



**ST HELENS**  
BOROUGH COUNCIL

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

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

**REPRESENTATION ORDER**

**RO1101 – RO1200**

**SEPTEMBER 2020**

RO1101



①-LPA05 ②-LPA06 site 3HS&8HS ③ Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0254
Type of Submission	Web submission
Full Name	Mr Simon Mackenzie
Organisation	
Address	29 Seddon Close St Helens WA10 5AG
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	8HS and 3HS
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?	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

#### 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.

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 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.

③

①

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.

①

②

**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 4:33:11 PM
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RO1102

299

Ref: LPSD

06 MAR 2019  
(For official use only)



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

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>JAMES</u>	First name: _____
Last Name: <u>MACRO</u>	Last Name: _____
Organisation/company: <u>RESIDENT</u>	Organisation/company: _____
Address: <u>20A BROOKLANDS RD</u>	Address: _____
<u>ECCLESTON</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA10 5HF</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>30 Feb 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](mailto:planningpolicy@sthelens.gov.uk)

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## FURTHER INFORMATION

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

Telephone: **01744 676190**

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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

## PART B - YOUR REPRESENTATION

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

<b>3. To which part of the Local Plan does this representation relate?</b> <i>BHS Safeguarded land.</i>									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)				<i>Grade 1 Agricultural land between the A580 Cranstock Grove Ecclesfield Rd and Houghtons lane.</i>					

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

<b>5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:</b> 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><b>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></b></p> <p><b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b></p> <p><i>Loss of Grade 1-2 agricultural land cannot be justified when St Helens has vast areas of brownfield sites available for development. We will have a greater need for home grown food when fuel for transport is less available.</i></p> <p><i>This area adjoins the A580 trunk road serving Manchester and Liverpool, including trading estates and the docklands. Air pollution is a problem. The National Institute for Health and Care (NICE) say that new development for housing should be kept away from such roads and the air pollution they create (The Times 28/2/19)</i></p> <p><i>The existing housing area that this large area of development will rely upon cannot support or provide the infrastructure for such large numbers of dwellings in terms of road, public transport, health (doctors dentist) schools.</i></p>
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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.

To make the local Plan sound, reclassify this area of land as Green Belt.  
 Concentrate new housing, if required, on Brownfield sites with sensible connections to Town centre facilities, bus services, shopping etc.  
 To train stations providing access to adjoining towns and cities and employment.  
 BHS can only offer the need for the motor car which will add to more congestion and pollution.  
 The local estate roads are narrow unsuitable for large vehicles and bus services  
 Local schools are already full to capacity  
 The Fire Service are closing the local station  
 Some approved sites for housing have been started but left fallow for several years  
 The local Police Station is not regularly staffed

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:

**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.**



## Revolution in plastic recycling

Fizzy drinks bottles could be turned into materials strong enough for car parts, scientists have said. It would transform the economics of plastic recycling. **Page 4**

## Top climber feared lost

A 30-year-old British climber whose mother died on K2 has been reported missing on Nanga Parbat, nicknamed "the killer mountain" of the Himalayas. **Page 5**

## Schools blamed for knife crime

An elected police chief in Birmingham has said schools that "off-roll" pupils are fuelling violence after three teenagers were stabbed to death in the city in a fortnight. **Page 13**

## Don't listen to British townies: Botswana is right to end its ban on elephant hunting

THUNDERER, **Page 26**

## Khan warns of nuclear threat

Imran Khan, the Pakistani prime minister, has warned of the risk of nuclear war hours after his military announced that it had shot down two Indian jets. **Page 33**

## Interserve to pay £90m fees

The government contractor Interserve is to pay £90 million, more than three times its stock market valuation, in fees to City advisers as part of a rescue plan. **Page 37**

## High five for Liverpool stars

Liverpool maintained their Premier League lead with a 5-0 win over Watford. Manchester City beat West Ham and Chelsea defeated Tottenham Hotspur 2-0. **Page 72**

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TV & RADIO TIMES 2

the times  
timesandsundaytimes  
the times

DINNER  
TONIGHT  
Lamb and minted  
crushed peas



and pepper, turn and repeat. Transfer to chopping board and leave to rest for at least 5 minutes. Roll

# Build new homes away from roads, health watchdog says

Chris Smyth Health Editor

New-build flats and houses should be kept away from the roadside, health advisers have said in guidance on town planning to cut exposure to dirty air.

Planning permission should be refused to developments that do not mitigate air pollution, and new buildings should be designed to avoid the need to arrive by car, according to the National Institute for Health and Care Excellence (NICE).

Schools, nurseries and care homes should not be built in areas where pollution is high and buildings should incorporate trees on the roof and "green walls", NICE said.

Children and adults with breathing problems must also be advised by GPs and others about staying inside, avoiding busy roads or other measures to avoid pollution on days when air quality is bad.

Councils have a responsibility to improve public health and NICE has urged

them to use the planning system to cut people's exposure to polluted air, which is linked to a list of health problems.

Professor Gillian Leng, deputy chief executive of NICE, said: "If we can address pollution at the planning stage, we can reduce the need for expensive remedial action further down the line."

"Poor air quality is associated with adverse health effects, including asthma attacks, reduced lung function, and admissions to hospital. As a society we need to think long-term and collaboratively to improve air quality across the country."

Street "canyons" lined by tall buildings on both sides trap pollutants and should be discouraged, the guidance states, adding that encouraging people to walk, cycle or take public transport is key to reducing pollution and new buildings should encourage people to travel this way.

NICE has previously said that ambulances, bin lorries and police cars should go electric to cut pollution and

set an example to the private sector. It has also recommended that councils fine parents who leave engines idling outside schools, remove speed bumps to encourage smoother driving and bring in congestion charges.

Richard Blyth, head of policy and research at the Royal Town Planning Institute, said: "Planners have a leading role in joining up the dots, from housing and transport to green spaces and land use management, to ensure communities benefit from a holistic approach to tackling air pollution. NICE's quality air standard should prompt more concerted efforts to tackle this vital issue."

Penny Woods, of the British Lung Foundation, said: "It's vital local authorities take this advice and turn it into bold action. Road transport is a major contributor to the UK-wide air pollution crisis, so it's great to see recommendations ensuring this is taken into consideration with planning applications. This guidance has the potential to make a huge difference."

## Emissions tests 'still clearing dirty cars'

Graeme Paton Transport Correspondent

Popular family cars are emitting up to eight times more pollution than advertised because of deficiencies in the official testing system, research suggests.

Levels of toxic emissions released by cars on urban roads are still routinely exceeding those shown in laboratory conditions more than three times over.

### Nitrogen oxide levels

Make and model	Official limit, mg/km	Actual, mg/km
Renault Clio 1.5	80	651 ▲
2017, diesel		
Ford Focus 1.5	80	429 ▲
2017, diesel		

2015. It is designed to provide a "standardised" ratings system that accurately shows how much pollution a car emits when driven in towns and cities. Doubts persist over the accuracy of the tests currently used to measure NOx. In September 2017 a new lab test was introduced — the worldwide harmonised light vehicle test procedure —



RO1103



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Council

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).

1066

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: MRS	Title:
First Name: KAREN	First name:
Last Name: MADDICK	Last Name:
Organisation/company:	Organisation/company:
Address: 118 GARTONS LAWE CLOCK FACE	Address:
Postcode: WA9 4QZ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

23.3.19

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.

RO1104

①-LPA05 ②-LPA06

#### Representor Details

Web Reference Number	WF0062
Type of Submission	Web submission
Full Name	Mrs Mr Kate Michael Coles Magowan
Organisation	
Address	
Agent Details	Kate Coles

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS and 8HA
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

For both developments, I believe that the way the population need has been calculated is wrong. We have a declining population since 1981 and the figures relating to Brexit, would indicate that this is continuing to fall.

Because of this, the need for houses will be lower.

The calculation for housing need is not based on a standard method, in fact the analysis is flawed and based on over optimistic assumptions. This is the case for both sites. Therefore the level of land needed is not as high as set out in the plan.

In St Helens, there is a large amount of brownfield land, it should not be unreasonable to build on this land first and not greenbelt. The council seem reluctant to promote building on brownfield and instead, allow developers to build on land that makes it cheaper for them. Until all possibilities of building on brownfield sites and if necessary, cleaning those sites up. Greenbelt release should not be considered. Once we build on green belt it is gone forever.

It has been noted in previous developments that the council seem to be controlled by developers and in fear of them. This should not be the case. St Helens should be making decisions on the need

①



in their communities, not developers buying sites and applying pressure on the council, creating 'done deals'.

There are no exceptional circumstances to release both sites from greenbelt and the release of it will have a serious impact on not only the ecological environment, but will also cause significant harm in respect of loss of trees, which are needed to counteract the increased air pollution from extra vehicles, both from warehouse developments already being built and traffic from residents in these proposed area.

