1.6 Confidentiality

E3P has prepared this report solely for the use of the Client and those parties with whom a warranty agreement has been executed, or with whom an assignment has been agreed. Should any third party wish to use or rely upon the contents of the report, written approval must be sought from E3P; a charge may be levied against such approval.

2. SITE SETTING

2.1 Site Details

Site Address	Land off Higher Lane, Rainford, St Helens, WA11 8BJ
National Grid Reference	E349230, N399860
Site Area	15.91 Hectares

All acronyms used within this report are defined in the Glossary presented in Appendix II.

A site location map is presented in Appendix III as Drawing 12-110-001.

2.2 Current Site Use

E3P has undertaken a site walkover of the entire site and a description of the key findings is summarised in Table 2.1.

Table 2.1 Site Description

Occupancy/use	The subject site is an irregular shaped parcel of land located to the south of Higher Lane. The site entirely comprises undeveloped grassed land, split into two main agricultural fields. There was evidence during the site walkover that the northern field had been recently ploughed with the land to the south covered in grasses, suggesting both parcels are alternated for crop growth.	
Structures	There are no structures present on the site.	
Access	Access into the northern sector of the site may be gained via field gate on Higher Lane in addition to a couple of gaps in the hedgerows. Access to the southern sector may be gained directly from the adjacent roads due to the lack of fencing in some areas.	
Slope	The site generally falls in topography from the north to the south on a gentle decline. There are also undulations across the site within the landform. The site level meets with the level of the roadways on all boundaries.	
Retaining structures	No retaining structures are present on the site.	
Surface Cover (%)	Buildings:	0%
	Hardstand:	0%
	Soft cover:	100%
Vegetation/Ecology	<p>The entire site appears to be utilised for crop production with the northern sector recently ploughed but the southern sector comprising grasses with evidence of previous ploughing.</p> <p>The site is lined by hedgerow in the most part along the southern, eastern and northern boundaries with sporadic trees, then dense trees along the length of the western boundary.</p> <p>A Habitat Survey will be required to support the planning application.</p>	

Hazardous Material Storage	No Above Ground Storage Tanks (AST) or Underground Storage Tanks (UST) were observed at the site during the preliminary site walkover. Due to the previously undeveloped nature of the site it is unlikely hazardous materials storage will have occurred on the site.
Asbestos Containing Material (ACM)	No evidence of ACM was noted across the site however it cannot be ruled out that ACM is not present within any localised areas of Made Ground.
Polychlorinated Biphenyls (PCBs)	There is no equipment identified which may contain PCBs within the site boundary.
Waste Storage	Potentially hazardous waste streams are unlikely to be generated at the site and none were observed during the preliminary site inspection.
Drainage	A formal drainage survey has not been completed, however a review of online records held by United Utilities indicates the presence of a sewer within Higher Lane to the north.

2.3 Surrounding Area

The surrounding area land uses are summarised in Table 2.2.

Table 2.2 Surrounding Land Uses




DIRECTION	LAND USE
North	Residential units and agricultural fields.
East	Residential units, Mill Lane Farm and agricultural fields.
South	Business Park.
West	Agricultural fields.




3. SITE HISTORY

3.1 On-Site Historical Development

A review of historical mapping pertinent to the site is summarised in Table 3.1 below. In addition, historical site features are presented on Drawing No 12-110-002 in Appendix III.

Table 3.1 Site Historical Development

MAP EDITION	HISTORICAL LAND USE	HISTORICAL MAP EXCERPT
1850 1:10,560	<p>The site is entirely undeveloped grassed land split into 12 No. fields separated by field boundaries.</p> <p>A well is located in the northern sector of the site adjacent to a small pond.</p>	
1894 1:10,560	<p>All field boundaries have been removed with the exception of a field boundary crossing through the centre of the site.</p> <p>The well and small pond in the northern sector have been infilled however a further pond is now located on the north eastern site boundary.</p>	
1909 1:10,560	<p>The pond on the north eastern boundary has now been infilled.</p>	

MAP EDITION	HISTORICAL LAND USE	HISTORICAL MAP EXCERPT
1938 1:10,560	There are no significant changes to the subject site.	
1965 1:10,000	There are no significant changes to the subject site.	
2017 1:10,000	There are no significant changes to the subject site.	

3.2 Off-Site Historical Development

A review of potentially contaminative uses identified on historical Ordnance Survey maps within a 250m radius of the site is summarised below in Table 3.2.

Table 3.2 Surrounding Potentially Contaminative Land Uses.

SURROUNDING FEATURE	DISTANCE	DATES	DIRECTION
Rainford Fire Brick Works and Fire Clay Field Then reservoirs.	100m	Pre 1850-Pre 1894 Pre 1894-Present	North
Alcocks Pits with associated ponds	220m	Pre 1850-Present	South East
Reservoir / Pond	20m	Pre 1894-Present	South East
Pottery Works Then Sanitary Tube Works Then Rainford Potteries Then Millbrook Business Centre	10m	Pre 1894-Pre 1909 Pre 1909-Pre 1928 Pre 1928-Pre 1999 Pre 1999-Present	South
Ponds Then Sand Washing Works Then Rainford Industrial Estate.	10m	Pre 1894-Pre 1909 Pre 1909-Pre 1999 Pre 1999-Present	South West
Builders Yard	10m	Pre 1965-Pre 1999	South West

3.3 Planning History

E3P has undertaken a detailed search of on-line planning records held by St Helens Council which has identified that, with the exception of several residential extensions and alterations of farm buildings, there is no planning application information pertinent to the site.

4. ENVIRONMENTAL SETTING

4.1 Geology and Hydrogeology

The British Geological Survey (BGS) map for the site, (1:50,000, Solid & Drift edition) and online records indicates the site is underlain by the geological sequence presented in Table 4.1.

Table 4.1 Summary of Underlying Geology

GEOLOGICAL UNIT	CLASSIFICATION	DESCRIPTION	AQUIFER CLASSIFICATION
Drift	Glaciofluvial Deposits	Sand and Gravel	Secondary Undifferentiated
	South East – Glacial Till	Devensian, Diamacton	
Solid	Pennine Lower Coal Measures Formation	Mudstone, Siltstone, Sandstone	Secondary A Aquifer

Table 4.2 Summary of BGS Borehole Records

LOCATION	DEPTH	MADE GROUND	DRIFT	SOLID
100m South	293m	0.61m	Sand & Gravel 8.23m Clay 43.89m	Mudstone 43.89m

The Envirocheck Report indicates that the site is not located within a Groundwater Source Protection Zone. Furthermore, there are no groundwater / potable abstractions within 1km of the site.

Based on the local topography, the location of surface watercourses and the presence of a drainage ditch / stream along the western boundary of the site, it is considered likely that shallow groundwater, if present, will flow in a southerly direction, following the topographical gradient towards Rainford Brook to the north.

4.2 Geotechnical Data

Geotechnical Data presented within a commercially available environmental database is summarised within Table 4.3.

Table 4.3 Summary of Geotechnical Data

HAZARD	DESIGNATION
Shrink-Swell Clay	Very Low Risk
Landslides	Very Low Risk
Ground Dissolution	No Hazard
Compressible Ground	No Hazard
Collapsible Deposits	Very Low Risk
Running Sand	Very Low Risk

4.3 Coal Mining

The Envirocheck Report states the site is in an area which may be affected by coal mining.

A Coal Authority Mining Report was obtained (Ref: 51001703131001) dated 29th November 2017.

The Coal Authority operates a risk based approach to the assessment of potential instability issues associated with future development of land located within the pre-defined Coal Authority Consultation Areas. This risk based approach sub-divides the potential risk into 'Low & High' Risk Categories.








The Risk Categories can be defined as:

Low Risk Sites - Deemed to be land where coal mining has taken place, however it was at such depth not to pose a risk to new development and it therefore contains no known recorded risks and as such no further assessment is required.

For Low Risk Sites, the Coal Authority categorically state:

"If your proposed development is within the Development Low Risk Area there is no need for you to submit any coal mining information with your planning application and The Coal Authority will not be consulted by the LPA. The LPA will include our Standing Advice as an informative note within the decision notice".

High Risk Sites are deemed to be landholdings located within an area known to contain legacy risks that include:

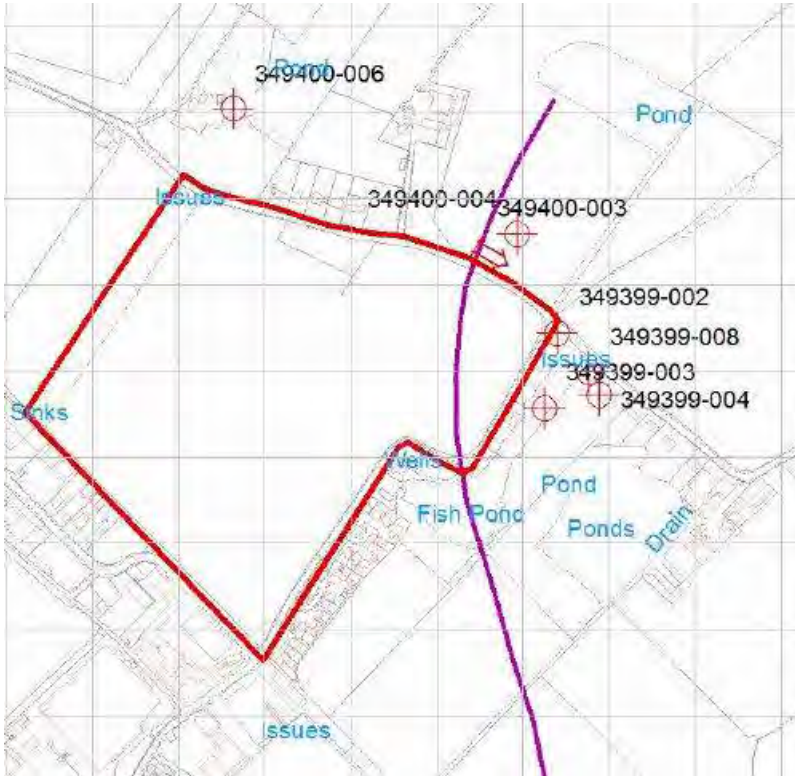
-  Mine entries (shaft or Adit);
-  Shallow Coal Workings (recorded and probable);
-  Workable coal seam outcrops;
-  Mine gas sites and areas;
-  Recorded coal mining related hazards;
-  Geological features (fissures and break lines); and,
-  Former surface mining sites (sometimes using historic opencast extraction methods).


4.3.1 Coal Mining Information

Prior to the enactment of the Coal Mines Regulation Act (1872) which came into force on the 1st January 1883, there was no statutory requirement to record the extent of abandoned mine workings and as such the Coal Authority has no knowledge of extensive workings throughout the UK Coal Fields where shallow workings are present at a depth which could result in a subsidence event in the future (through successive cavitation) associated with failure of support mechanism.

To determine if a site may have unrecorded or recorded coal mine workings requires a consideration of a wide range of information and E3P has completed a review of relevant information in relation to potential coal mining activities. Table 4.4 provides a summary of pertinent coal mining information.



Table 4.4 Coal Mining Information


SOURCES OF INFORMATION	SUMMARY
<p>Coal Authority Mining Report</p>	<p>The Coal Authority Mining Report (Ref: 51001703131001) dated 29th November 2017 has been obtained for the subject site by E3P. This report confirmed:</p> <ul style="list-style-type: none"> ▪ The Arley seam outcrops within the site boundary and is present at a depth of circa 9m beneath the site, dipping in a south easterly direction at 12.8 degrees, last mined in 1877; ▪ Probable shallow coal workings are recorded within the site boundary; ▪ There are no known coal mine entries within the site boundary however there are six mine entries within the immediate surrounding area, associated with the Arley seam, no treatment recorded within any; ▪ No faults, fissures or breaklines are recorded within the site; ▪ There is no record of a mine gas emission requiring action by the Coal Authority within the boundary of the property; ▪ The Authority is not aware of any evidence of damage arising due to geological faults or other lines of weakness that have been affected by coal mining; and ▪ The property is not within the boundary of an opencast site from which coal has been removed by opencast methods. <p>A snapshot of the Coal Authority mapping is shown below:</p> 

SOURCES OF INFORMATION	SUMMARY
Coal Authority Interactive Map	<p>A review of the Coal Authority GIS mapping has been undertaken which indicates the presence of a coal seam (Arley) outcropping in the north eastern sector of the site, dipping in an easterly direction with probable shallow coal workings recorded. Six mine entries are indicated in very close proximity to the site with further shafts at a greater distance, associated with the Arley seam. One of these is recorded as an adit into the drift which suggests this may have been utilised to extract clay associated with the fire clay works just to the north. Past shallow coal workings are recorded within the very north eastern sector of the site, presumably also associated with the Arley coal seam. A snapshot of the Coal Authority GIS mapping is included below:</p> 
British Geological Survey Mapping	The 1:10,000 geological mapping for the area notes the Arley coal seam present outcropping in the north eastern corner of the site and dipping to the east.
Review of Coal Authority Archive	No Coal Authority archives / Mine Abandonment Plans are made available.
Historical Ordnance Survey Mapping	A review of the 1:10,000 Ordnance Survey mapping from c. 1850 does not identify the presence of any mining features.
Historical Site Investigations	E3P has not been provided with any historic site investigation reports.

4.3.2 Coal Mining Risk Assessment

This Risk Assessment comprises a desk-based review of all available information on the coal mining issues which are relevant to the application site deemed to be located within a 'High Risk' area. This includes:

-  Interpretation of information to identify and assess the risks to the proposed development from coal mining legacy, including the cumulative impact of issues;
-  Setting out appropriate mitigation measures to address the coal mining legacy issues affecting the site, including any necessary remedial works and/or demonstrate how coal mining issues have influenced the proposed development; and,

-  Demonstrating to the Local Planning Authority that the application site is, or can be made, safe and stable to meet the requirements of national planning policy with regard to development on unstable land.

The Coal Mining Risk Assessment is summarised in Table 4.5.

Table 4.5 Summary of Coal Mining Risk Assessment

COAL MINING RISK ASSESSMENT	YES / NO	RISK ASSESSMENT
Recorded Underground Coal Mining at Shallow Depth (<30m)	Yes	High
Recorded Underground Coal Mining at Shallow Depth (>30m)	Yes	High
Unrecorded Underground Coal Mining at Shallow Depth (<30m)	Yes	High
Evidence of Fireclay Extraction	Yes	High
Mine Entries (Shaft / Adits)	Yes	High
Coal Mining Geology – Fractures / Fissures	No	Low
Recorded Gas Emissions	No	Low
Recorded Mining Surface Hazard	No	Low
Surface Mining (opencast)	No	Very Low / Low

Based on the above, a high risk of unrecorded coal mining at shallow depth has been identified. The Coal Authority as a statutory consultee will require a series of rotary open holes across the site to determine the presence of any coal on site and understand the nature of any coal workings.

4.4 Hydrology

Surface water features within 250m of the subject site are summarised in Table 4.6.

Table 4.6 Surface Water Features

SURFACE WATER FEATURE	QUALITY	DISTANCE (m)	DIRECTION
Stream / Ditch	N/A	0m	West
Rainford Brook	C	422m	South West

The site is predominantly located within a currently defined Flood Risk Zone 1; defined as land assessed as having less than 1 in 1,000 annual probability of river or sea flooding (<0.1%), and as such is considered to be unaffected by river flooding. In addition, the Envirocheck Report states there is a limited potential for groundwater flooding to occur at the site.

4.5 Radon Risk Potential

The Envirocheck Report indicates the site is situated in an area where less than 1% of homes are above the Action Level and that the BGS reports that full radon protective measures are not necessary in the construction of new dwellings or extensions.

4.6 Industrial Land Uses

The site is located within a predominantly agricultural area however there is an industrial park and business park to the immediate south of the site therefore there are 54 No. entries within the Trade Directory, of which 19 No. are currently active.

The closest active entry to the site is a glass lifting and storage works located 17m to the south west.

4.7 Sensitive Land Uses

The closest residential properties are located adjacent to the south east and northern boundaries of the site.

No other environmentally sensitive land uses have been identified within close proximity to the site.

4.8 Site Sensitivity Assessment



The site is assessed to be located within a **Moderate** sensitivity setting as discussed within Table 4.7.

Table 4.7 Site Sensitivity Assessment

SENSITIVITY PROFILE	DISCUSSION	RATING
Groundwater Source Protection Zone or Drinking Water Safeguard Zone	None	Low
Distance to the closest groundwater abstraction point.	There are no groundwater abstractions located within 1km of the site.	Low
Aquifer Classification in Superficial Drift Deposits.	The underlying superficial deposits are likely to comprise gravelly sands interbedded with low permeability clay soils to depths in excess of 5.0m which may reduce the potential for mobile phase contaminants to migrate towards the bedrock aquifer or adjacent watercourses.	Low
Aquifer classification in Bedrock.	Secondary A Aquifer	Moderate
Is the site underlain by low permeability Drift to depths in excess of 10.0m?	BGS boreholes records confirm there are circa 43m of granular drift deposits and cohesive drift deposits.	Low
Is the site located within 50m of a surface watercourse?	A stream / drainage ditch is present along the western boundary of the site.	Moderate
Sensitive land uses within close proximity (e.g. residential, school, nursery, local nature reserves etc.)	Residential dwellings are present on the northern boundaries and south eastern boundaries.	Moderate
Overall Site Environmental Sensitivity		Moderate

4.9 Preliminary Geotechnical Assessment

Based on the desk study information, the following geotechnical assessment has been made:

-  Given the predominantly undeveloped nature of the site, it is likely there will be limited Made Ground fill deposits and obstructions. However, in the positions of the two infilled ponds in the northern sector of the site, these may be a potential source of deep Made Ground and / or deep alluvial silts, which may result in the requirement for an abnormal foundation solution; and,
-  The site is undulating and decreases in topography from the north to the south. In order to construct low rise residential development, significant earthworks will be required to create a level developable platform.

4.10 Unexploded Ordnance

The regional unexploded bomb risk map from Zetica indicates that the site is in an area at moderate risk from possible Unexploded Ordnance (UXO) resulting from the Second World War. (Zetica, 2014).

5. CONSULTATIONS

5.1 Landfill Sites and Waste Treatment Sites

There are no landfill sites located within 250m of the site with the closest landfill site being 543m south of the site at Berringtons Lane.

5.2 Regulatory Database

The information summarised in Table 5.1 has been obtained from a commercially available environmental database. The summary table only includes records from within 250m of the subject site and not otherwise detailed in the report.

Table 5.1 Summary of Environmental Data

RECORD	ENTRIES WITHIN 250m	DETAILS
Contaminated Land Register Entries and Notices	0	None Identified (N/A).
Authorised industrial processes (IPC/IPPC/LAPPC).	8	6 No. IPCs registered to Unifrax Ltd for use of mineral fibres (non-asbestos) within the mineral industry. 1 No. IPPC registered to Unifrax Ltd for mineral fibres. 1 No. LAPPC registered to St Gobain Ltd for ceramic.
Fuel Stations Entries	0	N/A
Licensed radioactive substances	0	N/A
Enforcements, prohibitions or prosecutions	0	N/A
Discharge Consents	2	Both licenses registered to United Utilities for a pumping station on the north western boundary of the site.
Pollution Incidents	2	163m north west crude sewage from private sewerage to Randles Brook. Category 2 significant incident. 195m south west oils to Rainford Brook. Category 3 minor incident.
Consents issued under the Planning (Hazardous Substances) Act 1990	0	N/A
Control of Major Accident Hazard (COMAH) sites	1	COMAH registered to Carborundum Resistant Materials Ltd 12m south – Lower Tier.

6. INITIAL CONCEPTUAL SITE MODEL

6.1 Initial CSM

In accordance with Environment Agency, CLR 11 (2004) and BSI 10175 (Code of Practice for Investigation of Potentially Contaminated Land), E3P Ltd has developed an initial CSM to identify potential contamination sources, migration pathways and receptors within the study area. This is summarised within Table 6.1.

Table 6.1 Initial Conceptual Site Model

SOURCE	PATHWAY	RECEPTOR
Human Health		
Heavy metals / Semi Volatile Organic Compounds (SVOC) associated with localised Made Ground (infilled ponds)	Dermal Contact and Ingestion Consumption of Home-grown Produce	Construction Workers Residential End Users
<p>Discussion:</p> <p>Any Made Ground present on the site associated with any historical infilling works within the ponds, may contain ash deposits, a source of heavy metals and PAHs. However, this is likely to be a very low risk.</p> <p>Heavy metals and non-volatile PAHs may pose a short-term risk to construction workers who may be exposed to impacted soils during earthworks. Construction works must be undertaken using the appropriate Personal Protective Equipment (PPE) to remove this potential risk.</p> <p>Future residential end users may be exposed to impacted soils within private gardens and landscaped areas. An intrusive ground investigation is required to identify and assess for the presence of heavy metals and PAHs, to facilitate further risk assessment, and to determine appropriate remediation and / or mitigation measures.</p>		
Volatile hydrocarbon compounds associated with off-site land uses.	Volatilisation / Accumulation, Vapour Inhalation	Construction Workers, Residential End Users
<p>Discussion:</p> <p>There are no real on-site potential sources of hydrocarbon compounds however the presence of the industrial park in close proximity to the south of the site may be a potential source of volatile hydrocarbon compounds from the site processes, both existing and historical. That being said, considering the industrial park is located south of the site and therefore considered to be down hydraulic gradient of the site, these are likely to represent only a low risk off-site source.</p>		
Asbestos Containing Materials (ACM) within Made Ground	Fibre / Dust Inhalation	Construction Workers Residential End Users Third Party Property
<p>Discussion:</p> <p>Made Ground, if present, may contain ACM. Disturbance of ACM may give rise to dust generation, posing a risk to adjacent site users, construction workers, and residential end users.</p> <p>An intrusive ground investigation should test and assess for the presence of asbestos within Made Ground to facilitate further risk assessment, albeit the risk is very low.</p>		

SOURCE	PATHWAY	RECEPTOR
Hazardous Ground Gases		
Methane and Carbon Dioxide associated with possible on-site fill material	Inhalation Accumulation	Construction Workers Residential End Users
<p>Discussion: Two infilled ponds in the northern sector of the site may be a potential source of deep Made Ground deposits or alluvial silts which may generate hazardous ground gases. Furthermore, several ponds are present surrounding the site, some of which have become infilled through historical mapping, which may represent a low level off-site source of hazardous ground gases.</p> <p>Should a ground gas risk be identified to end users, the risks can be mitigated through the adoption of suitable control measures within the building construction using guidance presented within CIRIA 665 (Assessing Risk Posed by Hazardous Ground Gases to Buildings) and BS8485 (Code of Practice for the Characterisation and Remediation from Ground Gas in Affected Developments).</p>		
Controlled Waters		
Heavy metals / Semi Volatile Organic Compounds (SVOC) associated with potential Made Ground	Vertical / Lateral Migration	Secondary A Aquifer Western Boundary Stream
<p>Discussion: Any Made Ground, if present, represent potential localised sources of mobile contamination. Considering the underlying Secondary A Aquifer and surface watercourses in the vicinity of the site, a moderate risk to controlled waters is identified, albeit there are limited sources of contamination present on the site. Furthermore, although not identified and may therefore be redundant, a former well was present in the northern sector which may present a preferential pathway to underlying aquifer.</p> <p>Intrusive investigation with chemical analysis of soil and groundwater samples is recommended to assess the presence of mobile contaminants and facilitate further risk assessment.</p>		
Buildings and Infrastructure		
pH & Sulphate	Corrosion of Concrete	Foundations / Concrete
<p>Discussion Presence of pH and sulphate within Made Ground deposits may result in corrosion of buried concrete within the proposed development. Intrusive investigation with chemical analysis of soil samples is recommended to confirm the levels of pH and sulphate within Made Ground deposits and thus determine the concrete classification.</p>		
Ecology		
None Identified	Lateral Migration	Thornley Brook
<p>Discussion No significant ecological receptors are identified.</p>		

7. CONCLUSIONS AND RECOMMENDATIONS

Site Summary

The site has always been undeveloped grassed land split into fields, with two small ponds located in the north eastern sector which have since been infilled.

These uses are considered to have the potential to be low level sources of heavy metal, polycyclic aromatic hydrocarbon (PAH), asbestos and ground gas impact to the sub-surface.



There is a COMAH permitted facilities located within 10m of the subject site but this are not considered likely to have any exclusion zones that affect the subject site, with residential development currently taking place at the adjacent site.

Contamination Issues

Human Health	Any Made Ground, if present, represent potential localised sources of heavy metal, polycyclic aromatic hydrocarbon (PAH), asbestos, and ground gas. Considering the potential for direct contact during development works and within proposed gardens and landscaping areas, these potential sources of soil and groundwater contamination represent a low risk to construction workers and residential end users. An intrusive ground investigation to identify, and assess for the presence of these contaminants is required to facilitate further risk assessment, and determine appropriate remediation and / or mitigation measures.
Controlled Waters	<p>Any Made Ground, if present, represent potential localised sources of mobile contamination. Considering the underlying Secondary A Aquifer and surface watercourses in the vicinity of the site, a moderate risk to controlled waters is identified, albeit there are limited sources of contamination present on the site. Furthermore, although not identified and may therefore be redundant, a former well was present in the northern sector which may present a preferential pathway to underlying aquifer.</p> <p>Intrusive investigation with chemical analysis of soil and groundwater samples is recommended to assess the presence of mobile contaminants and facilitate further risk assessment.</p>
Ground Gas	Made Ground, if present, represents a source of hazardous ground gases. Carbon dioxide and methane have associated asphyxiation and explosive risks respectively. If present, the risks can be appropriately mitigated through the careful design of building structures.
Potable Waters	Based on existing information, it is considered the site will be suitable for PE water supply pipework.

Geotechnical Issues

Based on the desk study information, the following geotechnical assessment has been made:

-  Given the predominantly undeveloped nature of the site, it is likely there will be limited Made Ground fill deposits and obstructions. However, in the positions of the two infilled ponds in the northern sector of the site, these may be a potential source of deep Made Ground and / or deep alluvial silts, which may result in the requirement for an abnormal foundation solution; and,
-  The site is undulating and decreases in topography from the north to the south. In order to construct low rise residential development, significant earthworks will be required to create a level developable platform.

END OF REPORT

APPENDIX I LIMITATIONS



1. This report and its findings should be considered in relation to the terms of reference and objectives agreed between E3P and the Client as indicated in Section 1.2.
2. For the work, reliance has been placed on publicly available data obtained from the sources identified. The information is not necessarily exhaustive and further information relevant to the site may be available from other sources. When using the information it has been assumed it is correct. No attempt has been made to verify the information.
3. This report has been produced in accordance with current UK policy and legislative requirements for land and groundwater contamination which are enforced by the local authority and the Environment Agency. Liabilities associated with land contamination are complex and requires advice from legal professionals.
4. During the site walkover reasonable effort has been made to obtain an overview of the site conditions. However, during the site walkover no attempt has been made to enter areas of the site that are unsafe or present a risk to health and safety, are locked, barricaded, overgrown, or the location of the area has not been made known or accessible.
5. Access considerations, the presence of services and the activities being carried out on the site limited the locations where sampling locations could be installed and the techniques that could be used.
6. Site sensitivity assessments have been made based on available information at the time of writing and are ultimately for the decision of the regulatory authorities.
7. Where mention has been made to the identification of Japanese Knotweed and other invasive plant species and asbestos or asbestos-containing materials this is for indicative purposes only and do not constitute or replace full and proper surveys.
8. The executive summary, conclusions and recommendations sections of the report provide an overview and guidance only and should not be specifically relied upon without considering the context of the report in full.
9. E3P cannot be held responsible for any use of the report or its contents for any purpose other than that for which it was prepared. The copyright in this report and other plans and documents prepared by E3P is owned by them and no such plans or documents may be reproduced, published or adapted without written consent. Complete copies of this may, however, be made and distributed by the client as is expected in dealing with matters related to its commission. Should the client pass copies of the report to other parties for information, the whole report should be copied, but no professional liability or warranties shall be extended to other parties by E3P in this connection without their explicit written agreement there to by E3P.
10. New information, revised practices or changes in legislation may necessitate the re-interpretation of the report, in whole or in part.



APPENDIX II GLOSSARY



TERMS

AST	Above Ground Storage Tank	SGV	Soil Guideline Value
BGS	British Geological Survey	SPH	Separate Phase Hydrocarbon
BSI	British Standards Institute	TPH CWG	Total Petroleum Hydrocarbon (Criteria Working Group)
BTEX	Benzene, Toluene, Ethylbenzene, Xylenes	SPT	Standard Penetration Test
CIEH	Chartered Institute of Environmental Health	SVOC	Semi Volatile Organic Compound
CIRIA	Construction Industry Research Association	UST	Underground Storage Tank
CLEA	Contaminated Land Exposure Assessment	VCCs	Vibro Concrete Columns
CSM	Conceptual Site Model	VOC	Volatile Organic Compound
DNAPL	Dense Non-Aqueous Phase Liquid (chlorinated solvents, PCB)	WTE	Water Table Elevation
DWS	Drinking Water Standard	m	Metres
EA	Environment Agency	km	Kilometres
EQS	Environmental Quality Standard	%	Percent
GAC	General Assessment Criteria	%v/v	Percent volume in air
GL	Ground Level	mb	Milli Bars (atmospheric pressure)
GSV	Gas Screening Value	l/hr	Litres per hour
HCV	Health Criteria Value	µg/l	Micrograms per Litre (parts per billion)
ICSM	Initial Conceptual Site Model	ppb	Parts Per Billion
LNAPL	Light Non-Aqueous Phase Liquid (petrol, diesel, kerosene)	mg/kg	Milligrams per kilogram (parts per million)
ND	Not Detected	ppm	Parts Per Million
LMRL	Lower Method Reporting Limit	mg/m³	Milligram per metre cubed
NR	Not Recorded	m bgl	Metres Below Ground Level
PAH	Polycyclic Aromatic Hydrocarbon	m bcl	Metre Below Cover Level
PCB	Poly-Chlorinated Biphenyl	mAOD	Metres Above Ordnance Datum (sea level)
PID	Photo Ionisation Detector	kN/m²	Kilo Newtons per metre squared
QA	Quality Assurance	µm	Micro metre
SGV	Soil Guideline Value		

APPENDIX III DRAWINGS

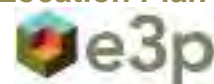


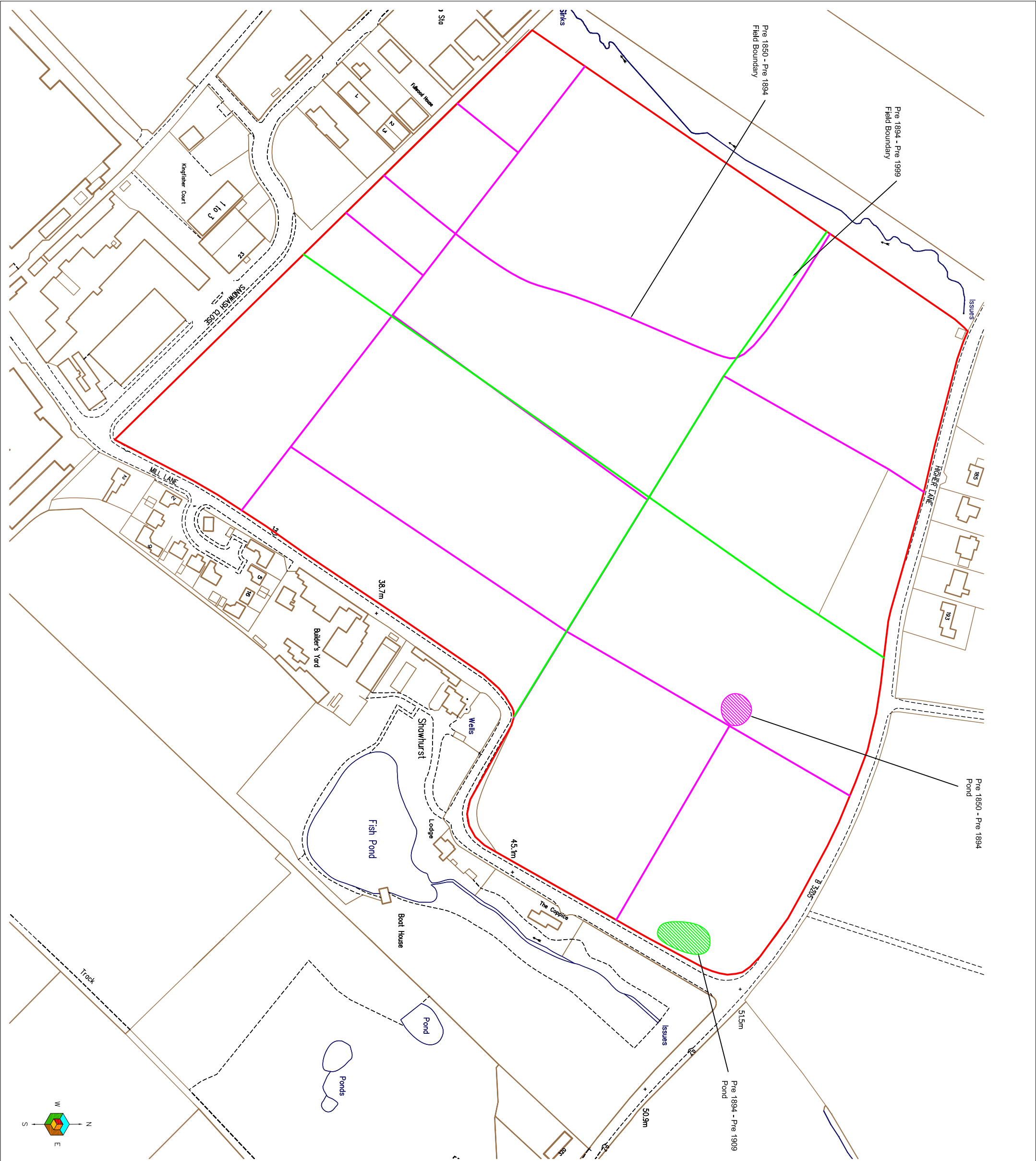


SITE



**Drawing 12-110-001
Site Location Plan**





- Historical Features
- Pre 1850 (Field Boundary, Pond)
 - Pre 1894 (Field Boundary, Pond)

Notes:					

P1		-	29-11-2017	DRAFT	CB	MD
Phase		Revision	Date	Issue	Drawn	Authorised
Client:		Job No:		Date:		
PWA Planning		12-110		29-11-2017		
Drawing No:		002		Scale:		
				NTS @ A3		

Job Title:	Drawing Title:
Higher Lane, Rainford	Historical Features Plan



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APPENDIX IV PHOTOGRAPHS





PLATE 1 – FRESHLY PLOUGHED NORTHERN SECTOR OF THE SITE.



PLATE 2 – VIEW OF THE NORTHERN SECTOR INTO THE SOUTHERN SECTOR.





PLATE 3 – VIEW OF THE STREAM ALONG THE WESTERN BOUNDARY OF THE SITE.



PLATE 4 – VIEW OF THE SOUTHERN SECTOR OF THE SITE ALONG THE WESTERN BOUNDARY.



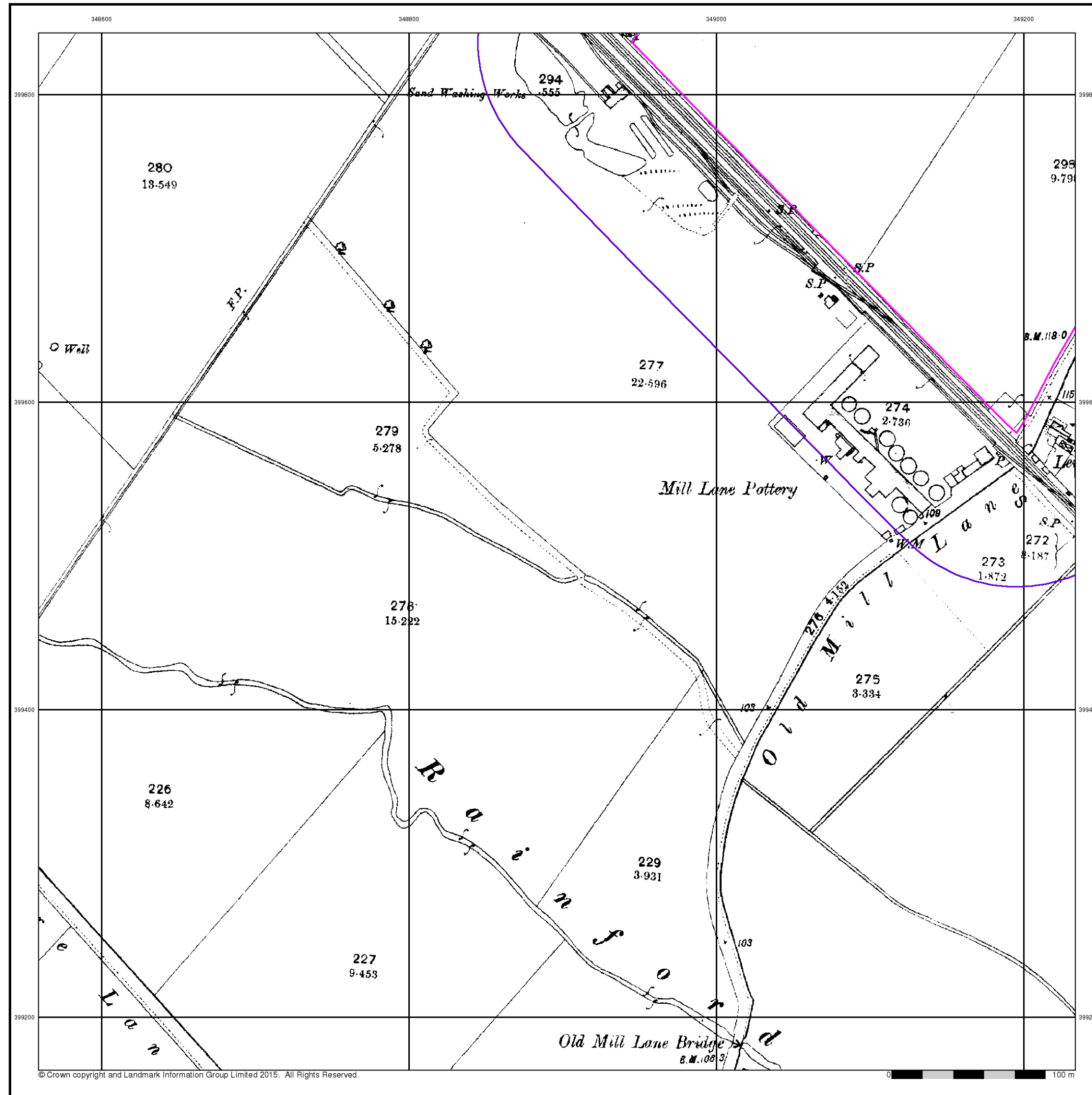


PLATE 5 – VIEW OF THE SOUTHERN SECTOR.



APPENDIX V HISTORICAL MAPS





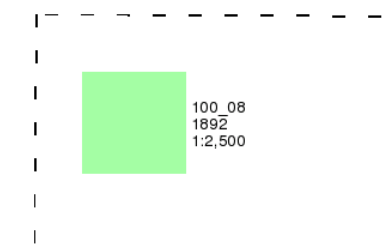
Lancashire And Furness

Published 1892

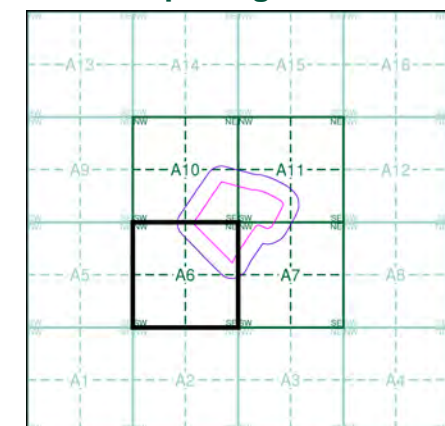
Source map scale - 1:2,500

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas and by 1896 it covered the whole of what were considered to be the cultivated parts of Great Britain. The published date given below is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas.

Map Name(s) and Date(s)



Historical Map - Segment A6



Order Details

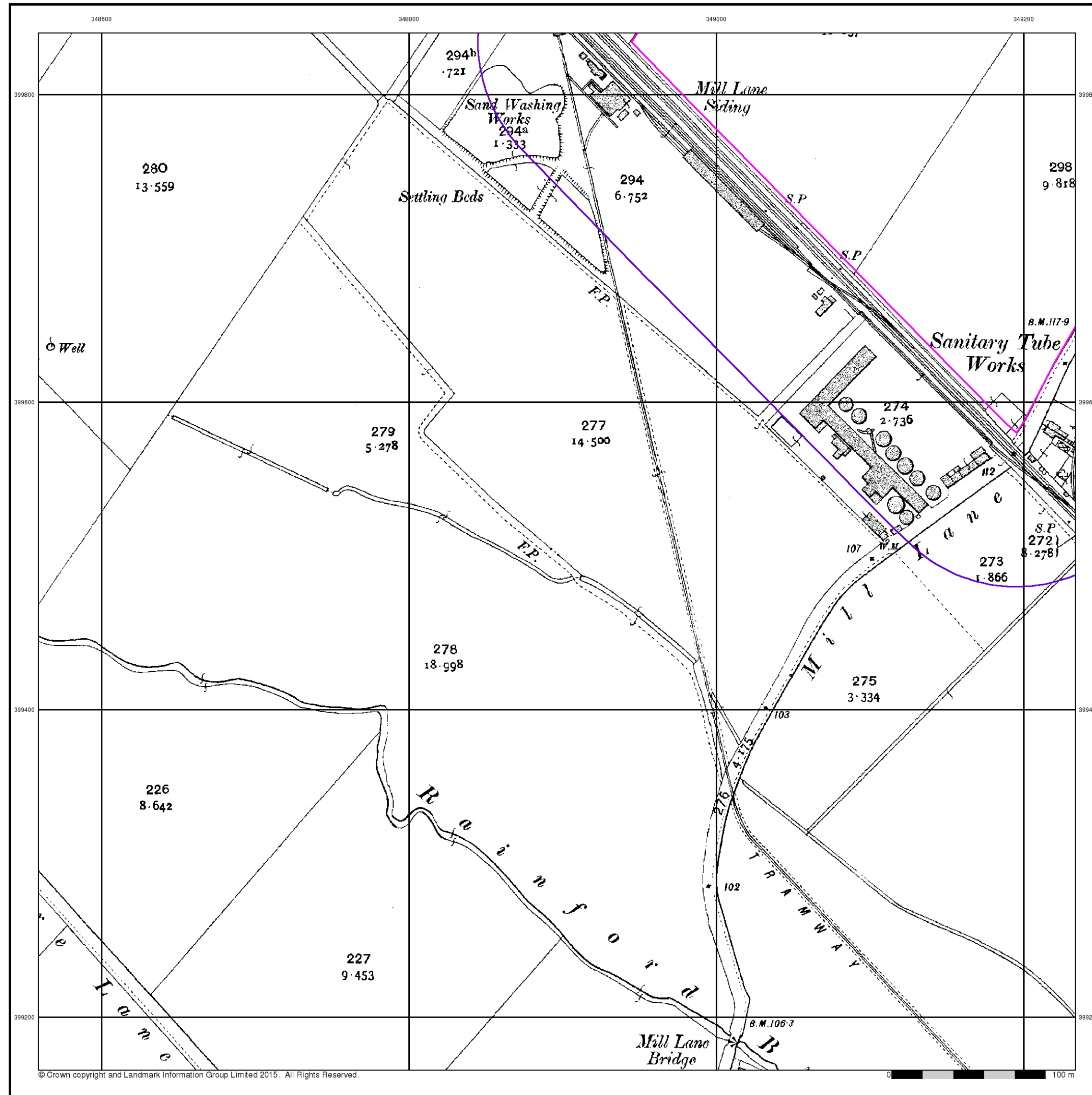
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Customer Ref: 12-110
National Grid Reference: 349230, 399860
Slice: A
Site Area (Ha): 15.91
Search Buffer (m): 100

Site Details

129, Higher Lane, Rainford, ST. HELENS, WA11 8BJ



Tel: 0844 844 9952
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Web: www.envirocheck.co.uk



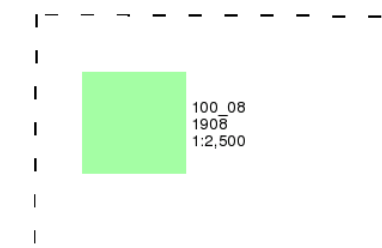
Lancashire And Furness

Published 1908

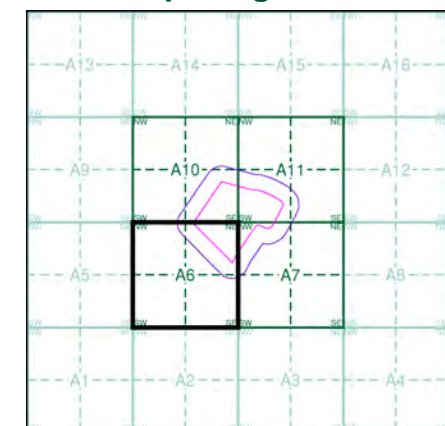
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Map Name(s) and Date(s)



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Order Details

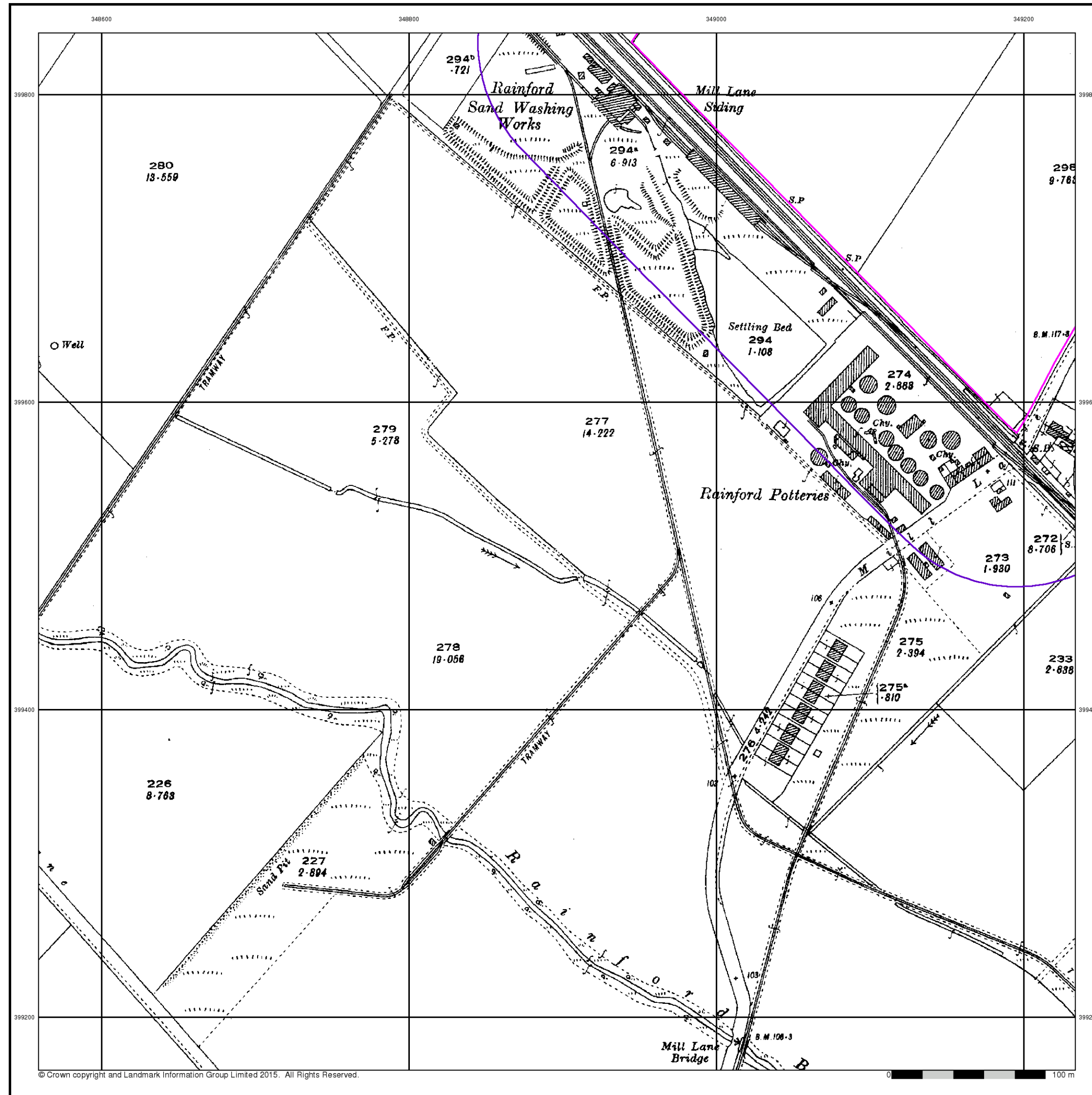
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Slice: A
Site Area (Ha): 15.91
Search Buffer (m): 100

Site Details

129, Higher Lane, Rainford, ST. HELENS, WA11 8BJ



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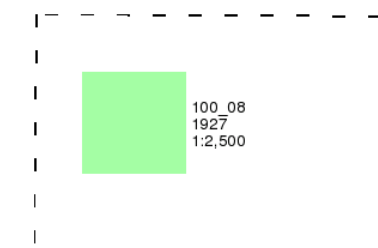
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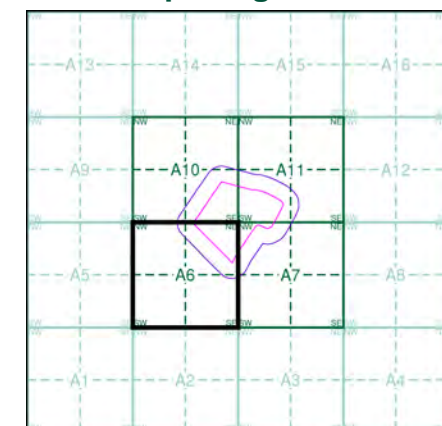
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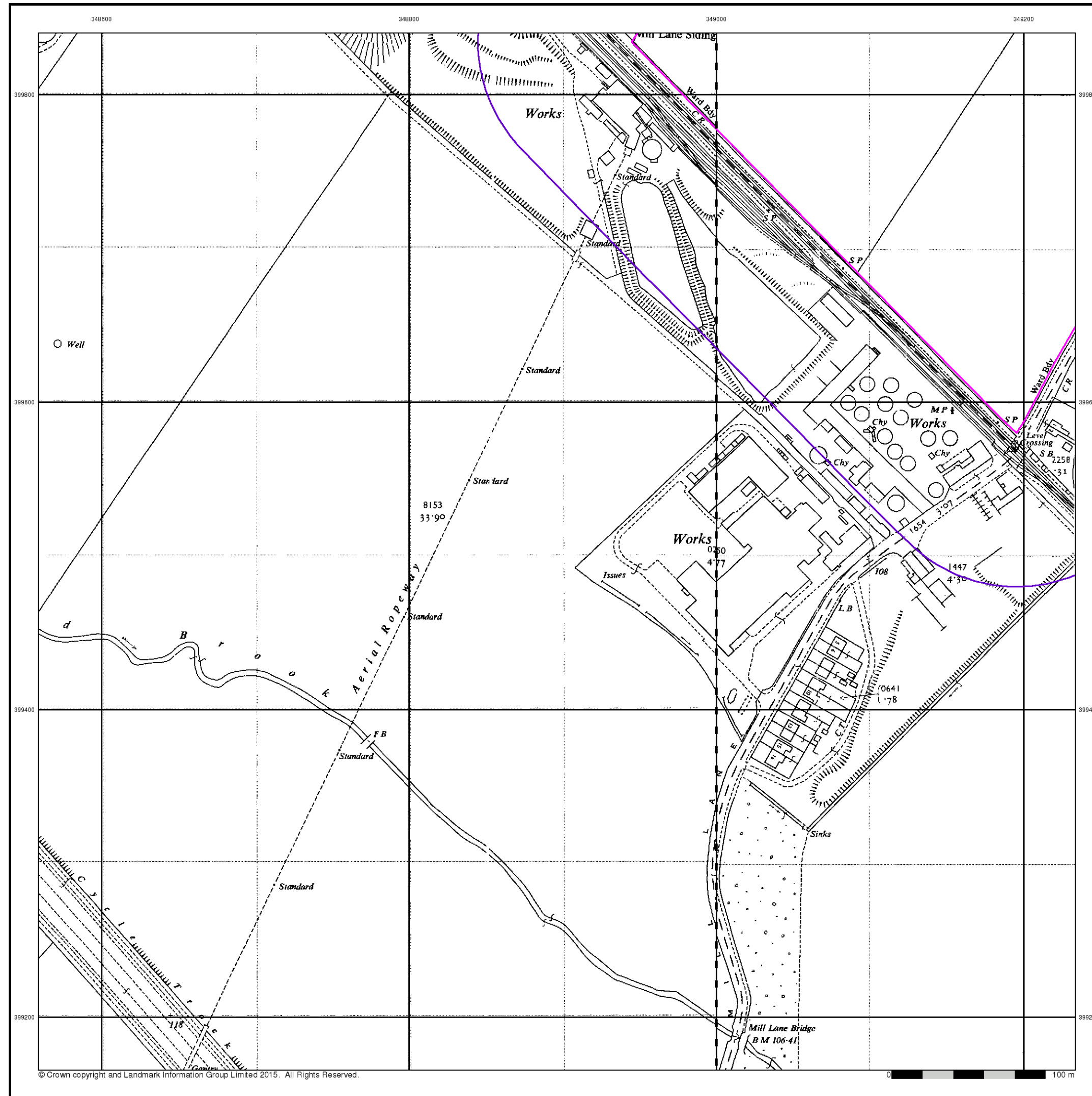
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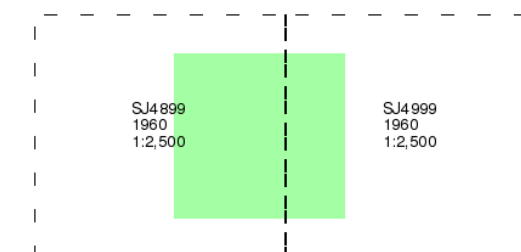
Ordnance Survey Plan

Published 1960

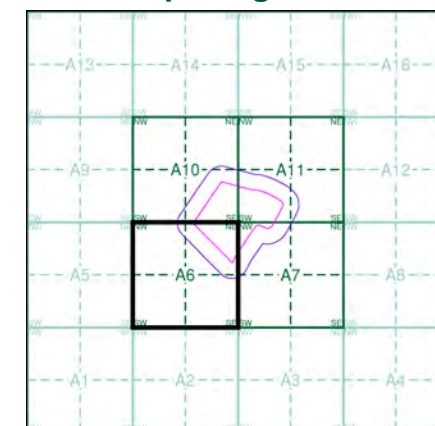
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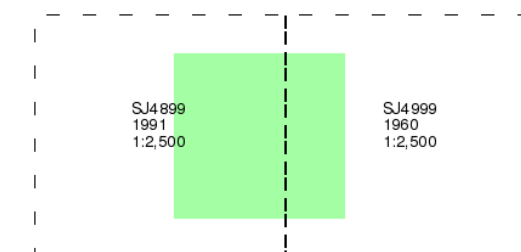
Additional SIMs

Published 1960 - 1991

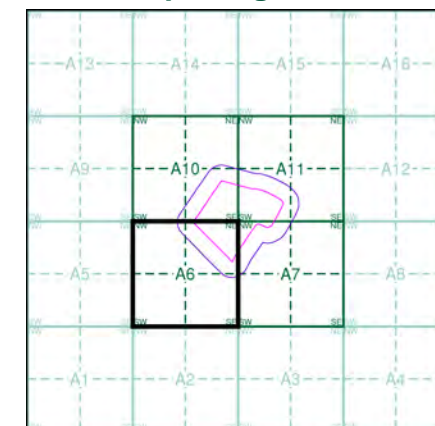
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The SIM cards (Ordnance Survey's 'Survey of Information on Microfilm') are further, minor editions of mapping which were produced and published in between the main editions as an area was updated. They date from 1947 to 1994, and contain detailed information on buildings, roads and land-use. These maps were produced at both 1:2,500 and 1:1,250 scales.

Map Name(s) and Date(s)



Historical Map - Segment A6



Order Details

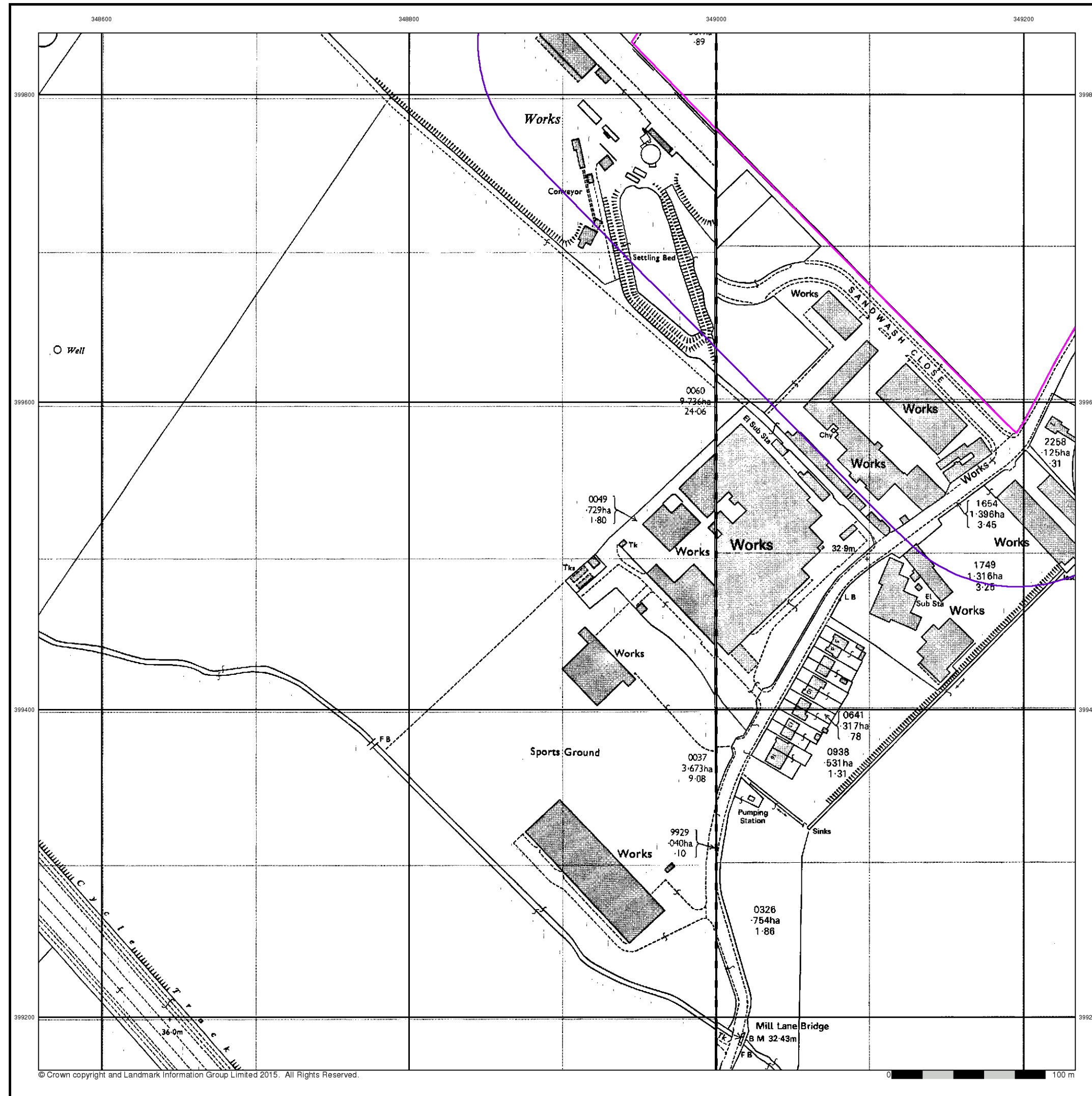
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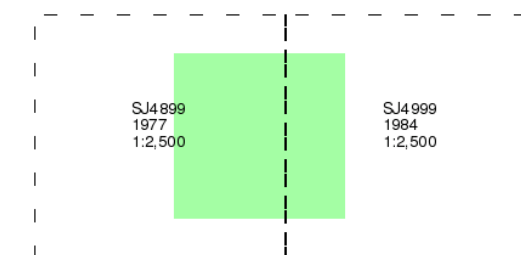
Ordnance Survey Plan

Published 1977 - 1984

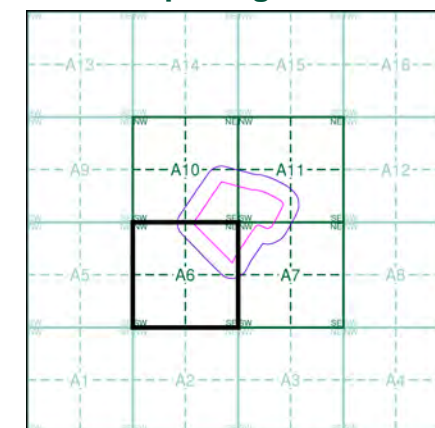
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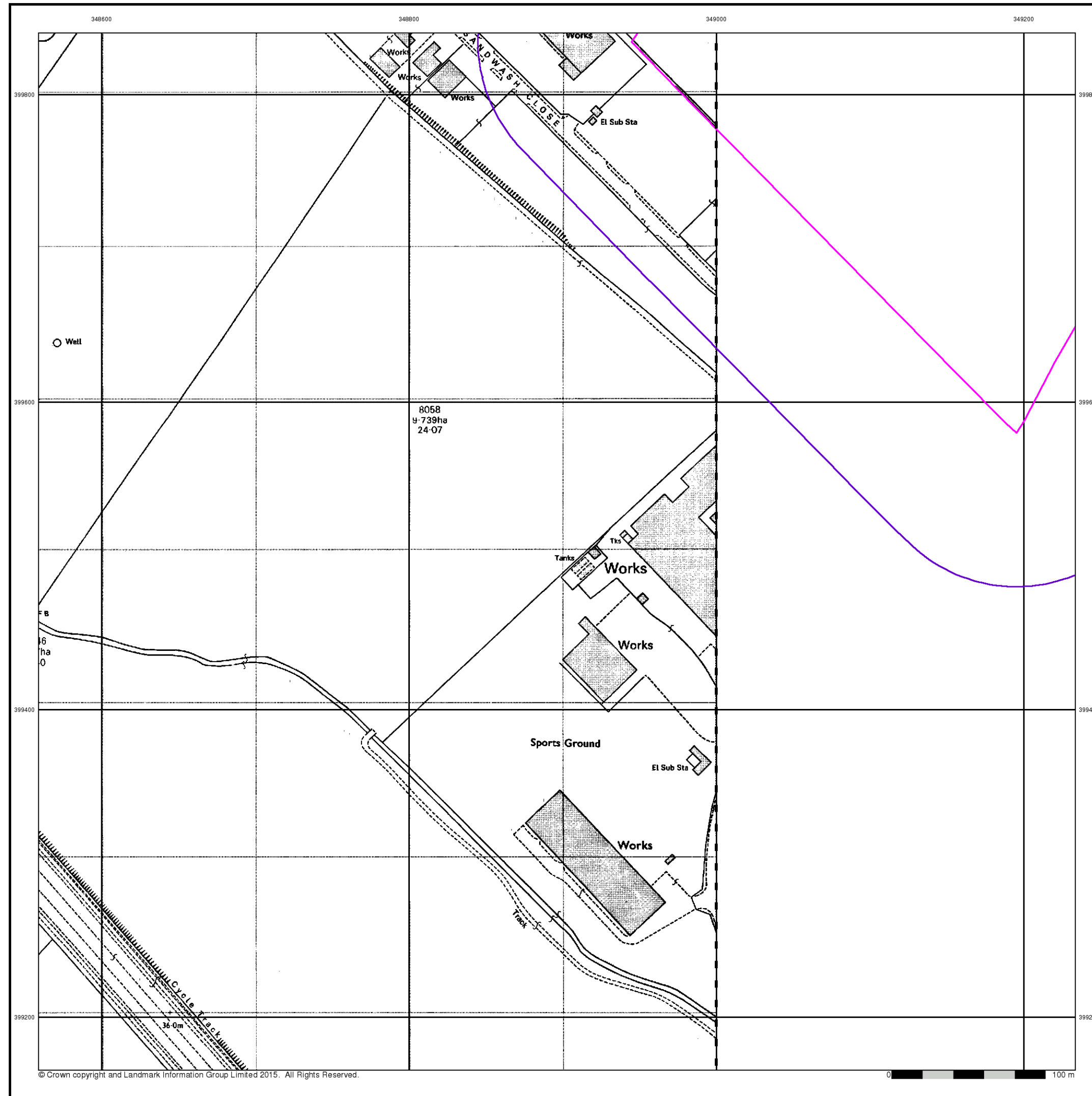
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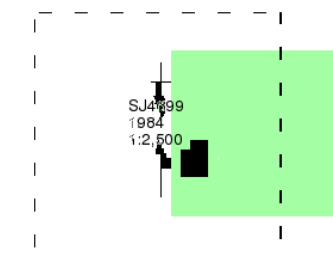
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Published 1984

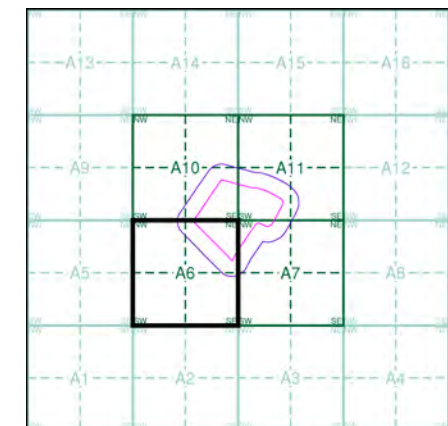
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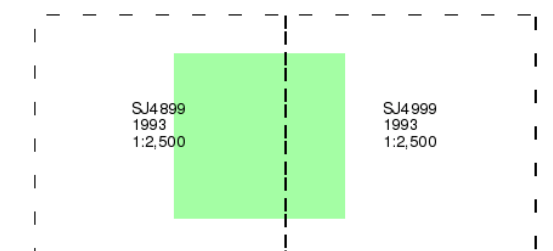
Large-Scale National Grid Data

Published 1993

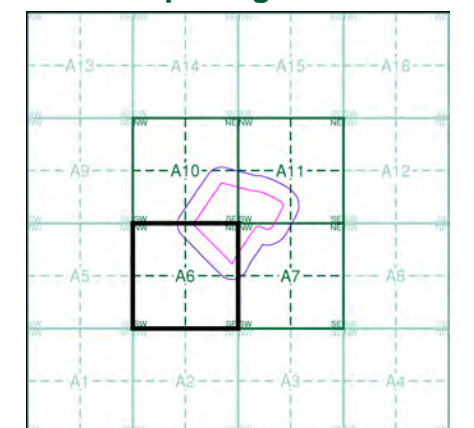
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'Large Scale National Grid Data' superseded SIM cards (Ordnance Survey's 'Survey of Information on Microfilm') in 1992, and continued to be produced until 1999. These maps were the fore-runners of digital mapping and so provide detailed information on houses and roads, but tend to show less topographic features such as vegetation. These maps were produced at both 1:2,500 and 1:1,250 scales.

Map Name(s) and Date(s)



Historical Map - Segment A6



Order Details

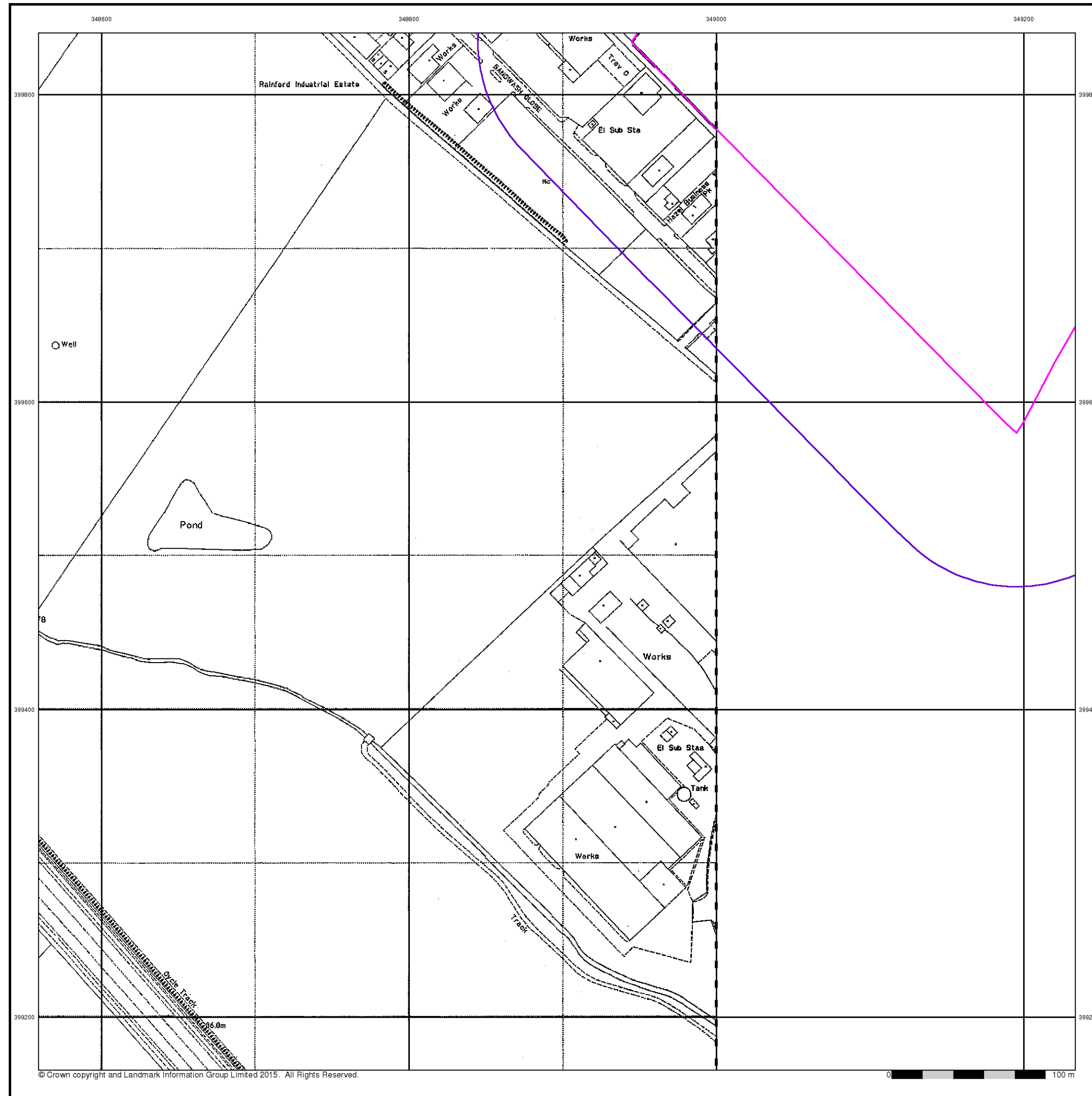
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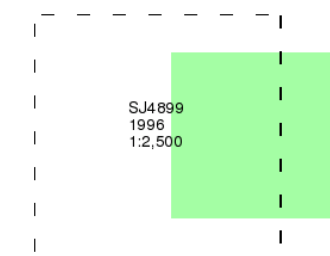
Large-Scale National Grid Data

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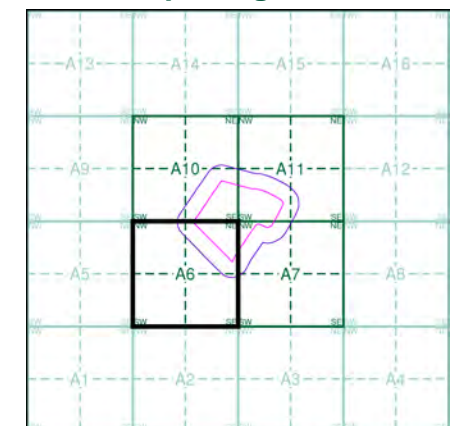
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Map Name(s) and Date(s)



Historical Map - Segment A6



Order Details

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National Grid Reference:	349230, 399860
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Site Area (Ha):	15.91
Search Buffer (m):	100

Site Details

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**APPENDIX VI
COAL AUTHORITY
MINING REPORT**

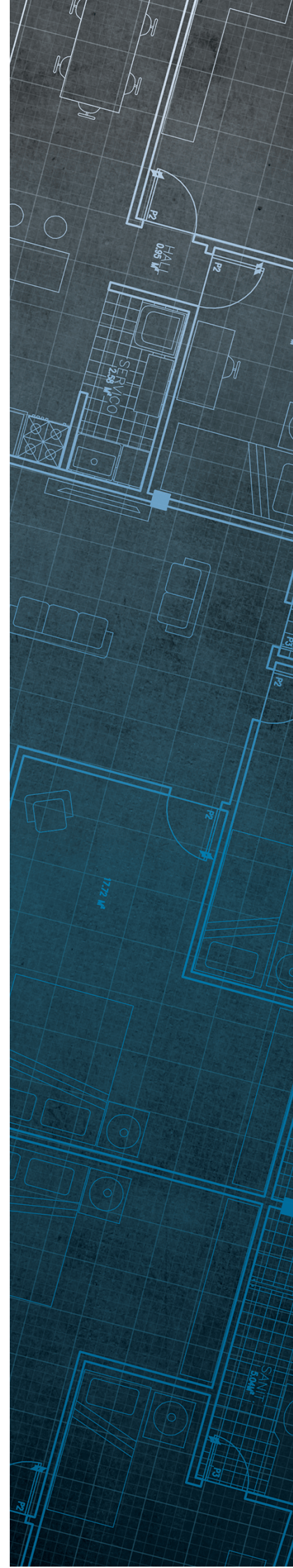


Consultants Coal Mining Report

129 Higher Lane
Rainford
St Helens Council
WA11 8BJ

Date of enquiry:	29 November 2017
Date enquiry received:	29 November 2017
Issue date:	29 November 2017

Our reference:	51001703131001
Your reference:	12110-7509-SC



Consultants

Coal Mining Report

This report is based on and limited to the records held by the Coal Authority at the time the report was produced.

Client name

E3P

Enquiry address

129 Higher Lane
Rainford
St Helens Council
WA11 8BJ

How to contact us

0345 762 6848 (UK)
+44 (0)1623 637 000 (International)

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

www.groundstability.com

@coalauthority
/company/the-coal-authority
/thecoalauthority
/thecoalauthority



Approximate position of property

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Section 1 – Mining activity and geology

Past underground mining

Colliery	Seam	Mineral	Coal Authority reference	Depth (m)	Direction to working	Dipping rate of seam worked (degrees)	Dipped direction of seam worked	Extraction thickness (cm)	Year last mined
unnamed	ARLEY	Coal	30E7	9	Beneath Property	12.8	South-East	90	1877

Probable unrecorded shallow workings

Yes.

Spine roadways at shallow depth

No spine roadway recorded at shallow depth.

Mine entries

Entry type	Reference	Grid reference	Treatment description	Mineral	Conveyancing details
Shaft	349399-002	349541 399944		Coal	
Shaft	349399-003	349526 399857		Coal	
Shaft	349399-004	349589 399873		Coal	
Shaft	349399-008	349577 399899		Coal	
Adit	349400-003	349444 400043		Coal	
Shaft	349400-004	349495 400059		Coal	
Shaft	349400-006	349165 400204		Coal	

Abandoned mine plan catalogue numbers

The following abandoned mine plan catalogue numbers intersect with some, or all, of the enquiry boundary:

NW799	9128	PO0
-------	------	-----

Please contact us on 0345 762 6848 to determine the exact abandoned mine plans you require based on your needs.

Outcrops

Seam name	Mineral	Seam workable	Distance to outcrop (m)	Direction to outcrop	Bearing of outcrop
ARLEY	Coal	Yes	Within	N/A	20
ARLEY	Coal	Yes	Within	N/A	351

Geological faults, fissures and breaklines

No faults, fissures or breaklines recorded.

Opencast mines

None recorded within 500 metres of the enquiry boundary.

Coal Authority managed tips

None recorded within 500 metres of the enquiry boundary.

Section 2 – Investigative or remedial activity

Please refer to the 'Summary of findings' map (on separate sheet) for details of any activity within the area of the site boundary.

Site investigations

None recorded within 50 metres of the enquiry boundary.

Remediated sites

None recorded within 50 metres of the enquiry boundary.

Coal mining subsidence

The Coal Authority has not received a damage notice or claim for the subject property, or any property within 50 metres of the enquiry boundary, since 31st October 1994.

There is no current Stop Notice delaying the start of remedial works or repairs to the property.

The Coal Authority is not aware of any request having been made to carry out preventive works before coal is worked under section 33 of the Coal Mining Subsidence Act 1991.

Mine gas

None recorded within 500 metres of the enquiry boundary.

Mine water treatment schemes

None recorded within 500 metres of the enquiry boundary.

Section 3 – Licensing and future mining activity

Future underground mining

None recorded.

Coal mining licensing

None recorded within 200 metres of the enquiry boundary.

Court orders

None recorded.

Section 46 notices

No notices have been given, under section 46 of the Coal Mining Subsidence Act 1991, stating that the land is at risk of subsidence.

Withdrawal of support notices

The property is not in an area where a notice to withdraw support has been given.

The property is not in an area where a notice has been given under section 41 of the Coal Industry Act 1994, cancelling the entitlement to withdraw support.

Payments to owners of former copyhold land

The property is not in an area where a relevant notice has been published under the Coal Industry Act 1975/Coal Industry Act 1994.

Section 4 – Further information

The following potential risks have been identified and as part of your risk assessment should be investigated further.

Development advice

The site is within an area of historical coal mining activity. Should you require advice and/or support on understanding the mining legacy, its risks to your development or what next steps you need to take, please contact us.

For further information on specific site or ground investigations in relation to any issues raised in Section 4, please call us on 0345 762 6848 or email us at groundstability@coal.gov.uk.

Section 5 – Data definitions

The datasets used in this report have limitations and assumptions within their results. For more guidance on the data and the results specific to the enquiry boundary, please **call us on 0345 762 6848** or **email us at groundstability@coal.gov.uk**.

Past underground coal mining

Details of all recorded underground mining relative to the enquiry boundary. Only past underground workings where the enquiry boundary is within 0.7 times the depth of the workings (zone of likely physical influence) allowing for seam inclination, will be included.

Probable unrecorded shallow workings

Areas where the Coal Authority believes there to be unrecorded coal workings that exist at or close to the surface (less than 30 metres deep).

Spine roadways at shallow depth

Connecting roadways either, working to working, or, surface to working, both in-seam and cross measures that exist at or close to the surface (less than 30 metres deep), either within or within 10 metres of the enquiry boundary.

Mine entries

Details of any shaft or adit either within, or within 100 metres of the enquiry boundary including approximate location, brief treatment details where known, the mineral worked from the mine entry and conveyance details where the mine entry has previously been sold by the Authority or its predecessors British Coal or the National Coal Board.

Abandoned mine plan catalogue numbers

Plan numbers extracted from the abandoned mines catalogue containing details of coal and other mineral abandonment plans deposited via the Mines Inspectorate in accordance with the Coal Mines Regulation Act and Metalliferous Mines Regulation Act 1872. A maximum of 9 plan extents that intersect with the enquiry boundary will be included. This does not infer that the workings and/or mine entries shown on the abandonment plan will be relevant to the site/property boundary.

Outcrops

Details of seam outcrops will be included where the enquiry boundary intersects with a conjectured or actual seam outcrop location (derived by either the British Geological Survey or the Coal Authority) or intersects with a defined 50 metres buffer on the coal (dip) side of the outcrop. An indication of whether the Coal Authority believes the seam to be of sufficient thickness and/or quality to have been worked will also be included.

Geological faults, fissures and breaklines

Geological disturbances or fractures in the bedrock. Surface fault lines (British Geological Survey derived data) and fissures and breaklines (Coal Authority derived data) intersecting with the enquiry boundary will be included. In some circumstances faults, fissures or breaklines have been known to contribute to surface subsidence damage as a consequence of underground coal mining.

Opencast mines

Opencast coal sites from which coal has been removed in the past by opencast (surface) methods and where the enquiry boundary is within 500 metres of either the licence area, site boundary, excavation area (high wall) or coaling area.

Coal Authority managed tips

Locations of disused colliery tip sites owned and managed by the Coal Authority, located within 500 metres of the enquiry boundary.

Site investigations

Details of site investigations within 50 metres of the enquiry boundary where the Coal Authority has received information relating to coal mining risk investigation and/or remediation by third parties.

Remediated sites

Sites where the Coal Authority has undertaken remedial works either within or within 50 metres of the enquiry boundary following report of a hazard relating to coal mining under the Coal Authority's Emergency Surface Hazard Call Out procedures.

Coal mining subsidence

Details of alleged coal mining subsidence claims made since 31 October 1994 either within or within 50 metres of the enquiry boundary. Where the claim relates to the enquiry boundary confirmation of whether the claim was accepted, rejected or whether liability is still being determined will be given. Where the claim has been discharged, whether this was by repair, payment of compensation or a combination of both, the value of the claim, where known, will also be given.

Details of any current 'Stop Notice' deferring remedial works or repairs affecting the property/site, and if so the date of the notice.

Details of any request made to execute preventative works before coal is worked under section 33 of the Coal Mining Subsidence Act 1991. If yes, whether any person withheld consent or failed to comply with any request to execute preventative works.

Mine gas

Reports of alleged mine gas emissions received by the Coal Authority, either within or within 500 metres of the enquiry boundary that subsequently required investigation and action by the Coal Authority to mitigate the effects of the mine gas emission.

Mine water treatment schemes

Locations where the Coal Authority has constructed or operates assets that remove pollutants from mine water prior to the treated mine water being discharged into the receiving water body.

These schemes are part of the UK's strategy to meet the requirements of the Water Framework Directive. Schemes fall into 2 basic categories: Remedial – mitigating the impact of existing pollution or Preventative – preventing a future pollution incident.

Mine water treatment schemes generally consist of one or more primary settlement lagoons and one or more reed beds for secondary treatment. A small number are more specialised process treatment plants.

Future underground mining

Details of all planned underground mining relative to the enquiry boundary. Only those future workings where the enquiry boundary is within 0.7 times the depth of the workings (zone of likely physical influence) allowing for seam inclination will be included.

Coal mining licensing

Details of all licenses issued by the Coal Authority either within or within 200 metres of the enquiry boundary in relation to the under taking of surface coal mining, underground coal mining or underground coal gasification.

Court orders

Orders in respect of the working of coal under the Mines (Working Facilities and Support) Acts of 1923 and 1966 or any statutory modification or amendment thereof.

Section 46 notices

Notice of proposals relating to underground coal mining operations that have been given under section 46 of the Coal Mining Subsidence Act 1991.

Withdrawal of support notices

Published notices of entitlement to withdraw support and the date of the notice. Details of any revocation notice withdrawing the entitlement to withdraw support given under Section 41 of the Coal Industry Act 1994.

Payment to owners of former copyhold land

Relevant notices which may affect the property and any subsequent notice of retained interests in coal and coal mines, acceptance or rejection notices and whether any compensation has been paid to a claimant.

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www.groundstability.com

Appendix 7: Flood Risk Assessment

ASSESSMENT OF FLOOD RISK

for

Mr J and Mrs M BERRY

PROMOTION OF STRATEGIC LAND

at

RAINFORD, ST HELENS

JANUARY 2018



CONTENTS

SECTION	TITLE	PAGE
1	INTRODUCTION	3
2	DESCRIPTION OF THE SITE	4
3	SCOPE OF THE ASSESSMENT	7
4	CONSULTATIONS AND DATA ACQUISITIONS	9
5	SOURCES OF FLOOD RISK	11
6	ASSESSMENT OF FLOOD RISK	15
7	PREDICTED IMPACTS AND MITIGATION	18
8	CONCLUSIONS	19

APPENDICES

- A Location plan
- B United Utilities sewer records

1. INTRODUCTION

- 1.1 This assessment on flood risk has been produced on behalf of Mr J and Mrs M Berry in support of a promotion of strategic land at Rainford, St Helens. A location plan identifying the land is included within Appendix A.
- 1.2 This assessment primarily addresses the land within the ownership of Mr J and Mrs M Berry (Site 1), and also takes account of the adjacent area of land (Site 2) to demonstrate that both sites work together as a housing allocation.
- 1.3 The assessment is compliant with the requirements set out in the National Planning Policy Framework (NPPF) published in March 2012 and the Planning Practice Guidance (NPPG) in relation to Flood Risk and Coastal Change, dated April 2015, and describes the existing site conditions and proposed development. It assesses the potential sources of flooding to the site from tidal, fluvial, groundwater, surface water and other sources, taking a risk based approach in accordance with National Policy.

Site summary

Site Name	Rainford
Location	St Helens
NGR (approx.)	SJ489999
Site area	Site 1 – 16.6 ha Site 2 – 11.6 ha
Development type	Residential
Vulnerability	More Vulnerable
Indicative Flood Zone	Flood Zone 1
Local Planning Authority	St Helens Metropolitan Borough Council

2. DESCRIPTION OF THE SITE

Existing site

- 2.1 The proposal relates to two parcels of land, Site 1 comprising 16.6 ha and Site 2 comprising 11.6 ha at Rainford, St Helens that is located entirely within the Green Belt.
- 2.2 The land lies to the southeast of the centre of Rainford and abuts the existing residential urban area. Site 2, which already has Council support for removal from the Green Belt and has been identified as a potential housing site is the western most parcel of land. Site 1 lies to the east of Site 2.
- 2.3 The land has Rookery Lane on the western boundary of Site 2, Higher Lane along its northern boundary and Mill Lane on the eastern boundary of Site 1. Sandwash Close and the Rainford Industrial Estate lie along the land's southern boundary.
- 2.4 A watercourse flows south along the boundary between Sites 1 and 2 and flows from the Rainford Reservoir located just to the north of Higher Lane into the Rainford Brook which is located 500m to the south. The watercourse is in open ditch along the boundary between the sites and goes into culvert at the site's southern boundary to discharge into the Rainford Brook.
- 2.5 The sites lie within Flood Zone 1, the lowest risk, as identified on the Environment Agency's Flood Map for Planning. An extract of the mapping is shown below.



Site 1

- 2.6 Site 1 comprises grassland and is of a size 16.6 ha. It has a general fall to the southwest.
- 2.7 The site lies within Flood Zone 1 as identified on the Environment Agency Flood Map for Planning.
- 2.8 A watercourse flows south along the western boundary of Site 1 between Sites 1 and 2 and flows from the Rainford Reservoir located just to the north of Higher Lane into the Rainford Brook which is located 500m to the south.
- 2.9 The Environment Agency's Surface Water Flood Risk Map identifies the site at a very low risk of surface water flooding.
- 2.10 There is no risk to the site from a reservoir failure.
- 2.11 Surface water runoff from the majority of the site is to the watercourse.
- 2.12 The Soilscales viewer has identified the geology of this parcel of land as slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils not conducive to infiltration.

Site 2

- 2.13 Site 2 comprises grassland and is a size of 11.6 ha. It has a general fall to the southwest.
- 2.14 The site lies within Flood Zone 1 as identified on the Environment Agency Flood Map for Planning.
- 2.15 A watercourse flows south along the eastern boundary of Site 2 between Sites 1 and 2 and flows from the Rainford Reservoir located just to the north of Higher Lane into the Rainford Brook which is located 500m to the south.
- 2.16 The Environment Agency's Surface Water Flood Risk Map identifies the site is at a very low risk of surface water flooding except for an area down the slope from Dial House Wood and along the southern boundary Site 2. The area along the southern boundary of the site is at a high risk.
- 2.17 There is no risk to the site from a reservoir failure.
- 2.18 Surface water runoff from the site is to the watercourse.
- 2.19 The Soilscales viewer has identified the geology of this parcel of land as slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils not conducive to infiltration.

Proposed development

- 2.20 It is proposed that the development will comprise residential with the potential to accommodate 429 dwellings on Site 1 and 174 dwellings on Site 2.

3. SCOPE OF THE ASSESSMENT

Flood risk planning policy

- 3.1 The National Planning Policy Framework (NPPF) sets out the Government's national policies on different aspects of land use planning in England in relation to flood risk. Supporting Planning Practice Guidance is also available.
- 3.2 The NPPF sets out the vulnerability to flooding of different land uses. It encourages development to be located in areas of lower flood risk where possible, and stresses the importance of preventing increases in flood risk off site to the wider catchment area.
- 3.3 The NPPF also states that alternative sources of flooding, other than fluvial (river flooding), should also be considered when preparing a Flood Risk Assessment.
- 3.4 As set out in the NPPF, local planning authorities should only consider development in flood risk areas appropriate where informed by a site specific Flood Risk Assessment. This document will identify and assess the risk associated with all forms of flooding to and from the development. Where necessary it will demonstrate how these flood risks will be managed so that the development remains safe throughout its lifetime, taking climate change into account.
- 3.5 This assessment is written in accordance with the NPPF.

Flood zones

- 3.6 In investigating the flood risk relating to the sites, the Environment Agency flood zone mapping identifies the proposed development land lying within Flood Zone 1. Flood Zone 1 is the lowest risk and is identified as land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (<0.1%).

Strategic Flood Risk Assessment

- 3.7 The land is within the area covered by the St Helens Council Strategic Flood Risk Assessment, September 2014, by Jacobs.

Sequential Test

- 3.8 A requirement of NPPF is that developers considering submitting a planning application should consult with the Local Planning Authority at all stages of development to ensure that the Sequential Test is applied at all stages of the planning process. The purpose of the test is to direct new development to areas with the lowest probability of flooding.
- 3.9 Strategic Flood Risk Assessments (SFRA) refine information on the probability of flooding, taking other sources of flooding and the impacts of climate change into account. They provide the basis for applying the Sequential Test, on the basis of the flood zones in the PPG Table 1.
- 3.10 The flood zones are the starting point for this sequential approach. As already stated, the Environment Agency's flood mapping identifies the land lying within Flood Zone 1, the lowest risk.
- 3.11 With reference to NPPF, Environment Agency Flood Maps and the SFRA, the land lies within an area identified as being potentially developable and following the sequential approach, all of the development will be located within Flood Zone 1.
- 3.12 The current development proposals are classified as "More Vulnerable" for residential development. Table 3 within the PPG indicates Flood Risk Vulnerability and Flood Zone 'compatibility'. Using Zone 1 and the "More Vulnerable" classification for residential use, the PPG considers that a development of this type would be deemed appropriate for development within Flood Zone 1.
- 3.13 Subject to the suitable assessment of flood risk, the development would be considered sequentially preferable in this location.

4. CONSULTATIONS AND DATA ACQUISITIONS

Environment Agency

- 4.1 The Environment Agency's flood zone mapping confirms that the land lies within an area of Flood Zone 1, the lowest risk. There is no record of any historic fluvial flooding occurring at the site.

United Utilities

- 4.2 United Utilities sewer records are included within Appendix B. The records show public foul and surface water sewers serving the residential properties that lie along Rookery Lane and the Rainford Industrial Estate to the south, and public combined and surface water sewers serving the residential properties that lie along Mill Lane. A public surface water sewer lies within Sandwash Close. Surface water drainage ultimately discharges into the Rainford Brook. A public combined sewer serves the properties on Higher Lane.
- 4.3 Adjacent to the northwest corner of Site 1 lies a surface water pumping station owned by United Utilities. It sits local to the outfall from the Rainford Reservoir into the watercourse that runs between the two sites. From the pumping station it is possible for surface water to be pumped along Higher Lane to discharge into the public combined sewer in Mill Lane.

Topographical Survey

- 4.4 A topographical survey has been carried out for Site 1. Except for the southeast corner of the site, there is a general fall to the southwest and towards the watercourse that flows to the south on the boundary between Site 1 and Site 2.

Site Investigation

- 4.5 Site investigations have not been carried out.
- 4.6 The online Soilscales viewer has identified that the geology encountered will be slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils not conducive to infiltration.

Site Inspections

- 4.7 A site visit was made to examine site conditions and levels as well as any significant visible features that would affect the flood characteristics of the sites. Such inspections are limited to areas that could readily and safely be accessed and no intrusive investigations or drainage surveys were carried out.

5. SOURCES OF FLOOD RISK

Potential Sources of Flood Risk

- 5.1 Potential sources of flood risk to the sites are identified below. The significance of these sources is investigated further into Section 6.

Fluvial flooding

- 5.2 The sites to be developed are identified as lying within Flood Zone 1 on the Environment Agency's flood maps, land assessed as having an annual probability of flooding of less than 1 in 1000 (<0.1%).

Tidal flooding

- 5.3 The sites are a significant distance from the nearest tidal estuary and are, therefore, not at risk of flooding from the sea. The sites are not identified as being at risk of flooding from the sea by any Environment Agency Flood Zone maps or within the SFRA for the area. As such, coastal and tidal flooding is not considered further within this assessment.

Canals, reservoirs and other artificial sources

- 5.4 The Rainford Reservoir is located just to the north of Higher Lane and feeds the watercourse that flows south along the boundary between Sites 1 and 2.
- 5.5 There are no canals or other artificial sources local to the sites.

Groundwater

- 5.6 Groundwater flooding tends to occur after much longer periods of sustained high rainfall. The areas that are at risk tend to be those low-lying areas where the water table is shallow. Flooding tends to occur in areas that are underlain by major aquifers, although groundwater flooding is also noted in localised floodplain sands and gravels. The main causes of groundwater flooding are:
- Natural groundwater rising due to tidal influence, or exceptionally wet periods leading to rapid recharge;

- Groundwater rebound due to cessation of abstraction and mine dewatering;
- Existence of confined aquifers and springs.

5.7 There are no recorded incidents of flooding associated with groundwater levels within the sites.

Sewers

- 5.8 Flooding from a drainage system occurs when flow entering a system exceeds its discharge capacity, the system becomes blocked or, in the case of surface water sewers, it cannot discharge due to high water level in the receiving watercourse. Sewer flooding is often caused by surface water discharging into the combined sewerage system, sewer capacity is exceeded in large rainfall events causing backing up of flood waters within properties or discharging through manholes.
- 5.9 Surface water (including the risk of sewers and culverted watercourses surcharging) poses the highest risk of more frequent flooding. Surface water drainage from new developments is critical in reducing the risk of localised flooding.
- 5.10 Where possible the preference for dealing with surface water runoff from the developed sites is for it to infiltrate back into the ground or alternatively to a waterbody or watercourse. Only if it is not possible for either of these options is surface water from the development to be allowed into the public sewers.
- 5.11 United Utilities sewer records show public foul and surface water sewers serving the residential properties that lie along Rookery Lane and the Rainford Industrial Estate to the south, and public combined and surface water sewers serving the residential properties that lie along Mill Lane. Surface water drainage ultimately discharges into the Rainford Brook. A public combined sewer serves the properties on Higher Lane.

- 5.12 Adjacent to the northwest corner of Site 1 lies a surface water pumping station owned by United Utilities. It sits local to the outfall from the Ranford Reservoir into the watercourse that runs between the two sites. From the pumping station it is possible for surface water to be pumped along Higher Lane to discharge into the public combined sewer in Mill Lane.

Pluvial runoff

- 5.13 The Environment Agency Risk of Flooding from Surface Water map indicates the sites are at a very low risk of surface water flooding except for an area within Site 2 down the slope from Dial House Wood and along the southern boundary of Site 2. The area along the southern boundary of the site is at a high risk. A very low risk means that each year, this area has a chance of flooding of less than 1 in 1000 (0.1%). A high risk means that each year, this area has a chance of flooding greater than 1 in 30 (3.3%).
- 5.14 Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding.

Development drainage

- 5.15 Surface water (including the risk of sewers and culverted watercourses surcharging) poses the highest risk of more frequent flooding. Surface water drainage from new developments is critical in reducing the risk of localised flooding.
- 5.16 If surface water runoff is not managed appropriately, there may be an increased risk presented elsewhere from development drainage, and the aim should be to implement appropriate sustainable drainage systems (SuDS) to treat and contain flows and mimic the existing conditions.
- 5.17 Where possible the preference for dealing with surface water runoff from the developed sites is for it to infiltrate back into the ground or alternatively to a waterbody or watercourse. Only if it is not possible for either of these options is surface water from the development to be allowed into public sewers.

- 5.18 The development of the sites will increase the area of impermeable hardstanding on site and therefore has the potential to alter the surface water runoff regime of the sites and to have an adverse effect on flood risk elsewhere in the wider catchment.

6. ASSESSMENT OF FLOOD RISK

- 6.1 This section of the Flood Risk Assessment looks at the flood risk to the sites before any mitigation measures are put into place and hence identifies where mitigation will be required. Section 7 continues to explain the mitigation measures proposed and the residual risk following implementation of any proposed mitigation.

Risk of Flooding to Proposed Development

Fluvial Flood Risk

- 6.2 The sites to be developed are identified as lying within Flood Zone 1 on the Environment Agency's flood maps, the lowest risk.
- 6.3 There is no fluvial flood risk to the sites.
- 6.4 The risk of fluvial flooding to the proposed development is therefore very low.

Canals, reservoirs and other artificial sources

- 6.5 The Rainford Reservoir is located just to the north of Higher Lane and feeds the watercourse that flows south along the boundary between Sites 1 and 2.
- 6.6 The Environment Agency risk of flooding from reservoirs map identifies the sites are not at risk.
- 6.8 As such the risk of flooding from canals, reservoirs and other artificial sources is low.

Groundwater

- 6.9 The SFRA states that The Environment Agency's CFMPs do not consider groundwater flooding to be a significant issue in the Borough and that the Council cannot recall any significant issues associated with groundwater flooding in the past.
- 6.10 There are no recorded incidents of flooding associated with groundwater levels within the sites. The flood risk from groundwater is therefore low.

Sewer Flooding and Pluvial Runoff

- 6.11 The ongoing operational and maintenance responsibility of the public sewers that lie on the periphery of the sites are the responsibility of United Utilities.
- 6.12 The risk of pluvial runoff from heavy rainfall events is from the land to the north of the sites that is higher than the sites. It is likely that any pluvial runoff from this area would be intercepted by Higher Road that runs along the northern boundary of the sites. As such there is only limited potential for pluvial runoff from heavy rainfall events to be conveyed towards the sites.
- 6.13 The Environment Agency Risk of Flooding from Surface Water map indicates the sites are at a very low risk of surface water flooding except for an area within Site 2 down the slope from Dial House Wood and along the southern boundary of Site 2. The area along the southern boundary of the site is at a high risk. The masterplanning of the site should take account of this possible surface water flow, which should be positively drained to the watercourse.
- 6.14 As such the risk is low from sewer flooding and pluvial runoff.

Effect of the Development on the Wider Catchment

Development Drainage

- 6.15 The proposed development will introduce an area of impermeable hardstanding on the sites which has the potential to significantly alter the surface water runoff regime of the sites and have an adverse effect on flood risk elsewhere in the wider catchment.
- 6.16 The majority of surface water runoff from the existing sites runs off into the watercourse that flows to the south between Site 1 and Site 2.
- 6.17 The ground is not conducive to infiltration.
- 6.18 It is intended that new surface water drainage will be constructed, appropriately sized to take all surface water runoff from the new roofs and hardstanding areas, to discharge into the watercourse running between Site 1 and Site 2, mimicking the existing scenario.

- 6.19 As the surface water runoff from the development will be attenuated to pre-development runoff rates, there will be no change to the flood risk upstream or downstream of this location.
- 6.20 Outline surface water requirements have been prepared and are discussed in the drainage strategy accompanying his report.
- 6.21 As a result of the mitigation measures, the risk of flooding from the development drainage is low.

7. PREDICTED IMPACTS AND MITIGATION

- 7.1 This section of the FRA sets out the mitigation measures recommended to reduce the risk of flooding to the proposed development and outlines any residual impacts.

Site arrangements

Access / Egress

- 7.2 The access to the sites during an extreme event will be from Higher Lane, which lies within Flood Zone 1.

Upstream and downstream effects

- 7.3 There is no material effect on the floodplain due to the proposed development.
- 7.4 It is intended that surface water attenuation will be provided within the development sites. Attenuation will be provided and a controlled discharge made into the watercourse that flows to the south between Site 1 and Site 2. The proposals will be designed so as to mimic the existing situation and therefore there will be no additional risk to upstream or downstream properties.

8. CONCLUSIONS

8.1 This assessment on flood risk has been produced on behalf of Mr J and Mrs M Berry in support of a promotion of strategic land at Rainford, St Helens.

Flood risk assessment

8.2 The land lies within Flood Zone 1, the lowest risk which is identified as land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (<0.1%).

8.3 The Environment Agency Risk of Flooding from Surface Water map indicates the sites are at a very low risk of surface water flooding except for an area within Site 2 down the slope from Dial House Wood and along the southern boundary of Site 2. The area along the southern boundary of the Site 2 is at a high risk. The masterplanning of Site 2 should take account of this possible surface water flow, which should be positively drained to the watercourse.

8.4 The risk of fluvial flooding is very low.

8.5 The risk of flooding from canals, reservoirs and other artificial sources is low.

8.6 The flood risk from groundwater is low.

8.7 The risk from sewer flooding and pluvial runoff is low.

8.8 The risk of flooding from the development drainage is low.

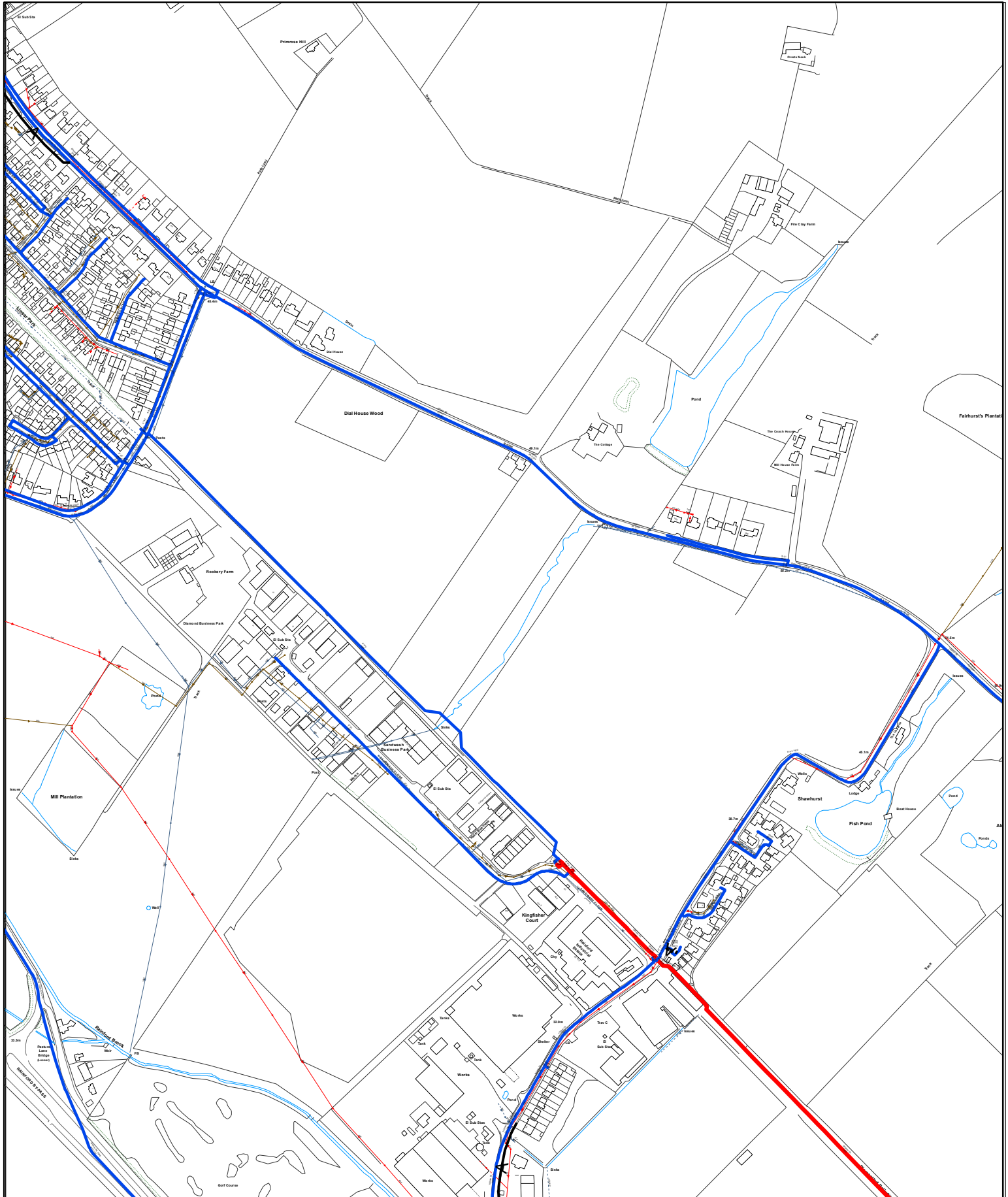
Client:		Mr J and Mrs M Berry	
Project Name:		Promotion of Strategic Land, Rainford	
Project Number:		2017-C-296	
Report Title:		Assessment of Flood Risk	
Created by:	Bob Ford	Date:	January 2018
Proofed By:	Sarah Buckley	Date:	January 2018
Approved by:	Bob Ford bob@tonks-consulting.co.uk	Date:	January 2018

APPENDIX A



RAINFORD – LOCATION PLAN

APPENDIX B



Date: 30/11/2017 **Extract from maps of public sewers and water mains**

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The position of this underground apparatus shown on this plan is approximate only and is given in accordance with the best information currently available. The actual positions may be different from those shown on the plan and private pipes, sewers or drains may not be recorded. Private service pipes may be shown where a known record is available. United Utilities Water will not accept liability for any loss or damage caused by the actual position being different from those shown. Crown copyright and database rights [2016] Ordnance Survey 100022432.