It is well documented that greenbelt, provides a 'buffer' between areas and prevents sprawl, it is also good for health and well being to have green spaces and areas for leisure. This is particularly relevant to 3HS, where the area is of natural beauty and a space where people go to enjoy the countryside, outside of the urban area of St Helens. The area supports many species of flora and fauna. I am led to understand that 13 of these at least are protected. This will be lost.

It is well known that St Helens has some of the highest incidents of respiratory disease in the UK, which suggests the council should be thinking of mitigating the issues that cause this i.e. pollution, traffic, lack of fresh air, rather than creating more problems, with more traffic and infrastructure. Large traffic jams are frequently encountered both on the Rainford Bypass, roads into Rainford and all areas surrounding Rainhill.

On both sites 3HS and 8HA, the infrastructure is fragile. Roads in both areas area blocked with traffic at times of the day. I drive from Billinge to Rainford and the road is extremely dangerous. There has been at least two deaths recently and one serious incident at the top of Rookery Lane. This will increase if more houses are built. Access on both sites is precarious, the lanes were not built for large developments.

The roads around 3HS are B roads and a C road, none of which cope with the existing traffic.

As well as the issues with roads, there is a problem with schools too. [REDACTED] despite living in Billinge, did not get a place at Rainford, due to over subscription. This will get worse if more houses are built. Currently [REDACTED] wait 8 days on average for a Dr's appointment. [REDACTED] move to the Rainford practice, but they were full. Unless more doctors surgeries are going to be built, the existing ones will not cope.

In Rainford [REDACTED] go to a private dentist, because NHS dentists have no space. This will also get worse.

Looking at 8HA, the site is currently used a Grade 1 Agricultural land, actively farmed and supports the local economy with a local producer, providing vegetables nationally. If this is lost, their production will reduce and impact not only on those employed, but also on the business. There must be consultation with Natural England, before Grade 1 Agricultural land is lost.

Overall, I am extremely worried about this Local Plan, it is ill thought out, uses the wrong calculations for need of housing and sets the need to high.

I am concerned particularly at the trend for the council to keep releasing greenbelt for construction, whether industrial or residential. Currently St Helens is suffering from loss of land, loss of our health and building more houses on greenbelt is not going to help.

I am also concerned that most of the housing proposed is not affordable housing, which really is what our town needs, due to extremely low income streams among residents. The housing is also not appropriate for the aging population of St Helens, who need accessible housing, not out in country villages, where there are no bus services.

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

The plan needs to take the greenbelt out, investigate brownfield and exisiting empty properties first and look at the real statistics for housing need as produced by the ONS and not ones invented on historical figures.

PLEASE NOTE: This objection is submitted on behalf of myself Kate Coles and Michael Magowan, of the address shown.

**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 2:10:52 PM
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RO1105



St. Helens  
Council

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

Ref: LPSD

**11 MAR 2019**

(For official use only)

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**PART 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: Sean	First name:
Last Name: Maguire	Last Name:
Organisation/company: N/A	Organisation/company:
Address: Belvedere 19 A Ritherup Lane Rainhill	Address:
Postcode: L35 4NZ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

7 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.



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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 – 5:00pm)



or by e-mail to:

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

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

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



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

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

3. To which part of the Local Plan does this representation relate?									
Policy	<b>LPA06</b>	Paragraph / diagram / table	<b>3HS</b>	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?	<b>Don't Know</b>	<b>Don't Know</b>
Sound?		<b>No X</b>
Complies with the Duty to Cooperate		<b>No X</b>

Please tick as appropriate

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

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

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

In that time there has been a significant increase in traffic in Rainhill Road. There was a surge in the volume of traffic when a housing development was undertaken either side of Rainhill Road, to the east of 3HS (EPG). The current situation of traffic backing up down Rainhill Road from it's



junction with Warrington Road A57 makes it virtually impossible to emerge from our lane onto Rainhill Road. The resulting standing traffic significantly increases the level of pollution in the area.

The increase of housing at 3HS (EPGC) would not be sustainable due to lack of doctor and dental surgeries as well as A&E facilities and school places. This would further increase traffic to access these.

I took advantage to walk the dog over 3HS (EPGC) and was surprised at the wealth of flora and fauna on the site. This green lung separates, if placed into safe guarding and then subsequently developed, a sprawling conurbation would ensue enveloping, Whiston, Rainhill, Eccleston Park, Nutgrove and Thetford Heath.

There is no co-ordination or statement of common ground with neighbouring authorities.

Although there has been a decline in population a large amount of brownfield sites exist to cater for any growth. Please continue on a separate sheet if necessary

Lack of job opportunities in the area would mean commuting outside the area.

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 green belt 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)

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

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

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

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

1. NAME JACQUELINE PRINT NAME MAGUIRE

ADDRESS

DATE 11-3-19

SIGNATURE

I give explicit permission for my name to be used in this response.

2. NAME Michael PRINT NAME MAGUIRE

ADDRESS

DATE 11/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

3. NAME ..... PRINT NAME .....

ADDRESS .....

..... DATE .....

SIGNATURE .....

I give explicit permission for my name to be used in this response.

4. NAME ..... PRINT NAME .....

ADDRESS .....

..... DATE .....

SIGNATURE .....

I give explicit permission for my name to be used in this response.

RO1106

**Representor Details**

Web Reference Number	WF0013
Type of Submission	Web submission
Full Name	Miss Lynn Mahon
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	P/2018/0249/FUL
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, 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 use of green belt land should be utilised only in exceptional circumstances and reasons fully evidenced and justified. This application is unsound and contrary to strong objections. There are far better places where brown belt land can be utilised. This is unsuitable for an area of local historic importance. The proposed use of this land is highly inappropriate for the surrounding areas, which would increase traffic in an already congested area, the air pollution would increase as would the air quality. It is totally at odds with the Governments policy on green belt land. The area cannot take mass warehousing and HGV's that this would bring. It would destroy Newton-le-Willows, Winwick, and Lowton. The wildlife will be destroyed, masses of habitat destroyed. The planet cannot afford to continue to cause such mass destruction with proposals such as this one. No exceptional circumstances have been met in order to legally push forward with this plan, it contravenes everything descriptive that green belt is. Hundreds of trees that work naturally to absorb the pollutants will be destroyed and hundreds of diesel HGV's poisoning the area will be in their place. We do not need it in this area and we are already being boxed in by Florida Farm, Omega both huge sites in such a small area.

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

The planning should be limited only to the brown belt land available and under no circumstances should the green belt be encroached upon. No exceptional circumstances have been met to do so.

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

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

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

Response Date	5/7/2019 6:37:01 PM
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RO1107

① - LPA05

② - LPA04

859

PF0792

18 MAR 2019



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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: ALAN

Last Name: MAKIN.

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

Address: THE BUNGALOW, 33 NIELDS ROAD  
BOLD ST HELENS

Postcode: WA9 4SY

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

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

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

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

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

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

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

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

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

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

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

Date: 13/3/2019

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

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

☒ Yes (via email)

☐ No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

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

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

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

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

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

Telephone: **01744 676190**

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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



## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy	LP A02	Paragraph/ diagram table	4.5 ↓ 4.6	Policies Map	4.1	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>The local Plan does not satisfactorily justify the use of existing Green Belt area. The population projections and future employment opportunities are speculative.</p> <p>The infrastructure proposals are not costed or agreed.</p> <p>Developer of 3000 houses on the Clock face / Sutton Green belt will lead to major traffic problems being served by only minor highways. It will also contribute to sprawl towards Warrington / Burtonwood.</p>	

Please continue on a separate sheet if necessary

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

The Council should seriously reconsider the designation of the Green Belt area in the Clock Face Sutton Key Settlement. The justification for a development of this size is non-existent given the aging population of the Borough, the lack of employment prospects, and the reduction in the environment from additional traffic and pollution.

Please continue on a separate sheet if necessary

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**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:

I would wish to hear first hand how the Council can justify their intentions.

**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.**

RO1108





St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

① - LPAOS

② - GENERAL

**PART A – YOUR DETAILS**

13 MAY 2019

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>Mr</u>	Title:
First Name: <u>Alan</u>	First name:
Last Name: <u>Makin</u>	Last Name:
Organisation/company: <u>Bold Parish Council</u>	Organisation/company:
Address:	Address:
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature	Date: <u>11/05/2019</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 - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

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

post to:

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

**or** by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:

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

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

## **NEXT STEPS**

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

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

Please tick as appropriate

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

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

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

See attached sheet

Please continue on a separate sheet if necessary



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

See attached sheet

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

X

Yes, I wish to participate at the oral examination

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

This representation is on behalf of Bold Parish Council

**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.

BOLD PARISH COUNCIL  
ST HELENS LOCAL PLAN 2020-2035 REPRESENTATION

The Parish Council recognise the need for viable land to meet the housing and employment needs of the future and believe an adopted Local Plan is the best mechanism for ensuring development is targeted in the right areas and green space is protected. However, the Parish Council are concerned about the number of new homes and employment land that is planned for Bold Parish. The proposed developments will more than double the current population of the Parish and a balanced approach across the borough has not been adopted in relation to the allocation. ①

The Parish Council question the legal compliance of the Local Plan in its current form in relation to the conformity with the Bold Forest Area Action Plan, as adopted by St Helens Council in July 2017, and listed in the Local Development Scheme 2018-2021<sup>1</sup> as an adopted development plan document. ②

The Area Action Plan was seen as 'breaking new ground on how areas should be planned in the future.'<sup>2</sup> 'The Area Action Plan was developed making use of neighbourhood planning principals but in the context of a formal development plan.'<sup>3</sup> The local community and the Parish Council were heavily involved in the development of the plan. 'Community groups and individuals need a voice in the development and management of the Forest Park if it is to be a community asset.'<sup>4</sup> ②

The Action Plan embedded the importance of community involvement in the following Policy:

**Bold Forest Park Area Action Plan Policy BFP COM1: Community Network Forum<sup>5</sup>**

The Council and its partners will facilitate a network of groups (including Parish Councils) and individuals in and around the Forest Park, who wish to work together to develop community led initiatives which will further the aims of the Forest Park and meet the needs of the community. The network will act as an umbrella for community interest groups such as Friends Groups, Special Interest Groups, Special Needs Groups, Uniform Groups and Sporting Groups.

Justification: Community consultation confirmed the community was supportive of Bold Forest Park being developed. In the long-term, community need and opinion must under-pin the development of the Bold Forest Park. A community network will provide the vehicle for the community to organise in to a cohesive unit that can help to drive the Forest Park initiative forward.

A key part of the vision for St Helens set out in the St Helens Plan states that the Council wishes to see all partners "consult, engage and empower communities".

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

<sup>2</sup> Bold Forest Park Area Action Plan, Adopted 2017, Foreword

<sup>3</sup> Bold Forest Park Area Action Plan, Adopted 2017, Foreword

<sup>4</sup> Bold Forest Park Area Action Plan, Adopted 2017, Page 14, 6.3.6

<sup>5</sup> Bold Forest Park Area Action Plan, Adopted 2017, Page 49



BOLD PARISH COUNCIL  
ST HELENS LOCAL PLAN 2020-2035 REPRESENTATION

As part of the Governments Frontrunner, Neighbourhood Planning Scheme, the Forest Park Area Action Plan, although a different mechanism, has actively sought to embrace Neighbourhood Planning principals. As such community empowerment is a fundamental aim of this plan.

The Parish Council are particularly concerned with the level of community involvement in the development of the Local Plan, specifically in relation to the Bold Forest Park. The Parish Council have been contacted by several concerned residents who originally were unaware of the plan and once aware the impact the developments at 4HA and 5HA will have on the Forest Park, local infrastructure, services and amenities.

The Parish Council believe the developments planned at 4HA and 5HA will jeopardise the success of the Bold Forest Park Area Action Plan and lead to the aims and objectives of the plan not being met and compromises several policies within the Forest Action Plan.

The Parish Council also share the concerns of the community in relation to the impact on infrastructure, service and amenities. In recent years, The Parish has already seen a number of housing developments in close proximity with planning permission granted for more. Despite the significant increase in the number of new homes there has been little to no investment in education and health services within the area. The primary schools are in high demand with some in particular, being over-subscribed. The two local high schools that serve the community have seen the numbers of pupils increase with no investment for expansion. The doctors surgeries that cover the area can be described as at breaking point with a number of doctors approaching retirement age and reported difficulty in securing new. The Local Plan does not contain any plan as to how increased provision for existing and incoming residents will be achieved in terms of structure and funding. The Parish Council believe this is essential prior to development plans to ensure the health and wellbeing of local residents is not compromised at any point and developments do not increase the pressure on already over stretched services.

The area has seen a significant increase in the amount of traffic on the roads over recent years due to the number of new homes that have been built not only in St Helens but the neighbouring boroughs also. The Parish is the main access route to the M62 motorway and the neighbouring boroughs of Warrington and Widnes. The Parish is saddled with a Victorian road network which in some cases will be difficult to improve effectively. There are already significant concerns around the volume and speed of traffic on Gorsey Lane, that will run south of the 4HA development. The road is used as a rat run for people heading to J8 of the M62 in Burtonwood, attempts to slow traffic down has had limited results. It is also compounded with being the main access point to Bold Industrial Estate and therefore used by a significant number of HGVs and on occasion abnormal loads. These require a police escort and limit the scope of traffic calming measures available. An alternative route that is sometimes used is Bold Rd/Reginald Rd/Mill Lane. Bold Rd runs along the north boundary of 4HA, eventually running in to Mill Lane and past a primary school. Clock Face Rd has also



BOLD PARISH COUNCIL  
ST HELENS LOCAL PLAN 2020-2035 REPRESENTATION

become heavily congested and is raising concerns on health and safety. There are bottle necks on the road, mainly at points lined by terrace houses, which as a result are proving difficult to resolve. The road is used as a main walking route to and from the local primary schools and is the location of a children's day nursery. The Parish council would like to encourage more parents to walk their children to school, but the safety aspect is a real concern.

①

There are areas within Bold Parish and the surrounding areas that are considered some of the most deprived areas in the country. Poor health and wellbeing is a key concern in these areas and a priority for improvement. Childhood obesity is significantly above average. The Forest Park offers invaluable access to free green spaces and a range of activities.

①

**Bold Forest Park Area Action Plan Policy BFP COM3: Bold Forest Park as a Flagship for Delivery of Community Health Improvement<sup>6</sup>**

The community put great emphasis and value on the green spaces at 4HA and 5HA and the wildlife it supports. The Public Rights of Way across both areas are heavily used. The Parish Council are concerned the significant developments planned for 4HA and 5HA will restrict community access to the Forest Park and reduce the range of activities the Park is able to offer having a further derogatory effect on the most vulnerable members of our community.

①

The countryside aspect and attractiveness of the Forest Park is a valuable asset in encouraging visitors to the Park and key to encouraging rural enterprise and boosting the rural economy. The Parish Council are aware of one equestrian business and stables that will close as a direct result of the development at 4HA. The stables are a community hub offering opportunities to many disadvantaged youngsters and encouraging positive involvement in the community. The stables are home to 62 horses, the owners and visitors to these horses increase footfall in other businesses within the Park. Urbanisation of large areas of the Park will detract away from the feeling of being in the countryside and deter many visitors to the Park. This has already been evident in two house sales that have collapsed, the buyers pulling out due to the threat of mass development. These issues in combination are expected to have a devastating effect on the local economy and opportunities for residents.

① - 4HA

①

Bold Parish Council believes the Parish and the Bold Forest Park is a unique offering within the Borough that should continue to be afforded the special protection Green Belt brings. Bold Parish Council feel they are unable to support the mass development planned for the area in terms of infrastructure, services, amenities and community health and wellbeing and any such development will severely jeopardise the success and implementation of the Bold Forest Park Area Action Plan.

②

<sup>6</sup> Bold Forest Park Area Action Plan, Adopted 2017, Page 50

BOLD PARISH COUNCIL  
ST HELENS LOCAL PLAN 2020-2035 REPRESENTATION

Signed on behalf of Bold Parish Council

Chairman



Vice Chairman



RO1109



**Representor Details**

Web Reference Number	WF0142
Type of Submission	Web submission
Full Name	Mrs Jane Makin
Organisation	On behalf of my household
Address	2 Moss Nook Lane Rainford St Helens WA11 8AF
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA02
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

In respect of the overall figures in the Plan:

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

Specific points on site HA8 (Rookery Lane)

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

01

02

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

02

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

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

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

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

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

Response Date	3/12/2019 8:24:53 PM
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RO1110





St.Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: Joan M.	First name: N/A
Last Name: Maloney	Last Name: N/A
Organisation/company: N/A	Organisation/company: N/A
Address: 3 Garsdale Avenue, Rainhill, Prescot, Merseyside	Address: N/A
Postcode: L35 4QE	Postcode: N/A
	Tel No: N/A
	Mobile No: N/A
	Email: N/A

**Signature:**

[Redacted Signature]

**Date:**

12 March 2019

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

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

Yes X (Via Email)

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

## **RETURN DETAILS**

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

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

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

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

## **PART B – YOUR REPRESENTATION**

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

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

Policy	LPA06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?	Don't Know	Don't Know
Sound?		No X
Complies with the Duty to Cooperate		No X

Please tick as appropriate

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

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

Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

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

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

This representation is from the following:

Mr & Mrs Maloney, [REDACTED]  
Mr Maloney & Mrs Roberts-Maloney, [REDACTED]  
Mr & Mrs Roberts, [REDACTED]

We have been residents in Rainhill [REDACTED]. The key point of our representation is the protection of the Greenbelt space for future generations and to avoid urban sprawl and overcrowding in Rainhill. We believe this will help promote a healthier lifestyle and environment for the residents. The physical and mental wellbeing needs of residents have to be considered now as it will have an impact on future generations especially if green spaces are taken away.