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Appendix 8: Surface Water and Foul Drainage Assessment

**SURFACE WATER AND FOUL WATER
DRAINAGE STRATEGY**

for

Mr J and Mrs M BERRY

PROMOTION OF STRATEGIC LAND

at

RAINFORD, ST HELENS

JANUARY 2018



CONTENTS

SECTION	TITLE	PAGE
1	INTRODUCTION	3
2	BASE INFORMATION	4
3	PROPOSED DRAINAGE STRATEGY	6
4	SUMMARY AND CONCLUSIONS	9

APPENDICES

- A Location plan
- B United Utilities sewer records
- C Preliminary surface water drainage design

1. INTRODUCTION

- 1.1 This surface water and foul water drainage strategy has been produced on behalf of Mr J and Mrs M Berry in support of a promotion of strategic land at Rainford, St Helens. A location plan identifying the land is included within Appendix A.
- 1.2 This assessment primarily addresses the land within the ownership of Mr J and Mrs M Berry (Site 1), and also takes account of the adjacent area of land (Site 2) to demonstrate that both sites work together as a housing allocation.
- 1.3 A preliminary surface water drainage design has only been carried out for Site 1.

2. BASE INFORMATION

Existing site

- 2.1 The proposal relates to two parcels of land, Site 1 comprising 16.6 ha and Site 2 comprising 11.6 ha at Rainford, St Helens that is located entirely within the Green Belt.
- 2.2 The sites comprise grassland and have a general fall to the southwest.
- 2.3 The land lies to the southeast of the centre of Rainford and abuts the existing residential urban area. Site 2, which already has Council support for removal from the Green Belt and has been identified as a potential housing site is the western most parcel of land. Site 1 lies to the east of Site 2.
- 2.4 The land has Rookery Lane on the western boundary of Site 2, Higher Lane along its northern boundary and Mill Lane on the eastern boundary of Site 1. Sandwash Close and the Rainford Industrial Estate lie along the land's southern boundary.

Site geology

- 2.5 The online Soilscales viewer has identified the geology of this parcel of land as *slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils not conducive to infiltration*.
- 2.6 Infiltration tests have not been carried out as the ground would not be conducive to infiltration.

Understanding of existing drainage local to the site

- 2.7 A watercourse flows south along the boundary between Sites 1 and 2 and flows from the Rainford Reservoir located just to the north of Higher Lane into the Rainford Brook which is located 500m to the south. The watercourse is in open ditch along the boundary between the sites and goes into culvert at the site's southern boundary to discharge into the Rainford Brook.

- 2.8 The watercourse takes surface water runoff from the local area including both the promotion sites.
- 2.9 United Utilities sewer records show public foul and surface water sewers serving the residential properties that lie along Rookery Lane and the Rainford Industrial Estate to the south, and public combined and surface water sewers serving the residential properties that lie along Mill Lane. A public surface water sewer lies within Sandwash Close. Surface water drainage ultimately discharges into the Rainford Brook. A public combined sewer serves the properties on Higher Lane.
- 2.10 Adjacent to the northwest corner of Site 1 lies a surface water pumping station owned by United Utilities. It sits local to the outfall from the Rainford Reservoir into the watercourse that flows between the two sites. From the pumping station it is possible for surface water to be pumped along Higher Lane to discharge into the public combined sewer in Mill Lane.
- 2.11 The sewer records are included within Appendix B.
- 2.12 United Utilities has advised that foul water from the development will be allowed to drain unrestricted to the public combined / foul sewer network, their preferred point of discharge from Site 1 being to the public combined / foul sewer located within Mill Lane and / or Sandwash Close, and from Site 2 being to the public foul sewer located within Rookery Lane.
- 2.13 Surface water from Site 1 should drain to either soak away or directly to watercourse. However if it is not possible for a discharge to be made to the watercourse that flows between Sites 1 and 2, then a restricted discharge will be allowed into the public surface water sewer located within Sandwash Close. Discharge rates and consents must be discussed and agreed with all interested parties.

Proposed development

- 2.14 It is proposed that the development will comprise residential with the potential to accommodate 429 dwellings on Site 1 and 174 dwellings on Site 2.

3. PROPOSED DRAINAGE STRATEGY

Surface water drainage

- 3.1 In accordance with the National Standards for Sustainable Drainage, the drainage strategy should incorporate the use of Sustainable Drainage (SUDS) where possible. The approach promotes the use infiltration features in the first instance. If drainage cannot be achieved solely through infiltration due to site conditions or contamination risks, the preferred options are (in order of preference):
- (i) a controlled discharge to a local waterbody or watercourse, or
 - (ii) a controlled discharge into the public sewer network (depending on availability and capacity).
- 3.2 The rate and volume of discharge should strive to provide betterment and be restricted to the pre-development values as far as practicable.

Surface water drainage discharges from the developed Site 1

- 3.3 The nature of the geology of the sites means that infiltration back into the ground is not feasible. A watercourse flows south along the boundary between Sites 1 and 2 into which surface water runoff from the promotion sites currently discharge. The watercourse flows from the Rainford Reservoir located just to the north of Higher Lane into the Rainford Brook which is located 500m to the south. The watercourse is in open ditch along the boundary between the sites and goes into culvert at the site's southern boundary to discharge into the Rainford Brook.
- 3.4 In line with common practice, surface water runoff from the proposed development should mimic those from the existing site. It is therefore intended that surface water runoff from the promotion sites will be attenuated and where possible discharge into the watercourse that flows south along the boundary between Sites 1 and 2.

- 3.5 The flow from the development will be controlled to pre-development runoff rates allowing surface water runoff generated by all rainfall events up to the 100 year critical rain storm plus 30% on stored volumes. The additional 30% is to allow for climate change and has been included in the surface water volume.
- 3.6 Because of the lie of the land it is not possible for surface water runoff from the whole of Site 1 to drain into the watercourse and United Utilities has stated that they will therefore allow a restricted discharge into the public surface water sewer located within Sandwash Close.
- 3.7 To determine the restricted surface water discharge rate from the developed Site 1, Greenfield runoff has been calculated using the 'Causeway Flow' programme and preliminary calculations have been carried out to identify the size of the attenuation required for the development. The calculations are based upon the area of the proposed development that is to be impermeable at the completion of the development. The rates have been calculated as follows:
- Qbar 41.5 l/s
 - Q1 36.1 l/s
 - Q30 70.6 l/s
 - Q100 86.3 l/s
- 3.8 It has been assumed that the surface water runoff from the southern part of Site 1 that cannot discharge into the watercourse (approx. 30% of Site 1) will be restricted to a flow of 5 l/s into the public surface water sewer that lies within Sandwash Close. This figure will be the minimum that will be allowed into the public sewer and is for discussion and agreement with United Utilities in the future.
- 3.9 The surface water runoff from the northern part of Site 1 (approx. 70%) will discharge into the watercourse. Prorating the Greenfield runoff rates in line with the area, the restricted discharge rates have been calculated as follows:
- Qbar 28.8 l/s
 - Q1 25.0 l/s

- Q30 48.9 l/s
- Q100 59.8 l/s

- 3.10 A preliminary surface water drainage design has been carried out for the proposed Site 1 development for all events up to the 100 year critical rain storm plus 30% on stored volumes. The additional 30% is to allow for climate change and has been included in the surface water volume. Attenuation is provided within proposed landscaped areas. The preliminary surface water drainage design is included within Appendix C.
- 3.11 It should be noted that the preliminary surface water drainage design identifies the volume of attenuation required for the 100 year event plus climate change and demonstrates, at this stage, that it can be accommodated within the indicative masterplan. The attenuation does not have to be in one location and can be designed within landscaped areas once a detailed masterplan has been worked up.
- 3.12 It is expected that surface water runoff from Site 2 will also be attenuated to pre-development runoff rates and discharge into the watercourse that flows between Site 1 and Site 2.

Foul Water Drainage

- 3.13 Foul water discharges from the development site will be allowed to drain unrestricted to the public combined / foul sewer network, the preferred point of discharge from Site 1 being to the public combined / foul sewer located within Mill Lane and / or Sandwash Close.

4. SUMMARY AND CONCLUSIONS

- 4.1 This surface water and foul water drainage strategy has been produced on behalf of Mr J and Mrs M Berry in support of a promotion of strategic land at Rainford, St Helens.
- 4.2 The nature of the local geology means that infiltration of surface water runoff back into the ground is not feasible.
- 4.3 Surface water runoff from the developed Site 1 will discharge, where site levels permit, into the watercourse that flows to the south between the two parcels of land. A restricted discharge will be made equivalent to pre-development runoff.
- 4.4 It is proposed that surface water runoff from the area of Site 1 that cannot discharge into the watercourse will be restricted to a minimum flow of 5 l/s and discharge into the public surface water sewer that lies within Sandwash Close.
- 4.5 The preliminary surface water drainage design has catered for surface water runoff generated by all rainfall events up to the 100 year critical rain storm plus 30% on stored volumes and demonstrates, at this stage, that it can be accommodated within the indicative masterplan. The additional 30% is to allow for climate change and has been included in the surface water volume.
- 4.6 It is expected that surface water runoff from Site 2 will also be attenuated to pre-development runoff rates and discharge into the watercourse that flows between Site 1 and Site 2.
- 4.7 Foul water discharges from the development site will be allowed to drain unrestricted to the public combined / foul sewer network, the preferred point of discharge from Site 1 being to the public combined / foul sewer located within Mill Lane and / or Sandwash Close, and from Site 2 being to the public foul sewer located within Rookery Lane.

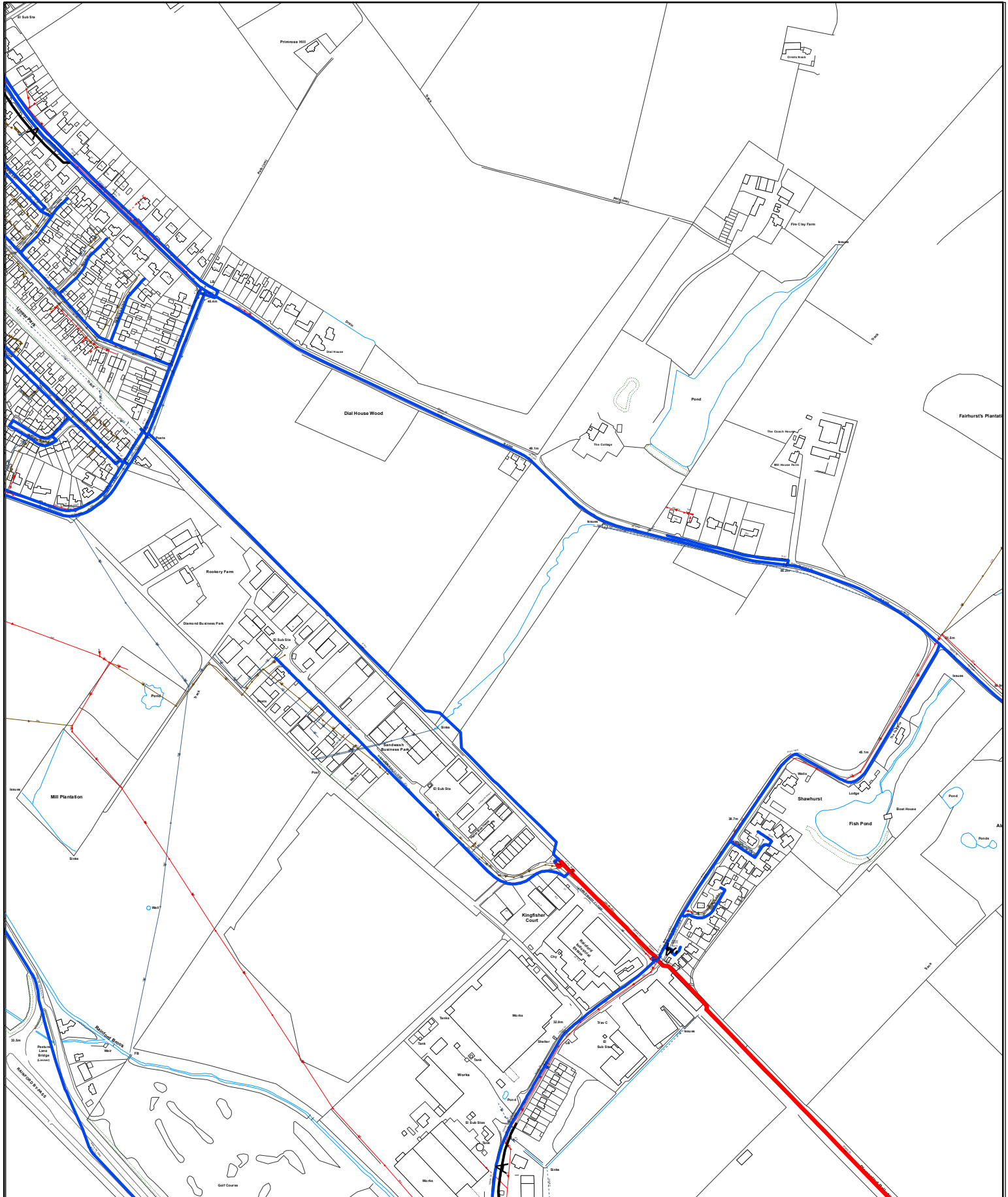
Client:		Mr J and Mrs M Berry	
Project Name:		Promotion of Strategic Land, Rainford	
Project Number:		2017-C-296	
Report Title:		Surface water and foul water drainage strategy	
Created by:	Bob Ford	Date:	January 2018
Proofed By:	Sarah Buckley	Date:	January 2018
Approved by:	Bob Ford bob@tonks-consulting.co.uk	Date:	January 2018

APPENDIX A



RAINFORD – LOCATION PLAN

APPENDIX B



Date: 30/11/2017 **Extract from maps of public sewers and water mains**

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The position of this underground apparatus shown on this plan is approximate only and is given in accordance with the best information currently available. The actual positions may be different from those shown on the plan and private pipes, sewers or drains may not be recorded. Private service pipes may be shown where a known record is available. United Utilities Water will not accept liability for any loss or damage caused by the actual position being different from those shown. Crown copyright and database rights [2016] Ordnance Survey 100022432.

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APPENDIX C

Northern
Network

Southern
Network



PAIRFIELD

PRELIMINARY
SURFACE WATER DRAINAGE
LAYOUT

Drainage Design Report

Flow

v6.0

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Network	Storm Network
Filename	C:\Users\Bob\Documents\ctc\rainford\drainage design\northern network\rainford northern two hydrobrakes new layout.pfd
Username	Bob-TOSH\Bob
Last analysed	31-Jan-18 10:31:33 PM
Report produced on	31-Jan-18 10:37:27 PM

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Web:	www.causeway.com

Technical support web portal:

<http://support.causeway.com>

RO0150

① - LPA09



{In Archive} RE: Have your say on the St.Helens Borough Local Plan 2020-2035 Submission Draft
Tim Bettany-Simmons
to:
planningpolicy@sthelens.gov.uk
04/02/2019 11:09

② - LPB01

③ - LPA11



Dear Sir/Madam

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

Page 63 – Para 4.32, Policy LPA09 – Green Infrastructure

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

①

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

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

②

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

③

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

Kind regards
Tim

Area Planner / Cynlluniwr Ardal

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

Sent: 18 January 2019 17:34

To: planningpolicy@sthelens.gov.uk

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

Dear Sir or Madam,

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

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

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

How can I view the Plan and submit representations?

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

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

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

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

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

Next steps

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

Data protection

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

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

planningpolicy@sthelens.gov.uk.

How can I find out more?

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

Yours sincerely,



Development Plans Manager

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

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

Cadw mewn cysylltiad

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

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

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

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

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

RO0151

Representor Details

Web Reference Number	WF0113
Type of Submission	Web submission
Full Name	Mr Paul Bevan
Organisation	
Address	193 Liverpool Road Haydock WA11 9RX
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA04
Paragraph / diagram / table	
Policies Map	2EA, 5EA & 6EA
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.

Not Justified -

The council should prove there is a requirement for this type of development in this location and of this scale as FFN has reduced in size.

This is destroying agricultural land which we require more than warehouses.

The local area cannot cope with the current levels of traffic let alone more.

There is no statement of common ground with neighbouring authorities.

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

Keep this land Greenbelt and remove these sections from the 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 8:52:38 AM
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RO0152



St. Helens
Council

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

Ref: LPSD

30 APR 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 Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: PHILIP	First name:
Last Name: BICKERTON	Last Name:
Organisation/company:	Organisation/company:
Address: 3 DOUGLAS AVE.	Address:
Postcode: WA9 4SZ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

30/4/19

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

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

Yes ☒ (Via Email)

No ☐

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

925

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

POLLUTION RECENT REPORTS CONFIRM THE ATMOSPHERE IN THIS AREA IS ONE OF THE MOST POLLUTED IN THE COUNTRY. IT IS SURROUNDED BY WARRINGTON, WIDNES, AND ST HELENS. THESE PLANS WILL MAKE IT WORSE. INFRASTRUCTURE. EXISTING ROADS CANNOT COPE WITH THE ADDITIONAL TRAFFIC. THESE HOUSES WOULD BRING, ALSO DOCTORS, DENTISTS AND HOSPITALS ARE STRUGGLING ALREADY.

WILDLIFE AT A TIME WHEN THERE IS NATIONWIDE CONCERN OVER SUSTAINING WILDLIFE ST HELENS COUNCIL WANTS TO DESTROY THE HABITATS OF NUMEROUS SONGBIRDS, FOXES, HARES, HEDGEHOGS ETC.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

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

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

BECAUSE I CANNOT STAND BY WHILE THE COUNCIL MAKES YET ANOTHER BIG MISTAKE.

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.

RO0153

924



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

10 MAY 2019

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>Denise</u>	First name: _____
Last Name: <u>Bickerton</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3, Douglas Ave</u> <u>B Bold</u> <u>St Helen's</u>	Address: _____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: _____	Email: _____

Signature: [REDACTED]	Date: <u>13.3.19</u>
-----------------------	----------------------

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

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

☐ Yes (via email) ☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>It would be tragic to lose all the wildlife, there is skylarks partridge Nuthatch Hare's to name but a few. To build on Greenbelt WHY! when there is so much Brown sites, when its gone its gone for ever.</p>

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

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 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.

RO0154

ELO182/A-F



Local Plan Representation

annette billington

to:

planningpolicy

13/03/2019 13:18

Hide Details



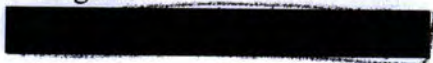
1 Attachment



Local Plan Representation Billington Family 13.03.19.docx

Please find attached a letter Re:response to St.Helens Council Local Plan.
Could you please send an acknowledgement of this email and letter.

Regards



① LPA05

② LPA06

③ IDP

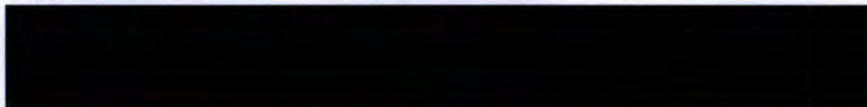
Please find attached a letter of representation

Re: St.Helens Local Plan.

The letter is written to represent the comments and views of 5 members of the Billington household and 1 other.

It also contains their name and address details.

Could you please acknowledge receipt of this representation



Dear Sir or Madam,

We are writing to object to the St Helens Council Local Plan (2018). In particular, we are objecting to the decisions made regarding Housing Need (LPA05), land allocated for safeguarding (8HS) and the Greenbelt Review (2018).

The revised version of the Local Plan seems to contain some fundamentally questionable elements. The expected growth over the period of this plan seems to be purely aspirational and not based on reality or on the use of the latest facts and figures.

Greenbelt/Housing

St Helens Council are using a projected annual house building target of 486, the ONS suggestion for 2014 is 468 and the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. We do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances". Careful reading of the local plan suggests that the release of greenbelt is so that development costs would be reduced thus enabling the affordable housing target to be achieved. Hardly meeting the "exceptional circumstances" justification for releasing greenbelt.

Putting that aside, the Councils own Brownfield Register suggests land availability for 5808 houses.

Contaminated brown field sites have not been considered for development; St Helens Council have identified 3,170 hectares of the lowest priority contaminated land but have not proposed a strategy for implementing this. It has been proposed by some Councilors that developers could be made responsible for this and offered this land as an alternative to Green Belt. This has not been seriously considered and, again, shows that there are no "exceptional circumstances" for Green Belt release.

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.

No Exceptional Circumstances

The loss of any greenbelt should not be taken lightly. We can only comment on one area of greenbelt mentioned in the local plan. The land referred to is 8HS and is south of the A580 adjacent to Windle Island and sweeping around to border Houghtons Lane.

The land concerned is grade 1 and 2 agricultural land and has been farmed since the 1850's. It is also land that is enjoyed regularly by the residents who use the numerous footpaths. It is the only open land near Eccleston. Nearby

greenbelt land of this quality is privately owned by Lord Derby and not accessible to the public.

If this valuable framing land is removed from Green Belt, the nearest green space would then be north of the A580 and people would be trying to cross this road to access open countryside. This is already a very busy and dangerous road. There are no allocated crossing points. It is also a 60mph main A road, linking Liverpool with Manchester. To safely and easily access open land such as this, we would have to travel 6 miles by car across heavily populated areas and a town centre on heavily congested roads to reach Sutton Manor or Sankey Valley.

For these reasons we would suggest that the Local Plan (2018) is unsound and needs to be changed. Initially the housing target figures should be reduced, secondly the Plan should only consider the fifteen-year target, eliminating any requirement for "safeguarded" sites and finally, the test of "exceptional circumstances" should be carefully and realistically applied to ensure that the precious local Green Belt continues to serve its purpose.

SUGGESTED
MODS

Infrastructure

A major concern we have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it. The Councils answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

The IDP (Infrastructure Delivery Plan) 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 IDP refers to some of these existing issues e.g. traffic, 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 because it has to be 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.

8HS

Below we have inserted the plan of 8HS. It indicates how the development of 1000 plus houses on this land will impact on the surround area of Eccleston and Windle. It will more than DOUBLE the housing area. The housing density proposed is not sustainable. The infrastructure is certainly inadequately addressed in local plan and could never be. It will be impossible to address any issues or solve in the future, due to the proposed density of housing outlined in the Local Plan and other factors.

LPSD Ref:	BHS - Land South of A580 between Houghtons Lane and Crantock Grove, Windle	Ward:	Windle
Notional Capacity:	1,027 units	Designation:	Safeguard



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 follow that it cannot be considered sound. ✓

Yours Sincerely,

The Household of Mrs N.M. Billington including 4 other family members, who explicitly agree with all of the above statements and live at the same address as her.

Mrs Norma Mavis Billington, Miss Annette Billington, Mr Paul Billington
Mr Mark Billington, Mr Michael Billington ✓

ALSO:

Mr Michael Holsgrove

Who also explicitly agrees with all of the above statements. ✓

RO0155

① - LPA04 ② LPA05
 ③ - LPA05, 8HA ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0355
Type of Submission	Web submission
Full Name	MS MARY BILLINGTON
Organisation	LOCAL RESIDENT
Address	17 HIGHCROSS ALFRED STREET RAININFORD WA11 8GF
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	LSPD
Paragraph / diagram / table	
Policies Map	HA8
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	shlaa 2016 16m&142

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.

The council have failed to co-operate with other councils and have not published other statements of common ground. _____ ④

With regard to the overall figures on the plan, there are no exceptional circumstances to justify using the standard method to calculate the housing need. _____ ②

the economic reasoning is flawed and based on over-optimistic assumptions. _____ ①

The level of land needed for development is therefore not as high as set out in the local plan. _____ ②

There are no exceptional circumstances to change the greenbelt boundaries. _____ ②

The site is grade 1 agricultural land providing employment, this plan is supposed to promote employment, the planned proposals do the opposite.. _____ ③

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

Only 4 sites score 4 negatives on the sustainability appraisal, the other 3 have been dropped. St Helens own assessment concludes that HA8 is the least appropriate Green belt site for housing. this site is next to an industrial area with all the associated risks.. _____ ③

There has been no consultation with NATURAL ENGLAND over the loss of this highly productive farming land. _____

Other reasonable alternatives should be explored, i.e using previously developed land, this will have less impact on the environment and would mean less need for new infrastructure. _____ ②

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 9:06:24 AM
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RO0156

18

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.

25 FEB 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: <u>N/A</u>
First Name: <u>ELAINE</u>	First name: <u></u>
Last Name: <u>BILLINGTON-SMITH</u>	Last Name: <u></u>
Organisation/company: <u></u>	Organisation/company: <u></u>
Address: <u>13 THORNHILL ROAD</u> <u>GARSWOOD</u> <u>WIGAN</u>	Address: <u></u>
Postcode: <u>WN4 0SR</u>	Postcode: <u></u>
Tel No: <u>[REDACTED]</u>	Tel No: <u></u>
Mobile No: <u>[REDACTED]</u>	Mobile No: <u></u>
Email: <u>[REDACTED]</u>	Email: <u></u>

Signature: <u>[REDACTED]</u>	Date: <u>21.02.2019</u>
------------------------------	-------------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

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DATA PROTECTION

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate? 1 HA.									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				LAND SOUTH OF BILLINGE ROAD, EAST OF GARSWOOD ROAD AND WEST OF SMOCK LANE GARSWOOD.					

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> 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.
<p>NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST HELENS HAS BEEN DECLINING SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM?</p> <p>HOUSING IN THIS AREA IS UNSUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTORS SURGERIES, BUS ROUTES AND OTHER SERVICES. THE USE OF CARS IS BEING ENCOURAGED BECAUSE OF THE LACK OF FACILITIES.</p> <p>THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES.</p>

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

DELETE THE LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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Please keep a copy for future reference.



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

25 FEB 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: _____
First Name: <u>ELAINE</u>	First name: <u>N/A</u>
Last Name: <u>BILLINGTON-SMITH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>13 KNOXHILL ROAD</u> <u>CARLSWOOD</u> <u>WILKIN</u>	Address: _____
Postcode: <u>WNA 0SR</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>21.02.2019</u>
-----------------------	-------------------------

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Other documents (please name document and relevant part/section)				LAND SOUTH OF LAYLAND GREEN ROAD NORTH OF BILLINGE ROAD AND EAST OF GARSWOOD ROAD GARSWOOD					

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Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>THE POPULATION HAS BEEN FALLING IN THIS AREA SINCE 1981. ONE OF THE PURPOSES OF THE GREENBELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND. USING GREENBELT FAILS TO ENCOURAGE THIS. THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSE OF GREENBELT. HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTORS SURGERIES, BUS ROUTES AND OTHER SERVICES.</p>

Please continue on a separate sheet if necessary

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

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0157

E10065



Wigan Council response to the St Helens Borough Local Plan 2020-2035

N.Clarke

to:

planningpolicy

11/03/2019 18:34

see attachment

- ① - LPA04
- ② - LPA04.1
- ③ - LPA06 (res)
- ④ - LPA06 (HATIF)
- ⑤ - LPA07
- ⑥ - LPA10

1 Attachment



Letter and reps on St Helens LP 11 Mar 19.pdf

Please note that Wigan's Council's representations on the St Helens Local Plan have been approved by the Council's Portfolio Holder for Planning and Environment but that the required 5 working days until that decision can be enacted have not passed and will not have passed until after your deadline of 13 March. They are therefore submitted on that basis and we will advise accordingly of the status once that time has passed.

Dear [REDACTED]

Thank you for the opportunity to comment on the Submission Draft version of your St Helens Borough Local Plan 2020-2035.

Overall, Wigan Council is supportive of the plan and is keen to continue working with you on key cross boundary issues of interest, including access to training and employment, accessibility by bus services, cycling and walking, and highway and other infrastructure improvements.

In this context, there are a small number of opportunities to improve the plan, most of which have been discussed at officer level recently, and parts that we specifically support. The related representations concerning them are attached and set out below, and cover parts of the following policies:

Policy LPA04: A Strong and Stable Economy

Policy LPA04.1: Strategic Employment Sites

Policy LPA06: Safeguarded Land

Policy LPA07: Transport and Travel

Policy LPA10: Parkside East

We firmly believe and that these matters can be overcome by short alterations to the wording of the policies.

All of these matters are, of course, pertinent to the duty to cooperate and the new requirement to prepare a statement of common ground. We will be happy to work further with you on this and discuss any matters arising to agree proposed amendments for submission alongside the plan, if possible. More generally, we wish you all the very best with progressing your local plan through to adoption.

Yours sincerely

Marie Bintley

Assistant Director Growth and Housing

Representations on St Helens Borough Local Plan 2020-2035 from Wigan Council

Policy LPA04: A Strong and Stable Economy

This policy allocates the following sites for employment development that are immediately adjacent or very close to the borough boundary with Wigan:

- Three sites between the A58 Liverpool Road and Haydock Industrial Estate, Haydock.
- Land North and South of Penny Lane, Haydock.
- Parkside, Newton-le-Willows.

Clause 10 of the policy states that "The Council will support....the creation of apprenticeships and training opportunities for local people". Where "local people" clearly includes residents in places like Ashton-in-Makerfield, Golborne and Lowton within Wigan Borough, measures should be taken to ensure that such opportunities are available for residents in Wigan Borough, as well as St Helens, and this should be recognised in the policy. We would also be happy to agree the means for how this can be achieved in practice and provide you with the relevant contacts to ensure it is implemented through the development management process.

Policy LPA04.1: Strategic Employment Sites

Most of the sites identified in the first and third bullet points under Policy LPA04 above are designated as Strategic Employment Sites under Policy LPA04.1.

Clause 2 of this policy states that "Any planning application for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole site, which must set out details of at least: e) Indicative layout promoting permeability and accessibility by public transport, cycling and walking."

Where these sites are close to the boundary with Wigan Borough, it is essential that cross-boundary connections with Wigan by bus, cycling and walking are a serious part of these considerations. The policy should acknowledge this relationship specifically, together with the need to work with Wigan Council, Transport for Greater Manchester and Highways England to improve cross-boundary accessibility by public transport, cycling and walking.

Issues for bus travel are compounded by the fact that bus ticketing arrangements are different within Greater Manchester and Merseyside and walking and cycling links are restricted by the motorway and heavy traffic on roads to and from motorway junctions.

Policy LPA06: Safeguarded Land North East of Junction 23 M6 (South of Haydock Racecourse), Haydock (ref 2ES)

One of the two areas safeguarded for future employment development is Land North East of Junction 23 M6 (South of Haydock Racecourse), Haydock. It is very close to Ashton-in-Makerfield and Golborne and is currently subject to a planning application from Peel, on which this council has a holding objection on the grounds of traffic impacts. In the previous version of this local plan, the site was allocated for employment development but it is now proposed as safeguarded land with the need for substantial improvements to enhance capacity at Junction 23 within the Plan period.

The policy is clear that planning permission for the development of the safeguarded sites for employment development will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for employment development on safeguarded sites in the Plan period will be refused.

Wigan Council is supportive of this policy position in preference to the allocation for employment

development proposed in the previous version of the plan. However, there are four issues of concern that we wish to raise:

1. The proposed area of safeguarded land and consequent deletion from the Green Belt reflects land ownership issues and would appropriately be rounded off on the eastern boundary and northern boundary, with the land removed from the site and restored to the Green Belt. This would result in the development intruding less into undeveloped land create a more logical revised Green Belt boundary than that currently proposed. To the north of the site, it would also allow the Green Belt boundary to be retained in its current form, extending to the rear of Haydock Park Gardens.
2. It should be clear within the policy that the improved highways infrastructure needed should be in place before any development on the site is operational.
3. If the A49 needs to be diverted in order to secure the strategic improvement needed to Junction 23, accessibility between Ashton-in-Makerfield and Newton-le-Willows should be maintained and improved, particularly for bus services, cycling and walking, for which there is a strong case for enhancement of provision for all three particularly the opportunity to strengthen links with the railway station.
4. Furthermore, if the A49 does need to be diverted, the approach to Wigan Borough from the south, and Ashton-in-Makerfield in particular, needs appropriate consideration befitting such a gateway route, with particular emphasis on the environmental quality of that route.

Policy LPA06: Safeguarded Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood (ref 1HS)

One of the eight areas safeguarded for future housing development is Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood. It is relatively close to the boundary with Wigan Borough and has capacity for around 291 homes.

The policy is clear that planning permission for the development of the safeguarded sites for housing development will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing development on safeguarded sites in the Plan period will be refused.

Together with land adjacent that is allocated for 216 homes, Wigan Council has concerns about the level of traffic that could be generated from these two areas combined using junctions in Bryn, Ashton town centre and Windy Arbour within Wigan Borough. Mitigation measures would be sought and, therefore, Wigan Council is supportive of this policy position.

Policy LPA07: Transport and Travel (Accessibility)

Clause 1 of this policy states that "The Council's strategic priorities for the transport network are to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions. To achieve these priorities it will seek to: b) Ensure that new development is sufficiently accessible by road transport, walking, cycling and public transport."

Clause 3 of this policy states that "New development will only be permitted if it would:

- d) Enable good levels of accessibility by walking and cycling between homes, jobs and services
- e) Provide for safe and convenient pedestrian, cycle and vehicular access and movement to, from and within the development"

Where strategic new development is close to the boundary with Wigan Borough, it is essential that cross-boundary connections with Wigan by bus, cycling and walking are a serious part of these considerations. The policy should acknowledge this relationship specifically together with the need to work with Wigan Council, Transport for Greater Manchester and Highways England to improve cross-boundary accessibility by public transport, cycling and walking, including to railway stations.

Issues for bus travel are compounded by the fact that bus ticketing arrangements are different within Greater Manchester and Merseyside and walking and cycling links are restricted by the motorway

and heavy traffic on roads to and from motorway junctions.

Policy LPA07: Transport and Travel (M6 Junction 23)

Wigan Council supports clause c) of Policy LPA07 "Secure improvements to existing motorway capacity and infrastructure with particular priority being given to the M6 Junction 23" and Wigan Council officers will continue to work with St Helens to determine what improvements need to be secured, to the benefit for both boroughs.

Policy LPA07: Transport and Travel (Carr Mill)

Wigan Council supports clause e) i) of Policy LPA07 "Secure a new station at Carr Mill". Although this will be a further stop for the hourly stopping service, adding 3-4 minutes per journey to Liverpool and St Helens from Bryn, it would improve accessibility into Wigan and Manchester from north St Helens, as well as into St Helens town centre and Liverpool.

Policy LPA07: Transport and Travel (Skelmersdale Rail Link)

Wigan Council supports clause e) iii) of Policy LPA07 "Secure delivery of the proposed Skelmersdale Rail Link" on the Wigan-Kirby railway line, which would extend the Merseyrail line through Rainford Junction in St Helens to a new terminus at Skelmersdale as well as diverting the Wigan Kirby line to Skelmersdale. As such it would result in improved accessibility between Wigan and Skelmersdale too and is a feature of the West Lancashire Local Plan, to which we have also offered our support.

Policy LPA07: Transport and Travel (Freight)

Clause 5 of this policy states "Development that would generate significant movement of freight must be located where there is a safe, convenient and environmentally acceptable access route to a suitable part of the Key Route Network. The part of the Network that is marked as 'Key Route Network – non freight' on the Policies Map shall not be regarded as suitable in this context. Access into a new development (of any land use) directly from the Key Route Network will only be allowed if this would not unduly restrict the capacity of the road or cause harm to highway safety, and where no more suitable alternative exists or would be provided by the development."

This clause is supported although it is noted that the A579 Winwick Road is not marked on the St Helens Policies Map as "non-freight" as it is not in St Helens, although clearly part of it at least is going to be heavily reliant on part of Winwick Lane at least. As you are aware, Winwick Lane is in Warrington at the point where the highway access into Parkside is proposed, and it is in Wigan Borough north of the railway line. Freight traffic to/from Parkside must be directed to M6 Junction 22 and not permitted to go northwards on the A579 Winwick Lane. This issue forms part of our objection to Policy LPA10: Parkside East.

Policy LPA10: Parkside East

Parkside East abuts the borough boundary south of the Chat Moss railway line. Wigan Council has objected previously to a planning application for this land on the grounds of traffic impacts, and has made representations on St Helens' previous local plan to ensure that the policy safeguards residents' interests in Wigan Borough.

Clause 3 of the policy states that "Proposals for development within (the) site...will be required to:

- b) Create safe and convenient access from Junction 22 of the M6 for Heavy Goods Vehicles and other vehicles
- c) Mitigate any adverse impacts on the surrounding strategic and local road network.

Freight traffic to/from Parkside must be directed to M6 Junction 22 and not permitted to go northwards on the A579 Winwick Lane.

This issue is pertinent to a planning application consultation at the present time, for a new road from the A49 in Newton-le-Willows through Parkside West, connecting to the A573 Golborne Road / Parkside Road under the motorway and then across Parkside East to the A579 Winwick Lane. The justification for this is to provide access to/from Parkside via M6 Junction 22, but it could also load traffic on to the East Lancashire Road at Lane Head. Wigan Council has a holding objection to this planning application on traffic and air quality grounds based upon the information currently available.

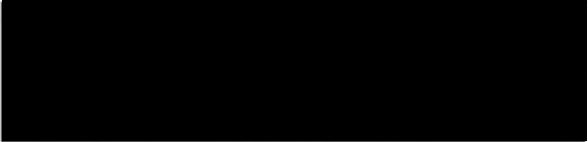
Clause 3 of the policy states that "Proposals for development within (the) site...will be required to: f) be designed to minimise impacts on residential amenity. There is no specific reference to air quality or noise, with the potential for rail movements and loading / unloading operations to give rise to disturbance to local residents, particularly at night if 24 hour operations are anticipated, including at Town of Lowton and Lane Head within Wigan Borough. The policy would benefit from the addition of wording similar to that applying to Parkside West in Appendix 5 to the plan, which states "Suitable measures must be included to control the impact of increased traffic movement or uses within the site on residential amenity, noise and/or air quality in the surrounding area."

The potential for advanced strategic landscape planting to take place should also be explored and written into the draft policy, in order to form a substantial visual screen to improve visual amenity once the development comes forward in what a largely flat landscape.

Clause 2 of the policy states that "The site is also considered suitable in principle for other forms of B2 and B8 employment use provided that they would: a) bring significant inward investment, local employment and training benefits for the local community." In line with our representation on clause 10 of Policy LPA04, as "local" clearly includes residents in places like Golborne, Lowton, Leigh and Ashton-in-Makerfield within Wigan Borough, measures should be taken to ensure that such opportunities are available for residents in Wigan Borough as well as St Helens, and this should be recognised in the policy. We would also be happy to agree the means for how this can be achieved in practice and provide you with the relevant contacts to ensure it is implemented through the development management process.

Ends

Nick Clarke
Planning and Transport Policy Service Manager
Economy and Skills
Wigan Council
Wigan Life Centre (South site), College Avenue, Wigan WN1 1NJ



E10065

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[Redacted]

Strategic Director – Place Services
St Helens Council
Town Hall
Corporation Street
St Helens WA10 1HP

Our reference: PB/NC/MB/KF
Your reference:
Please ask for: Marie Bintley
Extension:
Direct line: [Redacted]
Date: 11 March 2019

[Redacted]

St Helens Borough Local Plan 2020-2035

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Policy LPA04.1: Strategic Employment Sites

Policy LPA06: Safeguarded Land

Policy LPA07: Transport and Travel

Policy LPA10: Parkside East

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Yours sincerely

[Redacted signature]

Marie Bintley
Assistant Director Growth and Housing

Please reply to: Marie Bintley

Wigan Council, Places Directorate: Economy and Environment, PO Box 100, Wigan, WN1 3DS

[Redacted]

Representations on St Helens Borough Local Plan 2020-2035 from Wigan Council

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Clause 2 of this policy states that "Any planning application for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole site, which must set out details of at least: e) Indicative layout promoting permeability and accessibility by public transport, cycling and walking."

Where these sites are close to the boundary with Wigan Borough, it is essential that cross-boundary connections with Wigan by bus, cycling and walking are a serious part of these considerations. The policy should acknowledge this relationship specifically, together with the need to work with Wigan Council, Transport for Greater Manchester and Highways England to improve cross-boundary accessibility by public transport, cycling and walking.

Issues for bus travel are compounded by the fact that bus ticketing arrangements are different within Greater Manchester and Merseyside and walking and cycling links are restricted by the motorway and heavy traffic on roads to and from motorway junctions.

Policy LPA06: Safeguarded Land North East of Junction 23 M6 (South of Haydock Racecourse), Haydock (ref 2ES)

One of the two areas safeguarded for future employment development is Land North East of Junction 23 M6 (South of Haydock Racecourse), Haydock. It is very close to Ashton-in-Makerfield and Golborne and is currently subject to a planning application from Peel, on which this council has a holding objection on the grounds of traffic impacts. In the previous version of this local plan, the site was allocated for employment development but it is now proposed as safeguarded land with the need for substantial improvements to enhance capacity at Junction 23 within the Plan period.

The policy is clear that planning permission for the development of the safeguarded sites for employment development will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for employment development on safeguarded sites in the Plan period will be refused.

①

②

③

(2ES)

Wigan Council is supportive of this policy position in preference to the allocation for employment development proposed in the previous version of the plan. However, there are four issues of concern that we wish to raise:

1. The proposed area of safeguarded land and consequent deletion from the Green Belt reflects land ownership issues and would appropriately be rounded off on the eastern boundary and northern boundary, with the land removed from the site and restored to the Green Belt. This would result in the development intruding less into undeveloped land create a more logical revised Green Belt boundary than that currently proposed. To the north of the site, it would also allow the Green Belt boundary to be retained in its current form, extending to the rear of Haydock Park Gardens.
2. It should be clear within the policy that the improved highways infrastructure needed should be in place before any development on the site is operational.
3. If the A49 needs to be diverted in order to secure the strategic improvement needed to Junction 23, accessibility between Ashton-in-Makerfield and Newton-le-Willows should be maintained and improved, particularly for bus services, cycling and walking, for which there is a strong case for enhancement of provision for all three particularly the opportunity to strengthen links with the railway station.
4. Furthermore, if the A49 does need to be diverted, the approach to Wigan Borough from the south, and Ashton-in-Makerfield in particular, needs appropriate consideration befitting such a gateway route, with particular emphasis on the environmental quality of that route.

Policy LPA06: Safeguarded Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood (ref 1HS)

One of the eight areas safeguarded for future housing development is Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood. It is relatively close to the boundary with Wigan Borough and has capacity for around 291 homes.

The policy is clear that planning permission for the development of the safeguarded sites for housing development will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing development on safeguarded sites in the Plan period will be refused.

Together with land adjacent that is allocated for 216 homes, Wigan Council has concerns about the level of traffic that could be generated from these two areas combined using junctions in Bryn, Ashton town centre and Windy Arbour within Wigan Borough. Mitigation measures would be sought and, therefore, Wigan Council is supportive of this policy position.

Policy LPA07: Transport and Travel (Accessibility)

Clause 1 of this policy states that "The Council's strategic priorities for the transport network are to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions. To achieve these priorities it will seek to: b) Ensure that new development is sufficiently accessible by road transport, walking, cycling and public transport."

Clause 3 of this policy states that "New development will only be permitted if it would:

- d) Enable good levels of accessibility by walking and cycling between homes, jobs and services
- e) Provide for safe and convenient pedestrian, cycle and vehicular access and movement to, from and within the development"

Where strategic new development is close to the boundary with Wigan Borough, it is essential that cross-boundary connections with Wigan by bus, cycling and walking are a serious part of these considerations. The policy should acknowledge this relationship specifically together with the need to work with Wigan Council, Transport for Greater Manchester and Highways England to improve cross-boundary accessibility by public transport, cycling and walking, including to railway stations.

Issues for bus travel are compounded by the fact that bus ticketing arrangements are different within Greater Manchester and Merseyside and walking and cycling links are restricted by the motorway and heavy traffic on roads to and from motorway junctions.

Policy LPA07: Transport and Travel (M6 Junction 23)

Wigan Council supports clause c) of Policy LPA07 "Secure improvements to existing motorway capacity and infrastructure with particular priority being given to the M6 Junction 23" and Wigan Council officers will continue to work with St Helens to determine what improvements need to be secured, to the benefit for both boroughs.

Policy LPA07: Transport and Travel (Carr Mill)

Wigan Council supports clause e) i) of Policy LPA07 "Secure a new station at Carr Mill". Although this will be a further stop for the hourly stopping service, adding 3-4 minutes per journey to Liverpool and St Helens from Bryn, it would improve accessibility into Wigan and Manchester from north St Helens, as well as into St Helens town centre and Liverpool.

Policy LPA07: Transport and Travel (Skelmersdale Rail Link)

Wigan Council supports clause e) iii) of Policy LPA07 "Secure delivery of the proposed Skelmersdale Rail Link" on the Wigan-Kirby railway line, which would extend the Merseyrail line though Rainford Junction in St Helens to a new terminus at Skelmersdale as well as diverting the Wigan Kirby line to Skelmersdale. As such it would result in improved accessibility between Wigan and Skelmersdale too and is a feature of the West Lancashire Local Plan, to which we have also offered our support.

Policy LPA07: Transport and Travel (Freight)

Clause 5 of this policy states "Development that would generate significant movement of freight must be located where there is a safe, convenient and environmentally acceptable access route to a suitable part of the Key Route Network. The part of the Network that is marked as 'Key Route Network – non freight' on the Policies Map shall not be regarded as suitable in this context. Access into a new development (of any land use) directly from the Key Route Network will only be allowed if this would not unduly restrict the capacity of the road or cause harm to highway safety, and where no more suitable alternative exists or would be provided by the development."

This clause is supported although it is noted that the A579 Winwick Road is not marked on the St Helens Policies Map as "non-freight" as it is not in St Helens, although clearly part of it at least is going to be heavily reliant on part of Winwick Lane at least. As you are aware, Winwick Lane is in Warrington at the point where the highway access into Parkside is proposed, and it is in Wigan Borough north of the railway line. Freight traffic to/from

Parkside must be directed to M6 Junction 22 and not permitted to go northwards on the A579 Winwick Lane. This issue forms part of our objection to Policy LPA10: Parkside East.

Policy LPA10: Parkside East

Parkside East abuts the borough boundary south of the Chat Moss railway line. Wigan Council has objected previously to a planning application for this land on the grounds of traffic impacts, and has made representations on St Helens' previous local plan to ensure that the policy safeguards residents' interests in Wigan Borough.

Clause 3 of the policy states that "Proposals for development within (the) site...will be required to:

b) Create safe and convenient access from Junction 22 of the M6 for Heavy Goods Vehicles and other vehicles

c) Mitigate any adverse impacts on the surrounding strategic and local road network.

Freight traffic to/from Parkside must be directed to M6 Junction 22 and not permitted to go northwards on the A579 Winwick Lane.

This issue is pertinent to a planning application consultation at the present time, for a new road from the A49 in Newton-le-Willows through Parkside West, connecting to the A573 Golborne Road / Parkside Road under the motorway and then across Parkside East to the A579 Winwick Lane. The justification for this is to provide access to/from Parkside via M6 Junction 22, but it could also load traffic on to the East Lancashire Road at Lane Head. Wigan Council has a holding objection to this planning application on traffic and air quality grounds based upon the information currently available.

Clause 3 of the policy states that "Proposals for development within (the) site...will be required to: f) be designed to minimise impacts on residential amenity. There is no specific reference to air quality or noise, with the potential for rail movements and loading / unloading operations to give rise to disturbance to local residents, particularly at night if 24 hour operations are anticipated, including at Town of Lowton and Lane Head within Wigan Borough. The policy would benefit from the addition of wording similar to that applying to Parkside West in Appendix 5 to the plan, which states "Suitable measures must be included to control the impact of increased traffic movement or uses within the site on residential amenity, noise and/or air quality in the surrounding area."

The potential for advanced strategic landscape planting to take place should also be explored and written into the draft policy, in order to form a substantial visual screen to improve visual amenity once the development comes forward in what a largely flat landscape.

Clause 2 of the policy states that "The site is also considered suitable in principle for other forms of B2 and B8 employment use provided that they would: a) bring significant inward investment, local employment and training benefits for the local community." In line with our representation on clause 10 of Policy LPA04, as "local" clearly includes residents in places like Golborne, Lowton, Leigh and Ashton-in-Makerfield within Wigan Borough, measures should be taken to ensure that such opportunities are available for residents in Wigan Borough as well as St Helens, and this should be recognised in the policy. We would also be happy to agree the means for how this can be achieved in practice and provide you with the relevant contacts to ensure it is implemented through the development management process.

E100065

Overall the proximity of the site to the borough boundary and the issues of cross-boundary impacts should be acknowledged more explicitly in the plan.

RO0158



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

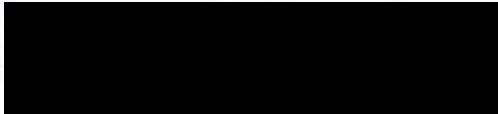
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MISS</u>	Title:
First Name: <u>CAROLINE</u>	First name:
Last Name: <u>BIRCH</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>3 SOMMERHIRE GARDENS</u> <u>BOLD ST, HELENS</u>	Address:
Postcode: <u>WA9 6ZP</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>11/5/19</u>
--	----------------------

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

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

Yes ☒ (Via Email)

No ☐

Please note - 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.

RO0159

ELO258



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

Site GBP-092-A

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



4 Attachments



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



Appendix 4- Comprehensive Reps to Submission Local Plan.pdf



Appendix 4a- Interim Housing Needs Assessment.pdf

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group

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

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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o
P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston
Park, St Helens (EMAIL 2)
Graham Lamb
to:
planningpolicy@sthelens.gov.uk
13/03/2019 17:03



1 Attachment



Appendix 1- Delivery Statement.pdf

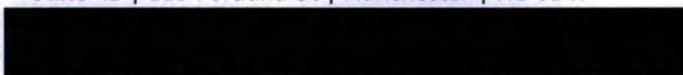
Email 2

Graham Lamb
Associate Planner

Pegasus Group

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
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From: Graham Lamb

Sent: 13 March 2019 17:01



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

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group

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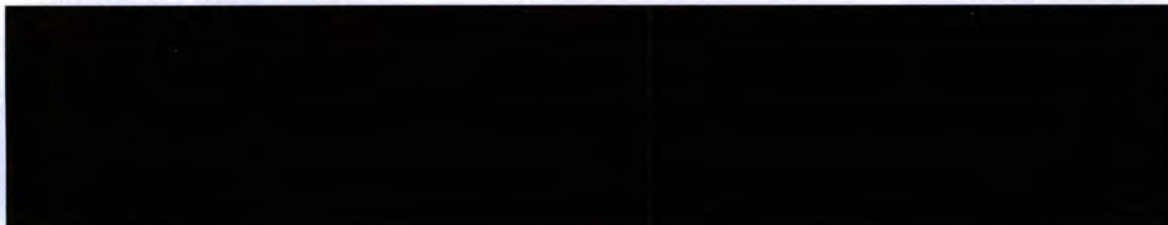
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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o
P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston
Park, St Helens (EMAIL 2)
Graham Lamb
to:
planningpolicy@sthelens.gov.uk
13/03/2019 17:04



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

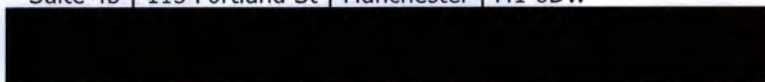
Email 3

Graham Lamb
Associate Planner

Pegasus Group

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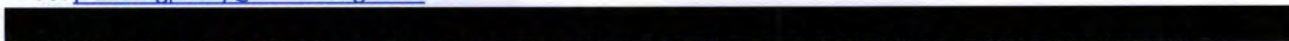


 Please consider the environment before printing this email message.