- We think that in Rainhill there is a lack of green spaces for parents and children to relax in [REDACTED] we think this is extremely important. A safe, dog-free zone, away from busy polluted roads is lacking in Rainhill and this should be considered a priority for the current community over and above the need for housing.

- Air quality is already established as a factor in childhood and adult respiratory illness so adding extra roads, traffic and congestion is not good for the current and future population of Rainhill and St Helens.



- Increased traffic will impact pedestrian safety and health.
- We would argue that the planned housing is not required as quite often new housing developments are not 'affordable' for the average person. New housing will also have an impact on the saleability of current housing.
- Alongside any planned new housing there would be a need for nurseries, schools, hospital spaces, GP & dentist surgeries, etc within the local vicinity of the housing to avoid the need to drive thus creating more congestion and pollution. [REDACTED]  
[REDACTED] to add further pressure on these school spaces would be impractical.
- The greenbelt space was designated as such to avoid urban sprawl and a continuous area of housing and roads. Releasing the greenbelt space negates the reason it was put there in the first place.
- Extra housing means extra car use and the traffic in Rainhill is already a major issue. Warrington Road is the only main road through Rainhill and is used by freight vehicles, buses and cars at all times of day. At busy times the road can be backed up through the village and if there is an incident on the M62 the traffic can be backed up the whole way along Warrington Road. [REDACTED]  
[REDACTED] we have seen how quickly the traffic can back up. There is often particular issue with the entrance to the Jones' Estate which has just one entry/exit point for several hundred houses. This junction is always crowded and can be difficult to use especially as it is effectively a crossroads with Knowsley Road.
- The new junction structure at Longton Lane/Mill Lane may add some relief to the traffic problems along Warrington Road but the traffic leading up to the Skew Bridge from Warrington Road and Rainhill Road is the main problem.
- We already see the issue of parking outside all the schools and on adjacent roads such as those on the Briscoe's estate. Double parking is a factor and can lead to issues with emergency vehicles getting access.
- Adding extra traffic to Warrington Road will impact the historic Skew Bridge as there is little scope for developing this.
- The junction from Vincent Road to Rainhill Road is already extremely busy and difficult to use at busy times. Vincent Road is often used as a cut-through to avoid the Rainhill Rd/Warrington Rd junction and traffic lights and despite traffic calming measures the traffic on Vincent Road is increasing. Adding further housing along Rainhill Road on the old Eccleston Golf Club will make the Vincent Rd/Rainhill Rd junction impossible to use due to increased traffic.
- Rainhill has an historic past and is known as the home of the Railway. We think it is important for the village to remain as much as possible a 'village' whilst modernising in an appropriate way. We should be developing Rainhill as an historic destination and creating a proper Railway museum rather than focusing on housing.
- Rainhill station is on a busy commuter route to Liverpool and Manchester [REDACTED] I know the trains area already busy at peak times. The council should be in discussion with Northern Rail as to the need for increased train capacity should any new housing be considered.
- We want Rainhill to be a vibrant community and village not part of an urban sprawl that looks like everywhere else.

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 Green Belt, therefore abiding with the National Planning Policy Framework (2019).**

**The council should not consider removing this land from Green Belt 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)

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

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

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

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



RO1111



St. Helens  
Council

269

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

Ref: LPSD

01 MAR 2019  
(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

### 1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Shirley Manley

Last Name: Manley

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

Address: 34 smock Lane

Garswood

Postcode: WN4 0SN

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Date: 28/2/19

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

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

☒ Yes (via email)

☐ No

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



## RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

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

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

Telephone: **01744 676190**

## NEXT STEPS

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

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

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

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



## PART B - YOUR REPRESENTATION

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

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

HA- HS

Policy LP08 LP09 LP11 LP12 LP04	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)								

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

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

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

Please tick as appropriate

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

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

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

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

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

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

Please continue on a separate sheet if necessary



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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

RO1112





St. Helens  
Council

272

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

Ref: LPSD

01 MAR 2019

(For official use only)

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

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>JOHN</u>	First name: _____
Last Name: <u>MANLEY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24 SMOCKLAND</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0SN</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: _____	Date: <u>28/2/19</u>
------------------	----------------------

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

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

☒ Yes (via email)

☐ No

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

## RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

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

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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? <b>1+1A - 1+15</b>									
Policy <b>LPA 07</b> <b>LPA 08</b> <b>LPA 09</b> <b>LPA 11</b>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <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 <u>set out</u> your comments.
<p>Not justified as council have not used population decline in sites which as come down. adrop with O.A.N = <u>Guideline</u></p> <p>Brexit will bring loss of food supplies using Greenbelt Grade 2 land and not all Brown field sites which have not been used is causing more problems, than making</p>

Please continue on a separate sheet if necessary

no resource to support this. eg  
Schools / doctors / no Denhams / no secondary schools



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.

Primary/Secondary school to accommodate 500 children  
 children/Primary schools are overprescribed now/  
 Full drainage system and water flow for current houses - as pressure is so low toilet and showers can only be used ~~before~~ at a time now! Flooding from field is regular - I have installed extra girds to try and stop flow if canal at low natural drainage will cause problem

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

Please keep a copy for future reference.

RO1113

INCLUDES A FURTHER 30 3HS

LP0027



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)

SIGNATURE!

27

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

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

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS** + DETAILS OF 30 NEIGHBOURS WHO ARE  
PART OF THIS REPRESENTATION (ON NEXT  
SHEETS)

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: JUNE	First name:
Last Name: MANSFIELD	Last Name:
Organisation/company:	Organisation/company:
Address: 14 ELLERSLIE AVENUE, RAINHILL, PRESCOT, MERSEYSIDE	Address:
Postcode: L35 4QD	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.



## 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 A06	Paragraph / diagram / table	3HS	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?	Yes <input type="checkbox"/> DON'T KNOW	No <input type="checkbox"/> DON'T KNOW
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

PLEASE SEE SEPARATE SHEET.

Please continue on a separate sheet if necessary



The removal from the greenbelt of area 3HS, and its safeguarding for housing, means that it would be developed at some point. It is no comfort to be told that it **may** not take place for several years. Whether it is now, in 5 years, or in 20 years, the threat of that development and fears of its consequences hang over all of us. We live close to the site and would be seriously and permanently affected in many ways. ✓

The purpose of the greenbelt is to protect communities and provide a breathing space between urban areas, and that is precisely what this area does effectively, adjoining the strip of woodland protected by the Woodland Trust who knew nothing of the Local Plan until very recently. It is a calm, green amenity space – a natural green buffer, much needed by both Rainhill and Nutgrove. The flora and fauna of the site, including many protected species, would be threatened by development. In recent years, we have lost many mature trees, so essential in maintaining air quality, the planting of new ones doing little to redress this loss. In an area where the number of deaths from respiratory disease is exceptionally high, and well above the national average, any reduction in green space and its associated 'fresh air and exercise' health benefits should be resisted. Once that green space has gone it has been lost for future generations. The golf club was an amenity for the community, supported by Sport England, and also an employer of more than 30 people. ①

Traffic congestion is, and will remain, a serious problem. The road infrastructure around 3HS is not able to support the current level of traffic at times. Many minor roads and exits from estates in Eccleston Park, Prescot and Rainhill feed onto Warrington Road, the only A road in the area, with the result that traffic queues are the norm for several hours a day. The roads are narrow with little scope for improvement and the Skew Bridge in Rainhill is a protected monument. Near the Black Horse junction, at times it can be extremely difficult to join Rainhill Road in either direction. The closure of Elton Head Road at the Link Road junction has unexpectedly helped make the traffic more manageable for us, but when the junction reopens the heavy traffic will resume. Anything which adds to that, like some more development, should be avoided. Many of us commute to work yet have to allow a lot of time just to get to the M62, which in theory is easily accessible. Just trying to cross Rainhill by car takes much longer than it should. It can take half an hour to travel one mile. Extra traffic, which new developments bring, would further increase the use of estate roads as short cuts. ①

3HS appears to be well situated with regard to accessing railway stations, which is surely to be encouraged. However, those stations have no parking, or parking stretched to capacity which already leads to commuters parking in narrow side ①



roads for most of the day. The proximity of Whiston Hospital, apart from adding to the traffic and side-street parking problems, means that ambulances are a frequent sight on our roads but they struggle to find their way through the current level of traffic congestion, on-street parking and narrow roads.

We believe that further housing development in this area is not sustainable as there is an existing shortage of school places, doctors and dentists. Having to go further afield to access these services merely leads to greater car use.

A particular concern for those of us who live near to 3HS, a confirmed zone 2 and 3 flood area, is the very high water table. Our gardens retain rainwater and the large area of the golf club site absorbs a lot. Given that new housing developments usually prefer paving to grass, a change in the land's drainage and run-off from the site could place properties, especially those near to the brook, at risk of flooding.

We question whether St Helens needs to safeguard this area for housing, given that the borough has had a declining population since 1981. Table 4.6 accompanying the plan shows a lower requirement for land for housing than is stated elsewhere.

Warrington and Knowsley are building, or have plans for, massive developments, for example Halsnead Garden Village as part of the Liverpool City Region Plan, and yet there is no statement of common ground with these neighbouring authorities.

At Local Plan presentations it was acknowledged that there are difficulties with site 3HS if it is to be developed, and yet the Council still wants to remove its greenbelt status. The Council's new mantra of 'brownfield first' is very welcome as there is plenty of land on the brownfield register, but surely the second choice should not be a chunk of green amenity land?

The proposal to remove 3HS from the greenbelt goes against everything stated by the council in their presentation of the new Local Plan. (St Helens First, St Helens Council's community magazine, Spring 2019)

It does NOT 'protect and enhance the natural environment'. Instead, it damages it and would lead to habitat loss.

It does NOT 'ensure that critical infrastructure such as schools, doctors surgeries and highways are not put at risk because of new development.' These services in and around Rainhill are stretched to capacity and have already been put at risk by developments such as those off Warrington Road and in Waterside Village.

We can envisage the current situation only getting worse for all of us if development is allowed on 3HS and for that reason we reject its change of status from greenbelt to 'safeguarded for housing'.



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 THE 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)

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

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

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

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

We have discussed, and agree fully with, the ideas expressed in this representation.

Name CLARE DAVIES

Address

I give explicit permission for my details to be included in this response.

Signature

Date 9/3/19

Name KEITH DAVIES

Address

I give explicit permission for my details to be included in this response.

Signature

Date 9/3/19

Name JEAN HUNTER

Address

I give explicit permission for my details to be included in this response.

Signature

Date 10/3/19

Name BARBARA MANSFIELD

Address

I give explicit permission for my details to be included in this response.

Signature

Date 10/3/19



We have discussed, and agree fully with, the ideas expressed in this representation.

Name SARY PRICE

Address .

I give expl

ed in this response.

Signature

Date 10-3-2019

Name Lorraine Price

Address

I give explicit permission for my details to be included in this response.

Signature ..

Date 10-3-2019

Name GEOFFREY PARR

Address

I give explicit permission for my details to be included in this response.

Signature ..

Date 10-3-2019

Name Peter Furlong

Address

I give explicit permission for my details to be included in this response.

Signature ..

Date 10 Dec 19



We have discussed, and agree fully with, the ideas expressed in this representation.

Name Kevin Moulbdale

Address ..

I give explicit permission for my details to be included in this response.

Signature ..

Date 10/3

Name Enid Moulbdale

Address ..

I give explicit permission for my details to be included in this response.

Signature ..

Date 10/3

Name Lewis Moulbdale

Address ..

I give explicit permission for my details to be included in this response.

Signature ..

Date 10/3

Name PHILIP RYAN

Address ..

I give explicit permission for my details to be included in this response.

Signature ..

Date 10-3-19

We have discussed, and agree fully with, the ideas expressed in this representation.

Name ... ROBERT OWEN .....

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature ... [REDACTED] Date ..... 10th March 2019

Name ... ERIC & JANICE SMITH .....

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature ... [REDACTED] Date ..... 10-3-19 .....

Name ... ~~IS ERIC SMITH~~ S. OWEN ERIC SMITH .....

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature ... [REDACTED] Date ..... 12-03-19 .....

Name ... D. Baker .....

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature ... [REDACTED] Date ..... 12-03-19 .....

We have discussed, and agree fully with, the ideas expressed in this representation.

Name Micelle Wood

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature [REDACTED]

Date 11/3/2019

Name David Wood

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature [REDACTED]

Date 11/3/2019

Name Robert Rimmer

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature [REDACTED]

Date 12/3/19

Name [REDACTED]

E J WILLIAMS

Address [REDACTED]

I give explicit permission for my details to be included in this response.

Signature [REDACTED]

Date 12/3/19



We have discussed, and agree fully with, the ideas expressed in this representation.

Name Rev + Mrs N. Wade

Address

I give explicit permission for my details to be included in this response.

Signature

Date 12.3.19

Name STEPHEN SMITH

Address

I give explicit permission for my details to be included in this response.

Signature

Date 12/3/19

Name Philip Lane

Address

I give explicit permission for my details to be included in this response.

Signature

Date 12/3/2019

Name WILLIAM ANDERS

Address

I give explicit permission for my details to be included in this response.

Signature

Date



We have discussed, and agree fully with, the ideas expressed in this representation.

Name Sandra Nunnery

Address

I give explicit permission for my details to be included in this response.

Signature

Date .....

Name Brian Wainwright

Address

I give explicit permission for my details to be included in this response.

Signature

Date 12/3/19

Name Lisa Flaherty

Address

I give explicit permission for my details to be included in this response.

Signature

Date 12 3 19

Name Matthew Southworth

Address

I give explicit permission for my details to be included in this response.

Signature

Date 12 3 19



We have discussed, and agree fully with, the ideas expressed in this representation.

Name ..... DAVID STEWART .....

Address .....

I give explicit permission for my details to be included in this response.

Signature .....

Date ..... 9/8/19 .....

Name ..... ALISON STEWART .....

Address .....

I give explicit permission for my details to be included in this response.

Signature .....

Date ..... 9/3/19 .....

Name .....

Address .....

I give explicit permission for my details to be included in this response.

Signature ..... Date .....

Name .....

Address .....

I give explicit permission for my details to be included in this response.

Signature ..... Date .....



RO1114



St. Helens  
Council

704

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name HEATHER	First name:
Last Name MARCM	Last Name:
Organisation/company:	Organisation/company:
Address: 1 LEAFIELD CLOSE, BIRTLEY, DURHAM	Address:
Postcode: DH3 1RX.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

01/03/19

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

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

Yes ☒ (Via Email)

No ☐

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

## RETURN DETAILS

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

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

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

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

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

### FURTHER INFORMATION

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

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

## NEXT STEPS

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

## DATA PROTECTION

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

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

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



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

### **PART B – YOUR REPRESENTATION**

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



### Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

3

### Policy LPA04 Strategic Employment Sites

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St. Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

4

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

### Policy LPA04.1: Strategic Employment Sites

I am opposed to needless release of Green Belt land for employment uses  
Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

5

### Policy LPA05: Meeting St. Helens Borough's Housing Needs

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

6



The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land. There are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is available for development.

Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could reach such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The guestimate figures bear no resemblance to this fact.

Adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

#### Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.



#### Policy LPA06: Safeguarded Land

I am strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

#### Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

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

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

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

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

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

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



RO1115

PL0004/A

13 MAR 2019

(14)

Village Home and Garden  
Walmesley Road  
Eccleston  
St. Helens  
WA10 5JN

March 12<sup>th</sup> 2019

Reference – St Helens Proposed Local Plan (2018)

Please find enclosed a Representation signed by 189 local people who would like to explicitly support the comments made in Section 6 of the attached form. I also enclose one letter passed to me to forward for your attention.

I would appreciate an acknowledgement of this Representation Form at the earliest opportunity as many of my customers are anxious to know that their voices are being heard.

Mike Myers



20 Ecclefield Road  
Eccleston St Helens

5 March 2019

Dear Sir / madam

As you can see from my address,  
I live opposite 8HS so have  
first hand knowledge of the  
increased traffic using  
Houghtons lane and Springfield  
lane. The future possibility  
of increased housing would  
result in increased accidents,  
noise and pollution.

The area of 8HS is agricultural  
land plus pathways which  
are used by the community  
which has few amenities  
already.

In relation to the area being important for those wishing to commute to Liverpool and Manchester, this is virtually impossible unless you drive. Train links are four miles away so again pollution would result.

I would suggest that the Local Plan Submission is based on flawed employment figures, so why build houses within 8HS?

Affordable accommodation within the town centre should be the answer plus an inner belt, and 8HS retained as Green Belt.