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

13 March 2019

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

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

Dear Sir/Madam,

**Land North of St Helens Road, Eccleston Park, St Helens
St Helens Local Plan Submission Draft (January-March 2019 Consultation)**

We are instructed on behalf of the client, I Birchall & D Birchall (c/o P Wilson & Company LLP Chartered Surveyors), to submit representations to the Local Plan Submission Consultation of the emerging St Helens Local Plan. The client are the landowners of a parcel of land referred to as land north of St Helens Road, Eccleston Park.

A Delivery Statement has been prepared for the site, which is contained at **Appendix 1**. As demonstrated in the document, the site has capacity to deliver up to 625 homes in a highly sustainable location. This document demonstrates how the site is entirely suitable, deliverable and viable for housing development, as well as being an entirely appropriate Green Belt release site.

Further technical studies have also been prepared to further demonstrate the suitability of St Helens Road site for housing development, as set out below and attached:

- Accessibility Statement (**Appendix 2**)
- Agricultural Land Report (**Appendix 3**)

The need to allocate additional sites

Pegasus Group has prepared comprehensive representations and an Interim Housing Report to the St Helens Local Plan on behalf of another client, Redrow, who have separate land interests within Eccleston (both reports are contained at **Appendix 4**).

So whilst not directly related to this site, these reports (particularly sections 4-9 of the main representation) outline a compelling case as to why the Council need to allocate more sites in order for the plan to be found sound and to meet emerging housing requirements, as summarised below:

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- There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned. (1)
- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites. ✓
- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan. (2)

To conclude, we politely suggest that the Council need to allocate more sites in order for the plan to be found sound. As demonstrated in the appended documents, the St Helens Road, Eccleston site is available and suitable for development and should therefore be considered for housing allocation. (3)

I trust the enclosed is clear, however should you have any queries on these representations please do not hesitate to contact me on the details provided below.

Yours sincerely,

[Redacted Signature]
Graham Lamb
Associate Planner
[Redacted Contact Details]

Encs.



**ST HELENS BOROUGH LOCAL PLAN 2020-2035:
SUBMISSION DRAFT**

**REPRESENTATION BY
REDROW HOMES NORTH WEST**

Date: 13th March 2019

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

Pegasus Group

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APPENDIX 2- DELIVERY STATEMENT

APPENDIX 3 - ACCESSIBILITY STATEMENT

APPENDIX 4 - PHASE 1 ECOLOGY SURVEY

APPENDIX 5 - AGRICULTURAL LAND ASSESSMENT

APPENDIX 6 -DETAILED SITE PRO FORMAS

APPENDIX 7- INTERIM HOUSING NEED ASSESSMENT

APPENDIX 8- COUNCIL'S HOUSING TRAJECTORY

APPENDIX 9- PEGASUS HOUSING TRAJECTORY

APPENDIX 10- SPATIAL DISTRIBUTION OF SITES

1. INTRODUCTION

- 1.1 Pegasus Group are instructed by Redrow Homes North West (Redrow) to make representations to the 'St Helens Local Plan 2020-2035 Submission Draft' consultation, which opened on 17th January 2019 and closes on 13th March 2019.

Redrow's Land Interests & Proposed Development

- 1.2 Redrow have an interest in 18.7 Ha of greenfield land to the south of Burrows Lane, Eccleston, which lies to the immediate west of Eccleston Mere. Redrow have legal control of the site through a development option with the landowner and are seeking to promote it for residential development through the Local Plan process. The full extent of the site is illustrated below and on the Site Location Plan attached at **Appendix 1**.
- 1.3 Details of this site have previously been submitted to the 'call for sites' process and considered within the 2016 SHLAA (site ref: CFS 167); and it has also been considered within the current consultation document and the 2018 Green Belt Review that supports it (site ref:GBP_093_B), which we refer to later in this document.

Figure 1.1 – Redrow's Ownership and Development Parcels



1.4 As shown above, the site comprises two distinct development parcels, hereafter referred to as Parcels A and B:

- **Parcel A** – Northern part of the site, measuring 11.6 Ha and fronting Burrows Lane. This part of the site is being promoted for allocation within the emerging Local Plan and is considered capable of delivering approximately 210 dwellings.
- **Parcel B** – Southern part of the site, measuring 7.1 Ha, forms a dog-leg around the bottom of Eccleston Mere. This part of the site is considered capable of delivering 160 -185 dwellings, but is not being promoted for development at the current time.

1.5 A Delivery Statement has been prepared for Parcel A (attached at **Appendix 2**) which demonstrates that it is a sustainable and deliverable site and includes an illustrative masterplan showing capacity for approximately **210 dwellings** on the site. Furthermore, the following Technical Reports have been prepared which demonstrate the site's suitability for development:

- Accessibility Statement (**Appendix 3**);
- Phase 1 Ecology Survey (**Appendix 4**); and
- Agricultural Land Assessment (**Appendix 5**).

Representation Structure

1.6 The structure of these representations takes the following form:

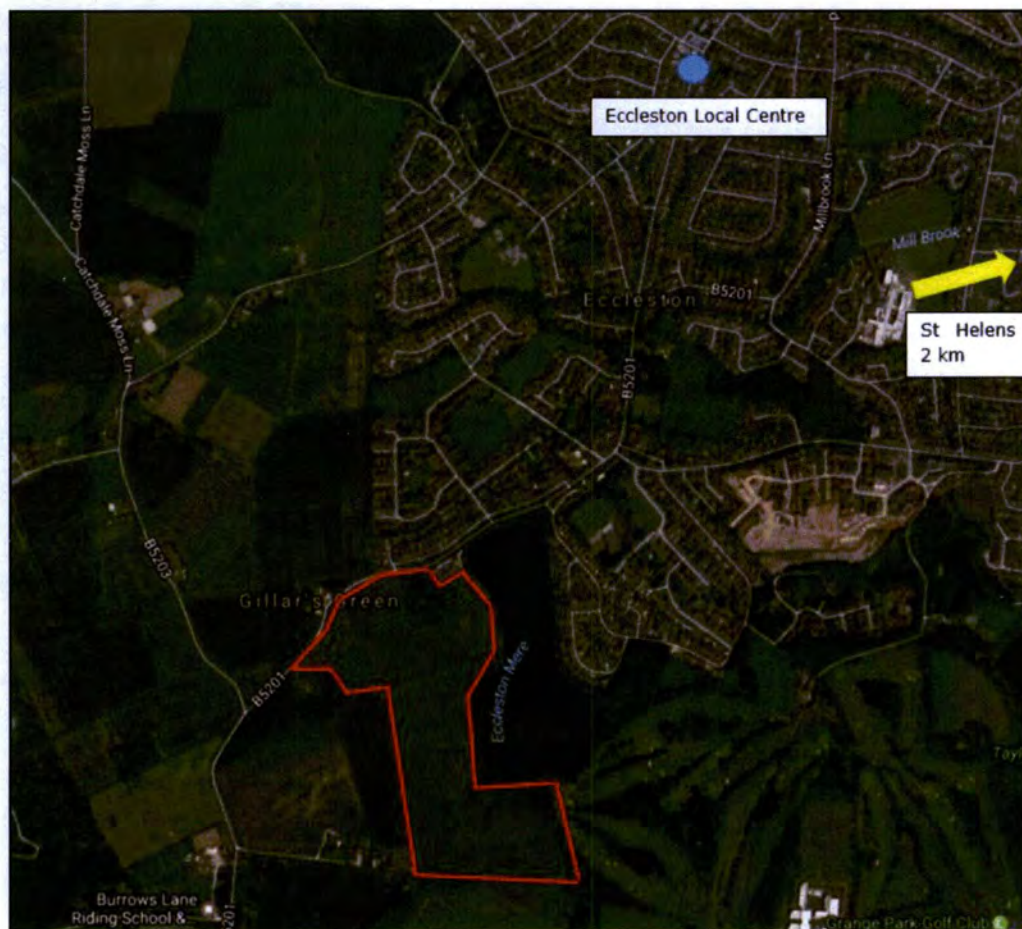
- In Section 2 we describe the site and surrounding area in more detail;
- Section 3 comprises a site-specific assessment of the Burrows Lane site, in respect of its contribution to the Green Belt, overall deliverability and sustainability, considered against the Council's evidence base;
- In Section 4 we comment on the spatial vision and strategic objectives in Chapter 3; as well as the overarching spatial strategy set out in Policy LPA02 (Chapter 4);
- In Section 5 we address general matters of housing need and supply in relation to Policy LPA05 (Chapter 4);
- Section 6 we provide a detailed critique of the Council's housing supply and trajectory (as per Policy LPA05 (Chapter 4) and its supporting information (notably tables 4.6 and 4.7);
- In Section 7 we provide a detailed critique of the proposed allocations and safeguarded sites, as set out in Policies LPA05.1 and LPA06 (Chapter 4), and how these have been considered within the Council's evidence base;
- In Section 8, we address the relevant housing policies in Chapter 6;
- In Section 9, we deal with the other relevant policies from Chapters 5,7 and 8; and
- In Section 10, we summarise and conclude our representations.

2. SITE BACKGROUND

The Site

- 2.1 The site is located within the Green Belt to the south of Burrows Lane, Eccleston, which is approximately 3km west of St Helens. The site comprises open fields with a mix of hedgerows and trees along the perimeter and field boundaries, with a denser area of tree cover in the north east corner. The site is largely flat, lies within flood zone 1 and is not subject to any other landscape or environmental designations.
- 2.2 As noted previously the whole site measures 18.7 Ha, however it is only Parcel A which is being promoted for development within this document, which has a total area of 11.6 Ha.

Figure 2.1 – Aerial View of the Site and Local Context



- 2.3 The northern part of the Parcel A includes certain features that highlight the site's historic use. A railway line once past through the site providing access to industrial facilities and mines including such uses on part of the site indicating that reasonable parts of Parcel A have been previously developed. The site appears to have been removed of such features following the war and has since

overgrown. However, it is clear that part of the land cannot be viably farmed and there is likely to be hardstanding and made ground under parts of the site.

- 2.4 To the north, the site is bound by the B5201 Burrows Lane, which will provide vehicular access to the development. To the east lies Eccleston Mere, which is designated as 'Other Open Space' within the adopted UDP (Policy ENV1) and is proposed as a Local Wildlife Site in the emerging plan. The Mere is used for recreational purposes and is jointly supervised by the Pilkington Sailing Club and the Pilkington Angling Association. Beyond the Mere lies residential development and a primary school, with Grane Park Golf Course to the south east.
- 2.5 To the west and south of the site are open agricultural fields, with some buildings relating to Mere View Farm at the south west corner.

Surrounding Area

- 2.6 Eccleston is a neighbourhood with a population of approximately 10,000, situated to the west of the larger built up area of St Helens, which is the Key Settlement of the borough. St Helens Town Centre is 2.5km to the east.
- 2.7 The neighbourhood includes a number of day to day facilities with a pharmacy, Post Office and other unit shops within the Local Centre, as well as two primary schools, a secondary school, medical centre, pub and convenience store within the wider area; whilst St Helens Town Centre provides a higher order centre with a range of national multiples and employment uses.
- 2.8 St Helens has traditionally been an industrial town dominated by the coal, chemical and particularly glass industries. The two main glass manufacturers were Pilkingtons and Ravenhead glass. Now St Helens major employers are in large scale distribution and wholesale operations; which include Co-op and Sainsbury's. These distribution operations benefit from the good linkages to the national road network.
- 2.9 Liverpool and Warrington are the largest sub regional centres in the vicinity. Liverpool is approximately 14 km to the west and Warrington is approximately 15 km to the south east.

3. SITE SPECIFIC ASSESSMENT OF BURROWS LANE SITE

3.1 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) (4)

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

- 3.3 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



- 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

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.] ③

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.

3.17 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.

3.20 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 is 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, Prescott 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. Sub
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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. 4
- 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). 4

- 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.] ④
- 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. ✓

4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)

- 4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

Spatial Vision & Strategic Objectives

- 4.2 Redrow support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*. ✓
- 4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a 'sufficient' number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be 'positively prepared' with the objective of 'significantly boosting the supply of housing'. As such, the Council should be seeking to surpass their needs so we recommend that the wording be updated to reflect this. 5
- 4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to need to meet local employment needs; however, boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to acknowledge this. 6

Policy LPA02 (Part 3) - Previously Developed Land

- 4.5 We agree that previously developed land will make a significant contribution to supply and support the Council in seeking to encourage brownfield re-development through the lowering of developer contributions. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide the range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another. 7
- 4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment.

Policy LPA02 (Part 4) - Green Belt and Safeguarded Land

- 4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is ✓

insufficient land within the existing urban area to meet their needs for housing and employment land going forward. ✓

4.8 We fully support this position; however, the policy and text does not fully explain how this generates the 'exceptional circumstances' required to alter Green Belt boundaries, in line with paragraph 136 of the 2019 NPPF; although this is addressed within paragraphs 1.11-1.21 of the Green Belt Review.

4.9 In our view, it is harm that will occur from failing to meet their housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances required for Green Belt release in St Helens, and we would ask that the text is strengthened to reflect this.

4.10 We also support the principle of safeguarded land but do have concerns with the quantum of proposed, which we address within section 7.

Policy LPA03 – Development Principles

4.11 Redrow fully support the development principles set out in this policy, as they promote sustainable development in line with the NPPF but with sufficient flexibility to allow for proposals to be considered on a site by site basis, to ensure that they don't restrict or frustrate development. 9

Policy LPA04 – A Strong and Sustainable Economy

4.12 We are generally supportive of this policy but would reiterate our comments above (in respect of Strategic Objective 5.1) on role that boosting housing supply can play in meeting economic growth aspirations and suggest that the wording in this policy is updated to acknowledge this. 10

5. MEETING ST HELENS BOROUGH'S HOUSING NEEDS (POLICY LPA05)

- 5.1 This section assesses the proposed housing requirement and general policy provisions within policy LPA05, with further detailed analysis of the proposed allocations and implications on supply in the following sections.

Part 1 - Housing Requirement

- 5.2 Policy LPA05 identifies a net minimum housing requirement of 9,234 dwellings over the period 2016 to 2035, at an average rate of **486 dwellings per annum** (dpa). This marks a 15% decrease from the previous consultation version (Preferred Options–December 2016) which set a housing requirement of 10,830 over the period 2014 to 2033, a rate of 570 dpa.
- 5.3 This 486 dpa requirement is based on an economic scenario set out in the 2018 SHMA update (specifically 'Economic Scenario 2 with sensitivity Option 3'). This is a calculation of the number of dwellings required to support the job growth expected from the proposed employment sites in the plan (based on the Councils ELNA evidence).
- 5.4 So, this is an economic led figure, however it represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa. This figure is derived from the 2014 based household projections across the 10-year period 2019-2029 combined with 2018 affordability ratios and represents the most up to date position under current national guidance (as confirmed in updates to the NPPG on 20th February 2019).
- 5.5 The 570 dpa requirement from the previous Preferred Options plan, was based on a demographic baseline of 451 dpa set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA), with a significant uplift of 20% (90 dpa) to stabilise and increase the population, promote more housing choice and restore pre-recession housebuilding levels. A further uplift of 29 dpa (6.4%) was applied to account for future demolitions. This 570 dpa figure is also the adopted requirement within the St Helens Core Strategy (2012) and the preceding North West RSS (2008) which this was based on, and as such this requirement has been in place since the RSS period began in 2003.
- 5.6 At the outset, we must stress we are surprised and disappointed by this reduction in the requirement figure and are unsure how this represents a positively prepared plan, or how this will address the housing crisis and government ambition to increase the delivery of homes to 300,000 per annum by the mid-2020s.] ①
- 5.7 A critique of the proposed housing requirement and the wider demographic and economic context within St Helens is enclosed at **Appendix 7**.
- 5.8 It had been our intention to provide a detailed Housing Needs Assessment using the Chelmer model to put forward our own housing requirement figure; however, we have held off from doing this at the current time for the following reasons:

- The current uncertainty regarding the standard methodology, with MCHLG formally confirming on 18th February 2019 (and through subsequent updates to the NPPF and NPPG), that planners should revert to the 2014 housing projections whilst the government reviews the formula over the next 18 months; and
- Affordability ratios are due to be updated in April 2019, which will affect the standard methodology calculation and time-period for assessment (will change from 2018-2028 to 2019-2029).

5.9 Therefore, we believe that the position will have moved on by the time of the EIP in summer/autumn 2019 and reserve the right to provide a more comprehensive assessment at that stage. As such the document at **Appendix 7** comprises an interim contextual analysis of demographic and economic trends in St Helens.

5.10 Before looking at the findings of this analysis, we review the current national guidance on assessing housing need, and particularly the circumstances that might support an uplift from the standard methodology.

National Guidance on Housing Need

5.11 Paragraph 60 of the 2019 NPPF confirms that local plan submitted after 24th January 2019 should use the Governments Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.

5.12 However, Paragraph 11 also confirms that for plan-making, the presumption in favour of sustainable development means that:

- Plan 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 and other uses, as well as any needs that cannot be met within neighbouring areas...

5.13 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. Many other considerations can impact on the final housing requirement figure set out in a Local Plan and this is evident within several paragraphs of the NPPG, including:

- 2a-002-20190220 - The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement.
- 2a-003-20190220 - The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).

- 2a-024-20190220 - The total need for affordable housing will need to be converted into annual flows...An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

5.14 Under the question 'When might it be appropriate to plan for a higher housing need figure than the standard method indicates?' the NPPG states the following (para 2a-010-20190220):

"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

5.15 Paragraph 2a-015-20190220 provides some useful clarification on how this 'exceptional circumstances' test will be applied at examination, confirming the logical assumption that exceptional circumstances are only required to justify a figure that's lower than the standard method:

"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and

that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."

- 5.16 Whilst St Helens are proposing an approach that exceeds the minimum requirement (by 3.8%), it is our strong view that this doesn't adequately reflect current and future demographic trends, and as such a far greater uplift is required, more in line with that proposed in the previous version of the plan and the adopted Core Strategy (570 dpa), for the reasons set out below.

Conclusions from Pegasus Housing Need Assessment

- 5.17 Our contextual analysis drew the following conclusions:

- That whilst St Helens is relatively affordable to live, the ratios have changed little over the last few years, suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to remain high in the long-term to address this issue and reducing the housing target to 486 dpa seems counter-productive to supporting inclusive growth in the Borough.
- Internal migration has been high in St Helens in recent years, indicating a level of demand for new housing in St Helens from people wanting to move into the area.
- St Helens has an ageing population and therefore needs to try and attract more people to live in the area from elsewhere to maintain its future labour supply and general socio-economic balance. A key way of doing this is to provide a sufficient supply of housing to attract new residents to the area.
- Job numbers in the Borough have been on a relatively strong upward trajectory over the last three years and further research is required to model what the implications of this will be for housing numbers. By not taking this issue into account, there is a real risk that the Local Plan as it stands is not giving full consideration to the economic growth potential and competitiveness of St Helens.

- 5.18 Furthermore, whilst the proposed requirement purports to be an economic led figure, it is clear from the supporting text in the 12th December Cabinet Report (paras 2.43 – 2.46) that the choice of this figure, and the reduction from 570 dpa was justified by (and therefore anchored to) the introduction of the standard methodology, rather than any change in the economic evidence:

"2.46 The figure of 486 dwellings per annum is substantially less than the figure of 570 dwellings per annum in the Preferred Options consultation document. This reduction is justified by the change of circumstances which has occurred since 2016, including the introduction of the national standard method, the new NPPF and related planning guidance, and the SHMA Update 2018. Whilst (for reasons stated above) it is not appropriate to rely on the standard method output of 468 dwellings per annum, there is now no robust evidential basis to continue with a figure as high as 570 dwellings per annum."

- 5.19 As such we suggest the Council continue to pursue the **570 dpa** figure to ensure that housing and economic aspirations are fully aligned, to allow St Helens to compete within the wider Liverpool City Region and the Cheshire and Warrington LEP Area.

Part 2 - Housing Supply

- 5.20 This part of the policy identifies the main sources of supply for the delivery of housing, including completions, sites with planning permissions, allocations, sites without permission in the 2017 SHLAA windfall sites and windfall sites, with the calculations set out in more detail in Tables 4.5 – 4.7.
- 5.21 Whilst we do not dispute this overall approach, we do provide a detailed critique of the proposed allocations within section 5 and the overall supply position in section 6.

Part 3 - Density

- 5.22 This policy suggests that new development should achieve minimum densities of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30 dph on sites in local centres, sites that are well served by bus or train services and in other urban areas. It also notes that densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of an area.
- 5.23 We support the need to encourage higher densities, particularly in the most accessible locations, in line with 2019 NPPF; however, it is our view that this policy would benefit from some additional flexibility, to take account local and site characteristics, market aspirations and viability in determining the appropriate density of the site and suggest that this part of the policy is reworded to reflect this. (11)

Part 4 - Monitoring and Supply

- 5.24 Redrow fully endorse the need to monitor housing delivery annually to ensure an ongoing supply (in accordance with the Housing Delivery Test and five-year supply requirements), and the acknowledgement that a partial or full Local Plan review will be considered to allocate safeguarded land sites for housing development where necessary.
- 5.25 However, we suggest that the wording is strengthened here, with clear triggers for when a review is required (i.e. what constitutes 'significantly' below the required level). (12)
- 5.26 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is a made a policy requirement.
- 5.27 In respect of housing an AMR, or equivalent document, should include the following as a minimum:

- Details of annual housing completions (both gross and net) with a list of contributing sites - to allow accurate monitoring of the Council's trajectory in Policy LPA05,
- Details of windfall/ small site delivery – for compliance with NPPF 10% small site requirement and to ensure projected windfall rate remains realistic (see section 7 for further analysis of this).
- Details of affordable completions – to monitor effectiveness of Policy LPC02.
- Proportion of delivery on brownfield/ greenfield sites – to monitor effectiveness of spatial strategy/ Policy LPA02 Part 2.

5.28 The Monitoring Framework at Appendix 4 of the Submission Plan does refer to several of these indicators and refers the Annual SHBC house completion survey as a data source, however as far as we are aware this is not publicly available, as such we would request that this is incorporated into the AMR.

5.29 Finally, in respect of Appendix 4 we would ask the Council to clarify the rationale for trigger in respect of safeguarded land (Policy LPA06) which states that if '10% or more of land safeguarded is granted planning consent, then they will consider an early review of the plan?'

6. HOUSING SUPPLY MATTERS (POLICY LPA05 PART2)

- 6.1 This section looks at the Council's housing supply and trajectory in more detail, assessing total supply across the plan period but also considering the five-year housing land supply position and the Housing Delivery Test. ✓
- 6.2 This analysis is based on the Table 4.6 'Housing land requirements and supply – 2016 until 2035' and Table 4.7 'Housing Trajectory' within the Submission Plan, and the 2017 SHLAA which forms the most of up to date housing evidence base. ✓
- 6.3 However, at the outset we would highlight the fact that these tables and the SHLAA include various discrepancies and do not allow for direct comparison or the consideration of delivery on individual sites.] ①
- 6.4 The SHLAA starts with a 1st April 2017 base date but only provides individual site delivery within the first 5 years (up to 2021/2022), with delivery aggregated into 5 year periods beyond that; whilst the housing trajectory in the plan starts at the year 2020 and provides an annual aggregated figure for 'allocations' and 'other supply' (which includes SHLAA sites and windfall), and the total figures in each to do not tally.] ⑫
- 6.5 As such we would ask that the Council provide further clarification on this, ideally by updating the SHLAA and making a full local plan trajectory available with projected delivery on each individual SHLAA site and allocation on a year by year basis to allow the full plan period supply to be considered.] ⑭
- 6.6 Furthermore, as noted previously, the Council have not produced an AMR since 2011, nor do they have any form of report or schedule monitoring housing delivery. As such it is not possible to obtain detailed information on delivery rates within St Helens in recent years and brings into question whether the Council can justify their delivery rates going forward. —
- 6.7 To assist our analysis at this stage we have consolidated information into one table, and we attach the Council's own trajectory (or our understanding of it) at **Appendix 8**, with our own trajectory attached at **Appendix 9**.] ⑭
- 6.8 Our delivery analysis at **Appendix 9** presents two scenarios a best case/ high delivery scenario (**Appendix 9a**) and a worst case/ low delivery scenario (**Appendix 9b**), from which we take a mid-point to calculate our overall supply figures. We also include summary trajectories for both scenarios to compare with the Council's (**Appendix 9c**). —
- 6.9 Accordingly, we reserve the right to make further comments on this at the EiP stage or whenever the Council are able to clarify the above points and provide a consolidated trajectory and supporting evidence to justify the proposed delivery rates. ✓

Overall Housing Supply

- 6.10 Table 4.6 sets out the Council's supply position in more detail across the full plan period to 2035. It suggests there will be 1,989 dwellings completed by April 2020, leaving a residual requirement of 7,245 over the plan period.
- 6.11 In line with the figures in the table, Paragraph 4.18.10 of the Submission Local Plan goes on to state the 2017 SHLAA identified capacity for 7,817 dwellings within the existing urban area including sites with planning permission, sites under construction and other sites identified as being suitable for housing. The same paragraph goes on to state that it also allowed for 93 dwellings per annum from small windfall sites (less than 0.25 ha) and that the largest brownfield sites identified by the SHLAA are strategic allocations including Sites 3HA, 9HA and 10HA.
- 6.12 Figure 4.3 in the SHLAA suggests the following over the next 15 years:
- 1,581 dwellings with planning permission and not started on large sites;
 - 654 dwellings under construction on large sites;
 - 289 on historically implemented but stalled sites;
 - 3,763 dwellings on suitable SHLAA Sites without planning permission;
 - 1,395 dwellings on small windfall sites (93x15);
 - **= TOTAL 7,682 dwellings.**
- 6.13 We assess the implications and discrepancies between these 2 tables below before setting out our own housing supply.

Table 4.6 (Row B) – Completions

- 6.14 Our analysis suggests that proposed completions of 1,989 by April 2020 is realistic based on completions in recent years (as set out below from MCHLG Live Table 122 – and including over-supply of 29 units in the year 2017/2018) and projected delivery in the SHLAA.
- 6.15 Accordingly, the basis for the residual requirement in line (c) is correct, albeit we suggest this is increased to align with our suggested housing requirement of 570 dpa, leaving a residual requirement of 8,391 dwellings.
- 6.16 The table at 6.1 does suggest there are issues with past delivery and we address these later in this section.

Table 4.6 (Row I) – Large SHLAA Sites

- 6.17 This suggests a total figure of 4,107 dwellings from this source; however, this is not consistent with the 2017 SHLAA which suggests a figure of 3,763 dwellings.] ④

6.18 The Council have seemingly allowed for some additional unknown capacity to make up the time period beyond the next 15 years, which is accounted for in the SHLAA. However, bearing in mind the SHLAA has undertaken a comprehensive review of all potential large sites for housing in the urban area, it seems unreasonable to add on additional supply unless some of the sites were expected to be delivered beyond the 15-year SHLAA period and this is articulated in the SHLAA tables. Upon first inspection, the SHLAA does not appear to allow for this.

6.19 That said, we have addressed this discrepancy by providing our own trajectory based on a composite of the Local Plan and SHLAA.

Table 4.6 (Row J) - Small Sites/ Windfall Allowance

6.20 The Council's supply figure includes a windfall allowance of 93 dpa over the 15-year plan period, based on historic completion rates from small sites (below 0.25 Ha) over the past 10 years, as set out in Figure 3.12 of the 2017 SHLAA.

6.21 Whilst the 2019 NPPF acknowledges that windfall development can be a realistic source of supply, paragraph 70 requires evidence not only of past delivery rates, but that such rates can continue going forward, taking account of expected future trends.

6.22 In this instance, it is considered that a flat rate across the full plan period is optimistic as sources of windfall are finite, and therefore the rate of windfall should fall over time as more sites are picked up through the call for sites and SHLAA processes going forward.

6.23 Furthermore, no formal housing allocations have been made within St Helens since the 1998 UDP, which only covered the period to 2001. This was substantially replaced by the Core Strategy in October 2012 (including Policy RES1 relating to residential allocations), however this document did not include allocations, as these were due to follow in a separate Allocations DPD, a process which has since been abandoned, in favour of the current Plan.

6.24 Given the limitations of these adopted plans, it is reasonable to assume that a large proportion of the Council's housing supply over the last 10 years has been through windfall development leading to an elevated delivery rate. It is also reasonable to assume that development opportunities of this scale and nature will have therefore been partly exhausted over this period, and as such are highly unlikely to continue at the same rate.

6.25 It follows that much of this windfall delivery will have been on previously developed land, on the basis that speculative applications on greenfield land have lower chances of success (and also given the lack of greenfield/ non-Green Belt sites in St Helens).

6.26 This is partly evidenced within the Council's Housing Land Position Statement 2013 (which is the most recent monitoring document available) which confirmed that net completions between 2003 and 2013 averaged 91.23% previously developed, with just 8.77% on greenfield land.

Fig 6.1 – Housing Completions and Site Type 2003-2013

Table 3.1 Housing Completions 2003/04-2012/13

Year	Gross Completions	Net Completions	PDL	GF
2003/04	871	631	90.82%	9.18%
2004/05	896	783	87.83%	12.17%
2005/06	549	530	85.61%	14.39%
2006/07	637	600	91.52%	8.48%
2007/08	496	436	98.19%	1.81%
2008/09	441	240	99.3%	0.7%
2009/10	401	399	96.68%	3.32%
2010/11	183	157	92.35%	7.65%
2011/12	431	419	90.72%	9.28%
2012/13	320	264	82.19%	17.81%
Total	5,225	4,459	4,767	458
Average	523 p.a.	446 p.a.	91.23%	8.77%

- 6.27 This is relevant, as the ongoing supply of small PDL sites is now recorded within the Council's Brownfield Register (19th December 2017 base date). Analysis of this confirmed a capacity of 437 dwellings on sites of less than 0.25Ha, all of which have extant planning permission.
- 6.28 Applying an 8.77% uplift to this to support some windfall delivery on greenfield sites in line with historic evidence rates generates a total small site windfall total of 475 units, and we have used this figure in our trajectory, rather than the 93 per year figure which the Council propose, which we consider extremely optimistic.
- 6.29 That said, we continue with the rate of 93 dpa within the first 5 years (to 2021-2022) given that all these windfall sites already have consent and in light of elevated delivery rates in recent years, even without any adopted allocations, with the remaining 10 units dropping into year 6.
- 6.30 In our worst case scenario at Appendix 9b we assume no further windfall delivery; however in the best case we apply a rate of 10 dpa from year 6 onwards to take account of the possibility that small amounts of additional land may become available later in the period beyond what has been identified in the brownfield register.

Table 4.6 (Row L) – Lapse Rate for Non-Delivery

- 6.31 This row applies a 15% discount for non-delivery of SHLAA sites in years 6-15 (which equates to 437 from a total of 4,368). Whilst we fully support the rationale for this discount, we suggest a discount is also added to the sites in years 1-5, as there will inevitably be some slippage amongst permitted sites as well as strategic sites, and this approach has been commonly accepted at EiPs and S78 appeals decisions, generally at 10% across all sites.
- 6.32 In this instance a blanket 10% lapse actually generates a lower discount than the 15% off years 6-16) and is therefore presents a more positive position than the Council's own figures; however

given our supply analysis has already discounted specific sites we are keen to avoid double counting.

- 6.33 We have taken the view that it would not be appropriate to add the 10% discount to our worst case scenario; however a 10% discount may be appropriate for the best case scenario as this broadly accepts the Council's anticipated delivery rates and timescales without compelling evidence and only removes clearly constrained sites that arguably should have not been included anyway.
- 6.34 Therefore for the mid-point figures we use to calculate total supply we have applied a 5% discount, which we consider to be a robust position.

Table 4.6 (Row O) – Reserve Sites Buffer / Green Belt Housing Requirement

- 6.35 This row applies a 20% buffer to the Green Belt supply requirement to account for c and long lead-in times. Again, we fully support this discount as it provides flexibility and choice within the Green Belt site typology, without leading to any double counting with the 10 or 15% discount applied for non-delivery of the SHLAA sites.

Overall Delivery Assumptions

- 6.36 Given the variety of different site types/ sizes and sources within the St Helens housing supply and the lack of a detailed trajectory or any supporting monitoring evidence we have taken a bespoke approach to our assessment, providing both best and worst case scenarios to give a balanced view, including the following assumptions:
- Using the Council's delivery rates on sites that are under construction or that have consent and are due to start on site within years 1-5, due to the Council's reasonable delivery record in recent years (with them delivering in excess of their trajectory target in 2017/2018). This includes 2 of the brownfield allocations (3Ha and 9HA).
 - On the remaining brownfield allocations (6HA and 10HA) we have applied the approach advocated by the Lichfields Report published in November 2016, entitled 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?'. For sites between 500-999 units (as the two brownfield allocations are) it suggests an average lead in time of 9.2 years from first being identified in a plan (3.9 years to submission of the first planning application then 5.3 years to start on site), with average delivery rates of 68 per year after that.
 - On remaining SHLAA sites due in years 6 onwards, we have used standard delivery rates of 30 dpa on sites over 50 units, and 15 dpa on sites less than 50.
 - We have generally allowed a 1-year lead-in for sites with full consent or with Reserved Matters/ Discharge of condition applications in, 2 years for outline schemes with evidence of ongoing activity, and 3 years for outlines with no further evidence.
 - In respect of the proposed Green Belt allocations, we have applied the Council's projected lead-in times and build out rates as these look to be well staggered across the plan period,

and with variable rates that we assume take account of site-specific factors (albeit this is not evidence or broken down individually). For balance we also applied the Lichfield approach set out above (suggesting an average lead in time of 8 years for sites between 100-499 units, with delivery rates of 60 dpa; and 9.2 years and 68 dpa for sites between 500-999 units). The Lichfield approach actually generates higher delivery so this has been used in the best case scenario (**at Appendix 9a**) with the Council's own rates for the worst case scenario (**Appendix 9b**).

- 6.37 In terms of pushing sites to later in the plan period, or discounting them entirely we have applied the definitions of deliverable and developable sites within the glossary of the 2019 NPPF, as set out below:

"Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

Developable: *To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".*

- 6.38 Accordingly, larger sites with outline or expired consents or other obvious constraints which do not meet the definition of deliverable, have been moved to later years of the plans.

- 6.39 We have also removed several sites entirely where some of all the following applied:

- Site in existing alternative use with no current prospect of that ceasing;
- Access required through third party land (with no evidence that this is available or achievable);
- Large scale clearance of buildings required to bring forward for residential.
- Viability concerns acknowledged within the SHLAA;
- Mixed ownership/ legal issues (with no evidence that these can be overcome);

- Site constraints such as flood risk, contamination, noise, adjacent uses flagged as an issue within the SHLAA.

- 6.40 In the best case scenario at **Appendix 9a** we have generally moved constrained sites to the later part of the plan period on the basis that these issues can be overcome in the medium to long term, and only removed those with obvious major issues – which applies to **10 sites, totalling 278 units** (highlighted orange).
- 6.41 In the worst case scenario at **Appendix 9b** we have removed all sites with multiple constraints – which applies to **25 sites, totalling 598 units** (also highlighted orange).
- 6.42 Having taken all the above into consideration we projected a total plan period supply of between 8,541 (worst-case scenario) and 9,824 (best case scenario). This generates a midpoint of 9,183 which in turn equated to a total SHLAA supply mid-point of **6,738** (from 1st April 2017- 31st March 2035), which can be entered Row E of Table 4.6.
- 6.43 Accordingly, our assessment of St Helens total housing supply and Green Belt allocation requirements is set out on the following page, with the full trajectories attached at **Appendix 9**.
- 6.44 Overall, this supply analysis suggests the Council will need to allocate additional Green Belt land for at least **2,243 dwellings**, based on a requirement of 570 dpa (and **868 dwellings** if the 486 dpa figure is pursued).] (14)
- 6.45 It is pertinent that this figure includes some headroom to allow for under-delivery, however this is only applied (at a rate of 20%) to the Green Belt element of the supply, which only represents 1/3 of the total supply. However, such a buffer is equally applicable across the total supply to allow for under delivery but also to provide a range and choice of sites for development, as advocated by the NPPF.] (14)
- 6.46 If a 20% buffer was sought across the total supply, then this would require additional land for 3,204 dwellings; whilst a 10% buffer would equate to 2,365 dwellings.
- 6.47 Even if the Council's own supply and requirement figures are used then there will be a surplus supply of just 361 dwellings, equating to just 4.98% of the total, which leaves minimal flexibility. In this case a 20% buffer would require land for an additional 1,088 units; whilst 10% would require 364 units.

Figure 6.2 – Total Housing Supply 2016-2035

	Requirements	Council claimed position	Council's reqt with Peg supply and methodology	Pegasus position
a	St.Helens housing requirement (19 years from 1st April 2016 to 31st March 2035) at average of 486 dpa / 570 dpa	9,234	9,234	10,380
b	Expected completions by 1st April 2020	1,989	1,989	1,989
c	Residual requirement over Local Plan period from 1st Apr 2020 to 31st March 2035	7,245	7,245	8,391
d	Anticipated supply			
e	Total SHLAA supply– 1st April 2017 until 31st March 2035/ From Pegasus Trajectory	7,817	6,378	6,378
	... consisting of:			
f	<i>Large sites (0.25ha or 5 units and above) - planning permission not started as of 1st April 2017</i>	1,581	n/a	n/a
g	<i>Large sites with planning permission under construction as of 1st April 2017</i>	654	n/a	n/a
h	<i>Large sites with planning permission but stalled as of 1st April 2017</i>	289	n/a	n/a
i	<i>Large sites - no planning permission as of 1st April 2017 in Local Plan/ in 2017 SHLAA</i>	4,107	3,763	3,763
j	<i>Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowance)</i>	1,395	475	475
k	Estimated SHLAA supply – 1st April 2020 until 31st March 2035/ calculated from From Pegasus Trajectory	6,344	5,060	5,060
l	SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18)/ 5% off overall plan	794	253	253
m	Residual SHLAA capacity over 15 year Plan period (1st Apr 2020 - 31st March 2035)	5,550	4,807	4,807
n	Required capacity to be found on Green Belt land	1,695	2,438	3,584
o	Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (site allocations 5HA to 15HA inclusive) (to allow for contingencies e.g., infrastructure provision, delays, lead-in times, to start of housing delivery etc.)	2,034	2,926	4,301
p	Total capacity of allocated sites removed from the Green Belt (sites 1, 2, 4, 5, 7 and 8 HA) (1st April 2020- 31st March 35) Counting up table 4.7 equates to 2,058	2,056	2,058	2,058
q	Total supply over plan period	7,606	6,865	6,865
	Total headroom % on residual requirement	4.98%	-5.24%	-18.19%
	Total headroom numbers on residual requirement	361	n/a	n/a
	Additional allocations required to meet requirement (with GB headroom)	n/a	868	2,243
	Additional requirement to give overall 10% headroom	364	1,105	2,365
	Additional requirement to give overall 20% headroom	1,088	1,829	3,204

Housing Delivery Test

- 6.48 The first round of Housing Delivery Test (HDT) results were issued in February 2019, which applies a standardised approach to housing delivery over the preceding 3-year period for all the Local Authorities across the country (in line with the HDT Measurement Rulebook and paragraphs 73-75 of the NPPF).
- 6.49 The resultant percentage figure used to confirm which buffer should be applied in the five-year supply calculation (5% if delivery is above 85% and 20% if below). In addition, if delivery has dropped below 95% the Council are required to prepare an Action Plan to assess the causes of under-delivery and identify actions to increase delivery in future years. Finally, if delivery is below 25% (in the current 2018 results but increasing to 45% in 2019 and 75% in November 2020 under transitional arrangements), then the tilted balance in relation to the presumption in favour of sustainable development is engaged.
- 6.50 In the case of St Helens this suggests a figure of 98% meaning that the 5% buffer is applicable, and an action plan is not required.

Figure 6.3 – Housing Delivery Test

	2019 HDT completions	2019 HDT requirement	Local Plan Requirement	Delivery against HDT requirement	Delivery against Local Plan Requirement
2015/2016	575	532	570	43	5
2016/2017	487	518	570	-31	-83
2017/2018	411	454	570	-43	-159
	1,473	1,504	1,710	-31	-237
Average dpa/ HDT %	491	501		97.94%	87.95%

Shortfall (pre 2015)	1,805		
5 year requirement	2,850		
5 year requirement + shortfall	4,655		
Shortfall required in 3 years (3/5ths of total)	2,793	against real reqt w/shortfall	52.74%

- 6.51 As can be seen from the table, St Helens delivered 1,473 new homes over the last three years against a 'requirement' of 1,504 dwellings; although it is pertinent that this requirement is based on the household projections (under transitional arrangements in the first 3 years of the HDT process) and is therefore artificially low, as the local plan requirement over the same period is 1,710 (206 higher). If delivery is considered against the adopted plan requirement the HDT figure drops to 88%.
- 6.52 Furthermore, it must be stressed that the household projections do not reflect the level of housing that should have actually been delivered over the last three years in St Helens and does not take

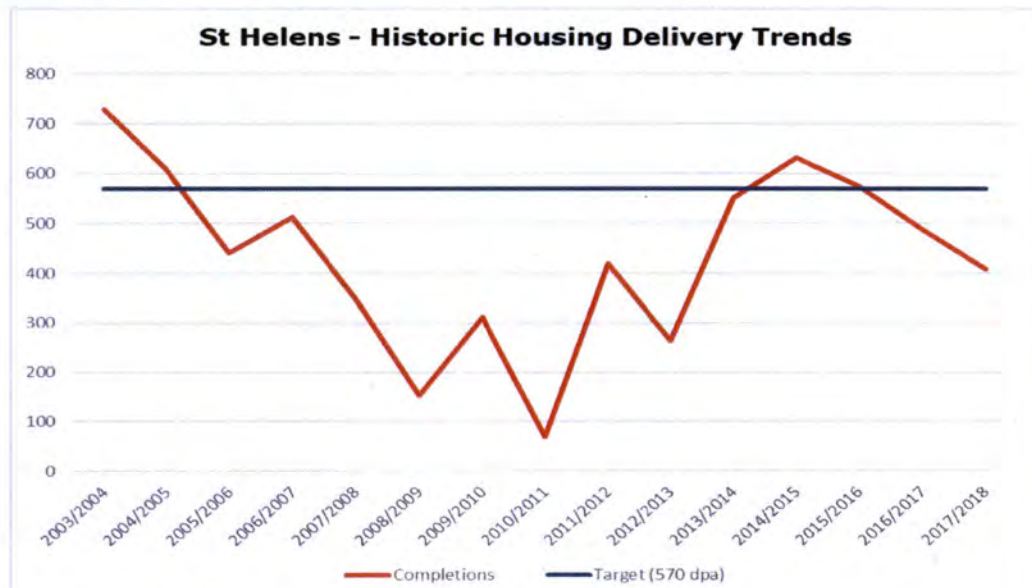
account of any historic under delivery, which is an issue in St Helens. Whilst the HDT and standard methodology effectively resets the clock and clears and past under delivery, the NPPG does confirm (at paragraph 2a-011-20190220) that where an alternative approach to the standard method is used, as it is in St Helens, past under delivery should be taken into account.

- 6.53 In the case of St Helens, a review of figures 6.3 and 6.4 below confirms there has been major under-delivery within St Helens dating back to 2003, when the RSS period began and the 570 dpa requirement figure was introduced, generating a total shortfall of 1,805 dwellings at 1st April 2015 (when the current HDT period begins).

Figure 6.4 – Historic Completions

	Live Table 122 Net Completions	Local Plan Requirement	Mixed Local Plan Requirement	Delivery against Local Plan Requirement	Delivery against Mixed Local Plan Requirement
2003/2004	728	570	570	158	158
2004/2005	607	570	570	37	37
2005/2006	442	570	570	-128	-128
2006/2007	512	570	570	-58	-58
2007/2008	348	570	570	-222	-222
2008/2009	152	570	570	-418	-418
2009/2010	311	570	570	-259	-259
2010/2011	69	570	570	-501	-501
2011/2012	419	570	570	-151	-151
2012/2013	264	570	570	-306	-306
2013/2014	551	570	570	-19	-19
2014/2015	632	570	570	62	62
2015/2016	575	570	570	5	5
2016/2017	487	570	486	-83	1
2017/2018	408	570	486	-162	-78
TOTAL	6,505	8,550		-2,045	-1,877
Average dpa	434	570		-136	-125

Figure 6.5 – Historic Housing Delivery Rates



Delivery figures from MCHLG Net Additions by Local Authority District Live Table 122

- 6.54 This meant that the actual annualised requirement the Council should have achieved from 1st April 2015 to 31st March 2020 was 931 dwellings per annum (i.e. $1,805 / 5 = 361 + 570 = 931$), which equates to **2,793 dwellings** over the 3-year period to 31st March 2018.
- 6.55 When considered against this elevated requirement, the 1,473 completions look less impressive and represents just **52%** of the requirement.
- 6.56 Notwithstanding this, the result of the HDT confirms that the 5% buffer is applicable when calculating 5YHLS in St Helens.

Five Year Housing Land Supply

- 6.57 The Council do not confirm their 5-year housing land supply position within the Submission Plan, yet their 2017 SHLAA concludes the following in Figures 45.4 and 5.5:
- Based on the 570 dpa Core Strategy requirement, the Council claim a **2.7 year supply**.
 - Based on an OAN figure of 451 dpa, they claim a figure of **5.3 year supply**.
- 6.58 Clearly the position has moved on since the 2017 SHLAA, indeed a 2018 base date can now be used to calculate supply, as can the Council's proposed requirement figure of 486 (albeit we are still advocating the use of the 570 dpa figure).
- 6.59 Accordingly, we set out our analysis of the Council's 5YHLS position below, using various different scenarios for both the requirement and supply side inputs to give a range of figures.

Figure 6.6 – Five Year Housing Land Supply

5 YEAR HOUSING LAND SUPPLY (1ST APRIL 2018 BASE DATE)	Council's Requirement		Pegasus Requirement	
Annual requirement	486		570	
5 year requirement	2,430		2,850	
Shortfall (plan period/ 2016-2018)	77		245	
Shortfall (historic/ 2003-2018)	1,877		2,045	
Buffer	5%	20%	5%	20%
Total requirement (no shortfall)	2,552	2,916		
Total requirement (with plan period shortfall)	2,632	3,008	3,073	3,512
Total requirement (with historic shortfall)	4,522	5,168	4,963	5,672
Council Claimed Supply	2,726			
Pegasus Supply (10% discount applied to Peg trajectory)	2,816			
Council 5YHLS (no shortfall)	5.34	4.67		
Council 5YHLS (with plan period shortfall)	5.18	4.53	4.43	3.88
Council 5YHLS (with historic shortfall)	3.01	2.64	2.75	2.40
Pegasus 5YHLS (with plan period shortfall)	5.35	4.68	4.58	4.01
Pegasus 5YHLS (with historic shortfall)	3.11	2.72	2.84	2.48

- 6.60 We conclude that the Council's supply is **2.84** or **4.58 years** depending whether shortfall is considered over the long-term (2003 onwards) or shorter term (2016 onwards), using the 570 dpa requirement and the 5% buffer as required by the HDT.
- 6.61 Within that it is pertinent to note that we have not applied a lapse rate for non-delivery as we have to the full supply figures. This is because we have been through on a site by site basis and therefore wanted to avoid double counting; however given the limited evidence on delivery rates presented by the Council it is highly likely that there will be additional slippage, particularly on sites that are already under construction or that have consent and are due to start on site within years 1-5, where we have accepted the Council's projections.
- 6.62 By way of comparison, using the Council's own supply figures and 486 requirement puts them between 3.01 and 5.18 years (with the same approach to shortfall), and with the 570 requirement between 2.75 and 4.43 years.
- 6.63 This combination of historic under-delivery and the 5-year supply shortfall (which it accentuates) provide further support for releasing additional sites now, on top of the Green Belt sites already proposed for allocation, to aid delivery in the first five years of the plan. This should also negate the need for an early review, or the risk of taking a plan to examination without a deliverable 5-year supply.
- 6.64 In short there are acute housing supply issues in the area that should be addressed at the earliest opportunity.

Conclusions on Housing Land Supply

- 6.65 Overall, this supply analysis suggests the Council will need to allocate additional Green Belt land for at least **2,243 dwellings** to meet shortfall within the first 5 years and across the full plan period.
- 6.66 Whilst housing delivery in recent years has been relatively strong, reflected in the 98% performance within the Housing Delivery Test, this masks acute under-delivery in the years before that, dating back to 2003.

7. STRATEGIC HOUSING SITES & SAFEGUARDED LAND (POLICIES LPA05.1 & LPA06)

- 7.1 This section assesses the overall distribution and site selection strategy set out in Policies LPA05.1 and LPA06, including a detailed critique of the 10 strategic housing sites and 8 safeguarded housing sites and supporting evidence base, and a comparison with the approach taken within the Preferred Options consultation in December 2018, and with our assessment of the site at Burrows Lane (as set out in section 3 and attached at **Appendix 6**).
- 7.2 The 18 individual site assessments can also be found attached at **Appendix 6**.

Proposed Housing Allocations and Safeguarded Sites

- 7.3 The Submission Plan proposes the allocation of 10 Housing Sites (Refs: 1HA – 10Ha) in Table 4.5 suggesting these have capacity to deliver **7,040** dwellings in total. Notably, **2,955** of these dwellings are expected to be delivered beyond the plan period (i.e. post 2035) with **4,085** expected within the plan period.
- 7.4 Of these 10 sites, seven are listed as 'Strategic Housing Sites' in Policy LPA05.1 (Ref: 2Ha, 3Ha, 4Ha, 5Ha, 6Ha, 9HA, 10HA) on the basis of their scale – over 300 units.
- 7.5 Four of these are brownfield sites (3HA, 6HA, 9HA and 10HA), which have been identified within the SHLAA for up to **2,029** dwellings within the plan period. The remaining 6 (1HA, 2HA, 4HA, 5HA, 7HA, and 8HA) are proposed for release from the Green Belt and have an estimated capacity of **2,056** dwellings in the Plan period.
- 7.6 The Council have also identified 8 Safeguarded Sites for housing within Policy LPA06 and Table 4.8 with a suggested capacity for **2,641** dwellings.
- 7.7 We assess the implications this has on the overall housing supply in section 6, but first we look at the site selection process and distribution of sites in the current plan and compare this to the previous Preferred Options.
- 7.8 Firstly, it is clear that there has been a substantial reduction in the number of allocated and safeguarded sites, as demonstrated in the table below, and there has also been significant changes in distribution (with various sites added, upgraded and downgraded, or changed in size):

Figure 7.1 – Changes in Allocations from Preferred Options to Submission Version

Site Type	Preferred Options Version	Submission Version	Change	% change
Allocated sites	16	10	-8	-50%
New Brownfield allocations	0*	4	4	n/a
Safeguarded Land	24	8	-16	-66%

* Sites 3 Ha and 10Ha were included in the 2016 SHLAA that supported this, whilst site 9HA was discounted as was still in active use.

- 7.9 Notwithstanding our comments in section 4 regarding the overall housing requirement, it is logical that a reduction in numbers would lead to a reduction in allocations and safeguarded sites; however regardless of the overall target it is our strong view that the scale of reductions and changes have not been justified in the Submission Plan and need to be revisited.