Yours faithfully,

SUGGESTED  
MOOS



RO1116

LP0040

EF0087

SITES - 8HS - 3HS



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

13/05/2019 14:20

2 attachments



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

Dear Planning Policy Unit

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

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

Please confirm receipt.

kind regards

Ken Marr

---  
This email has been checked for viruses by AVG.  
<https://www.avg.com>

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





St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Kenneth	First name:
Last Name: Marr	Last Name:
Organisation/company:	Organisation/company:
Address: Beech Lea 7 Chapel Lane Eccleston St Helens Merseyside Postcode: WA10 5DA	Address:  Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 13 <sup>th</sup> May 2019

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

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

## RETURN DETAILS

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

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

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

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

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

## FURTHER INFORMATION

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

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

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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



## PART B – YOUR REPRESENTATION

### B1 SPATIAL STRATEGY (LPA01 & 2)

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

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X
LPA01 02							
Other documents (please name document and relevant part/section)				Green Belt Review (GBR) Sustainability Assessment. (SA)			

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"/> <b>X Unsure</b>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> <b>X</b>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> <b>X</b>

Please tick as appropriate

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

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

#### INTRODUCTION

1. We support Local Plan led sustainable development. we are not against industrial and housing development where there is genuine need and it is justified and sustainable.
2. However, we are strongly opposed to unnecessary Industrial and Housing development on Green Belt land. The CPRE view, in line policies in the National Planning Policy Framework (NPPF) that Green Belt, Greenfield and Green Space land is essential to quality of life and the health and wellbeing of the community, is fully supported.
3. This submission is made by me and on behalf of 13 other residents in Chapel Lane as the separate attached lists. This response complements the submission made by Kirkwells Planning Consultants on behalf of the St Helens Green Belt Association (SHGBA) on the 13<sup>th</sup> March 2019.



SHGBA comprises Eccleston Community and Residents Association (ECRA ) with Windle residents , Rainford Action Group(RAG) & Rainhill Save Our Green Belt (RSOGB).

#### DUTY TO CO-OPERATE (DtC)

4. The Council have a statutory Duty to Co-operate (DtC) on cross border issues with neighbouring and regional authorities. The Planning Inspector will use Statement of Common Ground (SoCG) and Authority Monitoring Reports (AMRs) in order to assess whether this duty has been complied with.
5. It is questionable what strategic decisions have been made and how they have been arrived at under the statutory Duty to Co-operate and the Statements of Common Ground with neighbouring authorities in developing the LPSD. The LPSD notes the SoCG is still being produced and there are no references to AMR's or meeting minutes.
6. There are DtC concerns in relation to the following
  - Economic strategy – how can the whole region propose the same accelerated growth strategy that is not sustainable, sound, justified, effective or consistent with National Policy.
  - Transport and Traffic – how can it be sound, justified and consistent with national policy with the whole North West Region proposing flawed aspirational jobs and housing forecasts leading to a massive traffic growth and cumulative severe impact on the already congested highways network system that will ultimately lead to grid lock.
  - Agricultural policy – how can the huge population increase being proposed in St Helens and the region as a whole by Regional and Local Authorities completely ignore the need for food security and the needs of the farming community and industry in their Strategic and Local plans. This cannot be sound, justified or effective.
  - Healthcare services. – here again there is apparently no method for forecasting future healthcare demand for significant population increase with an increasing aged population. It is not good enough, for casual exchanges with local hospital trusts to satisfy Local Plan requirements. A robust regional forecasting system is needed to ensure healthcare services match demand between authorities and CCGs in a manner similar to the housing delivery tests. The current system fails to address this issue properly and is unsound.
  - Unsuitable sites – there is no local or strategic policy to bring back unsuitable Previously Developed Land back into use, allowing, disused sites in the poorer run-down central areas to be left whilst lucrative edge of town sites are developed on valuable green belt land. A more robust and effective policy is required Regionally and nationally to protect valuable green space and farming land. The current proposals are not sound, justified effective and not consistent with National Policy.
7. The above issues may impact on whether the Statutory Duty to Co-operate has been fully satisfied in this respect in the LPSD.

#### Presumption in Favour of Sustainable Development (LPA01)

8. The LPSD does not appear to comply with National Policy under NPPF Section as large-scale Employment and Housing development is directed to rural fringe sites rather than central urban sites. It fails to meet the economic, social and environmental elements of the para 8 of the NPPF.
9. This policy is neither sound, justified, effective nor consistent with National Policy. Moreover, agriculture, farming and food security are nor considered in any way.



## GREEN BELT

### Background and History

10. St Helens has 8,844 hectares of designated Green Belt Land, 65% of the 13,600 hectare St Helens Borough Area. ✓
11. The 2012 St Helens Core Strategy (SHCS) proposal envisaged no Green Belt development for housing or employment until the later years of the plan period. The Core Strategy covers a period from 2012 to 2027. By the time of the first 5-year Local Plan review in 2017 the position has changed significantly.
12. The St Helens Local Plan Preferred Options (SHLPPO) 2016 stated that St Helens could 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. ✓
13. The St Helens Local Plan Submission Draft (SHLPSD) 2019 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. ✓
14. The SHLPPO 2016 and the SHLPSD 2019 argue that St Helens can reasonably release more Green Belt land because at 65% it has more Green Belt Land than other neighbouring City Regional Authorities. Having more Green Belt Land is a valuable asset not to be sacrificed needlessly. The release and erosion of Green Belt Land is not sustainable in the long term. A higher percentage of Green Belt land is clearly a positive and should be considered as such for promoting St Helens as an agreeable and healthier place to live. A policy of promoting parity with other authorities on Green Belt area is not justified. ] ③
15. As well as reducing the Green Belt development area during the Plan Period to 2035, the SHLPSD 2019 proposes safeguarding Green Belt sites to ensure they can meet their housing targets. Eight sites, including 8HS on the East Lancs and the 3HS Eccleston Park Golf Club totalling 148 hectares are proposed as safeguarded sites for housing development beyond 2035 in addition to two safeguarded employment sites totalling 86 hectares. ✓

### NPPF 2018 -Protecting Green Belt Land

16. Section 13 of the NPPF 2018 relates to Green Belt protection. Para 136 states that
17. "Once established, Green Belt boundaries should only be altered where **exceptional circumstances** are fully evidenced and justified, through the preparation or updating of plans"
18. Para 137 states that

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.*

19. The SHLPSP 2019 states the *Green Belt Review* outlines the case for exceptional circumstances, the need for developing Green Belt land for housing and the need for safeguarding land to ensure housing targets are met to satisfy the government and NPPF 2018 Housing Delivery Test (NDT) requirements. ✓

### Safeguarding

20. The NPPF 2018 para 139 states

*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.*

### Conclusion

21. The Council's assertion that "*exceptional circumstances*" have been satisfied has not been demonstrated under section 13 of the NPPF. ] 3

#### The Submission Draft

- does not make effective use of Unsuitable Brownfield and Underutilised land outside of the Brownfield Register.
- does not make effective use of the land nor optimises housing densities.
- accelerated Growth Scenario predictions for aspirational employment growth are not robust enough to justify the housing targets proposed and
- the Green Belt and safeguarded sites are not sustainable development.

22. There is a therefore no need to have safeguarded or Green Belt Land allocations for housing to achieve the objectives of the Plan. The plan proposal are contrary to Planning Policy and unsound. ] 3

### Agricultural Policy

23. The 2012 Core Strategy, SHLPPO 2016 makes no reference the local agricultural industry.

24. The SHLPPO 2016 also makes no mention

25. The government launched a 25-year Environmental Plan (25YEP) in 2017 in order to protect natural assets, but there is little cross over to the NPPF 2018. The proposals appear to have been drafted in isolation. ] 4

26. The loss of productive Best and Most Versatile Grade (BMV) 1 'excellent', Grade 2 'very good' and Grade 3a 'good' Agricultural Land Classification (ALC) and local agricultural supply and industry to St Helens is to be discouraged and is not sustainable or sound. It could be considered



fully given the increased population growth estimates. The Local Plan Proposed Preferred Options (SHLPPO) 2016 planned for a 22% increase in population over 30 years; 11% over 15 years. The Local Plan Submission Draft (SHLPSD) 2019 proposes a 9.3% population increase over 15 years rising to 15.8% beyond the Plan period. ✓

#### Contribution of West Lancashire Agricultural Industry

27. The loss of agricultural land in St Helens is compounded by the Environmental Agency's plan to withdraw flood protection to farmland across West Lancashire, and limit protection to property only. Much of the farming land in West Lancashire is below sea level and relies on pumping stations at Alt Crossens to prevent flooding. This proposal is on hold at the moment pending updated land drainage legislation postponed due to Brexit. It will however, need to be considered and resolved over the period of the Local Plan and beyond. ✓
28. It is understood that West Lancashire agricultural industry produces 100, 000 tonnes of food annually and is important the local economy, contributing £230 million annually. It is considered a successful industry sector in the North West. ✓
29. A Local Plan proposing large population increases without proper consideration of food security for that population is folly and not sustainable. The situation is magnified as all City Regions and neighbouring authorities have similar accelerated growth scenarios without consideration of agricultural. Such a policy has no merit and is not sustainable. ] 4 ✓