Quantum of Housing Allocations (Policy LPA05.1)

- 7.10 As noted we fully support the Council's decision to allocate a mix of brownfield and Green Belt allocations of varying sizes to provide the range and choice of sites required by the NPPF.
- 7.11 However, as set out in section 6, our analysis of the housing requirement and existing housing supply indicates that the Council will need to make significant additional allocations to meet their needs in full and provide enough of a buffer to provide additional choice and flexibility and to allow for under-delivery.
- 7.12 Based on our suggested requirement figure of 570 dpa, which equates to 10,380 over the plan period, and a total supply of 6,378 (the mid-point of the two supply scenarios set out in **Appendix 9**), we consider that the Council will need to allocate land for **2,243** additional dwellings, rising to 3,204 dwellings to provide 20% headroom on the total supply.
- 7.13 If the Council's proposed requirement figure of 486 is used there is still a shortfall of 868 dwellings (rising to 1,829 to achieve the 20% headroom) that must be met through additional allocations.
- 7.14 Finally, it is worth noting that the Council's focus and incentivising of brownfield redevelopment for high density urban housing developments (see Policy LPA02 - Part 3), which is evident from recent consents and applications within the SHLAA, may also generate a longer term need for lower density family style housing on greenfield urban fringe sites, such as the allocations proposed, as these urban young professionals move up the property ladder and their lifestyle and requirements change. As such, allocating additional greenfield/ Green Belt sites will generate increased choice and liquidity in the market in the medium to long term.

Quantum of Safeguarded Housing Sites (Policy LPA06)

- 7.15 We fully support the Council's decision to identify areas of safeguarded land through the Green Belt Review within this Local Plan process, as this fully accords with paragraphs 136 and 139 of the NPPF, which look for changes to green belt boundaries to have a degree of permanence and endure beyond the plan period.
- 7.16 That said, whilst the previous version of the plan identified 24 safeguarded sites capable of delivering 7,895 units (equating to 13.8 years' worth of supply), the current plan identifies 8 sites for just 2,641 units (equating to just 5.4 year supply against the Council's current target, and 4.6 years against the previous 570 dpa target). This represents a stark reduction in the number of safeguarded sites and the associated capacity, with a total of 19 safeguarded sites omitted and others reduced in size, whilst some of the previous allocations have now been downgraded to

safeguarded sites. Those retained have largely increased their capacity through increased suggested densities.

- 7.17 Notably, the Council state that site 3HS at Eccleston Golf Club might be capped at 500 dwellings until highway issues have been resolved but retain 956 dwellings as its total capacity. If this cap is applied then the safeguarded supply reduces further to 2,185 (to just 4.5 years against the 486 target, and 3.8 years against the previous target).
- 7.18 This is clearly insufficient, as it fails to follow the NPPF guidance that green belt boundaries should endure beyond full plan periods. It follows that the supply of safeguarded sites should last at least 15 years, which is the standard Local Plan period as advocated at paragraph 22 of the NPPF.
- 7.19 Accordingly, based on a housing requirement of 570 dpa, the Council should be safeguarding land for at least 8,550 dwellings, **6,365** more than currently planned for (with the 456 units removed from site 3HS due to uncertainty).
- 7.20 Even based on the Council's proposed figure of 486 dpa, we would suggest safeguarding land for an additional **5,105** dwellings.
- 7.21 In addition to this, we would recommend that Policy LPA06 builds in flexibility to release or phase the release of safeguarded sites without a formal plan review, if the monitoring process indicates delivery targets are not being met. This should provide a quicker way to boost supply than the Local Plan process, which in the case of the current process can take 3-5 years to complete.
- 7.22 This could potentially be tagged to performance against the Housing Delivery Test and added to the Monitoring Framework in Appendix 4, potentially replacing the current trigger (early review of the plan if 10% or more of safeguarded land is granted planning consent) as mentioned in section 5.

Safeguarded Employment Sites

- 7.23 Whilst we have not undertaken a comprehensive review of employment sites and future needs, we note that there are only 2 large employment sites identified for safeguarding (Refs: 1ES and 2ES set out in table 4.7) totalling over 85.88 Ha.
- 7.24 We have also noted through our review of the SHLAA that several existing employment sites (of various sizes) within the urban area are either being redeveloped or due to be redeveloped over the emerging plan period. As such, it might be prudent to consider safeguarding additional land that could come forward for housing or employment to provide choice and flexibility and an alternate location and size to the 2 existing safeguarded sites. This could also serve to free up additional urban land for residential development in the future.
- 7.25 Overall, based on our analysis, the Council will need to make additional allocations for the following:
- Housing allocations – 2,243

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

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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.

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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)

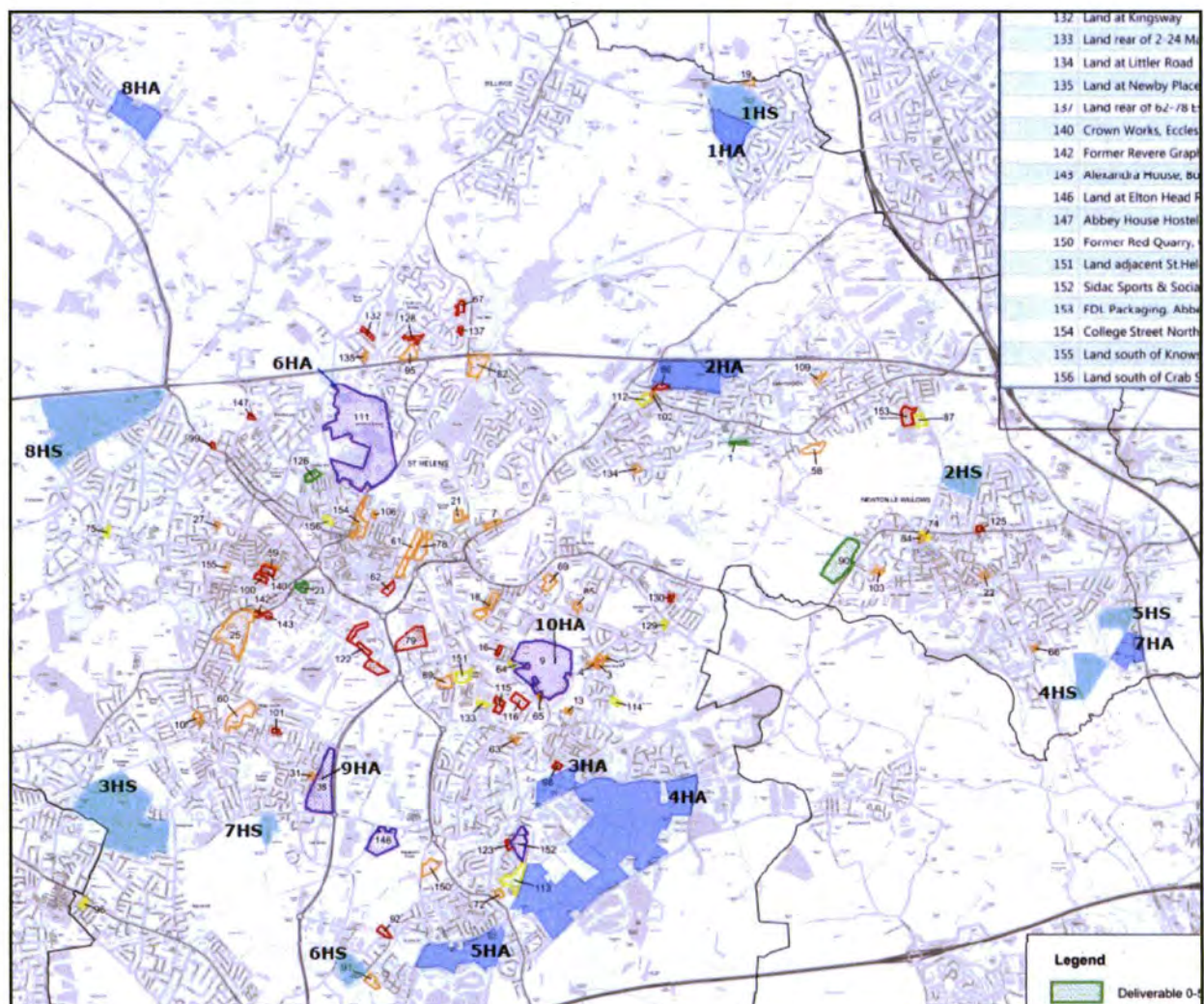


Figure 7.3 – Key Settlements Plan

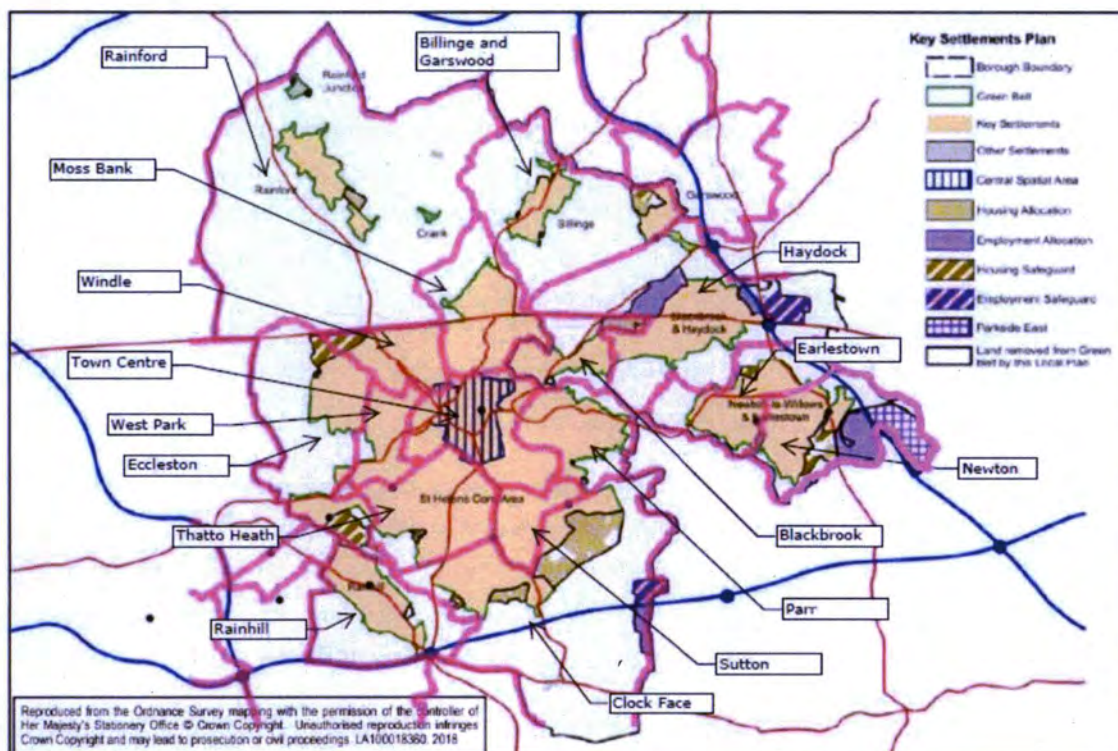


Figure 7.4 – Table showing Local Plan Distribution

AREA	SUB AREA	Total	Percentage	% of Core Area
St Helens 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%
	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%
Key Settlements	Blackbrook and Haydock	711	4.6%	
	Newton Le Willows & Earlestown	1,805	11.7%	
	Rainford	314	2.0%	
	Billinge including Garswood	514	3.3%	
	Rainhill	29	0.2%	
Other Settlements	Windle	1,180	7.7%	
TOTAL		15,407		

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. ③
- 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. ③
- 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 wholesale 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.] ③

- 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
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
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. ③

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
Likely to promote positive effects	4

Figure 7.7 – Sustainability Appraisal Assessment of Proposed Allocations against Burrows Lane site

Site Reference	Council's SA Score	Site Reference	Pegasus SA Score
5HA	53	5HA	53
9HA	52	9HA	52
2HA	51	2HA	51
3HS	51	Burrows Lane	51
3HA	50	3HA	50
2HS	49.5	10HA	49.5
6HS	49	3HS	49.5
7HS	48	6HS	49.5
1HA	47	2HS	48.5
6HA	47	7HS	48
4HS	47	1HA	47
7HA	45.5	4HS	47
1HS	45.5	7HA	45.5
5HS	45	6HA	45
8HA	44.5	5HS	45
Burrows Lane	44.5	1HS	44.5
4HA	43.5	8HA	43.5
8HS	43.5	4HA	43

- 7.50 In respect of Burrows Lane, it is clear that the site ranks towards the lower end of the AECOM assessment, albeit allocation 4Ha and safeguarded site 8HS score lower, with another 4 sites within a point, suggesting that it is relatively sustainable and should be considered for allocation. (4)
- 7.51 In addition, our own assessment ranks it as one of the most sustainable, based on our extensive knowledge of the site and access to technical information that may not have been available to AECOM (albeit we acknowledge that there may be similar additional information available to elevate other sites).

Deliverability/ Developability Assessment

- 7.52 In addition to our analysis of the Green Belt purposes and Sustainability criteria, we have also looked in detail at the deliverability and developability of the 18 proposed allocations, which is again set out within **Appendix 6**.
- 7.53 A summary table of findings is set out below, which highlights in red the sites that we consider have deliverability issues, namely sites 4HA, 6HA, 10HA, 1HS and 7HS, which equates to over half the proposed allocations (4,981 of 9,681). (16)

Figure 7.8 – Deliverability Assessment of Proposed Allocations against Burrows Lane site

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.
6HA	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.
Burrows Lane	Redrow have Development Option on the whole site. Due diligence and technical work confirms no deliverability issues.

7.54 This demonstrates potential deliverability issues with several sites, including the following:

- At least 2 of the proposed allocations (6Ha and 7Ha) and 3 of the safeguarded sites (1HS, 3HS and 7HS) have no known developer or housebuilder signed up, raising availability and achievability concerns.
- Site 4HA has 11 different landowners which could generate significant land assembly issues. Whilst Taylor Wimpey and St Helens Council have interests in some of the 4ha land parcel, the other 9 land owners have no affiliation with house builders or land promoters, which

raises questions as to whether these landowners are willing to develop and indeed questions about overall market interest.

Local Opposition / Political Element

- 7.55 In addition to the Council's formal evidence base and our own detailed analysis of the chosen sites and selection methodology, we have reviewed the various documentation that went to the Council's Cabinet in December 2018 to support the Submission Plan, including various reports on responses received to the previous Preferred Options consultation.

Figure 7.9 – Table of Consultation Responses to Preferred Options Local Plan by Area

RANK	AREA	NO OF RESPONSES	NO OF SITES				
			Removed	Added	Retained	Upgraded	Downgraded
1	Rainford (incl. Crank)	977	5		1		
2	Newton-le-Willows	804	7		2		1
3	Eccleston (inc Eccleston Park, Eccleston Mere)	672	2				2
4	Billinge (inc Bilinge & Seneley Green, Garswood)	593	2		2		
5	Haydock	557	3				
6	Rainhill	554	2				
7	Windle	303					
8	Bold (inc Sutton Manor, Clock Face)	88	2	1	1	2	1
9	Moss Bank	72	2				1
9	Thatto Heath	72		1	1		
11	West Park	52					
12	Blackbrook	41			1		
13	Sutton	40		1			
13	Parr	40					
15	Town Centre	34		1			
16	Earlestown	11					
TOTALS		4,910	25	4	8	2	5

December 2018 Cabinet Report – Appendix 5 – Preferred Options Local Plan – Number of responses by area

- 7.56 This table illustrates that those areas that attracted the highest level of local representation (most notably Rainford, Eccleston, Haydock and Rainhill) also saw the most site allocations removed or downgraded (from allocated to safeguarded).
- 7.57 This would suggest that many of these sites have been removed in response to local opposition.

Conclusions on Site Allocations

- 7.58 This section has demonstrated that the Council will need to allocate significant additional sites regardless of which housing requirement is used (for at least **2,243** dwellings within housing allocations, and **6,365** dwellings on safeguarded sites); whilst it has also highlighted major flaws

in the site selection methodology, which suggests that further site analysis and a more robust process is needed if the Council is intent on removing such a significant number of sites.

- 7.59 Based on our detailed comparative analysis of the land at Burrows Lane against the chosen sites (see section 3 and **Appendix 6**), it is our strong view that the site should be reconsidered and allocated for development.

8. HOMES AND COMMUNITIES POLICIES (CHAPTER 6)

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

Policy LPC01 - Housing Mix

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

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

Policy LPC02 – Affordable Housing

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

- 8.17 However, the Viability Assessment 2019 does raise viability issues with some of the proposed affordable requirements, with 30% affordable on greenfield sites within Zone 2 not considered viable at 30 dph and only marginally improved at 35 dph. One site remains unviable at 35 dph, with the others having very narrow margins of viability. Furthermore, when the cumulative impacts of the other policies within the Plan, on top of the 30% affordable requirement, the situation gets worse. (15)
- 8.18 Whilst we acknowledge that there is some flexibility built into the policy, with part 4 noting that affordable provision may vary on a site by site basis dependant on local need and viability; we would still request that the Council give further consideration these requirements and zonings before the plan is submitted, as there are obviously discrepancies with the evidence. (18)
- 8.19 With regard to the overall affordable need, table 15 of the 2019 SHMA Update confirms a net need of 117 affordable dwellings per annum for the period 2016- 2033, this equates to approximately 24% of the annual housing target of 486 dpa in the Submission Local Plan, which would seem to broadly align with the variable affordable requirement within this policy (ranging between 10 and 30%). ✓
- 8.20 However, we note that table 87 of the previous Mid Mersey SHMA 2016 confirmed a net need for 96 affordable dwellings; compared to an overall housing requirement of 570 dpa in the Preferred Options (which included an affordable housing uplift).
- 8.21 As such, whilst affordable need is clearly increasing (by 22% between 2016 and 2019) the overall housing requirement has reduced by 15%, suggesting that the plan is not providing sufficient support for affordable housing. (18)
- 8.22 We would also kindly ask if the Council could issue further information on past affordable housing delivery. We note the last Annual Monitoring Report is dated 2011 and therefore somewhat out of date. (18)

Policy LPC04: Retail and Town Centres

- 8.23 We fully support the identification of Eccleston as a Local Centre, which reflects the various local services and facilities present in the area and indeed demonstrates the sustainability credentials of Eccleston as a whole. (19)

9. OTHER RELEVANT POLICIES (CHAPTERS 4, 5, 7 & 8)

9.1 This section addresses the remaining policies in the Plan that are considered relevant to Redrow.

Policy LPA07 - Transport and Travel

9.2 Redrow are generally supportive of this policy and welcome the fact that our previous comments to the Preferred Options have been taken account of (regarding consistency of wording with NPPF paragraph 32/ now 109); however, we still have concerns with some elements of the policy as drafted.

9.3 Firstly, part 3(c) states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst Redrow do not oppose the provision of electric charging points, we would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements as they arise in different locations, rather than imposing a blanket requirement on all developments, as this could require a massive over provision of capacity (additional substations etc) which is never properly utilised.

9.4 Part 9 goes on to note that details of the operation of this policy including standards for vehicle charging provision will be set out in a future review of the Council's Ensuring a Choice of Travel Supplementary Planning Document (SPD). In our view, any such standards should be included in the policy rather than an SPD, so that they can be properly interrogated and justified in Local Plan Examination, as they will have a direct role in the determination of a planning applications and may also impact viability, where the energy requirements necessitate the provision of additional energy infrastructure within a development.

9.5 The Viability Assessment bears these concerns out (paragraphs 2.49 - 2.50), as it confirms that it has included a cost for £220 per dwelling for charging points, yet it goes on to note that:

"no allowance is made for any infrastructure costs that may in the future be needed if the chargers are used on a large scale".

9.6 We would also urge the Council to consult with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

Policy LPC10 - Trees and Woodland

9.7 In our view the requirement for trees to be replaced at a ratio of at least 2 to 1 is unjustified, as there is nothing in the evidence base supporting such elevated levels of planting, whilst such a requirement could prove particularly onerous on strategic sites where large scale tree clearance is required to facilitate development, both financially and in purely practical terms (if it is not possible to accommodate double the number of trees on the site).

9.8 Finally, this could have an unintended consequence of leading developers to retain low quality or damaged trees on sites, just to avoid having to replace them at a ratio 2 to 1, which could have both environmental and safety impacts.

9.9 Therefore, in our view this part of the policy should be deleted, unless further justification is provided, and at the very least it should include some relaxation to allow for clearance of low quality or damaged trees.

Policy LPC13 Renewable and Low Carbon Development

9.10 Part 4 of this policy requires proposals on strategic sites (both employment and housing) to ensure that 10% of their energy needs can be met from renewable and/ or other low carbon energy sources.

9.11 Whilst Redrow fully support the need to minimise carbon emissions, applying a blanket requirement such as this is clearly unjustified, as the Governments Housing Standards Review and Deregulation Act (both 2015) determined that energy requirements for new housing development were a matter solely for Building Regulations with no optional standards. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes and is clarified in section 56 of the NPPG, 'Housing- Optional Technical Standards', which is categoric that LPAs can only apply optional standards above and beyond Building Regulations in respect of water use, accessibility, and space standards; and even then there must be clear evidence on viability and need.

9.12 On this basis, we request that this requirement be removed.

Policy LDP07 – Digital Communications

9.13 This policy suggests that contributions may be sought from developers towards the cost of providing necessary off-site broadband infrastructure.

9.14 Redrow fully support the need for up to date digital infrastructure to be integrated in new developments, as this is a key customer requirement for all housebuilders; however, this is controlled by the service providers, so is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers.

9.15 Paragraph 112 of the 2019 NPPF is clear that local planning authorities should seek support the expansion of electronic communications networks, however it does not seek to prevent development that does not have access to such networks.

9.16 Therefore, it is our view that the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure. The Council should also note that Part R of the Building Regulations sets the appropriate standards

for high speed electronic communication networks, and as such they should not be seeking any additional local technical standards over and above this requirement.

- 9.17 In respect of any off-site contributions, these do not appear to have been considered within the Viability Assessment which only factors in provision for cable and broadband ducting and doesn't mention contributions.

Policy LPD02: Design and Layout of New Housing

- 9.18 Redrow are supportive of this policy, as it does not seek to impose prescriptive separation distance standards which can often pose as a constraint to bringing development forward. Instead, it allows for a more flexible way forward and for design solutions which can still readily achieve adequate privacy and outlook standards without policy restrictions.

Policy LPD03: Open Space and Residential Development

- 9.19 This policy relates to open space standards and notes how the standards set out in Table 7.1 will be used to guide the type, quantity and quality of open space required. Whilst we have no particular comments on the contents of Table 7.1 at this stage, we would emphasise that any open space requirements will need to be justified by up to date evidence.
- 9.20 We therefore reserve the right to comment on the Council's future open space SPD at a later date (which is referred to in Table 7.1).

10. CONCLUSIONS

- 10.1 To conclude, Redrow object to the removal of the Burrows Lane site from the emerging Local Plan, which was previously allocated as Safeguarded Land (Reference: HS08) in the Preferred Options Consultation Draft.
- 10.2 As demonstrated throughout these representations, the site is a highly suitable candidate for Green Belt release, a view which the Council previously supported. The Council's change in position is a result of its change in strategy to reduce the overall housing requirements for the District, rather than any material change in the merits of the site.
- 10.1 As outlined in our Interim Housing Need Assessment, 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.
- 10.2 The removal of previously allocated and safeguarded sites will prevent the Council from achieving these aims and should therefore be reconsidered.
- 10.3 We have identified a number of concerns with the Council's housing land supply figures, as well as the Council's methodology in assessing sites; most notably in the Burrows Lane site being given an overall 'high+' Green Belt contribution score, when it is acknowledged to make a low contribution on one of the three purposes. As demonstrated in this document, the evidence base is insufficiently robust and will need to be comprehensively updated by the Council as part of the next stage of the Local Plan process.
- 10.4 We have also demonstrated that the Council's spatial strategy currently fails to direct development towards highly sustainable key service settlements including Eccleston. It is suggested that the Council must re-address their proposed spatial strategy and allocate significant additional housing land to ensure emerging development requirements are met.
- 10.5 Accordingly, we politely request that the Council re-allocate the Burrows Lane site in the emerging Local Plan process, as it is a site which can provide a sizeable contribution to meeting the Borough's development requirements in a sustainable manner.
- 10.6 We trust the above representations are clear, but should you have any questions regarding the above, please do not hesitate to contact us. Otherwise, please keep us informed of any further consultations on the Local Plan (2020-2035) and associated documents.

APPENDIX 1- SITE LOCATION PLAN

APPENDIX 2- DELIVERY STATEMENT

LAND NORTH OF
ST HELENS ROAD

ST HELENS
MERSEYSIDE

DELIVERY STATEMENT
PI7-0098_R004 | MARCH 2019

Prepared by Pegasus Design on behalf of
I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors



PLANNING



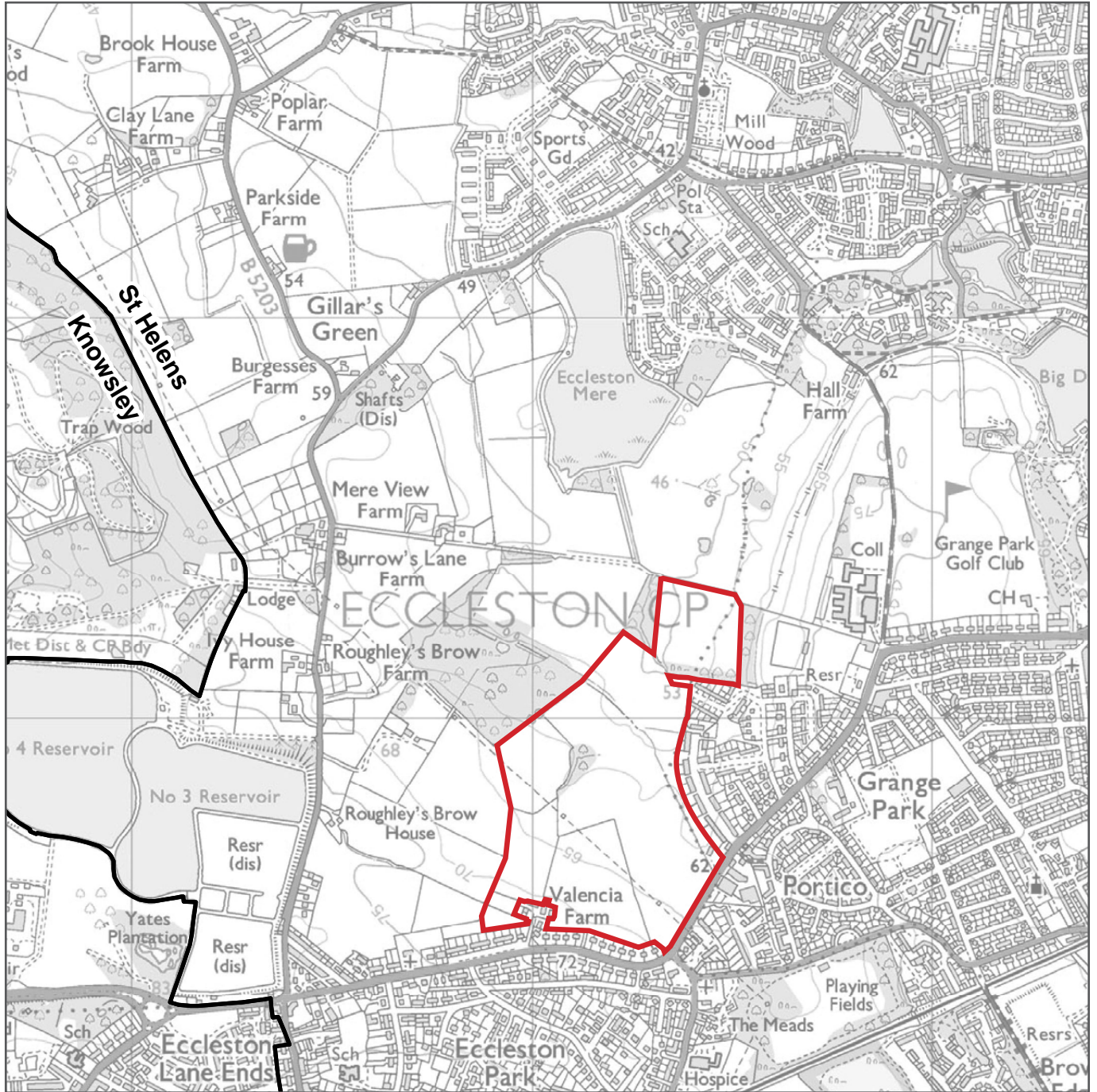
DESIGN



ENVIRONMENT



ECONOMICS



KEY

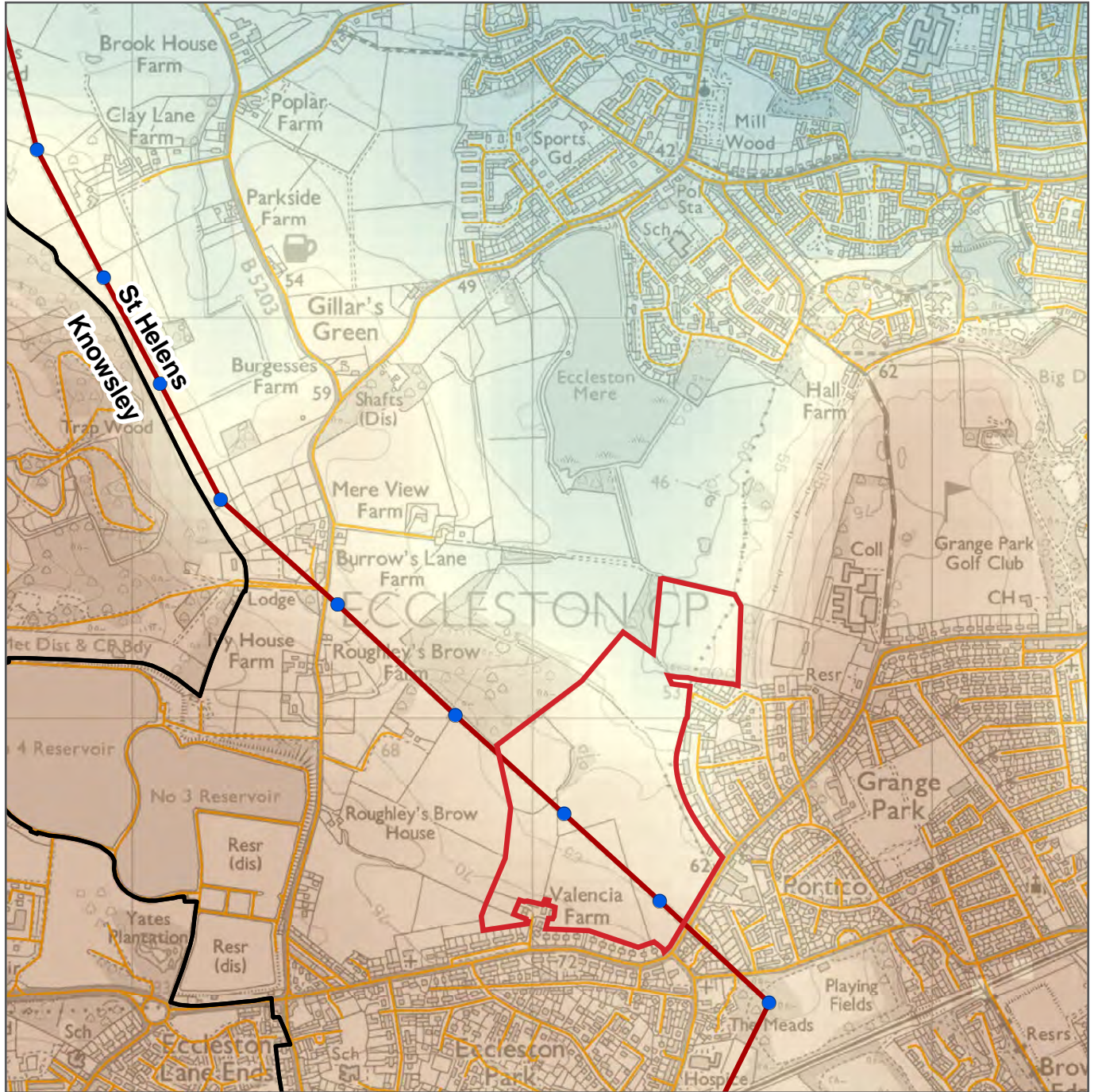
 Site Boundary

SITE LOCATION PLAN

1.1 Executive Summary

- 1.1.1 This Delivery Statement outlines proposals for the development of 35.2 hectares of land north of St Helens Road, Eccleston Park, which lies on the urban edge to the west of St Helens.
- 1.1.2 This document provides an executive summary of the site context and its suitability for residential development, demonstrating that:
- There are exceptional circumstances that support alterations to the Green Belt in the Borough and strong grounds to release this site, when tested against the 5 purposes of the National Planning Policy Framework ("NPPF").
 - In landscape terms, the site can be characterised as 'urban fringe', with urbanising features, lower lying land and wooded areas limiting its visual impact in the wider landscape and its contribution to openness.
 - The site is highly accessible and sustainably located in respect of local services and facilities, and there are no identified technical or environmental constraints that would prevent the site coming forward for development.
 - The site is deliverable, achievable and available for housing development in accordance with guidance contained in the NPPF.
- 1.1.3 As such, this site presents an excellent opportunity to deliver a high quality sustainable housing site that meets the future housing needs of the Borough, whilst also responding to the existing urban grain and wider landscape, and the enclosed Masterplan demonstrates how this can be achieved.

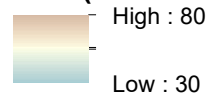




KEY

- District Boundaries
- National Grid Pylons
- National Grid Cables
- Local Roads

DTM (meters above ordnance datum)

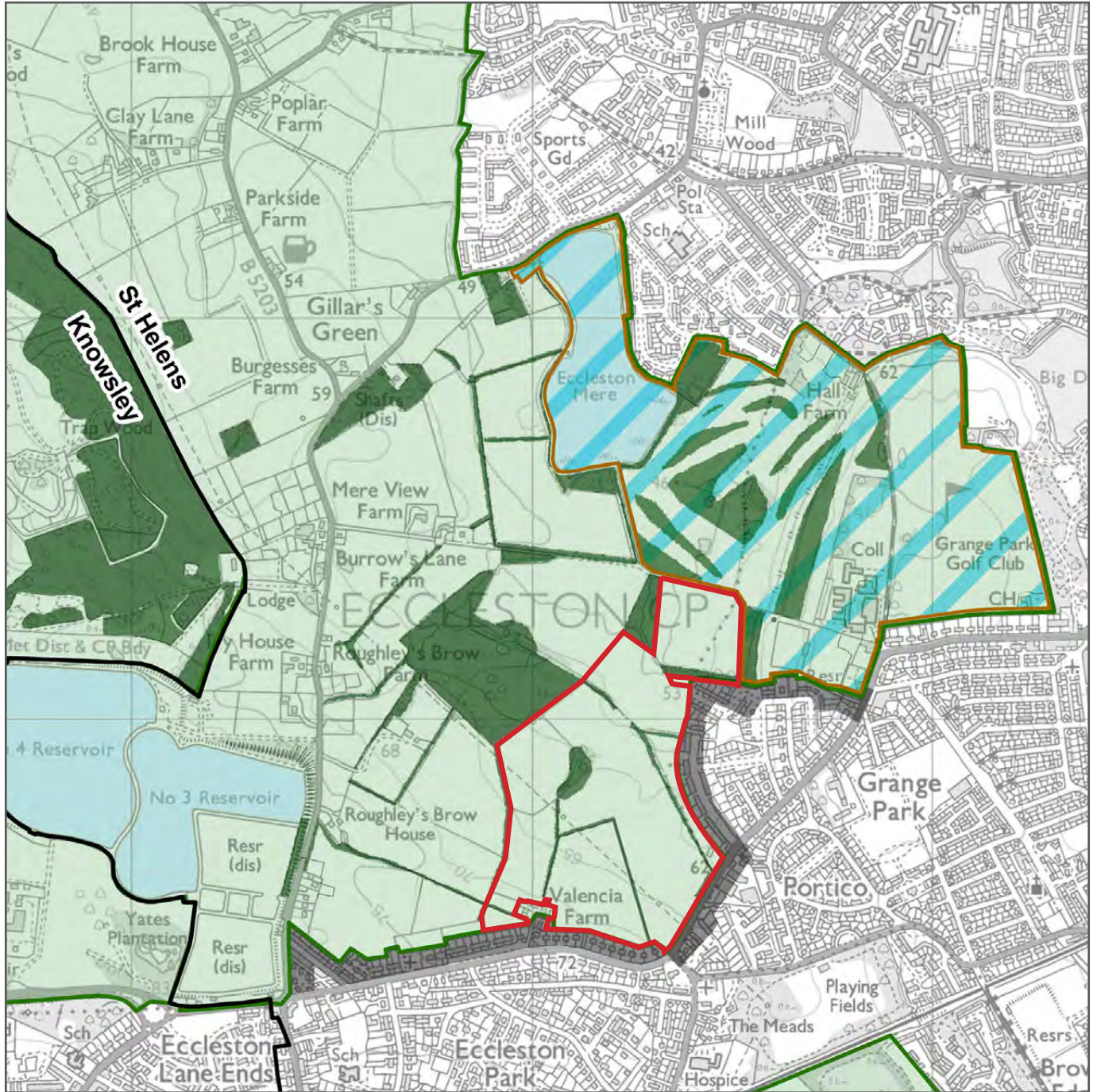


TOPOGRAPHY PLAN





1.2 The Site and Surroundings

- 1.2.1 The site is located within the Green Belt to the north of St Helens Road, Eccleston Park, approximately 3km west of St Helens.
- 1.2.2 The site measures 35.2 hectares and comprises a series of irregularly shaped fields; defined by hedgerows and trees, with a mix of residential development, hedgerows and wooded areas around the perimeter. The site is largely flat, lies within flood zone 1, and is not subject to any other landscape or environmental designations. There are overhead pylons crossing part of the site.
- 1.2.3 The south of the site is bound by the A58 St Helens Road, which will provide vehicular access to the development, and the rear gardens of existing residential developments. The west of the site is bound by agricultural fields, existing residential development and Preston and Odyssey Cricket Club.
- 1.2.4 The eastern boundary is formed by existing residential development and Grange Park Golf Course; whilst the northern boundary is characterised by a large woodland area, Sales Wood and agricultural fields, with Eccleston Mere and the settlement of Eccleston beyond.
- 1.2.5 The site is sustainably located in Eccleston Park, on the western urban edge of St Helens, which is home to a number of local facilities, including convenience stores, a Post Office, other unit shops, several schools and colleges; whilst St Helens Town Centre 3km to the east, provides a higher order centre with a range of national multiples and employment uses.
- 1.2.6 There are bus stops on Prescot Road direct adjacent to the site access, whilst Eccleston Park station is within 500m.





KEY

	Site Boundary		Woodland Belt
	Green Belt		Public Open Space
	Water Bodies		Prominent Urban Edge
	Safeguarded Sites		

GREEN BELT PLAN

2.1 The Case For Green Belt Release

2.1.1 Paragraph 135 of the NPPF confirms that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. St Helens are undertaking such a review, and the following exceptional circumstances support the release of the Prescott Road site from the Green Belt:

- An inability by the Council to demonstrate a 5-year supply of housing land.
- Insufficient land within the urban area to meet the Borough's need, even if greatly increased densities are applied.

2.1.2 In addition, the site no longer fulfils its purpose as Green Belt land as established at paragraph 133 of the Revised NPPF and, as such, there is a compelling case for its release. Its allocation for future development would:

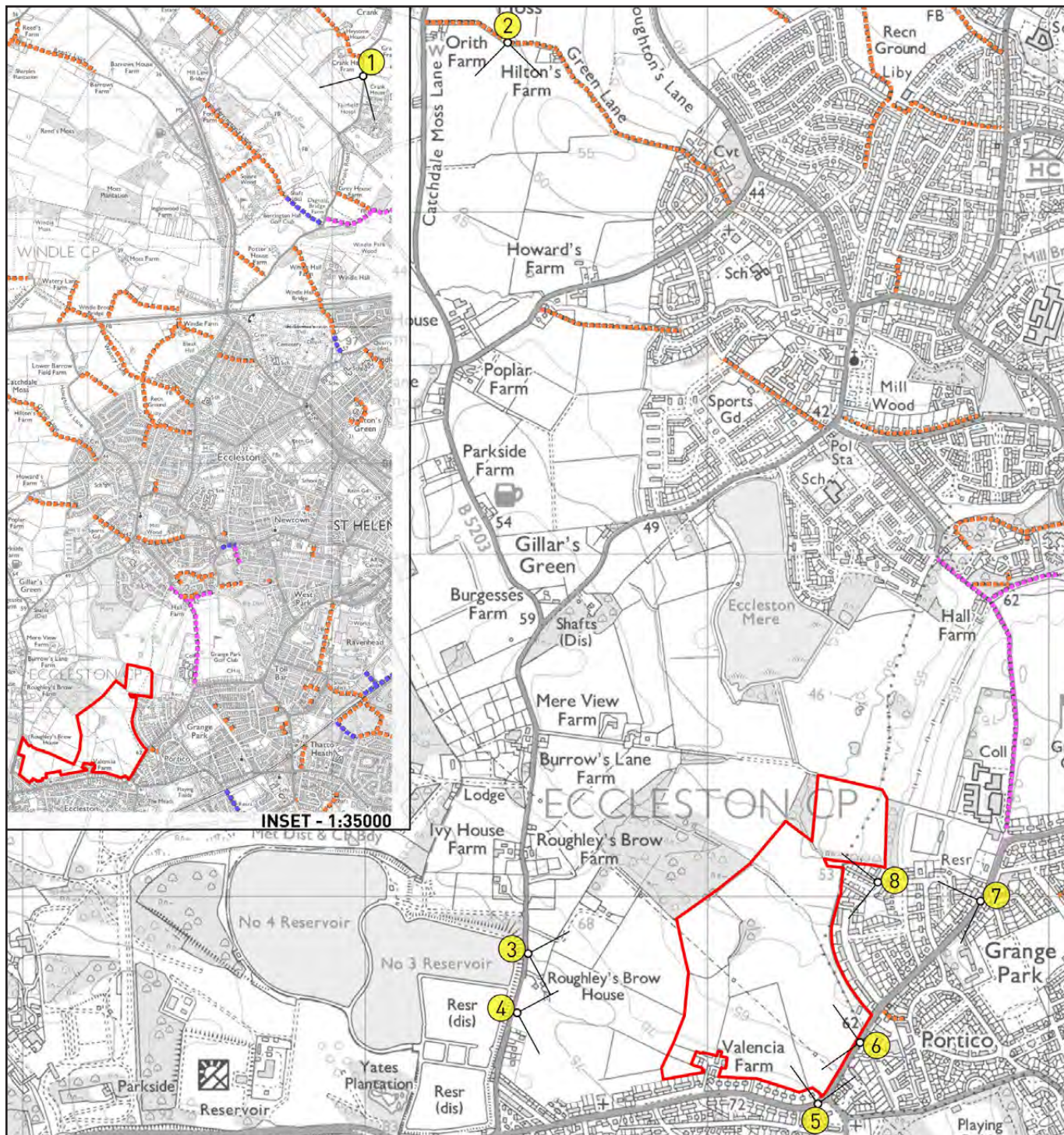
1. Not result in unrestricted sprawl of large built-up areas – as St Helens Road and the existing residential developments along it provide strong physical boundaries which restrict sprawl to the south and east; whilst the golf course restricts sprawl to the north west. Although the northern and western boundaries are not as well defined, there is a large block of established woodland and other mature planting which can be strengthened. As such development of the St Helens Road site would not constitute unrestricted sprawl, on the basis that existing physical features along its boundaries can be reinforced and enhanced, rounding off the urban area to the north of Eccleston Park.

2. Not cause the merger of neighbouring towns – as the development of this site would maintain the existing gap of 700m that currently exists between Carmel College and Pinfold Drive. Whilst there is a perception of a gap between settlements when travelling along Burrows Lane, the development parcels are located on areas that are more physically and visually contained and retain a stronger relationship with the existing urban area. In combination with a robust landscape strategy, this will ensure that this perceived gap is not compromised. Furthermore, both Eccleston and Eccleston Park form neighbourhoods within the wider built up area of St Helens and are not towns in themselves, which would arguably reduce the impact of any coalescence anyway.






3. Not create unacceptable encroachment into the countryside – As with all Green Belt sites, the development of this site will inevitably cause a level of encroachment. However, we would reiterate that St Helens Road, existing residential development and the Golf Course prevent encroachment to the north and east respectively. There are also opportunities for a robust landscape and green infrastructure strategy, which complements existing local landscape features, including Sales Wood, in order to establish a defensible boundary to the north and west to prevent further encroachment. Furthermore, the site has a distinct urban fringe character, due to surrounding residential development and other urbanising features such as pylons and road infrastructure, and as such it arguably makes a limited contribution as countryside in any event.

4. Not impact on the special character of historic towns – as there are no historic towns within the Borough according to the NPPF interpretation, and no Listed Buildings or Conservations areas close to the site in any event.

5. Not discourage urban regeneration – as the Council fully accept that there is insufficient land within St Helens existing urban area to meet its own needs. The release of this site from the Green Belt would therefore not prejudice or discourage brownfield sites coming forward, but would instead compliment these brownfield sites to ensure that sufficient housing land is available.



KEY

-  Site boundary
-  Public footpath
-  Byway open to all traffic
-  Representative viewpoints
-  Public bridleway

VIEWPOINT LOCATION PLAN

3.1 LANDSCAPE AND VISUAL ANALYSIS

Landscape Features and Character

- 3.1.1 The site is located within National Character Area (NCA) 56: Lancashire Coal Measures. In terms of key characteristics, the assessments notes that there is: a fragmented landscape pattern; a soft but varied topography; limited woodland cover across most of the area but with new community woodlands; isolated pockets of agriculture within the urban fabric; a strong cultural and industrial heritage; and a significant influence of transport and utilities infrastructure.
- 3.1.2 Some of these elements are apparent across the site and in the local context, including pockets of agriculture, varied topography, industrial remnants, and the influence of transport and utilities. Woodland cover is also very apparent here.
- 3.1.3 In the more localised study, the St. Helen's Landscape Character Assessment (2006), the site and area to the north are identified as being in a Landscape Character Type called "Intimate Farmed Valley".
- 3.1.4 The assessment notes the undulating (arable) agricultural landscape of the area, the influence of urban elements including pylons that serve to weaken landscape character, busy road networks and some geometric blocks of woodland planting.

Visual Amenity

- 3.1.5 Notwithstanding the relatively large scale of the site, views of it from the wider area are generally limited. This is due to several factors, including: the presence of the extensive urban areas to the south and east; the rising wooded topography across Knowsley Park to the west, and the gently undulating but low-lying landscape to the north and north-east in combination with woodland blocks in the vicinity of the site.
- 3.1.6 From the higher lying ridgeline to the north/north-east, just south of the village of Crank, there is a long-distance view looking towards the site. From this localised higher area, it is difficult to identify the site, set within the folds and wooded undulations of the landscape, where the urban areas are visible in part, see view 1.



03 LANDSCAPE CHARACTER

Views from adjacent to the site



3.1.7 Looking east from Burrows Lane, longer distance views to the north are absent and the views across the site focus more towards the rising urban edge, with the electricity pylons more evident and the visual composition is enclosed, and characterised by development, see view 7 (in part) and view 8.

3.1.8 Thereafter the southern section of the western (Burrows Lane) boundary and the vast majority of the southern (St Helens Road) boundary are characterised by ribbon residential development. The view into the site opens up again at the junction of St Helens road and Portico Lane where the visual horizon in the middle-distance is formed by mature woodland blocks, with the electricity pylon and highways infrastructure visually dominant, see view 9. The view opens up further to the east along St Helens Road where the site boundary is characterised by a hedgerow rather than built form, see view 10. Further to the east, the very southern tip of the site is visible from St Helens Road, surrounded by existing built form, see view 11.

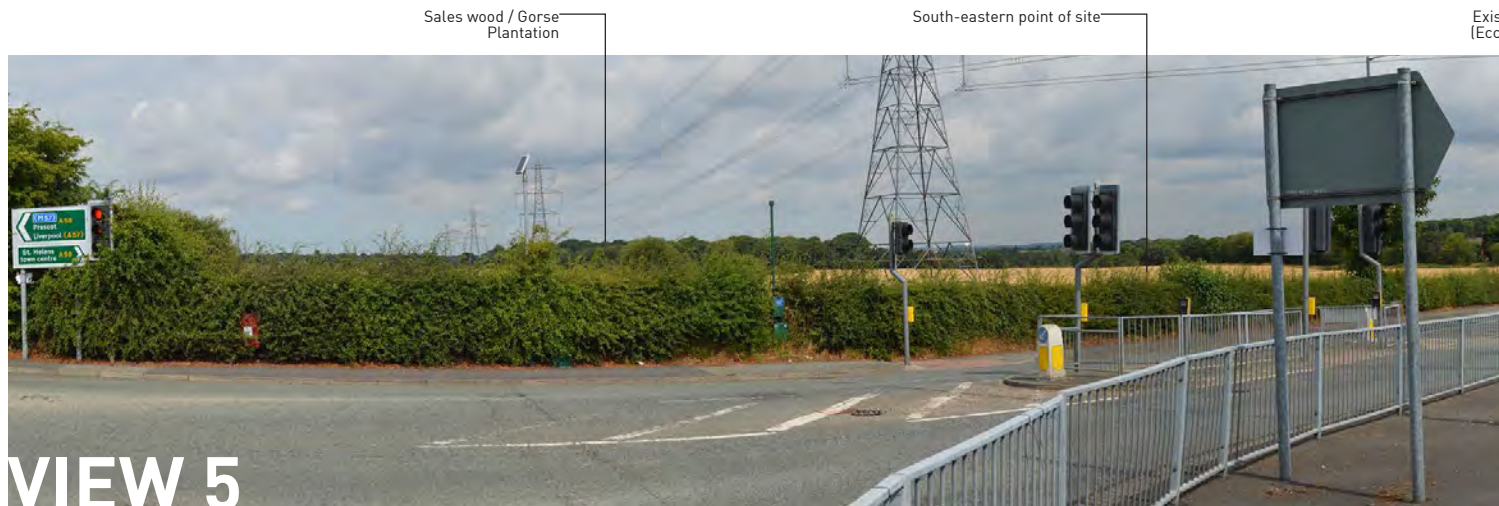


3.1.9 A number of views of the southern and central parts of the site are visible from the residential area between Grange Park Golf Course and St Helens Road, to a greater or lesser extent, see view 12. Woodland and arable enclosures on slightly rising topography generally feature in these views with the pylon lines.



03 LANDSCAPE CHARACTER





VIEW 5



VIEW 6



VIEW 7

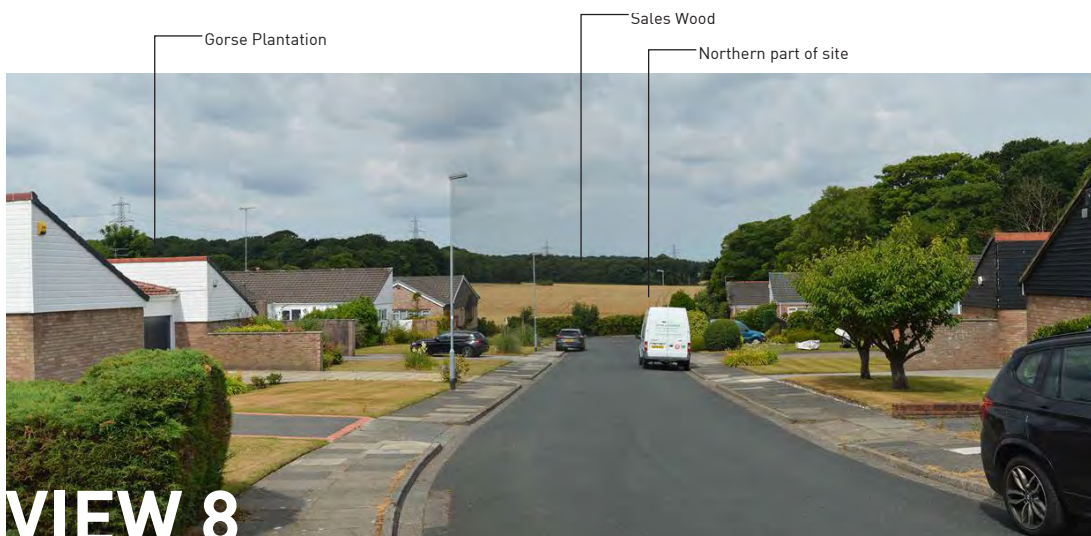
03 LANDSCAPE CHARACTER

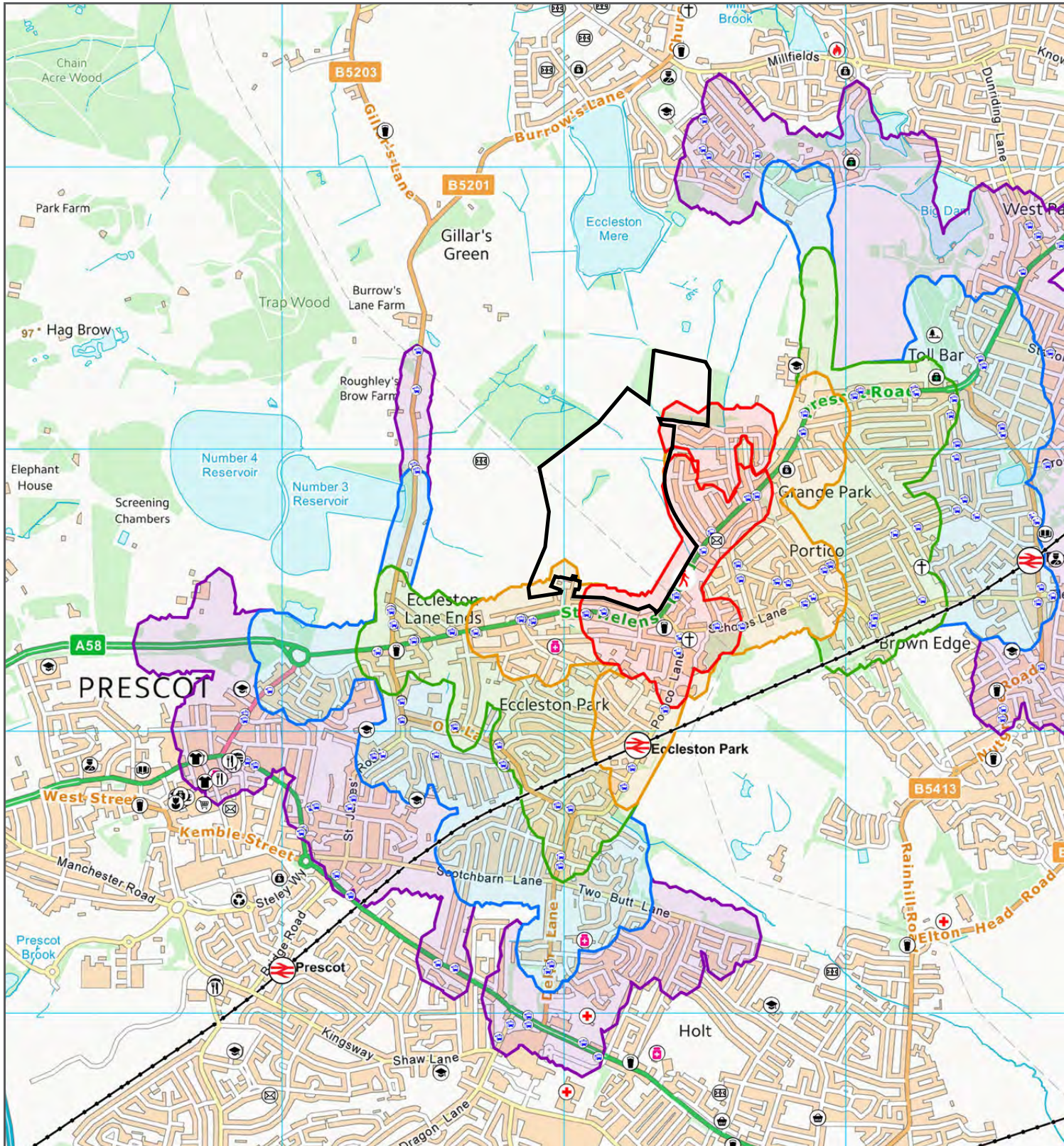


Landscape Features and Character

3.1.10 The following is a summary of the analysis of the site in landscape and visual terms:

- The site sits within a gently sloping valley that is consistent with the wider undulating topography of the area;
- It has very evident 'connectivity' with the adjacent urban area, which encloses the site to the south and east;
- This in combination with the prevalent vegetation patterns creates a series of localised 'wooded horizons' that casts influence over the inter-visibility across the landscape and urban edge;
- Notwithstanding the scale of the site, the combinations of the urban edges, ribbon development, lower lying undulations and wooded horizons serves to limit the overall visibility of the site in the wider landscape and its contribution to openness; and
- The character of the site is heavily influenced by the urban fringe, with the urban edges, other elements of isolated built form, utilities (pylons and reservoir embankments) and highways infrastructure, and recreational land uses all combining to reinforce this.







Legend:

- Site Boundary
- Site Location
- Place of Worship:
 - Christian
- Local Amenities:
 - Bank
 - Cafe
 - Chemist / Pharmacy
 - Clothes
 - Convenience
 - Department Store
 - Medical Centre
 - Educational Facility
 - Fast Food
 - Fire Station
 - Florist
 - Hospital
 - Library
 - Park
 - Playground / Pitch
 - Police
 - Post Office
 - Pub
 - Recycling
 - Restaurant
 - Sport Centre / Sport Shop
 - Supermarket
- Railway Stations
- Bus Stop Location
- Railway Track
- Walking Isochrone (Metres):
 - 400
 - 800
 - 1200
 - 1600
 - 2000

SUSTAINABILITY PLAN

4.1 Sustainable Development Principles

- 4.1.1 The land north of St Helens Road is located in a highly sustainable and suitable location on the western urban edge of St Helens. Once developed, it will generate economic, social and environmental benefits in accordance with the three pillars of sustainable development, and will deliver the type, quality and quantity of new homes required to support the growth of St Helens over the Local Plan period.

4.2 Accessibility

- 4.2.1 The site is located to the north of Eccleston Park, which is 3km west of St Helens Town Centre. The site is bound by the A58 Burrows Lane to the north, which links to St Helens to the east and national road network to the south west.
- 4.2.2 The plan opposite shows the sites location in relation to a range of key facilities and services. The plan indicates that the site is well connected by existing bus and rail services, providing connections to local facilities as well as St Helens Town Centre, Wigan and Liverpool which have a range of employment, retail and leisure opportunities.
- 4.2.3 The nearest bus stops to the site are on St Helens Road, directly adjacent to the proposed site access, whilst Eccleston Park train station is approximately 500m to the south.
- 4.2.4 There are a range of retail facilities within reasonable walking and cycling distance of the site, including convenience stores, a Post Office, pubs and other unit shops; with larger supermarkets in St Helens Town Centre.
- 4.2.5 In respect of community facilities, there are 7 primary schools and 2 secondary schools within walking distance, and Carmel 6th form college directly abuts the site; as well as a medical centre at Toll Bar and library in Thatto Heath.
- 4.2.6 There are several sport and recreation facilities within the vicinity including Burrows Riding School, Prescott and Odyssey Cricket 7 Bowls Club, West Park Rugby Club and Grange Park Golf Club.

4.3 Economic Benefits

4.3.1 The development of the St Helens Road site for up to 625 units will support the local labour market and will generate the following specific benefits:

- Direct construction-related employment: The proposed development could support around 746-person years of direct employment within the construction sector. This translates into 71 full time equivalent jobs per annum over the estimated ten-and-a-half-year build programme.
- Construction impact in the supply chain: A further 131 jobs could be supported each year locally and across the wider region through indirect and induced effects during the construction phase.
- Contribution of the construction phase to economic output: The proposed development could generate an additional £118.9million of gross value added (GVA) for the regional economy during the construction period.
- Growing labour force: Approximately 683 economically active and employed residents are estimated to live in the new dwellings once the site is fully built and occupied. These residents, along with those who are not economically active, will be spending money in the local economy, as outlined in the next finding.
- Household spend: Once fully built and occupied, the households are estimated to generate expenditure in the region of £16.0million per annum.
- New Homes Bonus revenue: The proposed development also has the potential to generate in the region of £4.1million in New Homes Bonus revenue for St Helens Council.
- Increased Council Tax income: Data published by Land Registry suggests average new build house prices in Eccleston are 70% above the St Helens average¹, which will generate elevated Council tax revenues, estimated at £1.0million per annum, once fully developed and occupied. When taken over 10 years, this site could generate an additional £10.5million in Council tax receipts at 2018/19 prices.

¹ Land Registry Data accessed on September 2018 – comparing average house prices in Eccleston postcode area WA10 (£214,407) to St Helens district (£125,278).

04 SUSTAINABLE DEVELOPEMNT

4.4 Environmental Considerations

- 4.4.1 Except for the site's Green Belt designation, there are no known environmental, landscape, heritage or other technical constraints on the site which would prevent development from coming forward.





ILLUSTRATIVE MASTERPLAN

5.1 Vision For The Site And Masterplan

- 5.1.1 The Illustrative design proposals have been informed by the local context of the site, its surroundings, constraints and opportunities.
- 5.1.2 The key drivers behind the design are:
- Distinctiveness - Creating a new settlement edge to Eccleston Park, with respect to the existing urban grain and wider landscape.
 - Green Infrastructure – Responding to the existing green infrastructure and creating on a network of high quality, connected green spaces with new defensible green belt boundaries.
 - Highway Works – Creating a new access point from St Helens Road, and potential for a secondary access from Burrows Lane, with a legible and permeable network of streets within the site.
 - Utilities and Services - Working with the existing utilities and services that cross the site.
- 5.1.3 It is envisaged that the development could provide up to 625 high quality new homes that are sensitive to the local context, creating a new rural to urban transition to the West of St Helens.
- 5.1.4 The development will have a clearly legible hierarchy of streets providing connectivity and access to local facilities, with clear access into the site and good pedestrian linkages to the surrounding area.
- 5.1.5 The layout and urban form of the scheme will be such that it maximises the potential of the site.



6.1 Summary

6.1.1 The St Helens Road site presents an exceptional opportunity to meet the future housing needs of St Helens in a location that would not undermine the purposes and function of the Green Belt. This Delivery Statement sets out the case for allocating the site for housing development within the emerging plan period, as well as the exceptional circumstances that support the alteration of the Green Belt in the Borough.

6.1.2 This Development Statement has demonstrated that the St Helens Road site:

- is entirely suitable, deliverable and viable for housing development; and will deliver a mix of housing types, including both market and affordable homes;
- is entirely appropriate for Green Belt release and allocation as a residential development site, as it is well contained by the existing urban area and natural features and forms a logical rounding off Eccleston Park, without compromising the core purposes of the Green Belt;
- will create a more defensible Green Belt boundary to the north of Eccleston Park;
- is sustainably located in proximity to a range of amenities, services and facilities;
- generates significant socio-economic benefits by providing housing choice, and stimulating job creation and economic investment;
- is not subject to any technical or environmental constraints that would prevent the delivery of housing;
- can deliver a landscape led masterplan for up to 625 homes that complements the surrounding site context and creates a high quality housing development

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APPENDIX 3 - ACCESSIBILITY STATEMENT

Accessibility Statement

Land North of the A58 St Helen's Road, St Helen's

**Prepared for: I Birchall & D Birchall c/o P Wilson & Company LLP
Chartered Surveyors**

March 2019

Doc Ref: AH/18021/AS/1

Prepared by: Aimee Thompson - Director

Document Revision Control

Revision	Date	Status
-	19.06.2018	Draft
-	13.03.2019	Final

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3.0	ACCESS PROPOSALS	5
4.0	EXISTING SUSTAINABLE TRANSPORT PROVISION	6
5.0	SUMMARY	11

APPENDICES

1	SITE LOCATION PLAN
2	ACCESS DRAWING
3	ACCESSIBILITY PLANS

1.0 INTRODUCTION

- 1.1 attp has been commissioned by I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors to prepare an Accessibility Statement in relation to the promotion of land located north of the A58 St Helen's Road in the Eccleston Park area of St Helens (postcode L34 2QD). The site is circa 3.2km south-west of St Helen's town centre. A site location plan is attached at **Appendix 1**.
- 1.2 The site is bound on its northern and western sides by undeveloped land, on its eastern side by the residential dwellings fronting Hill School Road and on its southern side by the A58 St Helen's Road. Further afield to the west is undeveloped land and to the north, east and south are well established residential settlements and supporting facilities.
- 1.3 Access into the site would be provided via two purpose build ghost island priority junctions and a off the A58 St Helen's Road, one of which would utilise an existing right turn holding lane on the A58 St Helen's Road.
- 1.4 This report provides a summary of the surrounding highway network and an assessment of the accessibility of the site by all modes.

2.0 SURROUNDING HIGHWAY NETWORK

- 2.1 The A58 St Helen's Road, from which the site will be accessed by all modes, is a distributor road which provides a direct route between Prescot and St Helen's town centre, via Ecclestone Park. By its very nature not only does the A58 St Helen's Road connect the local villages and towns it also provides access onto residential streets and to a wealth of supporting facilities and onto the strategic network.
- 2.2 In the vicinity of the site the A58 St Helen's Road is a single carriageway two-way road with footways on both sides of the carriageway. It is subject to a 40mph speed restriction and has pedestrian crossing facilities along its length, including a signal controlled facility located on the site frontage.
- 2.3 The A58 St Helen's Road is a bus route, with the bus stops located along its length, the closest of which are on the site frontage.
- 2.4 To the south-west the A58 provides access onto the M67 Motorway and the A57, which in turn provides a direct route into Liverpool city centre. To the north-east the A58 provides a direct route onto the M6 Motorway. There are various opportunities to connect with the M62 Motorway from both the M67 Motorway and the A58.
- 2.5 The development site is therefore well located in terms of its access onto the local and strategic highways networks.

3.0 ACCESS PROPOSALS

- 3.1 Access into the site would be provided via two purpose build ghost island priority junctions and a off the A58 St Helen's Road, one of which would utilise an existing right turn holding lane on the A58 St Helen's Road. A copy of the proposed site access drawing is attached at **Appendix 2**.
- 3.2 It can be seen that the site can be accessed with all LCC and DMRB geometrical standards met. These standards along with how each of the standards have been met are shown within the table provided on the drawing attached at **Appendix 2**.

4.0 EXISTING SUSTAINABLE TRANSPORT PROVISION

- 4.1 The Government's objectives, as set out in the NPPF, are to ensure that new developments are provided in sustainable locations, where the need to travel is minimised and the use of sustainable modes can be maximised.
- 4.2 This section outlines the existing walking, cycling and public transport facilities within the vicinity of the development site and describes the accessibility of the site in terms of its proximity to key services and destinations.

WALKING AND CYCLING

- 4.3 Whilst superseded by the NPPF, the transport policies set out in the former PPG13 set out specific guidance related to walking and cycling:

"Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2 kilometres" (Para 74)

and

"Cycling also has potential to substitute for short car trips, particularly those under 5 kilometres, and to form part of a longer journey by public transport" (Para 77).

Walking

- 4.4 Walking is recognised as the most important mode of travel at a local level and it offers the greatest potential to replace short car trips, particularly those trips under two kilometres.
- 4.5 The walking isochrone plan attached at **Appendix 3** shows the 2.0 kilometre walking catchment area from the centre of the site which include Eccleston Park, Grange Park and Toll Bar in their entirety, the north-western extent of Thatto Heath and the eastern extent of Prescott, including the key local facilities as set out below.
- 4.6 On the A58 St Helens Road there are footways on both sides of the carriageway and pedestrian crossing facilities along its length, including a signal controlled facility located on the site frontage. Footways in the surrounding area meet standards, and generous along certain roads, with dropped/low kerbs at appropriate junctions.
- 4.7 Access into the site, for all modes, is proposed via the A58 St Helen's Road. Footways will be provided on both sides site accesses which will connect into the existing footways on the A58 St Helen's Road.

Cycling

- 4.8 Cycling also has the potential to substitute for short car trips, particularly those that are less than five kilometres. As such, all areas and facilities within a reasonable walking distance can also be considered to be within a reasonable cycling distance.
- 4.9 The cycle isochrone plan attached at **Appendix 3** shows a 5.0 kilometre cycling catchment area from the centre of the site. It can be seen that, in addition to the areas that are accessible on foot, the five kilometre catchment area also includes, among others, the areas of Prescott, Windle, Thatto Heath and St Helens town centre within which is a host of additional facilities, as set out below.
- 4.10 As also shown at **Appendix 3**, national cycle route 56 is located to the south of Prescott, within the cycling catchment. National Route 56 of the National Cycle Network is open and signed from Chester to Wallasey and via the Mersey ferry to Liverpool and the National Route 62 - the Trans Pennine Trail.

PUBLIC TRANSPORT

Bus

- 4.11 The proposed development site is well located in terms of its proximity to public transport services, as shown on the plan attached at **Appendix 3**.
- 4.12 The nearest bus stops to the site are located on both sides of the A58 St Helen's Road, on the site frontage. These bus stops benefit from on road markings and shelters with seating and timetable information. These stops are served by buses 10, 297, 708 and 710, details of these existing bus services are summarised in **Table 4.1**.
- 4.13 There are also bus stops located on both sides on Scholes Lane, circa 300m south of the site. Both of these bus stops are poles with timetable information attached. These stops are served by bus 751, details of this existing bus service are provided in **Table 4.1**.

Table 4.1: Bus Services

Service	Route Description	Service Frequency (Peak Hour)			
		Daytime		Evening	
		Monday to Friday	Saturday & Sunday	Monday to Saturday	Saturday & Sunday
10	Liverpool – Prescott Bus Station – Kensington – Stanley – Woolfall Heath – Eccleston Park – Prescott – Thatto Heath – St Helen's	Every 30 minutes	Every 30 minutes	Every 30 minutes	Every 30 minutes
297	St Helen's - Kirkby	Every 60 minutes	-	-	-
708	Prescot – Grange Park – Rainhill Stoops	School Service			
710	West Park – Eccleston Park – Rainhill Stoops	School Service			
751	Prescot – Thatto Heath - Eccleston	School Service			

4.14 **Table 4.1** shows that in addition to the school bus services the site is within a reasonable walking distance of bus stops that are served by bus numbers 10 and 297 which connect the site with surrounding towns and villages, with a service frequency of every 20 minutes Monday to Friday during the daytime and every 30 minutes during the evenings and on Saturdays and Sundays.

4.15 These buses provide residents with a sustainable form of transport to access local areas of employment, medical, retail and education facilities or act as part of a linked trip to gain access further afield. They also provide a direct route to Prescot and St Helen's Bus Station where alternative bus services are available.

Rail

4.16 Prescot, Eccleston Park and St Helens Central Railway Stations, which are all within a reasonable cycling distance of the site and accessible via the buses which serve the stops located on Gillars Green Road offer an alternative model of travel for resident wishing to travel further afield, as part of a linked trip.

- 4.17 Prescott and St Helen's Railway Stations have sheltered bicycle parking for 10 bikes and Eccleston Park has bicycle parking for four bikes. St Helen's Railway Station has a car park with 70 spaces.
- 4.18 The stations are served by the Liverpool South Parkway to Preston service and the Liverpool Lime Street to Wigan North Western service which stop the stations every 60 minutes and 30 minute, respectively.

TRAVEL PATTERNS AND KEY DESTINATIONS

- 4.19 The surrounding area has a wide range of services and facilities which can be accessed by future residents of the site, as shown on the walking catchment plan attached at **Appendix 3**.
- Eccleston Park - has facilities including schools, a post office, convenience stores, recreation facilities and public houses, all of which are within walking and cycling distance of the site and are accessible via public transport;
 - Prescott town centre – has facilities including public houses, convenience stores, supermarkets, medical centres, schools, sports and social clubs, takeaway food outlets, a post office, a church and recreation facilities, the majority of which are within a reasonable walking distance of the site and all of which are within a reasonable cycling distance of the site and accessible via public transport;
 - St Helen's town centre – has a range of facilities including a range of shops, banks, a post office, a library, pubs, restaurants/cafes, leisure facilities, further education facilities and medical facilities and regular markets, all of which are within a reasonable cycling distance of the site accessible via public transport;
 - Employment – there are a number of employment areas in the vicinity of the site, which include the large commercial area to the south of St Helen's town centre which lies within an easy commute of the site, it is within a reasonable cycling distance of the site and is accessible via public transport;
 - Education provision – include Eccleston Park Day Nursery located on St Helen's Road circa 1.0km west of the site, Eccleston Lane Ends Primary School located on Albany Avenue circa 1.1km south-west of the site, Evelyn Primary School located on St James Road circa 1.6km south-west of the site and Prescott Primary School located on Maryville Road circa 1.9km south-west of the site, all of which are within a reasonable walking and cycling distance of the site and accessible via public transport.

The nearest secondary schools are De La Salle School located on Mill Brow circa 2.2km north of the site and The Prescott School located on Knowsley Park Lane circa 4.1km west of the site, both of which are within a reasonable cycling distance of the site and accessible via public transport

- Health facilities - include Spinney Medical Centre located on Whittle Street and Laurel Villa Dental Practice located on Prescott Road are both circa 1.8km north-east of the site within Eccleston Park, which are within a reasonable walking and cycling distance of the site and accessible via public transport.

Prescot House Dental Surgery is located on High Street circa 2.2km south-west of the site and Prescot Medical Centre is located on Sewell Street circa 4.2km south-west of the site, both of which are within a reasonable cycling distance of the site and are accessible via public transport.

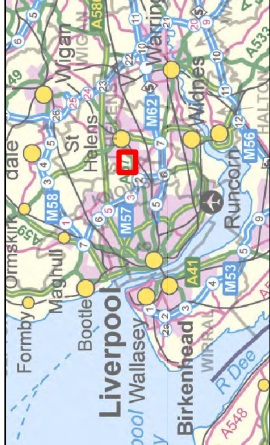
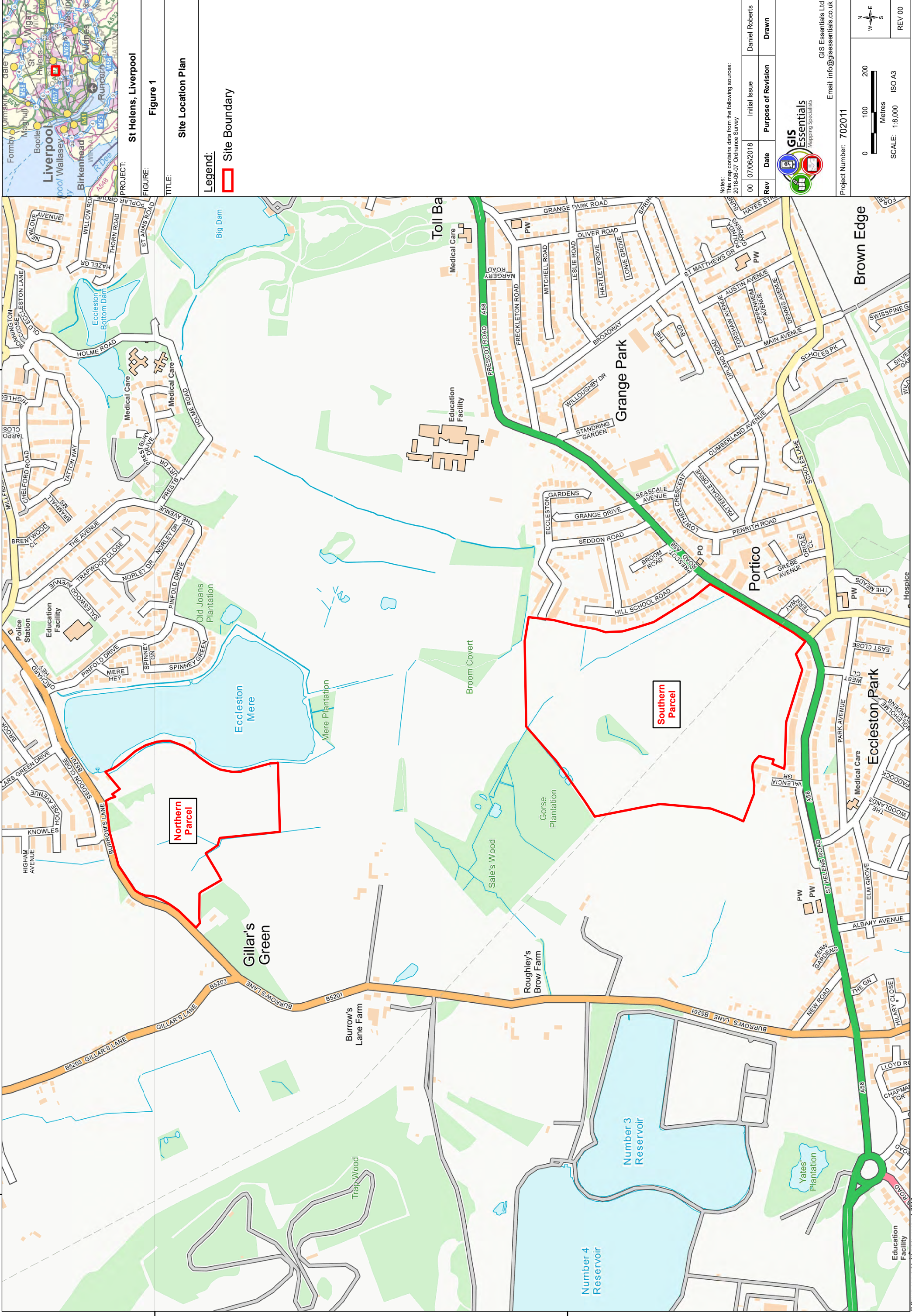
The nearest Hospital is Whiston Hospital, located on Warrington Road circa 1.7km south of the site, within a reasonable walking and cycling distance of the site and accessible via public transport.

- Food shopping – food retail units within the vicinity of the site include McColl's located on St Helen's Road circa 100m north of the site and Premier Store located on Old Lane circa 1.1km south of the site, within a reasonable walking distance of the site. There is a Tesco extra, M&S and Heron Foods located within Prescot and a Morrison's located in West Park, all of which are within a reasonable cycling distance of the site and accessible via public transport;
- Recreation – recreation facilities within the vicinity of the site include Portico Vine Panthers located on Scholes Lane circa 550m east of the site, Eccleston Park Tennis Club located on Forest Close circa 800m west of the site, Preston Cables football Club located on Eaton Street circa 2.0km west of the site and Grange Golf Club and Taylor Park both of which are located on Prescott Road circa 1.0km north-east of the site, all of which are within reasonable walking and cycling distance of the site and are accessible via public transport.

5.0 SUMMARY

- 5.1 The development site is well located in terms of its access onto the local and strategic highways networks.
- 5.2 It is considered that the site is well served by existing bus services providing good connections to the surrounding towns and villages, with bus stops located within a reasonable walking distance. They also provide a direct route to Prescott and St Helen's Bus Station where alternative bus services are available.
- 5.3 The railway stations located within Prescott, Eccleston Park and St Helen's town centre, which are all within a reasonable cycling distance of the site and accessible via bus, provides residents with an alternative mode of transport to travel further afield, as part of a linked trip.
- 5.4 The site is situated in an accessible location with employment destinations (including the large commercial area to the south of St Helen's), schools, convenience stores and medical facilities within a reasonable walking and cycling distance.
- 5.5 Overall, it is concluded that a range of key facilities and services, including employment, retail, health and education uses, are readily accessible from the site.
- 5.6 The report has shown that the site is accessible by a range of travel modes and therefore accords with current national and local transport policies.

APPENDIX 1



PROJECT: St Helens, Liverpool

FIGURE: Figure 1

TITLE: Site Location Plan

Legend:

- Site Boundary

Notes: This map contains data from the following sources:
2018-06-07 Ordnance Survey

Rev	Date	Purpose of Revision	Drawn
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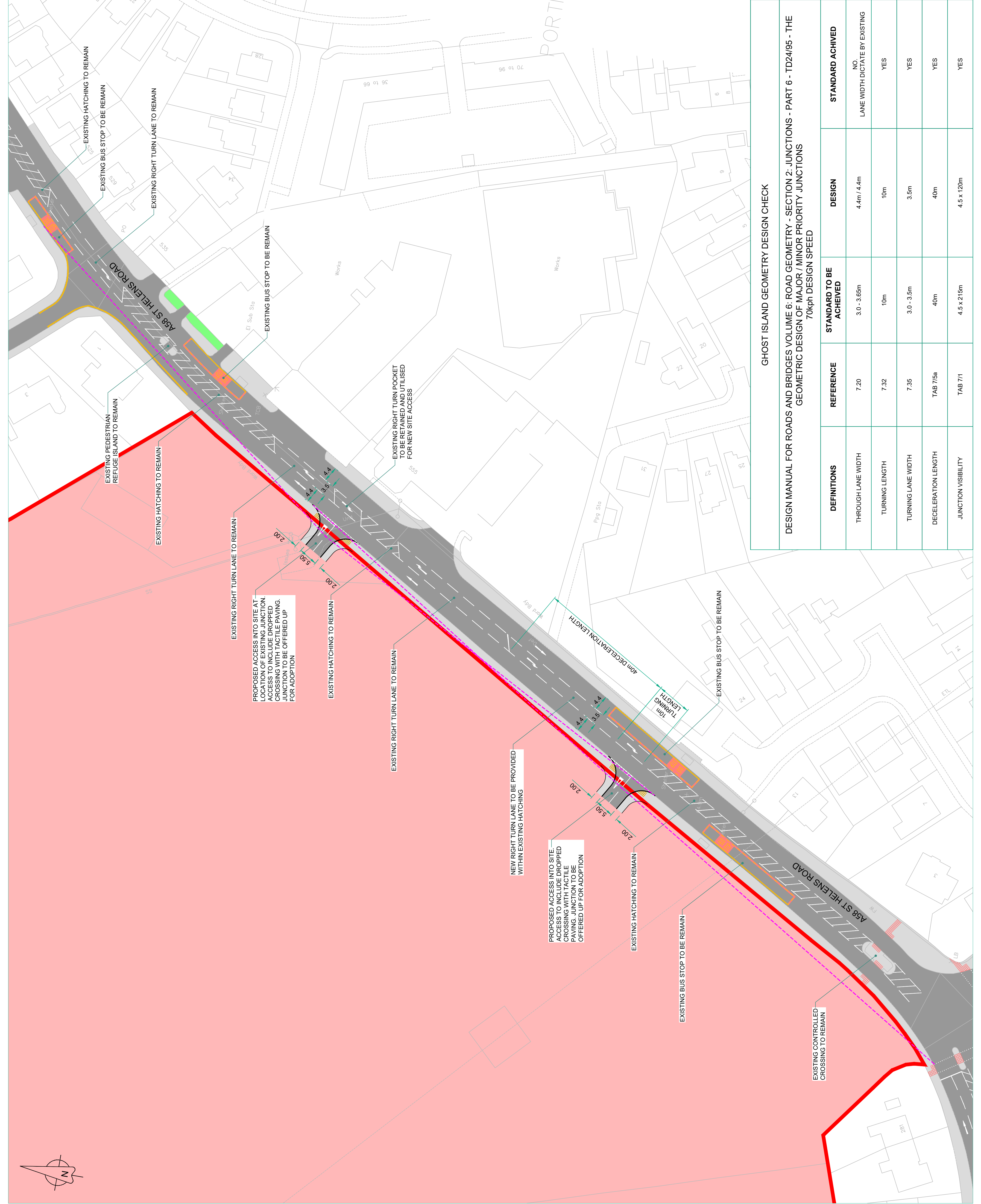
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APPENDIX 2



- DO NOT SCALE
- NOTES
- 1) ALL DIMENSIONS ARE IN METRES UNLESS STATED OTHERWISE

2) THIS DRAWING IS INTENDED FOR PLANNING USE ONLY AND SHOULD NOT BE RELIED UPON FOR CONSTRUCTION OR COSTING PURPOSES

3) THE INFORMATION SHOWN ON THIS DRAWING IS BASED ON ORDNANCE SURVEY MAPPING AND IS SUBJECT TO CHANGE FOLLOWING RECEIPT OF FULL TOPOGRAPHICAL SURVEY

KEY

DEVELOPMENT SITE BOUNDARY TAKEN FROM INFORMATION PROVIDED BY REDROW

ASSUMED HIGHWAY BOUNDARY

AREA OF CARRIAGEWAY

AREA OF FOOTWAY

AREA OF GRASS VERGE / VEGETATION

4.5 x 120m VISIBILITY SPLAY TO DMRB

B	13/02/2019	TS	DRAWING FRAME INFORMATION UPDATED	AH	AH
A	18/06/2018	TS	FIRST ISSUE	AH	AH
REV	DATE	BY	DESCRIPTION	CHK	APP

DRAWINGS STATUS:
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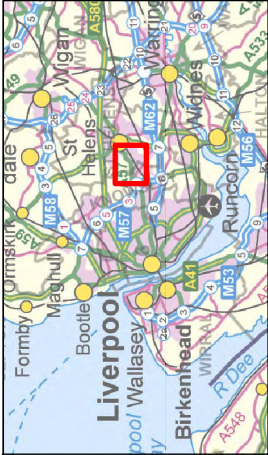
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TITLE:	ACCESS ARRANGEMENT

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CAD FILE:	DESIGNED/DRAWN:	TS	DATE:	18/06/2018
PROJECT NO:	DRAWING NO:	18021	18021/P/S/001	B

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GHOST ISLAND GEOMETRY DESIGN CHECK				
DESIGN MANUAL FOR ROADS AND BRIDGES VOLUME 6: ROAD GEOMETRY - SECTION 2: JUNCTIONS - PART 6 - TD24/95 - THE GEOMETRIC DESIGN OF MAJOR /MINOR PRIORITY JUNCTIONS				
70kph DESIGN SPEED				
DEFINITIONS	REFERENCE	STANDARD TO BE ACHIEVED	DESIGN	STANDARD ACHIVED
THROUGH LANE WIDTH	7.20	3.0 - 3.65m	4.4m / 4.4m	NO. LANE WIDTH DICTATE BY EXISTING
TURNING LENGTH	7.32	10m	10m	YES
TURNING LANE WIDTH	7.35	3.0 - 3.5m	3.5m	YES
DECELERATION LENGTH	TAB 7/5a	40m	40m	YES
JUNCTION VISIBILITY	TAB 7/1	4.5 x 215m	4.5 x 120m	YES

APPENDIX 3



PROJECT: **St Helens, Liverpool**

FIGURE: **Figure 3**

TITLE: **Walking Isochrone - Southern Parcel**

Legend:

- Site Location
- Place of Worship:
- Christian
- Local Amenities:
- Bank
- Cafe
- Chemist / Pharmacy
- Clothes
- Convenience
- Department Store
- Fast Food
- Florist
- Hospital
- Library
- Park
- Playground / Pitch
- Pub
- Recycling
- Restaurant
- Supermarket
- Railway Stations
- Bus Stop Location
- Railway Track
- Walking Isochrone (Metres):
- 400
- 800
- 1200
- 1600
- 2000

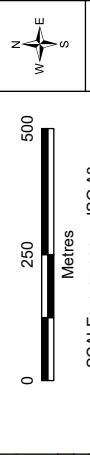
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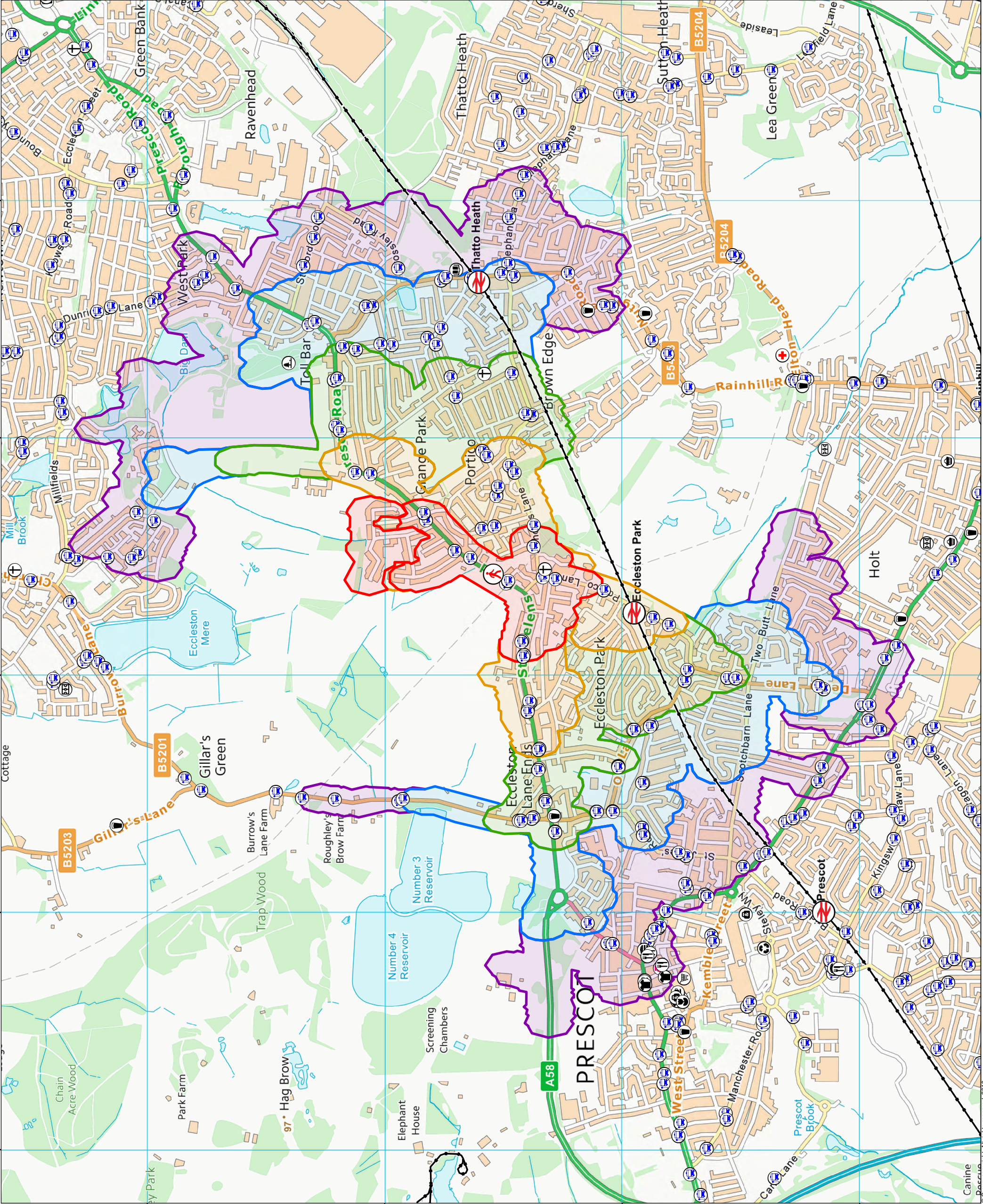
Project Number: 702011



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PROJECT: **St Helens, Liverpool**

FIGURE: **Figure 4**

TITLE: **Cycling Isochrone - Southern Parcel**

Legend:



Site Location

Sustrans Cycle Routes:

Traffic-free Route on the National Cycle Network

Traffic-free Route not on the National Cycle Network

On-road Route on the National Cycle Network

On-road Route not on the National Cycle Network

Cycling Isochrone (Kilometres):

1 2 3 4 5

1 2 3 4 5

1 2 3 4 5

1 2 3 4 5

1 2 3 4 5

1 2 3 4 5

1 2 3 4 5

1 2 3 4 5

1 2 3 4 5

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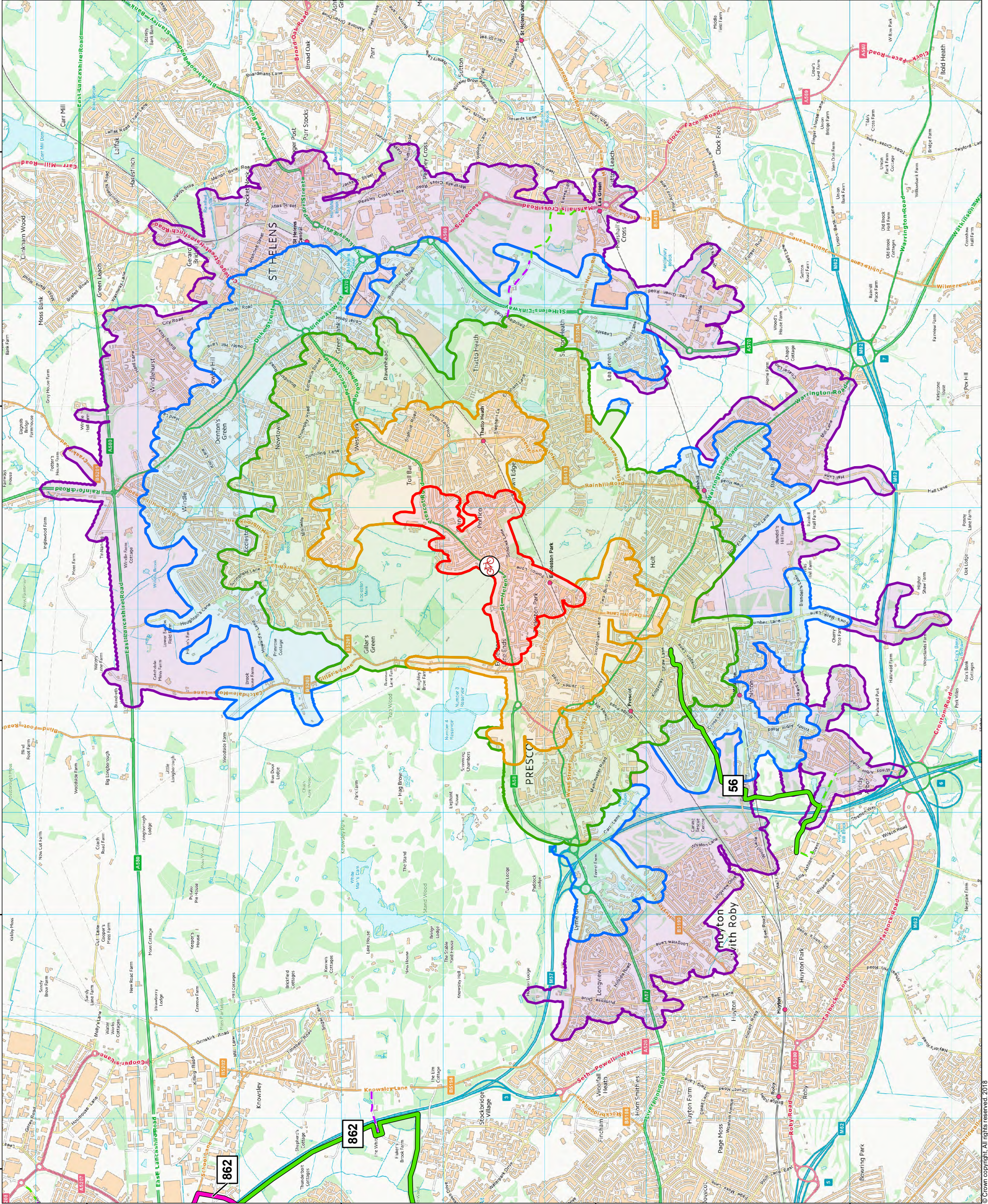
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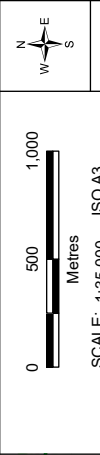


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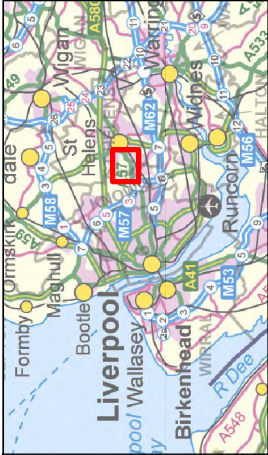


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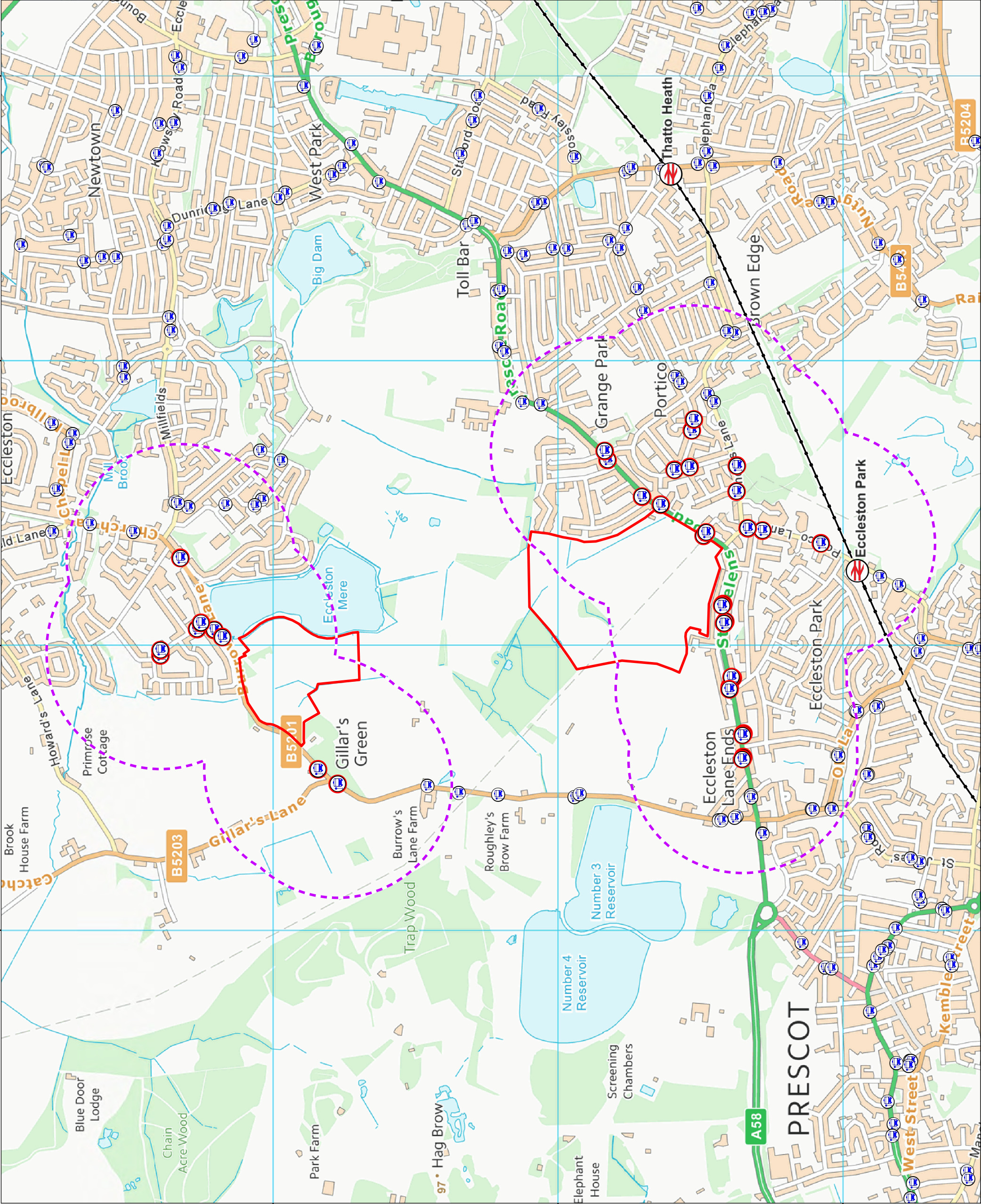


PROJECT: **St Helens, Liverpool**

FIGURE: **Figure 5**

TITLE: **Public Transport Plan**

- Legend:
- Site Boundary
 - Selected Bus Stop Locations Within 400m of Site Boundary
 - 400m Selected Bus Stop Location Buffer
 - Railway Stations
 - Bus Stop Location
 - Railway Track



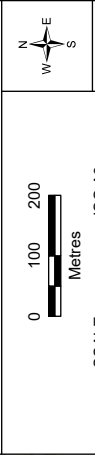
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APPENDIX 4 - PHASE 1 ECOLOGY SURVEY

APPENDIX 5 - AGRICULTURAL LAND ASSESSMENT

Report



Agricultural Land Classification School Hill Farm, Ecclestone

Date: October 2018

Submitted to:
I Birchall & D Birchall
c/o P Wilson & Company LLP
Chartered Surveyors

Prepared by:
R A Peel
RSK ADAS Limited

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Appendix 1: Agricultural Land Classification Map and Location Plan

Appendix 2: Soil Descriptions

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1 Executive Summary

The Agricultural Land Classification (ALC) of approximately 16.9ha of land lying to the west of St Helens, was assessed by ADAS in July 2018.

The site which is proposed for development lies north of the St Helens Road (A58) north of Portico. It is level to very gently sloping and lies at an altitude of 55 - 60m A.O.D. At the time of the survey the site supported arable agriculture.

The site is underlain by the Triassic sandstone deposits over which Till has been deposited. As a result the soils vary over short distances but most are medium to heavy textured and are imperfectly to poorly drained.

None of the site had been subject to an ALC survey undertaken by Natural England. The fieldwork undertaken for this report located poorer quality land mapped as Grade 3b due to a wetness limitation.

2 Introduction

ADAS was instructed by the Landowner to undertake an Agricultural Land Classification (ALC) survey on a site north of the A58, St Helens Road at Portico. The survey was required to inform a planning application for development.

The land was classified using the system outlined in the Ministry of Agriculture, Fisheries and Food (MAFF, now Defra) publication: 'Agricultural Land Classification of England and Wales - Revised guidelines and criteria for grading the quality of agricultural land' (October 1988).

3 Methodology

3.1 Fieldwork

A desk study of soils and climatic information was undertaken using reference material held by ADAS, followed by detailed fieldwork to study soil and site limitations.

Fieldwork was undertaken with a hand held 50mm diameter "Dutch" auger and/or spade to a depth of 1m. In addition, soil pits were excavated to determine subsoil characteristics which could not be identified from the auger samples.

The locations of 16 auger borings and 1 soil pit were examined, to determine the quality of the land and the results are shown on the map at **Appendix 1**. A brief description of the soil pits and auger profiles is given in **Appendix 2**. The results of laboratory analysis for topsoil particle size distribution are shown at **Appendix 3**.

The fieldwork was carried out on 4th and 10th July 2018 when the soils were dry.

3.2 The Agricultural Land Classification System

The ALC system provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations on agricultural use. The limitations can operate in one or more of four principal ways.

They may affect:

- *the range of crops which can be grown;*
- *the level of yield;*
- *the consistency of yield; and*
- *the cost of obtaining the crop.*

The classification system gives considerable weight to flexibility of cropping, whether actual or potential; the ability of some land to produce consistently high yields of a somewhat narrower range of crops is also taken into account.

The principal physical factors influencing agricultural production are climate, site (including relief) and soil. By assessing these factors, it is possible to assign land into one of five land classification grades, Grade 1 land being the highest quality and Grade 5 the lowest quality land. Grade 3 is sub-divided into Grades 3a and 3b, to identify good quality agricultural land from moderate quality land (see **Appendix 4** for a description of the grades used in the ALC system). By considering site specific climate, site and soil factors the land can be classified into 1 of 5 agricultural grades or certain non-agricultural grades, the results of which are detailed in Sections 5.3 and 5.4.

4 Geology, Soils and Present Land Use

4.1 Geology

The geology mapⁱ shows the whole site to be underlain by Triassic deposits of Chester Formation Sandstone which was laid down 247-250 million years ago by rivers. The solid geology is overlain by superficial deposits of glacial Till which were deposited 2million years ago in ice age conditions. The soils have developed in the glacial Till but in isolated profiles with sandstone or an iron pan were encountered.

4.2 Soils

The soils are mapped on the soil mapsⁱⁱ of the area as and Salop Association formed in the Till.