#### Soil Quality

30. A fundamental characteristic of the agricultural production is soil quality. There is a growing concern regarding the loss of topsoil across the country and Natural England, a statutory consultee has produced guidance for assessing development on agricultural land<sup>1</sup>. ✓
31. The NPPF 2018 para 170 states  
*"Planning policies and decisions should contribute to and enhance the natural and local environment by:*  
*'a) protecting and enhancing soils (in a manner commensurate with their...identified quality in the development plan)' and*  
*b) 'recognising the economic and other benefits of best and most versatile agricultural land'.* ✓
32. Footnote 53 to para 171 of the NPPF also states that  
*'Plans should:...allocate land with the least environmental...value, where consistent with other policies in this Framework...where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a high quality'.* ✓

33. The guidance requires desktop and field studies before allowing development. It is not clear that this is to be complied with prior to removing sites from the green belt an altering the Green Belt boundaries. ✓

#### Brownfield sites

34. For the SHLPSD, the Strategic Housing Land Area Assessment (SHLAA) that was updated in 2017 indicates that 7,245 houses are needed over the 15-year Plan Period and indicates that 5,550 homes (77%) will be provide from Brownfield sites included on the Brownfield Register. The Brownfield Register identified that brownfield sites would provide 5,818 homes at the end of March 2017. ✓
35. The LPSD does not however consider Brownfield sites, that are not on the register and available for development, these are generally termed unsuitable sites. ] 5 6 ✓

<sup>1</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>



### Unsuitable sites

36. It is important to distinguish between Brownfield Register sites and Unsuitable sites.
37. Brownfield Sites included on the Register MUST be available for development and must have an owner willing to sell, a willing developer and be free from development constraints<sup>2</sup>.
38. Sites that do not meet these requirements are not therefore available for development cannot be included in the Brownfield Register. They generally comprise Brownfield Previously Developed Land (PDL) that fails to meet the criteria for inclusion on the Brownfield Register. They may be excluded for access or utilities constraints, contamination or legal ownership and Compulsory Purchase issues. Councillor Long in his television interview of early June last year stated that two-thirds of St Helens was made up contaminated land. This 2/3<sup>rd</sup>s figure is confirmed in the St Helens Environmental Services *Statement of Contaminated Land 2015 reproduced below.*

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

Notes:- 1 km<sup>2</sup> 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 - Group C sites have an area of 3170 hectares.

**Table :- St Helens Statement of Contaminated Land 2015**

39. The SHLPD currently states that 5,500 homes or 77% (12 of 15 year Plan period) of the current housing need will be provided from Brownfield Register sites. If over two thirds of the 13,600 hectare borough area is contaminated - 9,500 hectares from the statement table above - this

<sup>2</sup> uksl 20170403\_en Brownfield Register - regulation 4



has the theoretical potential to provide a staggering 285,000 homes. Clearly, more data is needed here as 4,756 hectares of Urban land and 8,844 hectares of Green Belt make up the total borough area of 13,600 hectares (136 km<sup>2</sup>). The Council figures indicate there is a massive potential for development on Previously Developed Land (PDL).

40. Put another way, the SHLPSD only requires that 355 hectares – 11.2% of the Group C lowest category contaminated sites in the Statement Table – needs to be remediated to provide the land necessary to remove all Allocated and safeguarded Green Belt sites from the Local plan. A further 301 hectares is required in the LPSD to for allocated and safeguarded employment land over the same period
41. As can be seen, these areas represent a huge potential if remediated to prevent the unnecessary development of Green Belt land, whether allocated or safeguarded for housing need. It is not convincing to suggest that all low priority or level contaminated Land will need significant Regional or Central government funding for remediation.
42. The LPSD ignores any provision in meeting the housing need from Unsuitable sites. It has been excluded in the LPSD on the basis that it is not possible to bring them forward for development within the 15-year plan period and beyond.
43. The council's policy for Contaminated sites is listed on their website<sup>3</sup> and its Contamination Land Inspection Strategy review 2017<sup>4</sup> that has been developed in conjunction with other Liverpool City Region Authorities. They also have Brownfield Briefing Note.

#### Discussion and conclusion on Unsuitable sites

44. Evidently, not all contaminated sites are so heavily contaminated as to require expensive remediation to make them ready for housing or other development. Under the *polluter pays* policy remediation becomes the owner's responsibility. The council policy states they have a duty 'To establish who may be the appropriate persons to bear responsibility for remediation'. It is only where the owner is unknown, or has insufficient funds, or the sites are heavily contaminated would regional or central government funding be necessary.
45. To rule out redevelopment of these unsuitable sites as impossible over the Plan period and beyond stretching to 25 years cannot be justified as a reason to sacrifice Green Belt land. The Council cannot ignore this issue nor pass the whole responsibility back to central government. It is incumbent on the Council to formulate a policy to recycle these sites and where necessary work with Regional Mayors and the Northern Powerhouse to make a case for funding from Central Government. There appears to be no political will and no policy on contaminated sites remediation in St Helens or Liverpool City Region (LCRCA) to provide housing land and help regenerate run down inner town centre sites. It is argued this is against National Planning Policy Sections 11 & 13.
46. The Council also has not included an allowance for unsuitable sites coming on line within the Local Plan period. CPRE have made recommendations for replacing the Derelict Land Grants<sup>5</sup>. Natural recycling of sites will surely take place over a 25-year period so brownfield land could be considered as a *gift that keeps on giving*. An allowance for PDL similar to the small/windfall sites allowance should be introduced.
47. Central government too needs to do more to assist northern councils saddled with cleaning up the legacy of industrial sites in order to satisfy the wider requirements of the NPPF for regenerating town centres and protecting valuable green field sites in order to make effective uses of land.

<sup>3</sup> <https://www.sthelens.gov.uk/business/environmental-health/environmental-protection/contaminated-land/>

<sup>4</sup> <https://www.sthelens.gov.uk/media/5595/contaminated-land-inspection-strategy-review-2017.pdf>

<sup>5</sup>



48. Para 137 of the NPPF 2018 Section 13 Protecting Green Belt Land states that

*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.*

49. The LPSD requires 206.82 ha of Green Belt is needed to meet its Allocated housing need and 148.34 ha of safeguarded Green Belt Land to satisfy its long-term housing need over approximately 25 years- a total of 355.16 ha. Therefore, with only 355.16 ha -or around 11% of the 3, 170 ha area of low priority or low level contaminated sites requiring relatively low cost remediation being available, the SHLPSD fails to meet the requirements of NPPF para 137 a and Section 11. It is unreasonable to expect that sufficient contaminated sites cannot be made available for development in the 25 years safeguarded period. Leaving neglected and derelict sites to lie fallow for 25 years is surely not an option for a Council and government committed to town centre regeneration and effective use of available land in National policy.
50. The St Helens Brownfield briefing note assesses the cost of remediating contaminated Land in accordance with government guidelines<sup>6</sup>. Fig 2 of the guidance (fig 1 in the briefing note) estimates that remediation of low priority contaminated sites varies between £75 -410,000 per hectare for highly sensitive sites (homes with gardens) depending on ground conditions and previous use.
51. Land Value gain on the granting of Planning permission can rise by 100 times with Housing land values at £1,256,000 ha in Merseyside 7. A small developer contribution over and above Section 106 and CIL amounts for could fund remediation of low-level contaminated sites.
52. Therefore, the case for 'safeguarding' or indeed for Green Belt land development to meet housing need within the plan period is not met nor is the case for "exceptional circumstances made". The Local Plan SD does not comply with National Policy and is therefore not sound.

#### **Sustainability Appraisal (SA)**

53. The SA document is considered flawed. The scoring system allows variable interpretation and inconsistent answers to the same question. The SA does not produce an objectively assessed study and conclusion.
54. Short distances to local shops have been included that ignore the fact the shop in question is on the opposite side of the busy and dangerous A580 East Lancs Road without a crossing point nearby. In another instance the distance to a temporary doctor's surgery has ignored the fact that it is in the process to moving to permanent premises at significantly greater distance.
55. The SA is viewed to

<sup>6</sup> Homes and Communities Agency – Guidance of Dereliction, Demolition and Remediation costs -Mar 2015

<sup>7</sup> <https://www.gov.uk/government/publications/land-value-estimates-for-policy-appraisal-2017>



- have inconsistent approach to SA objectives
- having the sites being preselected for safeguarding with the objectives and reasoning being drafted in order to validate.
- having more positive factors when in reality more negative factors would produce another outcome.
- have poor integrity resulting in misleading data skewing the assessment outcome of the objectives.

56. The Sustainability Appraisal methodology is therefore questionable. A review of the SA needed to restore confidence in its findings.

**Green Belt Review (GBR) Evidence document.**

57. Again, as will be seen in other responses, particularly those from [REDACTED] an RTPI Planner, there are similar concerns in respect of how the Green Belt Review (GBR) has been conducted.