Salop Association soils typically have medium textured topsoils over heavier textured, gleyed and slowly permeable subsoils. This soil type was located over the site but topsoil textures were lighter than typical especially at the northern end of the site, typically medium sandy loam. The subsoils varied from loamy medium sand to clay loam with clay in the lower subsoil in most profiles. The soils were imperfectly to poorly drained due to the high rainfall coupled with the presence of heavy textured subsoils. Most profiles fell into Wetness Class (WC) 4 having mottles and gley colours close to the surface. Soils falling into WC 4 were slowly permeable within 570mm of the surface whilst those falling into WC 3 were not slowly permeable within 570mm of the soil surface (WC 1 soils are well drained and WC 5 very poorly drained).

4.3 Present Land Use

At the time of the survey the site supported arable agriculture including barley and wheat.

4.4 Previous Agricultural Land Classification Surveys

The Provisional ALC maps show the site as an area of Grade 3. The Provisional maps only give an indication of land quality over larger areas and should not be relied on for site specific assessment of land quality.

In addition, they do not classify land into Grade 3a and Grade 3b to differentiate between better quality (Grade 3a) and lower quality (Grade 3b) land.

The Magic websiteⁱⁱⁱ indicates that none of the site or surrounding land has been surveyed by Natural England.

5 Results

The sections below illustrate the main considerations and limitations to the grading of the land.

5.1 Climate

The site climatic variables have been interpolated from grid point data surrounding the site, as follows:

Table 1: Climatic Variables

Grid Reference	SJ482937
Altitude (m)	60
Accumulated Temperature (day °C)	1386
Average Annual Rainfall (mm)	903
Overall Climatic Grade	1
Field Capacity Days	210
Moisture deficit (mm): Wheat	79
Moisture deficit (mm): Potatoes	64

The site lies in the lowlands of northern England, and so has a mild wet climate. Accumulated Temperature (January–June), a measure of the relative warmth of the area, is 1386°C and the average annual rainfall is 903mm.

This combination of rainfall and temperature indicates that the area is fairly mild and wet, making it good for crop growth so long as the soils are freely drained and easy to work.

5.1 Site Limitations

Slope: The site lies at an altitude of 60m in the south, falling to 55m in the north. The land is level to very gently sloping and gradient does not affect land quality. There is a small gully running from the wood in the west to the eastern field boundary across the narrowest part of the field.

Flooding: The site lies above any flood plain and has a low risk of flooding, it has been designated as being within Flood Zone 1 on the Environment Agency Flood maps^{iv}.

5.2 Soil and Interactive Limitations

The limitations of soil wetness and soil drought are determined by the interaction between soil depth, wetness, structure and texture, all of which influence how easy the land is to work, and so have an effect on land quality. The measure of soil wetness takes account of the number of days the area is at field capacity and the depth to a slowly permeable layer. On this site the soils are imperfectly to poorly drained and mainly fall into WC 4; they are well structured and permeable in the topsoil but the subsoil is mainly heavier textured and poorly structured (WC4).

The soils are at worst only slightly droughty on this site and drought is not an overriding limitation to land quality.

The main factor affecting land quality in this area is:

- *Depth to a slowly permeable layer coupled with topsoil texture, which affects the workability of the soils;*

5.3 Land Quality

The land quality of the site is shown on the attached plan (**Appendix 1**).

Grade 1

No land has been placed in this grade.

Grade 2

No land has been placed in this grade.

Grade 3a

No land has been placed in this grade but isolated profiles occur where the soils have a deeper sandy upper subsoil. The areas involved are too small to map separately.

Grade 3b

- *This Grade has been mapped over 93.7% of the site to include soils with light textured topsoil over heavy textured subsoil, they are gleyed and mottled within 400mm. The land has:*
- *A sandy loam or sandy clay loam topsoil over sandy clay loam upper subsoil or lies directly over heavy clay loam to clay, the soils are gleyed within 400mm and have a slowly permeable layer within 570mm; they fall into WC 4.*

Grade 4

No land has been placed in this grade.

Grade 5

No land has been placed in this grade.

Non-agricultural/ urban and woodland

This grade has been mapped over 6.3% of the site to include woodland.

5.4 Summary of Land Quality in the Survey Area

Table 2: Agricultural Land Classification Measurements

Grade	Area (ha)	% of Total Area
1	-	-
2	-	-
3a	-	-
3b	15.826	93.7
4	-	-
5	-	-
Non agricultural	1.061	6.3
Total	16.887	100.0

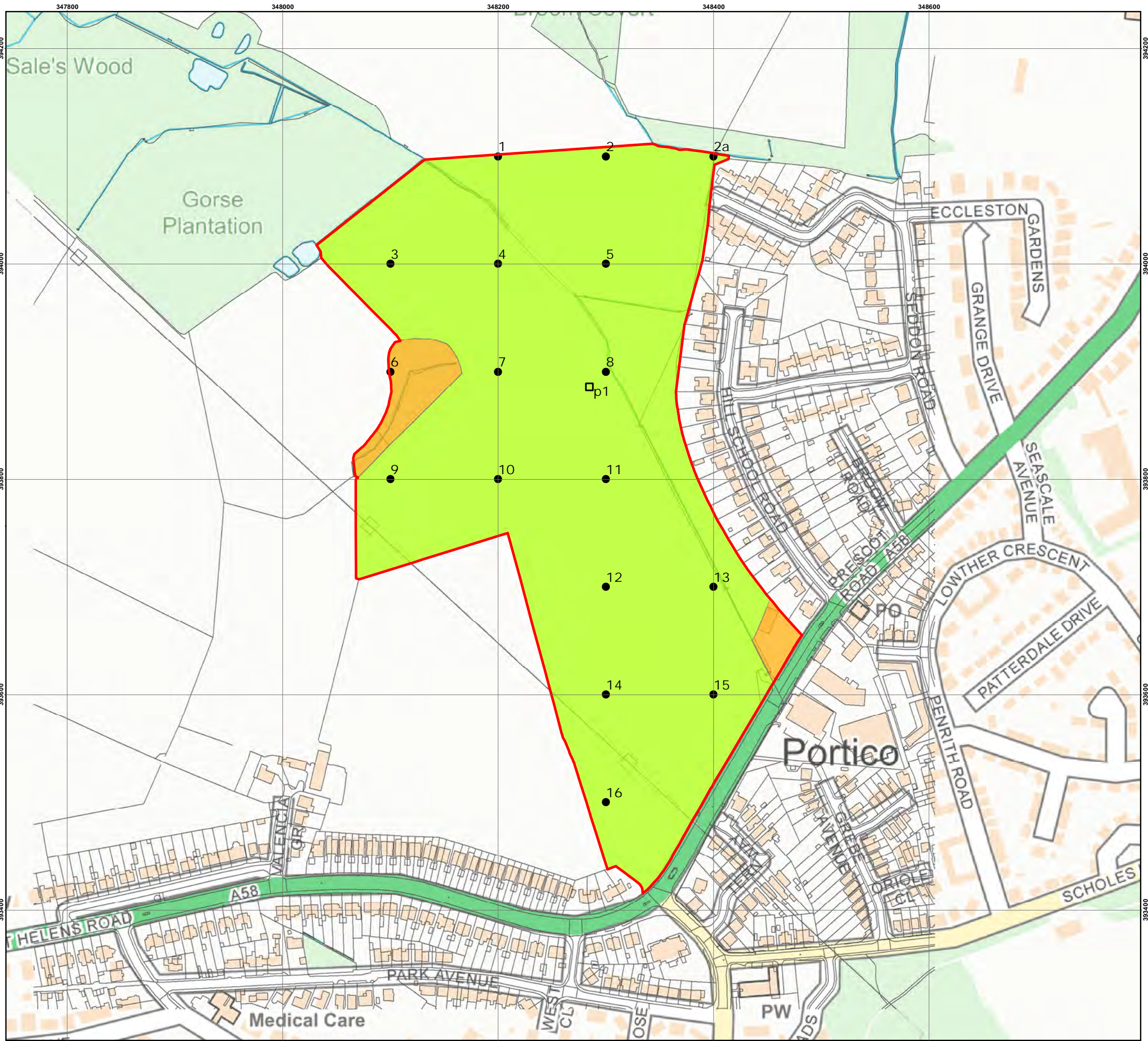
6 Conclusions

- The Provisional ALC maps, produced in the 1970s, classified the site as Grade 3 land. However, the provisional mapping exercise was not meant to give a detailed grading of small parcels of land and so the site has been classified again, using the current ALC guidelines.
- The site has a cover of glacial Till which has given rise to sandy soils over clay. The soils are slowly permeable and seasonally wet and fall into Wetness Classes 3 and 4.
- A detailed survey of the site undertaken by ADAS for this report classified the site as Grade 3b.
- A suitable soil handling strategy should be developed to make effective use of the soils on site, to help preserve the soil and retain soil functions such as water and carbon storage.

Appendix 1: Agricultural Land Classification Map and Location Plan

See following page













Document Path: N:\Projects\FocalPoint\Ecology_General\1050183_Chris_Thomson\Eccleston\A3L_Eccleston_ALC_South.mxd



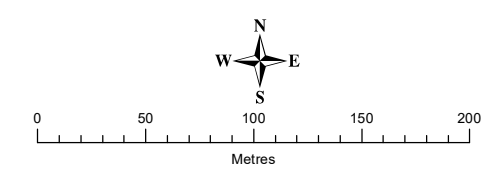
ADAS

Eccleston Mere South

Agricultural Land Classification

-  Site boundary
-  Auger boring
-  Soil pit
-  Grade 1
-  Grade 2
-  Grade 3a
-  Grade 3b
-  Grade 4
-  Grade 5
-  Non Agricultural
-  Urban
-  Other

Drawn by Andy Frost 08/08/2018, Verified by Rosemary Peel 08/08/2018



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Appendix 2: Soil Descriptions

See following page

PIT AND BORING DESCRIPTIONS

SITE:

Keys common to all tables

Texture Key

S = sand
Z = silt
C = clay
L(y) = loam(y)

F = fine
M = medium
C = coarse
Pt(y) = peat(y)

Structure Key

(V)Wk = (very)weak
F = fine
SG = single grain
AB = angular blocky
Fm = firm

M = moderate
M = medium
GR = Granular
PR = prismatic

S = strong
C = coarse
SAB = subangular blocky
Fri = friable

Colour key

Br = brown
Rd = red
Ol = olive

Bl = black
Or = orange

Yl = yellow
pl = pale

Main Limitation

DR = Drought
GR = Gradient

WE = Wetness
MR = Microrelief

CL = Climate
TX = Texture

Land use

Wht = wheat

perm past = permanent
pasture
Ley = grass ley
r&f = ridge and furrow

Osr = oil seed rape

WC = winter cereals
Bar = barley

WBC = wild bird cover
fal = fallow

Others abbreviations

ab = abundant
MB = moisture balance
occ = occasional/ly
pot = potatoes
SPL = slowly permeable layer
OM = organic matter

cons = concretions
Mn = manganese
och = ochreous
sat = saturated
na = not applicable
rrm = rusty root mottles

imp = impenetrable
mot = mottles
pok = pockets

CBC = chalky boulder clay

CaCO₃ Tests

Topsoils and upper subsoils were tested with a 10% solution of HCl to estimate levels of Calcium carbonate in the soil. All soils are non-calcareous unless marked 'calc' ie they reacted with an audible or visible fizz.

Site: Ecclestone south

PIT DESCRIPTIONS

Pit	Depth (mm)	Colour	Texture	Structure	Drainage /Porosity (0.5% pores)	Total Stone %
1	260	7.5YR3/2 dk br	MSL	Wk,M,SAB below cap	-	<10
	440	7.5YR5/5 br N 4/0 dk gr ped faces	SCL	Wk,C,PI	Many och com / <	<5
	900	5YR5/4 rd br more st br with depth	HCL	Wk,C,PR	Och com+Mn cons /<	<2
	100	Yl rd	SCL	Not assessed	Och many	<2

Slightly Gleyed at:	Gleyed at: 260	SPL at: 260	Wetness class: 4	Wetness grade: 3b	Comments: Disturbed layer at 310-500mm	
		MB wheat: MB pot:	DR Grade:	Main limitation. WE		ALC grade 3b



AUGER BORING DESCRIPTIONS

No / land use/ gradient	Bottom Depth of horizon	Texture	Colour	Gleyed / spl	% Stone >2cm /total	Wetness Class	Main Limitation	Grade
1	270	SCL	Dk gr br	-	<5			
	540	SCL	Br	Och com	<10			
	750	HCL	Gr	Och many		4	We	3b
	110	LMS	Gr	Och com				
2	270	SCL	Dk gr br	-	<2			
	540	SCL+ LMS	Rd br	Och com	<2			
	100	HCL, pok LMS	Gr	Och many		4	We	3b
2a	280	MSL	Dk br	-	<5			
	370	MSL	Lt br	Och com	<5			
	660	HCL	Pl br	Och com + Mn	<5			
	1000	LFS	Rd gr	Och com	<2	4	We	3b
3	280	MSL	Br	-	<5			
	350	SCL	Br	Och few	<10			
	700	HCL	Wk rd	Och com	<20			
	700+	Too dry and stony to auger			<20	4	We	3b
4	270	MSL	Br	-	<5			
	330	MSL	Br	Och com + Fe cons	<10			
	330+	Too dry and stony to auger				4	We	3b
5	230	MSL	Dk br	-	<5			
	350	MSL	Dk br	Och com by 300	<5			
	600+	HCL	Pl yl br	Och com + Mn	<5	4	We	3b
6		wood						Non Ag
7	260	MSL	Dk br	-	<5			
	400	MSL	St br	-	<5			
	450	LMS	St br	-	<5	1	Dr?	3a?
	450+	Sst?						
8	260	MSL	Dk br	-	<5			
	440	MSL/SCL	Dk br	Och many	<5			
	900+	HCL	Rd bt	Och com + Mn	<5	4	We	3b
9	290	MSL	V dk gr br	-	<5			
	540	SCL	Br	Och many	<5			
	620	SCL	Rd br	Och com +Mn cons	mod			
	620+	Too stony to auger				4/3	We	3b/a

10	270	MSL	Dk br	-	<5			
	350	MSL	Lt br	Och few	<5			
	600+	HCL	Pl yl br	Och com + Mn	<5	4	We	3b
11	350	MSL	Dk br	-	<5			
	600	MSL	Lt br	Och com	<5			
	800+	HCL	Rd br	Och com + Mn	<5	3	We	3a
12	300	MSL	Dk br	-	<5			
	700	HCL	Rd gr	Och many	<5			
	700+	Hit stone				4	We	3b
13	260	MSL	Dk br	-	<5			
	310	MSL	Pl br	Och many				
	450	SCL	Rd br	Och com	<5			
	650	HCL/SCL	Rd br	Och com + Mn	<5	4	We	3b
	1000+	MSL	St br	Och many				
14	290	SCL	Dk br	-	<8			
	520	MCL	Lt br	Och com	<5			
	1100+	C	Rd br	Och com + Mn	<5	4/3	We	3b/a
15	330	MSL	Dk gr br	-	<5			
	540	MSL/SCL	gr	Och com	<5			
	850	HCL	Rd br	Och many				
	1000+	MZCL	Lt gr	Och com	<5	4	We	3b
16	250	SCL	Dk gr br	-	<8			
	360	SCL	Pl gr	Och com	<5			
	1100+	HCL	Rd br	Och com + Mn	<5	4	We	3b

Appendix 3: Laboratory Analysis

See following page



ANALYTICAL REPORT

Report Number	19842-18	X922	ROSEMARY PEEL RSK
Date Received	16-JUL-2018		ADAS LTD PARKFIELD
Date Reported	20-JUL-2018		COTTAGE POLLARDS
Project	1050183 SOIL 11 07 2018		LANE SOUTHWELL
Reference	ECCLESTON MERE AND		NOTTS NG25 0TL
Order Number			

Laboratory Reference		SOIL394827	SOIL394828	SOIL394829	SOIL394830						
Sample Reference			S PIT 2	S 18	S 24						
Determinand	Unit		SOIL	SOIL	SOIL						
Sand 2.00-0.063mm	% w/w		62	63	62						
Silt 0.063-0.002mm	% w/w		22	20	23						
Clay <0.002mm	% w/w		16	17	15						
Textural Class **			SL	SL	SL						

Notes	
Analysis Notes	<p>The sample submitted was of adequate size to complete all analysis requested.</p> <p>The results as reported relate only to the item(s) submitted for testing.</p> <p>The results are presented on a dry matter basis unless otherwise stipulated.</p>
Document Control	This test report shall not be reproduced, except in full, without the written approval of the laboratory.

Reported by	<p>** Please see the attached document for the definition of textural classes.</p> <p>Darren Whitbread</p> <p>Natural Resource Management, a trading division of Cawood Scientific Ltd.</p> <p>Coopers Bridge, Braziers Lane, Bracknell, Berkshire, RG42 6NS</p> <p>Tel: 01344 886338</p> <p>Fax: 01344 890972</p> <p>email: enquiries@nrm.uk.com</p>
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ADAS (UK) Textural Class Abbreviations

The texture classes are denoted by the following abbreviations:

Class	Code
Sand	S
Loamy sand	LS
Sandy loam	SL
Sandy Silt loam	SZL
Silt loam	ZL
Sandy clay loam	SCL
Clay loam	CL
Silt clay loam	ZCL
Clay	C
Silty clay	ZC
Sandy clay	SC

For the sand, loamy sand, sandy loam and sandy silt loam classes the predominant size of sand fraction may be indicated by the use of prefixes, thus:

vf	Very Fine (more than 2/3's of sand less than 0.106 mm)
f	Fine (more than 2/3's of sand less than 0.212 mm)
c	Coarse (more than 1/3 of sand greater than 0.6 mm)
m	Medium (less than 2/3's fine sand and less than 1/3 coarse sand).

The subdivisions of clay loam and silty clay loam classes according to clay content are indicated as follows:

M	medium (less than 27% clay)
H	heavy (27-35% clay)

Organic soils i.e. those with an organic matter greater than 10% will be preceded with a letter O.

Peaty soils i.e. those with an organic matter greater than 20% will be preceded with a letter P.

Appendix 4: Description of the Grades and Subgrades

The ALC Grades and Subgrades are described below in terms of the types of limitation which can occur, typical cropping range and the expected level and consistency of yield. In practice, the grades are defined by reference to the land's physical characteristics, for which the cut-offs are described in Section 3 of the 1988 MAFF (now Defra) ALC guidelines. The most productive and flexible land falls into Grades 1, 2 and Subgrade 3a and collectively comprises about one-third of the agricultural land in England and Wales. About half the land is either of moderate quality (Subgrade 3b) or poor quality (Grade 4). Although less significant on a national scale, such land can be locally valuable to agriculture and the rural economy where poorer farmland predominates. The remainder is very poor quality land in Grade 5, which mostly occurs in the uplands.

Descriptions are also given of other land categories which may be used on ALC maps.

Grade 1 - excellent quality agricultural land

Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown and commonly includes top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality.

Grade 2 - very good quality agricultural land

Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than on Grade 1 land.

Grade 3 - good to moderate quality agricultural land

Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in Grades 1 and 2.

Subgrade 3a - good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.

Subgrade 3b - moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.

Grade 4 - poor quality agricultural land

Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (e.g. cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties in utilisation. The grade also includes very droughty arable land.

Grade 5 - very poor quality agriculture land

Land with very severe limitations which restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.

Appendix 5: References

ⁱ <http://www.bgs.ac.uk/data/mapViewers/>

ⁱⁱ SSEW 1983 Soils of Eastern England

ⁱⁱⁱ magic.defra.gov.uk/

APPENDIX 6 –DETAILED SITE PRO FORMAS

APPENDIX 7- INTERIM HOUSING NEED ASSESSMENT



ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

INTERIM HOUSING NEED ASSESSMENT

ON BEHALF OF REDROW HOMES NORTH WEST

Date: March 2019

Pegasus Reference: P17-0098

Pegasus Group

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3.	NEW DEMOGRAPHIC AND HOUSING MARKET INDICATOR DATA	6
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5.	CONCLUSIONS.....	17

1. INTRODUCTION

- 1.1 This report considers the demographic and economic factors relevant to responding to the Submission Draft of the St Helens Local Plan. It focuses on the housing growth targets and economic arguments that form part of the **document's** evidence base. This report has been prepared on behalf of Redrow Homes North West (Redrow).
- 1.2 The comments within this report serve to highlight a number of aspects of the Local Plan and its supporting evidence base that require revision or additional analysis to be considered suitably robust.
- 1.3 This report is structured as follows:
- Section 2 provides a review of existing evidence on housing need in St Helens.
 - Section 3 analyses the most recent data on demographic trends and housing market indicators.
 - Section 4 reviews past employment trends in St Helens, along with selected benchmark areas.
 - Section 5 presents overall conclusions from the analysis.

2. EXISTING EVIDENCE ON HOUSING NEED IN ST HELENS

Introduction

- 2.1 This section reviews what the existing evidence says on future housing need in St Helens. It references the housing requirement figure identified in the adopted Core Strategy, before going on to summarise the standard methodology for calculating local housing need, which was introduced by the Government in 2017 as part of its **'Planning for the Right Homes in the Right Places'** consultation. It also summarises housing targets identified in the Liverpool City Region Strategic Housing & Employment Land Assessment (January 2017), the January 2019 SHMA Update and the Submission Draft of the Local Plan. The targets are set out in chronological order.

Current Housing Target for St Helens – October 2012

- 2.2 The adopted Local Plan Core Strategy (October 2012) for St Helens goes with the figure of 570 dwellings per annum (dpa), which was identified by the Regional Spatial Strategy in 2006. The Local Plan Preferred Options document, published in December 2016, also identifies the need for 570 dpa over the period 2014-33. This requirement includes an annual uplift of 119 dpa compared to the objectively assessed housing need (OAN) figure of 451 dpa, which was set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA).

Strategic Housing & Employment Land Market Assessment – January 2017

- 2.3 Published in January 2017, the consultation Draft of the Liverpool City Region Strategic Housing & Employment Land Market Assessment (SHELMA) identified housing need for St Helens ranging from 397 dpa (economic baseline) to 855 dpa (economic growth) dpa, with a demographic based need of 416 dpa. The housing need associated with the economic growth (855 dpa) reflects the jobs growth which could result from development projects and policies which are expected to be implemented over the study period.

'Planning for the Right Homes in the Right Places' – September 2017

- 2.4 This consultation document was published in September 2017 on the back of **commitments set out within the White Paper 'Fixing our Broken Housing Market'**, which included proposals to tackle the housing challenge, specifically to build more houses of the type people want to live in, in the places they want to live in. The consultation paper considered that the previous system for determining dwelling requirements was too complex and that it led to a costly and time-consuming process that lacked transparency.

In response to this a standard approach was identified, based on three key principles, to be simple, based on publicly available data and realistic.

- 2.5 The approach taken, as part of the original standard methodology, is essentially a top down method to achieving a total number of homes nationally per annum. The targeted figure was initially 266,000 homes per annum, which was an average of three different sources of evidence. More recently, however, a higher figure of 300,000 homes per annum has been targeted by the Government.
- 2.6 When the standard methodology was released for consultation, it used the 2014-based household projections as one of the main starting points for calculating local housing need. It takes the projections (the average between the first ten-year period from the current year (now 2019 to 2029, although the original methodology was based on a timeframe of 2016 and 2026) as a starting point or the Local Plan requirement (if it was adopted within the last five years). On top of that, it then applies an uplift based on affordability, which is an arbitrary calculation to generate figures that are capped at 40% of the household projections or the Local Plan figure (depending on its status and age).
- 2.7 The total number of homes achieved by the standard methodology using the most recent 2016-based household projections is significantly short of 266,000 and 300,000 and is closer to around 213,000 homes per annum.
- 2.8 More recently, a Revised NPPF (July 2018) was published following a consultation exercise, which provides the policy framework that the standard methodology fits within. The methodology remained unchanged, except for clarity over the starting point and a discrete change relating to what figure the cap is applied to in certain circumstances.
- 2.9 Following the release of the 2016-based housing projections and a consideration of their implications on the standard methodology (which identified a much slower rate of household formation for many districts), a consultation was launched in October 2018 by MHCLG on how to assess local housing need¹. In summary, it suggested that there are flaws to the standard method, which will cumulatively result in delivering homes at a level inconsistent with the national target to deliver 300,000 homes per annum. The consultation closed in the first week of December 2018 and made three proposals:
- For the short-term, to specify that the 2014-based data will provide the demographic baseline for assessment of local housing need.

¹ Ministry of Housing, Communities & Local Government. *Technical consultation on updates to national planning policy and guidance*. October 2018.

- To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies a departure from the standard methodology.
- In the longer term, to review the formula.

2.10 **The Government's response to the consultation** was published on 19 February 2019 and the NPPF and NPPG have subsequently been updated to take account of the consultation findings. The NPPG now states that the 2014-based projections should be used for the standard method, while going on to confirm that the 2016-based projections will not be considered to be an exceptional circumstance that justifies identifying minimum need levels lower than those identified by the standard method (para 2a-015-20190220).

SHMA Update – January 2019

2.11 The updated SHMA was published in January 2019. It calculates housing need using the standard methodology for the period 2018-2028 utilising both the 2016-based and 2014-based household projections. Applying the 2016-based projections to the standard method produces a figure of 383 dpa, which rises to 482 dpa when the 2014-based projections are used. This represents a decline from the 504 dpa indicative housing need figure identified by the standard methodology for the period 2016-2026.

2.12 In addition to housing need arising from the standard method, the SHMA considers a number of scenarios aligned with planned economic growth in the Borough, which are set out in the St Helens Employment Land Needs Study². The ELNA considers three economics scenarios that set out different rates at which sites could be built out and jobs created – 1 is the quickest, 2 is the middle option and 3 is the slowest, taking account of possible infrastructure constraints. The ELNA concludes that Scenarios 2 and 3 as the most likely to happen. The SHMA models the resulting housing requirements and scenario 2 results in a need for 514 dpa, while scenario 3 results in a need for 479 dpa (both for the period 2016 to 2033).

2.13 The ELNA also considered alternative St Helens employment scenarios where particular sites do not come forward for different reasons. The SHMA looks at four sensitivity options in relation to this:

- Option 1: Remove Omega South (EA1).
- Option 2: Remove EA1 and Land at Millfield Ln and Liverpool Rd, Haydock (EA7).

² BE Group. *St Helens Employment Land Needs Study*. October 2015.

- Option 3: Remove EA1 and Land North East of Junction 23 M6, Haydock (EA4).
- Option 4: Remove EA1, EA7 and EA4.

2.14 Economic scenarios 2 and 3 have been used by the SHMA to estimate the quantum of housing needed to support the workforce growth in each of the four options outlined above. The options show a need for between 474-511 dpa for Scenario 2, and for between 459-476 dpa for Scenario 3. The economic scenario 2/sensitivity option 3 combination leads to a requirement of 486 dpa, which is the proposed target for new homes in the Local Plan Submission Draft.

Housing Target in Local Plan Submission Draft – January 2019

- 2.15 Prior to arriving at the proposed housing target, the Local Plan Submission Draft firstly applies the 2014-based household projections to the standard method for the period 2019-29. This calculation produces a target of 468 dpa.
- 2.16 Taking into account the economic scenarios outlined in the SHMA, the Plan concludes that over the period 2016 to 2035, a minimum of 9,234 net additional dwellings should be provided, at an average of at least 486 dwellings each year. The Plan considers this to be the most realistic outcome based on the various housing need figures identified by the January 2019 SHMA Update. The target of 486 dpa represents a decline of around 15.0% on the previous figure of 570 dpa in the previous consultation version of the document. No information is provided on why it is felt a lower housing target is now required for the District.

Summary

- 2.17 Dwelling requirements for St Helens currently stand at 570 per annum, as outlined in the adopted Core Strategy. The Submission Draft of the Local Plan is proposing to reduce the annual requirement to 486, which would represent a decline of around 15.0% on the current target. This reduction could pose a real risk to St Helens as it seeks to achieve sustainable long-term growth and attract new households and employment opportunities to the area. Further evidence is provided in sections two and three on why the Local Plan needs to give serious consideration to uplifting the housing target for St Helens over the Plan period 2020-35.

3. NEW DEMOGRAPHIC AND HOUSING MARKET INDICATOR DATA

2017 Affordability Ratio Data

- 3.1 The 2017 affordability ratio³ for St Helens is 5.59, which is 0.25 points higher than the previous ratio of 5.34, demonstrating that affordability in the District has worsened slightly over the most recent 12-month period for which data are available. The affordability ratio was below 5 over the period 2009-13, however it has remained above 5 since 2014.
- 3.2 When comparing the affordability ratio data with other authorities in the North West, St Helens is one of the more affordable districts to live in region. South Lakeland (9.67) and Trafford (8.94) are the least affordable places. The average ratio for the entire region is 5.79, which is closer to the figure for St Helens. However, the fact that the ratio in St Helens has remained above 5 since 2014 means that affordability still remains an issue for the District.
- 3.3 When comparing the North West with other regions, the most affordable region to live is the North East, with an affordability ratio of 5.21. Unsurprisingly, London is the least affordable and has a ratio of 12.36. **The North West's** ratio remained above 5 since 2004, indicating that housing in the region has not become more affordable. The average price of a home is therefore likely to remain unaffordable for many, especially for local employees on average incomes.

2016-based Subnational Household Projections

- 3.4 Compared with the 2014-based household projections, the 2016-based projections suggest that growth in St Helens will be lower than originally thought. This is in line with many other districts in England, with the 2016-based projections being less optimistic about future growth prospects. For example, between 2016 and 2026, the 2014-based projections indicate there will be growth of around 4,700 households in St Helens. Over the same timeframe, the 2016-based projections suggest the figure will be approximately 3,900.
- 3.5 It should be noted that household projections are based on short-term past trends of natural change and net migration (five years for internal migration and six years for international migration). Indeed, ONS themselves acknowledge the limitations of the projections within the October 2018 MCHLG technical consultation, noting at Page 7 that:

³ Consistent with the original standard methodology consultation in 2017, the work-place based median affordability ratio has been used.

*"They do not take account of how many people may want to form new households, but for whatever reason aren't able to, such as young adults wanting to move out of their parents' house, or people wanting to live on their own instead of in a house share. Therefore, household projections are not a measure of how many houses would need to be built to meet housing demand; they show what **would happen if past trends in actual household formation continue.**"*

*"Although the latest household projections are lower than the previously published projections, this does not directly mean that fewer houses are needed in the future than thought. This is because the projections are based on recent actual numbers of households and are not adjusted to take account of where homes have been needed in recent years but have not been available. Therefore, if more homes are built, the increased availability of homes may result in more households forming. The opposite is also true – if fewer homes are built then fewer households are able **to form.**"*

- 3.6 Further, it is acknowledged that there are additional methodological changes, which may have impacted the change to the number of households. Relevant factors for the variations are considered further below.

2016-based Subnational Population Projections

- 3.7 In order to further understand the variations between the different household projection time series, it is necessary to consider the population projections, which are a key component. Tables 3.1 and 3.2 show the population change in each of in the 2016 and 2014-based Subnational Household Projections (SNHP) respectively.
- 3.8 In order to further understand the differences between the different household projection time series, it is necessary to consider the population projections, which are a key component. Tables 3.1 and 3.2 show the population change in each of in the 2016 and 2014-based Subnational Household Projections respectively. With the more recent projections showing a slower rate of household formation, the new population projections unsurprisingly show a lower rate of growth in the number of people living in St Helens. The lower rate of growth projected in the more recent projections compared to the earlier data set is quantified between 2016 and 2026 as a difference of around 1,100 fewer people and between 2019 and 2029 as a difference of around 1,200 fewer people.
- 3.9 When reviewing the differences in population profile over a ten-year period, it is evident that the younger population and those of working age are projected to contract and, in particular, the older/retirement population is projected to grow. Such circumstances show

the opposite of a balanced and sustainable community. It is also in contradiction of two of the Plans Strategic Aims, namely:

- Strategic Aim 1: Supporting regeneration and balanced growth – which includes the objective of regeneration by enabling steady and sustainable economic and population growth.
- Strategic Aim 4: Meeting housing needs – which has the objective of enabling the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings.

3.10 This sustainability issue lends further weight to the argument that St Helens should be planning for economic growth to expand opportunities for a younger population to reside in the area.

Table 3.1: 2016-based Subnational Population Projections by Five Year Age Group in St Helens

Age group	2016	2019	2026	2029	2016-26	2019-29
Age 0 - 4	-561	-336	-321	-561	-336	-321
Aged 5-9	-311	-622	-668	-311	-622	-668
Aged 10-14	1,343	473	206	1,343	473	206
Aged 15-19	520	1,442	1,551	520	1,442	1,551
Aged 20-24	-1,528	-608	-337	-1,528	-608	-337
Aged 25-29	-1,480	-2,015	-1,954	-1,480	-2,015	-1,954
Aged 30-34	494	-329	-704	494	-329	-704
Aged 35-39	2,238	1,390	1,249	2,238	1,390	1,249
Aged 40-44	134	1,683	1,939	134	1,683	1,939
Aged 45-49	-2,742	-1,697	-1,288	-2,742	-1,697	-1,288
Aged 50-54	-1,836	-3,045	-2,929	-1,836	-3,045	-2,929
Aged 55-59	1,195	436	-297	1,195	436	-297
Aged 60-64	2,320	2,171	1,939	2,320	2,171	1,939
Aged 65-69	-524	1,136	1,598	-524	1,136	1,598
Aged 70-74	351	-691	-680	351	-691	-680
Aged 75-79	2,445	1,454	1,205	2,445	1,454	1,205
Aged 80-84	1,506	2,102	1,994	1,506	2,102	1,994
Aged 85-89	889	972	1,076	889	972	1,076
Aged 90+	379	552	628	379	552	628
All Ages	4,837	4,466	4,201	4,837	4,466	4,201

Source: ONS

Table 3.2: 2014-based Subnational Population Projections by Five Year Age Group in St Helens

Age group	2016	2019	2026	2029	2016-26	2019-29
Age 0 - 4	0	-100	-100	0	-100	-100
Aged 5-9	100	-100	-100	100	-100	-100
Aged 10-14	1,200	600	400	1,200	600	400
Aged 15-19	400	1,300	1,400	400	1,300	1,400
Aged 20-24	-1,600	-600	-300	-1,600	-600	-300
Aged 25-29	-1,400	-2,100	-2,100	-1,400	-2,100	-2,100

Age group	2016	2019	2026	2029	2016-26	2019-29
Aged 30-34	700	-100	-500	700	-100	-500
Aged 35-39	2,100	1,500	1,400	2,100	1,500	1,400
Aged 40-44	0	1,500	1,700	0	1,500	1,700
Aged 45-49	-2,900	-1,900	-1,400	-2,900	-1,900	-1,400
Aged 50-54	-2,000	-3,100	-3,000	-2,000	-3,100	-3,000
Aged 55-59	1,000	300	-500	1,000	300	-500
Aged 60-64	2,200	2,000	1,700	2,200	2,000	1,700
Aged 65-69	-600	1,000	1,500	-600	1,000	1,500
Aged 70-74	400	-700	-700	400	-700	-700
Aged 75-79	2,700	1,600	1,300	2,700	1,600	1,300
Aged 80-84	1,700	2,400	2,300	1,700	2,400	2,300
Aged 85-89	1,200	1,200	1,300	1,200	1,200	1,300
Aged 90+	700	900	1,100	700	900	1,100
All Ages	5,900	5,500	5,200	5,900	5,500	5,200

Source: ONS

- 3.11 It is next appropriate to consider the projected components of change, to understand where the differences are occurring (i.e. due to differences in natural change and/or migration). Table 3.3 presents this information for the 2016-based projections, with Table 3.4 showing the corresponding figures for the 2014-based projections.
- 3.12 When comparing the data, it can be seen that natural change in the 2016-based projections is expected to be lower as a result of fewer births (as reflected in the declining population of people aged 0-4 in Table 3.1) and higher number of deaths (as reflected in the reduced levels of people aged 85+). The level of net migration is higher in the 2016-based projections, although this is offset by the lower level of natural change. Based on the analysis presented, there is concern that St Helens will have an unbalanced population, due to a declining younger population and fewer people of working age.
- 3.13 The data suggest that St Helens needs to try and attract more people to live in the area from elsewhere if its population is to be balanced and sustainable. This is a particularly **important point to consider in relation to the District's future labour supply** (i.e. sufficient people of working age to fulfil job growth aspirations). As shown in Table 3.1, growth in the number of working age people is projected to be significantly lower in the 2016-based projections. To ensure this does not place added pressure on the existing working age population, St Helens must ensure it has a sufficient supply of housing to attract new residents to the area.

Table 3.3: 2016-based Subnational Population Projections Components of Change in St Helens (Figures in 1,000s)

Component	2016	2019	2026	2029
Population	178.5	179.0	179.5	180.0
Natural Change		0.0	0.1	0.1

Births		1.9	2.0	2.0
Deaths		1.9	1.9	1.9
All Migration Net		0.4	0.4	0.5
Internal Migration In		4.9	4.9	5.0
Internal Migration Out		4.5	4.5	4.5
International Migration In		0.3	0.3	0.3
International Migration Out		0.3	0.3	0.3
Cross-border Migration In		0.2	0.2	0.2
Cross-border Migration Out		0.3	0.3	0.3

Source: ONS

Table 3.4: 2014-based Subnational Population Projections Components of Change in St Helens (Figures in 1,000s)

Component	2016	2019	2026	2029
Population	178.2	178.8	179.4	180.1
Natural Change	0.3	0.3	0.3	0.3
Births	2.0	2.0	2.0	2.1
Deaths	1.8	1.8	1.8	1.8
All Migration Net	0.3	0.3	0.3	0.3
Internal Migration In	4.6	4.7	4.7	4.7
Internal Migration Out	4.4	4.4	4.4	4.3
International Migration In	0.3	0.3	0.3	0.3
International Migration Out	0.2	0.2	0.3	0.3
Cross-border Migration In	0.2	0.2	0.2	0.2
Cross-border Migration Out	0.3	0.3	0.3	0.3

Source: ONS

- 3.14 As highlighted above, the projections are based on short-term trends (five years for internal migration and six years for international migration). It is therefore useful to consider the components of change that informed the different time series of projections. Table 3.5 sets out the estimated components of change since 2002. The final two rows (highlighted in bold) summarise the data that was used as an input to the projections.
- 3.15 Consistent with the estimates for the periods leading up to the projection starting year, births in the most recent data series (2016-based) are lower and deaths are higher, which has resulted in increased levels of negative natural change. Levels of migration (both internal and international) are higher for the 2016-based projection timeframe, although this is offset by the lower level of natural change. The migration data indicate that St Helens is still a place where people want to live. The mid-2016 and mid-2017 estimates show a significant increase in internal net migration compared with 2015, which could be a future direction of travel that would not be picked up by the most recent projections.

- 3.16 Given the variation and fluctuation in migration levels, it is clear that population projections can change significantly based on recent past trends. LPAs should, therefore, be mindful that projections are self-fulfilling and consider other important factors such as affordability, population profile and the housing needs arising from economic growth aspirations.

Table 3.5: Mid-Year Estimates Components of Change for St Helens

	Pop Start	Births	Deaths	Natural Change	Internal Net	Interna- tional Net	Other Change	Pop End
Mid 2002	176,826	1,820	1,890	-70	-39	-69	-353	176,295
Mid 2003	176,295	1,829	1,835	-6	69	5	-366	175,997
Mid 2004	175,997	2,014	1,938	76	101	-74	-362	175,738
Mid 2005	175,738	1,933	1,864	69	121	-188	-379	175,361
Mid 2006	175,361	2,023	1,783	240	-49	29	-382	175,199
Mid 2007	175,199	2,119	1,819	300	-115	-11	-403	174,970
Mid 2008	174,970	2,124	1,816	308	104	160	-436	175,106
Mid 2009	175,106	2,083	1,874	209	300	83	-426	175,272
Mid 2010	175,272	2,148	1,764	384	-114	128	-467	175,203
Mid 2011	175,203	2,128	1,694	434	150	113	-495	175,405
Mid 2012	175,405	2,143	1,708	435	224	40	20	176,124
Mid 2013	176,124	2,033	1,851	182	-108	13	10	176,221
Mid 2014	176,221	2,024	1,727	297	599	54	20	177,191
Mid 2015	177,191	1,967	1,964	3	281	101	16	177,592
Mid 2016	177,592	1,991	1,907	84	604	197	3	178,480
Mid 2017	178,480	2,067	1,946	121	667	77	-14	179,331
2016	2,389	10,295	8,944	1,351	1,146	449	-429	
2014	1,115	10,535	8,891	1,644	452	537	-1,358	

Source: ONS

- 3.17 Information published by the Ministry of Housing, Communities & Local Government (MHCLG) provides net completions data going back to 2001/02 and Table 3.6 presents this information. It can be seen that in 2017-18, there were 408 net additions to the dwelling stock in St Helens – below the annual target of 570 in the adopted Local Plan.
- 3.18 In the 17-year presented in Table 3.6, the District has only seen net dwellings exceed the current annual target of 570 on four occasions (highlighted in red in the table). There was a sharp fall in net dwellings in 2010/11, where the recorded figure fell to only 69, although this is very much an outlier when compared with the other years. Net additional dwellings in St Helens have been in the range 400-630 since 2013/14 and this has

coincided with higher levels of internal migration, indicating a level of demand for new housing in St Helens from people wanting to move into the area.

Table 3.6: Net Additional Dwellings in St Helens, 2001-17⁴

Year	Net Additional Dwellings
2001-02	433
2002-03	206
2003-04	728
2004-05	607
2005-06	442
2006-07	512
2007-08	348
2008-09	152
2009-10	311
2010-11	69
2011-12	419
2012-13	264
2013-14	551
2014-15	632
2015-16	575
2016-17	487
2017-18	408

Source: MHCLG Live Table 122

- 3.19 A further indicator of housing market pressure is whether there is a sufficient proportion of vacant housing stock in the market to provide flexibility for renovations, transactions etc. A rate of 3.0% has previously been identified as an appropriate level of vacancies to maintain. The Government maintains a statistical data set of live tables recording such data. The number of vacancies in October 2017 was 2,436, which represents 3.0% of the total housing stock (82,160), meaning St Helens is right on the threshold for the appropriate level of vacancies.

Summary

- 3.20 Despite not being one of the most expensive parts of the North West in which to buy a house, the cost of housing in St Helens still remains an issue. The affordability ratio was below 5 over the period 2009-13, however it has remained above 5 since 2014 and this means that many people will continue to be priced out of the housing market.
- 3.21 Net additional dwellings in St Helens have been in the range 400-630 since 2013/14 and this has coincided with higher levels of internal migration, indicating a level of demand for new housing in St Helens from people wanting to move into the area.

⁴ The 2011/12, 2012/13, 2013/14, 2014/15, 2015/16, 2016/17 and 2017/18 figures are provisional and subject to scheduled revisions pending the release of future census dwelling stock data.

- 3.22 In terms of the future, it is evident that the younger population in St Helens is projected to contract and the number of elderly people is expected to grow. Such circumstances show the opposite of a balanced and sustainable community, which is further evidence to suggest that District should be planning for economic growth to expand opportunities for a younger population to reside in the area. Accordingly, it is important to consider other factors such as affordability and growth aspirations (the latter is explored in the next two sections), when creating successful and sustainable communities.

4. EMPLOYMENT TRENDS IN ST HELENS

- 4.1 It is helpful to look at past employment trends in St Helens, as housing need will be driven to a large extent by changes in the labour market. This section analyses the latest jobs data published by the Office for National Statistics (ONS). It focuses on St Helens, along with the benchmark areas of the Liverpool City Region Combined Authority, the North West and Great Britain.

Employment Trends

Total Employment

- 4.2 ONS data allow for long-term analysis of past trends in employment going back to 1998. As a result of changes to the methodology used in producing the data, it is not possible to look at trends over a continuous period. The following timeframes have been analysed to allow for this fact:

- 1998-2008: Jobs data published as part of the Annual Business Inquiry (ABI) by ONS.
- 2009-2015: Jobs data published as part of the Business Register & Employment Survey (BRES) by ONS, which replaced the ABI.
- 2015-2017: Jobs data published by ONS as part of the BRES.

- 4.3 Table 4.1 shows jobs in St Helens between 1998 and 2008, along with the benchmark areas. The District saw total employment increase by around 6,000 from 1998-2008, equating to annual growth of 1.0%. This was higher than the year-on-year change seen in all three benchmark areas.

Table 4.1: Jobs Change in St Helens, 1998-2008

Total Employment	1998	2008	Absolute Change	% Annual Change
St. Helens	55,000	61,000	6,000	1.0%
Liverpool Combined Authority	551,000	584,000	33,000	0.6%
North West	2,789,000	3,004,000	215,000	0.7%
England	21,155,000	23,074,000	1,919,000	0.9%

Source: Annual Business Inquiry

Note: Figures may not sum due to rounding

- 4.4 Table 4.2 shows the jobs change in St Helens and the selected benchmark areas between 2009 and 2015. The District saw employment decline by 0.5% per annum between 2009 and 2015, equating to around 2,000 less jobs. By contrast, the three benchmark areas all saw employment increase over the same timeframe. One possible explanation for the downward trend in St Helens is that the District felt the effects of the 2008/09 economic

downturn more severely than the Combined Authority, region and England as a whole. While sectors such as business, administration and support services (growth of 2,500) saw an increase in job numbers from 2009-15, this was offset by declines in construction (3,000), public administration (1,000) and education (1,000).

Table 4.2: Jobs Change in St Helens, 2009-2015

Total Employment	2009	2015	Absolute Change	% Annual Change
St. Helens	63,000	61,000	-2,000	-0.5%
Liverpool Combined Authority	600,000	612,000	12,000	0.3%
North West	3,118,000	3,231,000	113,000	0.6%
England	24,068,000	25,699,000	1,631,000	1.1%

Source: Business Register & Employment Survey

Note: Figures may not sum due to rounding

- 4.5 Table 4.3 shows employment change between 2015 and 2017. The labour market in St Helens performed relatively well over this period, which is the most recent timeframe for which data are available. The decline in job numbers witnessed between 2009 and 2015 was reversed, with St Helens seeing employment growth of 1.6% per annum. In absolute terms, this represents a rise of 2,000. The percentage annual growth was in line with the Liverpool Combined Authority increase and was slightly higher than the national increase of 1.4% p.a.

Table 4.3: Jobs Change in St Helens, 2015-2017

Total Employment	2015	2017	Absolute Change	% Annual Change
St. Helens	62,000	64,000	2,000	1.6%
Liverpool Combined Authority	619,000	639,000	20,000	1.6%
North West	3,263,000	3,384,000	121,000	1.8%
England	25,934,000	26,682,000	748,000	1.4%

Source: Business Register & Employment Survey

Note: Figures may not sum due to rounding

- 4.6 It has been already noted in paragraph 2.3 of this report that the January 2017 consultation of the Liverpool City Region SHELMA highlights that St Helens could see a housing requirement of up to 855 dpa – significantly higher than the 486 dpa target in Submission Draft of the Local Plan. This is based on the economic growth scenario in the SHELMA, which assumes 0.7% employment growth per annum in the City Region between 2012 and 2037. The St Helens Employment Land Needs Study⁵ notes that past growth in the District has been significantly restricted by a lack of suitable land. If the District is able to address this issue, it does not appear unreasonable to expect it to see a long-term increase in job number numbers of at least 0.7% per annum, especially since its labour market performed well between 2015 and 2017.

⁵ BE Group. *St Helens Employment Land Needs Study*. October 2015.

Summary

- 4.7 This section demonstrates that employment in St Helens grew strongly over the ten-year period up to 2008, before suffering a decline from 2009-15. This is likely to have been the legacy effects of the economic downturn and recession in 2008/09. However, since **then the District's labour market has been** on a positive trajectory since 2015, with the jobs market performing in line with the wider Liverpool Combined Authority area and out-performing national growth. For St Helens to continue making an important contribution to the Combined Authority, it is imperative that its strong recent employment growth continues in the long-term.
- 4.8 Based on a review of the evidence base which sits behind the Submission Draft Local Plan, further analysis is required of the implications on housing numbers of St Helens continuing to see strong levels of employment growth in the long-term. It had been our intention to provide a more detailed assessment of housing need, considering demographic and economic factors, using the Chelmer Model to put forward our own suggested housing requirement figure based on appropriate levels of economic growth, however we have held off from doing this at the current time for the following reasons:
- The current uncertainty regarding the standard methodology, with MCHLG formally confirming on 18 February (and in subsequent updates to the NPPF and NPPG) that planners should revert to the 2014 housing projections whilst the government reviews the formula over the next 18 months.
 - Affordability ratios are due to be updated in April 2019, which will affect the standard methodology calculation and time period (will change from 2018-28 to 2019-29).
- 4.9 Therefore, we believe that the position will have moved on by the time of the Examination in Public (EiP) in summer/autumn 2019 and as such reserve the right to provide a more comprehensive assessment at that stage.

5. CONCLUSIONS

- 5.1 The analysis presented in this report raises a number of important points when responding to the Submission Draft of the St Helens Local Plan. In particular, the information discussed in section two shows that the District is now planning on setting a lower annual housing target (486 dpa) than is currently outlined in the adopted Core Strategy (570 dpa). This is the opposite of what should be happening when considered against the context of the housing crisis and the **government's ambition to** increase the delivery of homes to 300,000 per annum by the mid-2020s.
- 5.2 Compared with other parts of the country, St Helens is more affordable to live, however affordability ratios have changed little over the last few years and remain above 5, suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to remain high in the long-term to address this issue and reducing the housing target to 486 dpa seems counter-productive to supporting inclusive growth in the District. It is important that the Local Plan recognises this important issue and takes steps to address it through additional housing and employment provision otherwise, as identified in section three, unsustainable consequences may occur. As it currently stands, it is hard to see how the Submission Draft Local Plan will fully address some of the main housing and demographic issues faced by the District – especially in relation to the issue of an imbalanced and ageing population.
- 5.3 The analysis presented in section four raises the question of how much labour market growth St Helens should be aiming for. Job numbers in the District have been on a relatively strong upward trajectory over the last three years and further research is required to model what the implications of this will be for housing numbers, especially in light of the argument around supporting the development of sustainable communities. By not taking this issue into account, there is a real risk that the Local Plan as it stands is not giving full consideration to the economic growth potential and competitiveness of St Helens.
- 5.4 As noted in section four of this report, we are likely to undertake a far more detailed assessment of economic growth and housing need in St Helens by the time of the EiP in summer/autumn 2019. Prior to this, however, evidence within this report suggests that the District needs to be aiming for higher housing provision than the Submission Draft Local Plan is currently suggesting. This is to meet future economic needs and to attract a more balanced and mixed community. A more appropriate starting point would be the

570 dpa target in the adopted Core Strategy, and the more detailed modelling may indeed indicate that this figure needs to be higher.

- 5.5 We reserve the right to provide a detailed Housing Needs Assessment using the Chelmer model to put forward our own housing requirement figure at a later date. We have held off from doing this at the current time due to the current uncertainty regarding the standard methodology and the impending update to the affordability ratio data in April 2019, which will affect the standard methodology calculation and time period for assessment.

APPENDIX 8- **COUNCIL'S HOUSING TRAJECTORY**

APPENDIX X 9- PEGASUS HOUSING TRAJECTORY

APPENDIX 10- SPATIAL DISTRIBUTION OF SITES

RO0160



St. Helens
Council

258

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

Ref: LPSD

01 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>SHIRLEY</u>	First name: _____
Last Name: <u>BIRCHALL</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>227 LIVERPOOL ROAD</u> <u>PEWFAH HAYDOCK</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA11 9RT</u>	Postcode: _____
Tel No: _____	_____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>25/2/19</u>
------------------	----------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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)

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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

PART B - YOUR REPRESENTATION

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

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

Policy LPA 05 SITE 2HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

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

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

Legally Compliant? DON'T KNOW	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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

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

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

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

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

The Council will have to prove that the population is going to implode to the extent that is put forward by the Council. This is greenbelt land, the use of this land fails to encourage recycling of derelict land. Our farming land will be greatly diminished if it is going to be used for building. There are insufficient places now in doctors surgeries, schools, very poor bus services, would be put not be sustainable with the addition of this number of houses. Traffic is horrendous now & and our roads & highways will not be able to cope with the increase in traffic. I have flooding problems at this site, blissley Brook could not take any increased amount of water.

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.

DELETE THIS LAND FROM THE PROPOSED REMOVAL
FROM THE GREENBELT

Please continue on a separate sheet if necessary

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

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

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

<div></div>


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

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3. To which part of the Local Plan does this representation relate?									
Policy WAD4 SITES 2EA 5EA	6EA 	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>DEVELOPMENT OF THIS SIZE AND TYPE IS NOT JUSTIFIED, ALREADY HAVE HAD MASSIVE WAREHOUSES BUILT ON GREENBELT LAND. WE NEED TO KEEP GREENBELT FOR FARMING AND URBAN REGENERATION</p> <p>THE AREAS OF HAYDOCK FLOOD BADLY AND THE RISK OF FLOODING AT CLIPSELEY BROOK WILL BE MADE MUCH WORSE WITH THE RUN OFF FROM SUCH DEVELOPMENTS.</p> <p>LIVERPOOL ROAD, MILLFIELD LANE AND THE EAST LANCASHIRE ROAD ARE BADLY CONGESTED NOW AND WITH THE EXCESSIVE AMOUNT OF TRAFFIC FROM SUCH A DEVELOPMENT THEY WOULD BE COMPLETELY GRIDLOCKED.</p>

Please continue on a separate sheet if necessary

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

DELETE THIS LAND FROM THE PROPOSED.
REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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

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

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--

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.

RO0161

PF0471

① - LPA05
③ - LPA06

518 ② - Statement of
Common Ground
12 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

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

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title:
First Name: <u>Caroline</u>	First name:
Last Name: <u>Birchall.</u>	Last Name:
Org. /ation/company:	Organisation/company:
Address: <u>32 Glain Ave</u>	Address:
<u>Garswood.</u>
Postcode: <u>WN4 0RH.</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature:	Date: <u>5/3/19.</u>
------------------	----------------------

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

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PART B - YOUR REPRESENTATION

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p><i>Release of Greenbelt in case significant harm to the purpose of the greenbelt] ①</i></p> <p><i>No statement of common ground with neighbouring authorities] ②</i></p>

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

Delete 1.2 for proposed removal
for greenbelt

Please continue on a separate sheet if necessary

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

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

--

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Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy <i>1H \$</i> <i>LP A06</i>	Paragraph/ diagram table <i>LP A06</i> <i>Billings</i>	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment			
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>Not justified - Council should provide</i> <i>strict proof of population estimate</i> <i>in decline since 1981</i> <i>Where extra people come from?</i></p>	

3

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.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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

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

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

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.

RO0162

735

13 MAR 2019

St Helens Council

Mrs Thelma Bird
5 Oaktree Road
Eccleston
St Helens
WA10 5LJ

11th March 2019

Reference: St Helens Local Plan

I am writing to object to the St Helens Council Local Plan(2018). In particular, I am objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018). The lack of infrastructure and education available 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 intensified 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.

8HS is not a sustainable parcel of land on which to build over 1000 houses. 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.

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.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the St. Helens Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

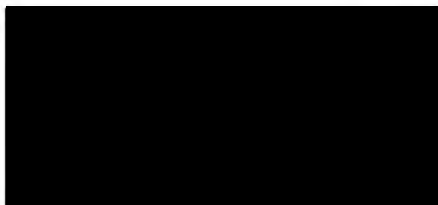
The local Primary and Secondary schools are oversubscribed. New schools will be required and there is nowhere to build them.

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 Local Plan Submission Draft is based on flawed employment forecasts and cannot be supported by historical facts.

8HS should be changed from the safeguarding for development category and maintained as Green Belt for the reasons above. The green belt should be kept for our future communities.

Thelma Bird



RO0163



St. Helens
Council

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

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
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This form has two parts;

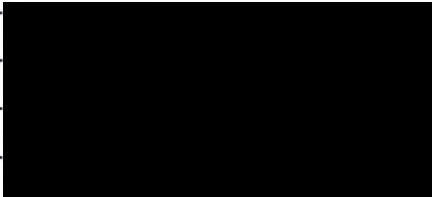
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>DAVID</u>	First name:
Last Name: <u>BIRNEY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>TONSTALL FARM</u>	Address:
Postcode: <u>WA9 4QJ</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <u>11/5/19</u>
--	----------------------

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

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

Yes ☐ (Via Email)

No ☐

Please note - 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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St.Helens Council
Town Hall
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Merseyside
WA10 1HP**

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Telephone: 01744 676190

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

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

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

Please continue on a separate sheet if necessary

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

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Yes, I wish to participate at the oral examination

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

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

Please keep a copy for future reference.

RO0164



St. Helens
Council

745
13 MAR 2019

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.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: SIMON	First name:
Last Name: BLACK	Last Name:
Organisation/company:	Organisation/company:
Address: 107 HIGHER LANE RAINFORD	Address:
Postcode: WA11 8BQ	Postcode:
	Tel No:
	Mobile No:
	Email:

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.

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 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**](mailto: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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

> IN EFFECTIVE INFRASTRUCTURE
 < FLOODING HISTORY TO (PARTIAL) PROPOSED FUTURE HOUSING AREAS
 > DRAMATIC INCREASE "NEGATIVELY" TOWARDS EXISTING ROAD NETWORK / GREEN SPACE / ENVIRONMENT / NOISE & AIR POLLUTION.
 < NATIONAL OUTLINE REINFORCES ~~GREEN~~ BROWN FIELD REDEVELOPMENT NOT GREEN!!
 > LOCAL SERVICES ALREADY PARTIALLY INEFFICIENT DUE TO OVERLOAD ROADS / DENTISTS / DOCTORS.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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RO0165



St. Helens
Council

746

13 MAR 2019

Ref: LPSD

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PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title: N/A
First Name: SARAH	First name:
Last Name: BLACK	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 110 HIGHER LANE, RAINFORD, ST. HELENS, MERSEYSIDE	Address:
Postcode: WA11 8AZ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

12/3/2019

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

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

Yes ☐ (Via Email)

No ☒

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RETURN DETAILS

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post to:

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	<i>mi</i>	Paragraph / diagram / table	<i>mi</i> <i>NA</i>	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓ ✓ ✓ ✓	Habitats Regulation Assessment	✓ ✓ ✓
Other documents (please name document and relevant part/section)				<i>Object to all policies</i>					

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not</u> legally compliant or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments</p> <p><i>Biased plan, building should be on brownfield where available and it isn't! Building on greenbelt is not necessary.</i></p> <p><i>Fails to take into account local needs regarding impact of traffic, effects from flooding, noise pollution, not enough doctors and dentists for extra demand, local schools already full, lack of public transport access and the lack of farm produce as a direct result of the farmland not being farmed.</i></p>

Please continue on a separate sheet if necessary

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

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Yes, I wish to participate at the oral examination

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

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

RO0166



St. Helens
Council

747

13 MAR 2019

Ref: LPSD

(For official use only)

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SUSAN	First name:
Last Name: BLACK	Last Name:
Organisation/company: ✓	Organisation/company:
Address: 6 THAKWOOD MESS RAINFORD	Address:
Postcode: WARR 8QL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

13. / 3. / 2019

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

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

Yes ☒ (Via Email)

No ☐

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

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

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

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

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NEXT STEPS

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**Please use a separate copy of Part B for each
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PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

Infrastructure 259 dwellings 500 houses
 Cars / Traffic impact Perhaps Village - fuel
 Flooding impact School impact
 Noise pollution / HABITAT.
 Doctors / Dentists Grade 1 Agriculture
 Green belt. 6000 loss of
 production which

Please continue on a separate sheet if necessary

Gorp Khan Brown field for Brexit takes
 loss of green wood

Please continue on a separate sheet if necessary

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

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

This image shows a completely blank white page. It is surrounded by a thick black border, which appears to be the edge of a scanner or a frame. There are no markings, text, or illustrations on the page itself.

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

RO0167



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: JAYNE	First name:
Last Name: BLACK	Last Name:
Organisation/company:	Organisation/company:
Address: 24 THE PASTURES NEW BOLD ST HELENS Postcode: WA9 4ZB	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

5 / 5 / 19

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

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

Yes ☒ (Via Email)

No ☐

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

RO0168



GREEN BELT OPPOSITION 12-03-2019
A BLACKFORD
to:
planningpolicy
12/03/2019 10:53



1 Attachment



OPPOSITION TO GREEN BELT DEVELOPMENT- HA 16.wps

Please log attached as my opposition to your Local Plan.

Alan Blackford




12 March 2019

Dear Sirs,

I am writing to register my:

**OPPOSITION TO DEVELOPMENT OF GREEN
BELT LAND IN ST. HELENS**

In particular I am strongly opposed to the release of Green Belt previously referred to as site HA16 now known as 8HS which, as a resident  will have a dramatic effect on my "Quality of Life"!

Brief points relating to my opposition are as follows :

- Green Belt Land should be sacrosanct and kept for current and future generations.
- This council has allowed significant housing development in Eccleston (notably Bobbies Lane and Triplex site) which has resulted in an unacceptable increase in traffic along Springfield Lane such that it has become a "rat run"!
- To further expand the population (1000 houses approx.) and upgrade Houghtons Lane, would turn Springfield Lane into an "overcrowded racetrack". During alterations to "Windle Island" on the East Lancs Road we have seen significant and unacceptable increases in traffic along Springfield Lane. Development of 8HS would see this become the norm resulting in additional pollution problems, difficulty for residents accessing their property, further dangers to pedestrians (including school children) and the ever increasing noise problems !
- Any development would add to existing problems with schools places and services such as doctors/dentist.
- The 8HS Ecclesfield Site provides a recreational facility for the general public and I understand there are a number of protected species therein. Leave them alone!
- With the demise of St. Helens as a Lancashire industrial town there must be

significant brownfield sites which should be developed first to include sites for SME's.

- St. Helens council appear intent on making the town a “logistics centre”. This I presume means building massive warehouses which in turn require vast numbers of H.G.V.'s to service them.
- The development of 8HS should not take place - Eccleston is full!! Leave well alone. St Helens should not become an overspill site for Liverpool. Concentrate on the many brownfield sites now available thanks to the demise of industry in the town.

ALAN BLACKFORD

RO0169



St. Helens
Council

614

12 MAR 2019

Ref: LPSD

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Representation (i.e. Comment) Form**

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS.	Title:
First Name: ELAINE	First name:
Last Name: BLACKBURN	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 1 ECCLESTFIELD ROAD ECCLESTON ST. HELENS.	Address:
Postcode: WA10 3LU	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

10-03-2019

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 ☐

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St.Helens Council
Town Hall
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3. To which part of the Local Plan does this representation relate?

Policy	LPA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

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

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

Legally Compliant?	Yes	No
Sound?	Yes	No X
Complies with the Duty to Cooperate	Yes	No

Please tick as appropriate

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

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

Positively Prepared?	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.

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)

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

Yes, I wish to participate at the oral examination

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

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.

RO0170



St Helens
Council

615

12 MAR 2019

Ref: LPSD

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

(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.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR.	Title:
First Name: ROBERT	First name:
Last Name: BLACKBURN	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 1. ECCLESFIELD ROAD ECCLESTON ST. HELENS	Address:
Postcode: WA10 5LU	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

10-3-19

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

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

Yes ☐ (Via Email)

No ☒

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 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

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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 PART B of this form, setting out your representation/comment.

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

PART B – YOUR REPRESENTATION

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

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

Policy	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 Review (2018)					

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

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

Legally Compliant?	Yes	No
Sound?	Yes	No X
Complies with the Duty to Cooperate	Yes	No

Please tick as appropriate

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

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

Positively Prepared?	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 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.
- It is unreasonable to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town, remediation has been required to develop housing in the past, such as Triplex. The plan should look to develop these brownfield sites with developers.
- 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, food security and jobs is not considered.
- The local road networks, health service, schools, policing and public transport cannot support the massive expansion of housing into otherwise farming land.

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 - 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.

Please continue on a separate sheet if necessary

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

X

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

Yes, I wish to participate at the oral examination

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

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

RO0171



St. Helens
Council

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

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
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This form has two parts;

Part A – Personal Details


Part B – Your Representation(s).

PART A – YOUR DETAILS

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

13 MAY 2019
1408

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>LINDSAY</u>	First name:
Last Name: <u>BLACKBURN</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>TUNSTALL FARM</u>	Address:
Postcode: <u>WA9 4QT</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <u>13.5.19</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

Yes, I wish to participate at the oral examination

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

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

Please keep a copy for future reference.

RO0172

① - LPA05 ② - GEN ③ Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0263
Type of Submission	Web submission
Full Name	Mrs Clare Blade
Organisation	
Address	9 Villiers Crescent Eccleston St Helens WA10 5HP
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Justified - No, the plan is based on flawed methodology

Effective - No the plan is not deliverable

Consistent with National Policy - No, it does not comply with NPPF 2018

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.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in

③

①

the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

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. Evidence as the examples identified above dictate otherwise.

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 local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

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 1:28:27 PM
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RO0173

① - LPA05 ② - GEN ③ - Para 1.7.2 OTC

Representor Details

Web Reference Number	WF0264
Type of Submission	Web submission
Full Name	Mr Stephen Blade
Organisation	
Address	9 Villiers Crescent Eccleston St Helens WA10 5HP
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Justified - No the plan is based on flawed methodology

Effective - No, the plan is not deliverable

Consistent with national policy - No, it does not comply with NPPF 2018

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It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in

③

①

the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

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

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

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 1:22:41 PM
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RO0174



St Helens Local Plan Representation Form

sonia bleasdale

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:28



1 Attachment



lpsd-representation-form .doc

Please find attached form.

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

Ref: LPSD

(For official use only)

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Paul	First name:
Last Name: Bleasdale	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 10 Edward Road Whiston Prescot Merseyside Postcode: L35 5AJ	Address: Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature:

[REDACTED]

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.

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 Post)

No ☐

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 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.

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/> Don't know <input type="checkbox"/>	No <input type="checkbox"/> Don't know <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> X

Please tick as appropriate

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

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

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

Having examined the Local Plan and knowing the site well, I wish to object strongly to the development of houses in the area 3HS as I feel the increase of dwellings in the area is not sustainable and will place undue pressure on the local infrastructure.

Bordered to the south by the C road known as Two Butt Lane and to the West by the B road

Portico Lane, 3HS is situated within half a mile of two new housing developments on neighboring Scotchbarn Lane within Knowsley authority. These new developments at Callanders Green (68 homes) and Scotchbarn Rise (133 homes) are already putting additional pressure on the local road infrastructure, particularly at the confluence with the nearest A roads servicing the area. The junctions of Portico Lane/Prescot Road and Portico Lane/Warrington Road (A57) are now confirmed with council figures at capacity.

No statement of common ground between neighboring authorities has resulted in a number of new housing developments within a 2.5 mile radius of 3HS (EPGC) including Scotchbarn Lane and the new Halsnead Garden Village under the Liverpool City Regional Plan, delivering in total almost 4000 new dwellings. Taking 3HS out of green belt for housing development would create a continuous area of urban dwellings effectively making the areas of Whiston, Portico, Eccleston Park, Nutgrove, Thatto Heath and Rainhill one large conurbation.

Increased traffic will impact pedestrian safety and the increased air pollution will adversely affect health in an area which is already way above the national average for deaths due to respiratory disease in the under 75s. Health services are already at capacity with a lack of doctors and dental surgeries, hospital and A&E facilities in the area.

More housing in the area is not sustainable due to the lack of school places which means the use of cars is encouraged to access these, thereby causing further damage to the environment.

I strongly believe no green belt land should be developed and feel **all** brownfield sites should be developed first.

Please continue on a separate sheet if necessary

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

The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019).

The council should not consider removing this land from greenbelt to place in safeguarded.

Please continue on a separate sheet if necessary

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

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8. If your representation is seeking a modification; do you consider it necessary to participate at

the oral part of the examination? (the hearings in public)

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

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.

RO0175

402



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

Ref: LPSD
11 MAR 2019
(For official use only)

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

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

This form has two parts;


Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR + MRS</u>	Title: _____
First Name: <u>JOHN + JUNE</u>	First name: _____
Last Name: <u>BLUCK</u>	Last Name: _____
Organisation/company: <u>—</u>	Organisation/company: _____
Address: <u>58 AVON RD</u> <u>BILLINGE</u>	Address: _____
Postcode: <u>WNS 7QU</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>11 MARCH 2019</u>
--	----------------------------

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

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

☐ Yes (via email) ☒ No

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

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

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 Plan does this representation relate?									
Policy	<input checked="" type="checkbox"/>	Paragraph/ diagram table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				RE:- ACO6 GREEN BELT REVIEW DOCUMENT					

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

Please tick as appropriate

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

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

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

REMOVAL OF ACO6 FROM THE LOCAL PLAN/GREEN BELT REVIEW. ALTOGETHER.

REFER TO REASONS IN PART 6. (PREVIOUS PAGE)

THE KEY POINTS ARE:-

- NO EXCEPTIONAL CIRCUMSTANCES
- NO NECESSITY
- THE BOUNDARY IS PERMANENT AND CORRECT (FOLLOWING THE ROAD) - THERE IS NO ANOMOLY.

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 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.

This local plan is unsound and not lawful for the following reasons:

No Exceptional Circumstances

There are No Exceptional Circumstances to justify the revision of the green belt boundary line. Modifications for the sake of it are simply not allowed. There is no development proposal submitted therefore no amendment can 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 and there is nowhere in this document or in the comments made by the local authority that could be considered a justification. **There must be a necessity**. This has not been demonstrated. General Planning policies and the preparation of the local plan are not enough in themselves to merit 'exceptional circumstances.' To change the green belt boundary in these circumstances would be wrong as it would not comply with the NPPF.

Existing Boundary Line

It is clear that the existing boundary line follows the pattern of the road. The house at no .81 has the boundary line behind their property – there is open land- i.e Barrows Farm next to this. The greenbelt boundary line was never going to run through open land when it was set, it has come down to the road. This is the most appropriate visible and credible feature to use as the boundary follows the pattern of the road. It picks up the rear of the properties further down the road. This was and still is the most appropriate visible and credible feature to use. No error was made when the boundary line was set. Barrows Farm is a farm site –it is rightfully wholly in the greenbelt. There is no anomaly. There were two later properties built but would have been subject to green belt planning policy so this is not an issue- they were planned in the greenbelt and have stood in the greenbelt for years. Why try to change the boundary now without a reason with would not be considered an 'exceptional circumstance' – It makes no sense. If The local authority planning officials now simply disagree where the boundary should be then this in itself does not mean that they can propose a change based on what they now believe to be correct. The boundary is meant to be permanent and enduring and not to be changed on a whim.

Openness

If amended then development is more likely. Enclosure of the land is therefore more likely. There has been permitted development in the form of a change of use of agricultural buildings at Barrows Farm (which is acceptable on such sites) however the site retains openness. The footprint is the same. As 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 land. Urban development not subject to the same planning criteria on the same site and neighbouring sites would be inappropriate

Public Access

The public access path is in the green belt which leads to the wider countryside (also green belt) is in the area proposed to be removed from the greenbelt and this is concerning as it could limit accessibility to local residents who enjoy leisure time in the area, particularly walkers [REDACTED]

Residential Dwellings

As part of a wider Farm site, Barrows Farm should remain in the Greenbelt, that is appropriate. 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, they would be in the same position with no detriment. There is no need to revise the boundary around them. Why bother?

The other two properties may however suffer a detriment if part of Barrows Farm were removed as development could happen directly behind their houses which is not subject to green belt policy, yet all the other residential dwellings on the same side of Carr Mill Road in the immediate area would be subject to Green Belt Policies should development be proposed directly at the rear of their properties. This would seem very unfair, particularly as there is no actual need to re draw the boundary at all.

Retrospective Planning applications

The council cannot claim that part of the site at Barrows Farm is an anomaly. They are aware of what is there having approved various retrospective application that were deemed not inappropriate in the greenbelt. As it was deemed appropriate for the green belt in recent years, it should certainly not be removed now as nothing has changed.

Traffic Issues

There have been long standing issues regarding traffic in this area both in terms of volume and highway safety. If the boundary is changed and development is more likely then this problem could get worse in time.

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 appear to be no realistic arguments to justify any boundary change in law or in accordance with the NPPF. It shows poor reasoning and judgement and a lack of comprehension of policy.

What will happen when the next local plan is drafted, will it be changed again? What reason will be given next time? Will we have an ever diminishing Green Belt boundary in St Helens based on unsupported opinions of where the actual boundary should be?

I would also like to comment on the lack of publicity in specific regards to the residents of Billinge. Many of our residents are elderly, have no internet access and will not be aware of the Local Plan and how this will affect their local area. This is largely due to the fact that they do not receive the free local newspaper – the St Helens Star to keep them updated on local news and events. Other areas of St Helens receive this however most Billinge residents do not. The nearest Roadshow event was in Garswood and not accessible to most Billinge Residents directly by public transport.

RO0176

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)

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.

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

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

Response Date	3/8/2019 3:02:55 PM
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RO0177



St. Helens
Council

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

Green Belt Review
Site AC06

PF347

Ref: LPSD

11 MAR 2019

(For official use only)

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

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS LISA BLACK +</u>	Title:
First Name: <u>MR PHILIP TURTLE</u>	First name:
Last Name:	Last Name:
Organisation/company: <u>/</u>	Organisation/company:
Address: <u>79 Carr Mill Road</u>	Address:
<u>Billinge</u>
<u>Wigan</u>
Postcode: <u>WN5 7TX</u>	Postcode:
Tel No: <u>[REDACTED]</u>	Tel No:
Mobile No: <u>[REDACTED]</u>	Mobile No:
Email: <u>[REDACTED]</u>	Email:

Signature: <u>[REDACTED]</u>	Date: <u>7/3/19</u>
------------------------------	---------------------

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

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

☒ Yes (via email)

☐ No

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

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

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post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	✓	Paragraph/ diagram table	✓	Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				AC06 Green Belt Review Document December 2018					

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

Please tick as appropriate

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

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

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

Removal of AC06 from the local Plan / Greenbelt 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 who 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 ^{on p.6} under 'Final Summary'.

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	<input checked="" type="checkbox"/> Yes, I wish to participate at the oral examination
--	--

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

Significant errors & unsound planning judgement is being applied with this proposal. Residents from the immediate locality of AC06 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.

6:
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 be 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 is 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 [REDACTED] 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. [REDACTED] description 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 [REDACTED] 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) Planning guidance is a material consideration for planning plan-making and decision-taking. However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies.

ii) The test for redefining a Green Belt boundary has not been changed by the NPPF (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 guidance 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 LJ). 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 LJ'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 for over ten years; and, in my respectful view, is right.

132. In this case, following two inquiries, the 1997 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 Solihull 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.

RO0178



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: PHILIP	First name:
Last Name: BLUMBERG	Last Name:
Organisation/company:	Organisation/company:
Address: 144 ELEPHANT LANE ST HELENS	Address:
Postcode: WA9 5RA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 30/4/19
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

RO0179

13 MAR 2019

Ref: LPSD



St. Helens
Council

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>IAN</u>	First name:
Last Name: <u>BOARDMAN</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>33 SEDDON CLOSE</u>	Address:
<u>ECCLESTON ST. HELENS</u>
<u>MERSEYSIDE</u>
Postcode: <u>WA10 5AG</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: <u>12th March 2019</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>BROWNFIELD STREETS SITES IN THE BOROUGH NOT BEING CONSIDERED. INCREASE IN TRAFFIC CAUSING INFRASTRUCTURE AND POLLUTION PROBLEMS.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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 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.

RO0180

ELO/65



Natural England's response to St Helens Borough Local Plan 2020-2035 Submission

Draft

Bohan, Aurelie

to:

planningpolicy@sthelens.gov.uk

13/03/2019 10:52

① - LPDO9
② - LPC06
③ - LPC06

1 Attachment



Natural England's response to St Helens Local Plan 2020_2035 Submission Draft.pdf

Dear [REDACTED]

Please find attached Natural England's response to the consultation on Natural England's response to St. Helens Borough Local Plan 2020-2035: Submission Draft.

Best wishes,
Aurelie

Aur lie Bohan
Strategic Coastal Lead Adviser
Coast and Marine Team
Cheshire, Greater Manchester, Merseyside and Lancashire Area Team

Natural England
2nd Floor
Arndale House
The Arndale Centre
Manchester
M4 3AQ

Date: 13 March 2019
Our ref: 271075
Your ref: St.Helens Borough Local Plan 2020-2035: Submission Draft

NATURAL
ENGLAND

Local Plan
St Helens Council
St Helens Town Hall
Victoria Square
St Helens
WA10 1HP

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

Dear [REDACTED]

Planning consultation: St. Helens Borough Local Plan 2020-2035: Submission Draft

Thank you for your consultation on the above, which was received by Natural England on 18th January 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England provided previous advice on the St. Helens Local Plan Preferred Options (28th January 2017) and acknowledge amendments have been made to the Local Plan in order to address some of Natural England's previous comments. This letter provides our formal response on the soundness and legal compliance requirements of the pre-submission draft.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED

The Habitats Regulations Assessment (HRA) of St. Helens Borough Local Plan has identified potential effects in relation to air pollution, functionally linked land and recreational disturbance. Natural England advise that further detail is needed to outline appropriate mitigation should an allocation result in impacts at project stage.

Without the assurance of suitable mitigation measures, the allocations are at risk of becoming undeliverable at project stage if the Habitats Regulations cannot be satisfied. While we do not expect significant detail at this stage, we would expect the relevant policies to contain details of the type of mitigation measures deemed appropriate to remove impacts and a level of confidence that they can be delivered. Without this detail we consider the plan currently **unsound** with regard to the 'effective' test and we also raise legal compliance issues with regard to the Habitats Regulations.

We welcome that St. Helens Borough Local Plan 2020-2035 contains strong policies, particularly relating to key issues such as air pollution and functionally linked land but we are seeking assurance that mitigation is available and deliverable should it be required at project level HRA. In addition, clarity is sought on how St. Helens will address recreational pressure until such a time as a Liverpool City

Region wide Recreational Mitigation Strategy is developed and adopted. We have laid out further detail on this below.

Habitats Regulation Assessment

Air pollution

Natural England welcomes the assessment of air pollution impacts on European designated sites, although we feel that further work could have been done to equate the increase in cars likely to travel along the M62 motorway as a result of housing allocations. When looking at clarifying the number of additional cars using the M62 motorway we recommend that you familiarise yourselves and make reference to the *Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* [2017] EWHC 351 in terms of in-combination effects relating to air pollution.

We are minded to agree with the conclusion of the HRA that the Plan when considered alone will not result in adverse impacts upon the integrity of the European designated sites. We appreciate that it is difficult to assess and mitigate air pollution at plan level and are content that allocations should consider this at a project level HRA, but we would like to be assured that mitigation exists and is deliverable in line with project level HRAs over the timeframe of the plan. Without these assurances the HRA cannot conclude that there will be no in-combination impacts to designated sites as the Plan is relying on project level HRAs, as stated under section 6.4 in the HRA (page 46);

"there is also the need to ensure that project-level analysis of potential air quality impacts (and if necessary, project-level mitigation) is required. This will require particular projects that are likely to result in a substantial increase in traffic flows to devise project-specific mitigation beyond the strategic 'in combination' air quality improvement measures being included in the Local Plan."

As there is a reliance on project level HRA, we would expect to see reference to the type of mitigation measure available and their deliverability set out in Policy LPD09: Air Quality within the Plan.

Functionally Linked Land (FLL)

Natural England advise that more certainty is needed in relation to the availability of suitable mitigation land should it be required at project stage. This is particularly relevant for those allocations identified in the HRA as having the potential to result in an adverse impact upon the integrity of the populations of European designated sites;

- 6EA, 7EA and 8EA allocated for employment development,
- 8HA allocated for housing,
- and sites 1HS, 4HS, 5HS, 7HS and 8HS safeguarded for housing development.

We support the Council's commitment to update the Biodiversity Supplementary Planning Document (SPD) which will look at setting out strategic proposals to work with landowners to maintain and enhance FLL within the borough, as stated in the HRA under section 5.3.3 (page 34). We advise that the Biodiversity SPD needs to be clearly referred to in the Plan. If this SPD is the proposed mechanism for delivering mitigation land as a result of loss of FLL from allocations in the Plan then this needs to be clear within the plan. In addition to stating that the SPD will be the framework for mitigation it should include the time frame for the development of the SPD, the availability of suitable mitigation sites and the arrangement for allocation sites that come forward prior to the completion of the SPD.

Recreational Pressure

Natural England welcomes the strategic approach across the Liverpool City Region in developing a Recreation Mitigation Strategy (RMS) to look strategically at the impacts of recreational pressure in the region on European designated sites and their features. However, until such a strategy has been developed and adopted it does not constitute mitigation for impacts on European designated sites that arise from recreational pressure in-combination with other plans or projects. We reiterate our advice (dated 28th January 2017) that the Council needs to consider what happens in the interim before the RMS is finalised and how you will consider in-combination impacts on European Sites prior to this. We advise that until the RMS is developed and adopted a borough wide strategy for addressing the in-combination impacts from recreational pressure is included in the Local Plan. The relevant

Policy should be worded in such a way that this interim position will be superseded when the RMS is finalised and adopted.

3

Yours sincerely

Stephen Ayliffe
Team Leader
Coast and Marine Team
Cheshire, Greater Manchester, Merseyside and Lancashire Area Team

RO0181



St Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1254
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: <i>KENNETH</i>	First name:
Last Name: <i>Bolan</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>1, CRAWFORD STREET CHOCKFACE ST. HELENS</i>	Address:
Postcode: <i>WA9 4XR</i>	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: <i>11/3/2019.</i>

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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
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

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Now please complete PART B of this form, setting out your representation/comment.

RO0182



St.Helens
Council

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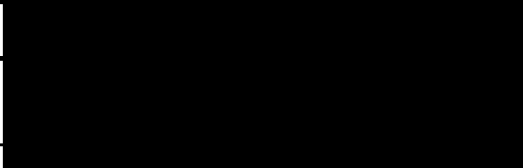
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019
1360

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: Lee	First name:
Last Name: Bolan	Last Name:
Organisation/company:	Organisation/company:
Address: 68 Crawford St Clock Face St. Helens	Address:
Postcode: WA9 4XA	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date: 11/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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Yes ☐ (Via Email)

No ☐

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St.Helens
Merseyside
WA10 1HP**

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Please use a separate copy of Part B for each separate comment/representation.

RO0183



St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SUSAN BOLAN	First name:
Last Name: BOLAN	Last Name:
Organisation/company:	Organisation/company:
Address: 1, Crawford STREET CLOCK FACE	Address:
Postcode: WA9 4XQ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11/3/19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

RO0184

ELO250



REPRESENTATION: St Helens Borough Local Plan 2020-2035 - Submission Draft
Carole Bolton
to:
planningpolicy
13/03/2019 16:45

IHA & HHS

① - LPA05

② - LPA06



1 Attachment



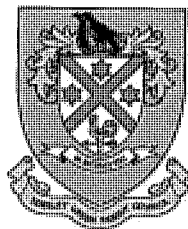
Seneley Green Parish Council.doc

Please see the attached representation from Seneley Green Parish Council.

Kind Regards

*Carole Bolton - Clerk/RFO
Seneley Green Parish Council*

75 Windsor Road - Billinge - Wigan WN5 7LD



c/o75 Windsor Road
Billinge
Wigan
WN5 7LD



13th March 2019

Local Plan
Planning Policy
St Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP

Dear Sirs

SUBMISSION DRAFT OF ST HELENS BOROUGH LOCAL PLAN 2020-2035

The following is our representation in response to the current consultation on the Submission Draft of the St Helens Borough Local Plan 2020-2035 specifically relating to:

Policy LPA05: Meeting St Helens Borough's Housing Need (table 4.5 site 1HA: land south of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood, capacity 216)

Policy LA106: Safeguarded Land: Safeguarded Land, Table 4.9 ref 1HS: land south of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood – capacity 291)

Seneley Green Parish Council supports the concerns of residents and feels that the proposals in the Submission Draft would:

1. Exceed the number of homes required in this area and as such we feel the removal of this land from Green Belt was not justified and therefore not consistent with national policy.
2. Be detrimental to residential amenity, due to the loss of Green Belt
3. Create additional traffic leading to increased congestion to adjacent 'main' roads which are narrow and clearly not sufficient for the significant traffic now using this route.
4. Reduce highway safety for both pedestrians and vehicles
5. Put increased pressure on our open spaces/playing fields; the two areas

'SERVING THE PEOPLE OF DOWNALL GREEN AND GARSWOOD'

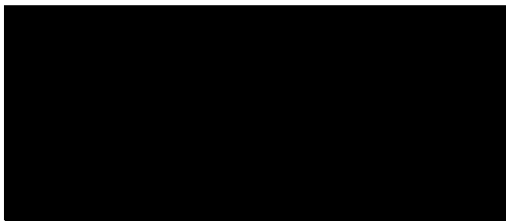
proposed for housing development are adjacent to this much used facility and

once developed, there will be no opportunity to extend this recreational space unless developers are happy to use some of their land towards this: there are no other identified, significantly sized areas in the Seneley Green area to provide the playing fields that will be needed.

6. Put at risk the open space/playing fields at Birch Grove ; we acknowledge there are existing planning regulations in place to prevent this being used for anything else but have concerns relating to this for the future.
7. Exacerbate existing health problems for residents, due to increase vehicle pollution
8. Increase pressure on our currently poor social infrastructure to the detriment of existing residents, eg there are already reported problems in getting doctor appointments at the health centre.
9. Increase pressure on our currently full schools/nurseries
10. Increase pressure on our bus transport system which is currently poor and pressure on parking at Garswood rail station which is currently not sufficient.

Parish Council is seriously concerned in relation to the above and if these cannot be resolved then we would consider the Local Plan to be unsound as there is nothing to suggest at the current time that the needs of Seneley Green would be adequately addressed and thereby not constitute sustainable development.

Yours faithfully



CAROLE BOLTON
RFO/CLERK TO THE COUNCIL

RO0185

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

30 APR 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 Monday 13th May 2019**
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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ANNE</u>	First name: _____
Last Name: <u>BONKS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2A DOUGLAS AVENUE</u> <u>BOLD, ST. HELENS</u> <u>MERSEYSIDE</u>	Address: _____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: <u>[REDACTED]</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>23/4/19</u>
------------------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

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planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

NEXT STEPS

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939

10 MAY 2019

Ref: LPSD

(For official use only)



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10 MAY 2019

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Title: <u>MRS</u>	Title: _____
First Name: <u>ANNE</u>	First name: _____
Last Name: <u>BONES</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2A DOUGLAS AVENUE</u> <u>BOLD, ST. HELENS</u>	Address: _____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>12/3/19.</u>
-----------------------	-----------------------

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Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				4 HA					

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		
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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
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Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>WE MOVED TO THIS AREA BECAUSE OF THE OPEN ASPECT IT IS ABUNDANT WITH WILDLIFE. I AM TOTALLY UNCONVINCED THAT YOU HAVE EXHAUSTED ALL THE BROWN SITES IN THE AREA. ONCE THE COUNTRYSIDE AND FARMLAND HAS GONE, IT IS GONE FOREVER AND THAT IS A TRAGIC TURN OF EVENTS. I WOULD HOPE THAT YOU START SOURCING THE MANY BROWN SITES FIRST. ALSO WERE NOT INFORMED OF THE CHANGE TO BROWN SITE</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

BY NOT BUILDING ON GREEN BELT 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.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

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.

RO0186



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

30 APR 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 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.

913

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>JOHN</u>	First name: _____
Last Name: <u>BONES</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2A DOUGLAS AVENUE</u> <u>BOLD, ST. HELENS,</u> <u>MERSEYSIDE</u>	Address: _____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>23/4/19.</u>
------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 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.**

938

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

PART A - YOUR DETAILS

10 MAY 2019

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>JOHN</u>	First name: _____
Last Name: <u>BONES</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2A</u> <u>DOUGLAS AVENUE</u> <u>BOLD, ST. HELENS</u>	Address: _____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>12/3/2019</u>
------------------	------------------------

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
4									
HA									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>I am disgusted to find out the decision to take the perfectly good farmland from Gorsey Lane to Sutton Road for this housing estate. The 1 field [redacted] Douglas Avenue is always flooded due to a high water table. Another issue is with all these large estates, the waste sewage and water are directed into the existing drainage that is ancient and can't cope resulting in a lot of flooding in this area. All the factories and large outlets around this part of the M62 corridor now carry huge amounts of traffic.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Leave the green belt and farmland as it is

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination ✓
--------------------------	--	-------------------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To have my points listened to

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.

RO0187

644

13 MAR 2019

Ref: LPSD



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

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This form has two parts;

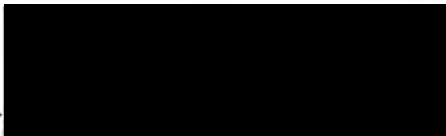
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>CAROL</u>	First name: _____
Last Name: <u>BOOTH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>14 AVERY RD</u> <u>HAUNDOK, ST HELENS</u>	Address: _____
Postcode: <u>WA1 0XA</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>5/3/19</u>
--	---------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

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RETURN DETAILS

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Town Hall
Victoria Square
St Helens
WA10 1HP**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LP A05 - SITE 2144		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> Don't Know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST HELENS HAS BEEN IN DECLINE SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM? HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTORS SURGERIES, BUS ROUTES AND OTHER SERVICES. THE USE OF CARS IS BEING ENCOURAGED BECAUSE OF LACK OF FACILITIES. THE ACCESS TO THE SITE IS INADEQUATE AND THE PROPOSAL FOR A JUNCTION AT LUGGERPOOL ROAD AND VICARAGE ROAD WOULD PUT ADDITIONAL TRAFFIC ON AN ALREADY OVERSTRETCHED ROAD.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS CAND FROM THE PROPOSED
REMOVAL FROM 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	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.



St Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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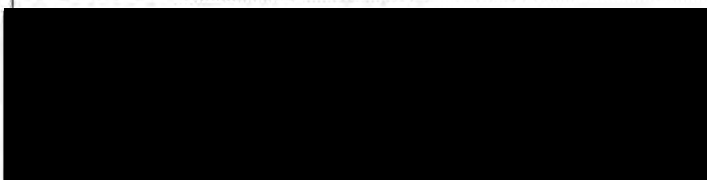
This form has two parts;


Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>CAROL</u>	First name:
Last Name: <u>BOOTH</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>14 AUGRY RD, HAYDOCK</u>	Address:
<u>ST HELENS</u>
Postcode: <u>WA11 0XA</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>5/3/19</u>
--	---------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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St.Helens Council
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Victoria Square
St Helens
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 PART B of this form,
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**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPAD4 -SITES 2 EA, 5 EA, 6 EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF THE NEED FOR THIS TYPE OF DEVELOPMENT, IN THIS POSITION AND ON THIS SCALE.</p> <p>ONE OF THE PURPOSES OF GREENBELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE USE OF RECYCLING DERELICT AND OTHER URBAN 'BROWN SITES' LAND.</p> <p>USING UP THE GREENBELT DISCOURAGES THIS. THE COUNCIL HAS ALREADY GRANTED PLANNING PERMISSION IN THE GREENBELT IN RESPECT OF SITE 26A FLORIAN PARK NORTH, AND FURTHER DEVELOPMENTS WILL ADD TO OVER CAPACITY OF ROADS.</p>

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO	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.

RO0188



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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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 (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>Russell</u>	First name: _____
Last Name: <u>Booth</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>14 Avery Rd</u> <u>Haydock, St Helens</u>	Address: _____
Postcode: <u>WA11 0XA</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>10/3/19</u>
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

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St Helens
WA10 1HP**

or by hand delivery to:

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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 PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA 04 -SITES 2 EA 5 EA 6 EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not justified - the council should be made to provide proof of the need to provide for this sort of development, in this position and at this scale. Greenbelt land is to assist in encouraging the use of recycling and using up urban 'brown sites' and for supporting the production of our own food and maintaining green sites. Using Greenbelt will allow brown sites to remain + foster.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	--------------------------	--

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Please keep a copy for future reference.

13 MAR 2019

Ref: LPSD

(For official use only)



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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>Russell</u>	First name: _____
Last Name: <u>Booth</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>14 Avery Rd</u> <u>Haydock, St Helens</u>	Address: _____
Postcode: <u>WA11 0XA</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>10/3/19</u>
------------------	----------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA05 -SITE 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>This is not justified. The Greenbelt land should be used for farming as it was intended. The council should have to prove the population estimates which it sites for the housing requirements as St. Helens population has been in decline. It's information is unsound. Additional housing isn't sustainable due to the lack of facilities - schools, doctors, bus routes and other facilities. The road systems would also be inadequate to cope.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	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.

RO0189

846 ①-LPA05 ②-LPA06 13 MAR 2019 PFO781

Ref: LPSD

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: KATE

Last Name: BOOTH

Organisation/company: _____

Address: 10 LILAC AV.

Postcode: WN4 0QL

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12/3/19

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy IHA LPAS		Paragraph/ diagram table SMACH		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Less school places, stretch doctors surgeries. more traffic</p>	

①

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.

Delete p. 50 10 from
review of greenbelt 10

Please continue on a separate sheet if necessary

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<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
IHS LPA06		Billings					
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Food security</p> <p>TRC</p>	

2

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete 10 from paper
removal of green belt 10

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0190

Representor Details

Web Reference Number	WF0399
Type of Submission	Web submission
Full Name	Mrs Melanie Boulton
Organisation	
Address	93 Winwick Road WA12 8DB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Justification of removing Site 7EA from Greenbelt at Parkside East and West, Newton-le-Willows
Paragraph / diagram / table	4.36.14 and 4.36.15
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is unsound being contrary to strong public objection to the site being removed from Green Belt, inappropriate development in respect of adjacent residential areas, and the likelihood of significant increased traffic impacts and associated health impacts caused by depreciated air quality. Site traffic is also likely to further depreciate air quality in Air Quality Management Areas in vicinity of the site caused by increased traffic levels. The previous Prologis application which included development on both Parkside East and Parkside West anticipated introducing 17,000 extra vehicles/day to our local road network.

7. Please set out modification(s) you consider are necessary

A much smaller development would be appropriate sited on the former footprint of the colliery. This would significantly reduce the anticipated increase in traffic levels and depreciation of air quality for residents. It would also mitigate the harm to wildlife.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/1/2019 9:55:39 AM
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RO0191



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

07 MAR 2019

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Anthony	First name:
Last Name: Boulton	Last Name:
Organisation/company: none	Organisation/company:
Address: 6 Alder Lane Crank St Helens	Address:
Postcode: WA11 7SG	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:
Signature: [REDACTED]	Date: 6-3-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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Merseyside
WA10 1HP**

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3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

1. WHY HAS THE NUMBER OF HOUSES INCREASED FROM 147 - TO - 259 ON THE ROCKEY LANE / HIGHER LANE SITE
2. WHY ARE YOU BUILDING ON PRIME AGRICULTURAL LAND AND TAKING JOBS AWAY FROM LOCAL PEOPLE.
3. WHY ARE YOU BUILDING ON LAND THAT IS LIKELY TO FLOOD
4. WHY ARE THE MAIN ACCESS MILL LANE / HIGHER LANE / RAINFORD BYPASS, ALL ACCIDENT BLACK SPOTS AS MAIN ROUTE OF THE ESTATE?
5. EXTRA 500 PLUS CARS ON "B" CLASS ROADS
6. SCHOOLS ARE FULL TO CAPACITY NO POLICE / FIRE / AMBULANCES NEAREST HOSPITAL 7 MILES AWAY
7. RAINFORD IS ALREADY GRID LOCKED

Please continue on a separate sheet if necessary

bro.

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.

Suggest you look at "Brownfield Site," before you take away Prime Fields for Local Produce Peoples Livelihood Jobs. - These people will be using Rainford as a commute to work in Preston Liverpool Manchester - not STHllers These wild not be affordable houses

Please continue on a separate sheet if necessary

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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RO0192

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title:
First Name: <u>BRENDA</u>	First name:
Last Name: <u>BOWDEN</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>305 LIVERPOOL RD</u>	Address:
<u>HAYDOCK</u>
<u>ST. HELENS</u>
Postcode: <u>WA11 0UB</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <u>25/2/2019</u>
-----------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LP AOS 2HA.	Paragraph/ diagram table	3HA	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DO NOT KNOW.
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> 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.	
<p>1) The council should be put to strict proof of its population estimates - population of St. Helens has been in decline since 1981 where are all the extra people coming from.</p> <p>2) One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using green belt fails to encourage this.</p> <p>3) The release of greenbelt will cause significant harm to the purposes of greenbelt</p> <p>4) Housing in this area isn't sustainable - lack of school places, e.g. Pegasus, bus routes.</p> <p>5) Access to the site is inadequate, a left inlet out from East Lane. Rd isn't safe and the proposal for the junction of Liverpool Rd + Uxbridge Rd would put additional traffic on already overstretched highway.</p> <p>6) There would be problems of rats running through proposed development</p> <p>7) Flooding problems at this site any remedies to prevent this could place greater amounts of wastes into Clapsay Brook.</p> <p>There is no statement of common ground with neighbouring authorities</p> <p>Traffic pollution - causing chest complaints - the endless noise from lorries, cars, motorbikes</p> <p>noise pollution. will increase</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

"DELETE THIS LAND FROM PROPOSED REMOVAL FROM 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	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.

RO0193

① - LPAOS

② - Statement of Common Ground AS

FF0165

Ref: LPSD

01 MAR 2019
(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>GORDON</u>	First name:
Last Name: <u>BOWDEN</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>305 LIVERPOOL ROAD</u>	Address:
<u>HAYDOCK</u>
<u>ST HELENS</u>
Postcode: <u>WA10 4N</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <u>25-2-2019</u>
-----------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
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**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
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**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA 05 SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Don't Know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES.

ONE OF THE PURPOSES OF THE GREEN BELT IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT AND OTHER URBAN LAND. USING GREENBELT FAILS TO ENCOURAGE THIS.

MOVING IN THIS AREA ISNT SUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTORS SURGERIES BUS ROUTES AND OTHER SERVICES THE PROXITY TO THE SITE IS INADEQUATE.

THERE WOULD BE PROBLEMS OF RAMP RUNNING THROUGH THE PROPOSED DEVELOPMENTS

THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES.

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.

DELETE THIS LAND FROM PROPOSED REMOVAL
FROM THE GREENBELT

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please keep a copy for future reference.

RO0194

① - LPA05

② - LPA04



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Katy	First name:
Last Name: Bowen	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 21 Derby Drive Rainford	Address:
Postcode: WA11 8BX	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

12/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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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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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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3. To which part of the Local Plan does this representation relate?

Policy	AU	Paragraph / diagram / table	AU	Policies Map	AU	Sustainability Appraisal/ Strategic Environmental Assessment	AU	Habitats Regulation Assessment	AN
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Taking Grade 1 arable land out of greenbelt protection particularly unwise in the light of Brexit - land used to grow food and adverse effect on local farm employment

The economic plan is not sustainable - there is only mention of warehouse development and provision no long term sustainable development plan for economic or employment growth

There is no mention of infrastructure support - i.e. schools, medical provision, increased traffic on an already oversubscribed road network

The lands floods regularly and if built on water will cause brook in Rainford to flood and in turn in St. Helens

Please continue on a separate sheet if necessary

①

②

①

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 more robust and sustainable plan for economic growth bringing employment (sustainable) to the borough

To ensure all brown land is used before encroaching on green belt

To comply with ONS figures.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☒ **No, I do not wish to participate at the oral examination**

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

RO0195

Representor Details

Web Reference Number	WF0231
Type of Submission	Web submission
Full Name	mr tom bowers
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	lpa05/ lpa06
Paragraph / diagram / table	
Policies Map	8HS
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.

NPPF(2016) WILL NOT BE SATISFIED DUE TO TRAFFIC GROWTH.

criteria for sustainable transport will not be met.

sustainable housing - targets are based on aspirational growth predictions

effective land use will not Be met as green belt development is promoted over brownfield sites/ town centre developments that we vary over time.

Agricultural Land - Grade 1 and 2 will be destroyed causing job loses and food sourcing will be unsustainable.

7. Please set out modification(s) you consider are necessary

and struggle to get a doctor's appointment. Schools are being extended but there are insufficient teachers. The infrastructure will not support more residents, cars and houses. Economic predictions used to support the proposed plan are inflated and inaccurate. cross border discussion must be effective and considered - this is yet to be completed fully. Brownfield land is everywhere and must take precedence over the use of green spaces.- in line with government guidelines. Road improvements do not outline how local and borough wide amends will be planned and funded.

Air quality, pollution, noise, wildlife and general health will be adversely affected to the detriment of all - where is the indication/ reference to collaboration with local hospital trusts, ccgs and 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 9:08:19 PM
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RO0196

Representor Details

Web Reference Number	WF0244
Type of Submission	Web submission
Full Name	mr andrew bowers
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	8HS
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.

UNSUSTAINABLE TRAFFIC GROWTH, - DOES NOT SATISFY NPPF 2016
INEFFECTIVE USE OF LAND CONCENTRATING ON GREENBELT RATHER THAN BROWNFIELD SITES /TOWN CENTRE DEVELOPMENT FUTURE FOOD SECURITY REQUIREMENTS ARE BEING IGNORED - THIS LAND IS AGRICULTURAL LAND OF HIGH QUALITY
THE HOUSING IS NOT SUSTAINABLE AS TARGETS FOR EMPLOYMENT ARE INACCURATE

7. Please set out modification(s) you consider are necessary

The proposal is significantly flawed and would require too many amend to list. Issues of healthcare, education traffic density, resulting pollution and effects on health - all aspects that are ill considered in the plan and out of date data has been used to justify the use of the land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

RO0197

Representor Details

Web Reference Number	WF0245
Type of Submission	Web submission
Full Name	mrs HELEN BOWERS
Organisation	
Address	
Agent Details	HELEN BOWERS

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 + LPA06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	2
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 is based on flawed methodology.

the plan is not deliverable

the plan does not comply with Nat Policy NPPF2018.

The plan does not meet criteria for sustainable growth housing transport target are based on incorrect predictions, assumptions.

The plan does not make effective use of land - green space versus town centre developments. The land does not need to be used for development - other brown site areas could be used.

7. Please set out modification(s) you consider are necessary

I do not see how the Plan can become compliant due to the number of issues

incorrect economic predictions

required regional and cross border collaboration has not been undertaken.

standard methodology for the housing need assessment has not been used.

Outdated forecasts are being used for housing needs showing inflated numbers - overestimating.

The brownfield register must be referred to and adequately used with adjustments over time.

The negative impact on farming jobs has not been justly considered.

NPPF 2016 cannot be met as the plan promotes unsustainable traffic growth causing severe traffic issues.

Air quality, pollution, general health will all be negatively impacted given the detail of the proposed plan.

Vehicle dependency will increase due to the location of the site.

Healthcare and Education requirements of the plan can never be met. They are not met now with the current level of housing. Schools, doctors surgeries etc. can be built but the required level of qualified staff must work in them. This is not currently happening in St Helens

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 6:18:50 PM
---------------	----------------------

RO0198

Representor Details

Web Reference Number	WF0239
Type of Submission	Web submission
Full Name	Mr Peter Boyce
Organisation	N/A
Address	23 Holford Way Bridge Park Newton-le-Willows WA12 0BZ
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	Local Plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	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.**7. Please set out modification(s) you consider are necessary**

There is insufficient consideration as to the effect of new buildings on both the existing infrastructure and air quality at the very least. This must contradict the guidelines set out in Government Policies.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 7:04:49 PM
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RO0199



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.


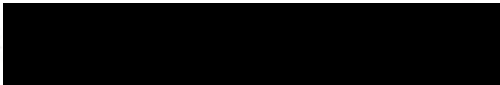
This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: KAREN	First name:
Last Name: BOYES	Last Name:
Organisation/company: RESIDENT.	Organisation/company:
Address: 4 ROSE HILL AVENUE	Address:
Postcode: BOLD WA9 4SX	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date: 16/4/19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0200



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: FRANK

Last Name: BOYLE

Organisation/company: _____

Address: 24 Grosvenor Road
Haydock

Postcode: WA11 0HA

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 02/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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 Plan does this representation relate?									
Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Removal of Green belt does not encourage the recycling of urban derelict sites.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please remove this land from proposed removal from 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)

X	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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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.



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1. Your Details

(we will correspond via your agent)

Title: MP

First Name: FRANK

Last Name: BOYLE

Organisation/company: _____

Address: 24 Grosvenor Road

Holydock

Postcode: WA11 0HA

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 07/03/19

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT sustainable as there are insufficient doctors surgeries and school places. The population is in decline in St Helens since 1981 - no justification for Councils estimates.</p>

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<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

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