58. The concerns relate to the following:-

- The scoring mechanism used is entirely subjective.
  - The methodology would not stand up to a recognised process designed to deliver consistent assessments.
  - It seems that the parcels of land have been divided amongst council officers for assessment as the resulting scores differ for the same assessment criteria.
  - If the parcels were to be redistributed and re-assessed, different results would be obtained, thus failing the consistency test required for any measurement system.
  - Whilst the review attempts to portray a sense of their being a level playing field, assessing each parcel individually, those assessments are not applied consistently across the board which has led to inconsistencies in the output.
  - One cannot logically reason for one parcel and assign a score, then find those same reasons for a different parcel but assign a different score.
59. Discounting purpose 5 – the regeneration of derelict land – is a concern. By ignoring this purpose disincentivises the recycling of and reuse of such land thereby adding to and perpetuating the problem of town centre regeneration.
60. It could be argued that it would be more effective to employ staff on assessing unsuitable sites.
61. The points raised throughout the GBR document clearly show inconsistencies with subjective scoring and findings. It's almost as if some of the parcels of land have been pre-selected for safeguarding or discounting and then the scoring, findings and rationale documented to produce the desired results.
62. A review of the GBR methodology and process is needed to restore confidence in its findings.

**Green Belt Land Parcels (GBP) Profiles**

**GBP 098 8HS (formerly HA16 in SHLPPO 2016) East Lancs Site.**

63. The *Green Belt Review (GBR)* outlines the justification for removing sites from the Green Belt LPSP para 4.6.
64. 8HS has a gross area of area of 52.69 ha and has a net developable area ratio of 65 % to reflect development constraints on the site. A nominal capacity of 1027 homes with a nominal dph of 30. Development constraints are related to UU water mains crossing the site and flooding from Windle brook. Also the site would involve the provision of significant and expensive utility provision and infrastructure.



65. It is remote from rail transport hubs and would have considerable negative impacts to a sustainable transport as increased car dependency to access local services and employment zones would inevitably be necessary. There is long-standing intractable traffic congestion at the Bleakhill Road/Rainford Road junction, that will be further exacerbated by a further 1850 cars from the development in addition to bus traffic. A traffic island planned for the north west of the development on the A580 is unlikely to relieve the congestion on the junction or the East Lancashire Road.

66. 3HS the Eccleston Park Golf Club has a significant development restriction, due to a similar traffic issue until the traffic issues can be resolved. The council has been inconsistent in not applying a similar restriction for 8HS until the Bleakhill Road/Rainford Junction issues are resolved. This is a major concern to local residents.

67. The site is situated on a flood plain. As will be seen in other responses, there is concern that the FRA and sequential testing and exception procedures and processes have not been undertaken in a objectively assessed manner to satisfy section 14 of the NPPF.

68. The Habitats Regulation Assessment (HRA) has indicated that there are issues that require further study related to European protected species. It suggests an appropriate ecological field study is undertaken in order to arrive a mitigation strategy before the considering development. This appears a major constraint on site development.

69. The site is crossed by public foot paths and is surrounded in part by established hedgerows. If developed the nearest Green Belt would be to the north of the extremely busy and dangerous East Lancashire Road. It is worth noting that whilst the GBR dismiss the visual amenity an openness but the developer of the site, Story homes, sees it as an asset in promoting the merits of the site.

70. It is clear that before the site is taken out the Green Belt. Studies and investigations normally undertaken a planning permission stage should be brought forward to the plan maker stage in order to remove doubt and establish the accurate situation to better inform the decision makers. Certainly, the following would aid an objective assessment of the suitability of this parcel of land for development.

- Ecology
- Soil quality
- Flooding
- Noise and tranquillity
- Air quality of the perimeter roads to assess harm.

71. This parcel of land should remain in the Green Belt. The case for *exceptional circumstances* and being safeguarded has not been made. Allocation for housing at this stage is against planning policy.

#### GBP 087 HS3 Eccleston Park Golf Club (formerly HA8)

72. 3HS has a gross area of 49 ha and a nett developable area ratio of 65% to reflect development constraints. It has a notional capacity of 956 homes at 30dph. Development constraints to its former use as a golf club and the presence of electricity pylons and other major utility services that impact on the development area. Although, over 90% of the parcel is in Eccleston the effects of the development will be felt in Rainhill particularly in respect to traffic.

73. The major development constraint is the surrounding highway network. The surrounding roads are already heavily congested with a number junction capacity issues. A further 1,750 vehicles from the proposed Mulury homes development will simply overwhelm the current residential roads around the site and on the A57 Warrington Road over the skew bridge, through Rainhill village to J7/M62. Recognising this the LPSP has placed a development restriction of 500 homes



(out of 956) on the site until the traffic issues are resolved. It is difficult to see how this can be resolved practicably or economically in such a land locked parcel of land.

74. The site is the last piece of green space remaining that separates Knowsley, Eccleston Park, Nutgrove, Thatto Heath, and if lost to development will see all these settlement merge into one mass of urban development to perpetuate sprawl. These communities would lose a valuable asset and green space essential to health and wellbeing and contrary of National Policy.
75. The fact that site lacks visual amenity and openness beyond its boundaries is not a reason for concluding that the parcel does not possess enough greenfield value.
76. The council in order to develop this site still have to address the concerns of Sport England. The site should remain as Green Belt and be used for recreation.

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

- The LPSD may not be DtC compliant in respect of economic growth, transport, agriculture and healthcare.
- The spatial strategy is based on flawed economic data that needs review.
- Housing Need assessment needs review to reflect latest information to comply with NPPF para 31 and National Audit Office guidance.
- A more robust Agricultural policy at Regional and local level is needed to ensure Food Security.
- A strategic policy directing development to central urban areas is needed to be consistent with National Policy.
- Redevelopment and recycling of Previously Developed Land (PDL) not currently on the Brownfield Register requires addressing before development of Green Belt land in order to be consistent with National Policy.
- Regional Strategy needs review to ensure achievable and sustainable economic growth that satisfies the obligations under the Duty to Cooperate and Statements of Common Ground.

Please continue on a separate sheet if necessary

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

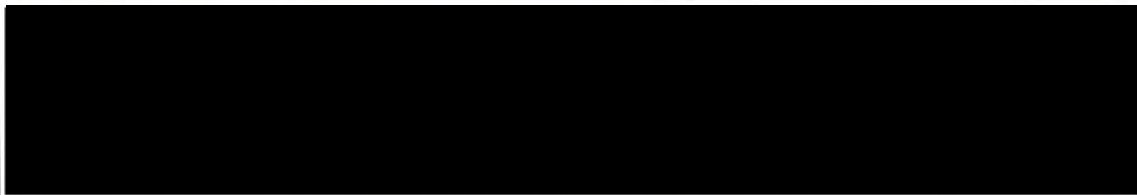
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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

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

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

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

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## PART B – YOUR REPRESENTATION

### B2- ECONOMY (LPA04)

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

3. To which part of the Local Plan does this representation relate?							
Policy <b>LPA04</b>		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				<b>Economic Evidence.</b>			

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"/> <b>X Not sure</b>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> <b>X</b>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> <b>X</b>

Please tick as appropriate

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

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

1. The LPSD is not sound in that the economic data is out of date and is extremely aspiration in nature.
2. It has been used subjectively to create a supply side scenario that is not supported by recent economic data and trends.
3. As such it is argued that the it has not been positively prepared, or is justified, effective or consistent with National Policy.
4. It is also questionable as to whether the Duty to Cooperate obligations have been satisfied if all Regional Authorities as well as St Helens are following a simultaneous and competing growth trend that is not achievable or sustainable.



Economy (LPA04)

5. The Local Plan Submission Draft (LPSD) economic proposals are set out in LPA04. ✓
6. The following observations have been made with reference to with the following reports
  - *St Helens Borough Local Plan 2020-2035 Proposed Submission Draft December 2018*. Economic Appraisal Paper – evidence prepared by Dr Glenn Athey of My Local Economy – Athey Consulting Ltd dated – 1<sup>st</sup> March 2019
  - St Helens Local Plan Submission Draft and update of St Helens Strategic Housing Market Assessment (SHMA) – Demographic Appraisal – prepared by Piers Elias an Independent demographer of Demographer Support.
7. These reports were submitted separately as part of the St Helens Green Bel Association ( SHGBA) submission on the 13<sup>th</sup> March 2019 by Kirkwells Planning Consultants of Burnley.
8. It should be noted that Dr Glenn Athey economic evidence is compromised as he was unable, despite requests to SHMBC Planning to gain access to the input made by St Helens Council to the Liverpool City Region Combined Authority (LCRCA) Strategic Housing & Employment Land Market Assessment (SHELMA). This SHMBC input is viewed to be material to the St Helens Local Plan. It should be publicly available. A lack of transparency is perceived on this issue. ] ?
9. A review of the St Helens LPSD suggests that the St Helens growth trends are significantly higher than historic annual growth trends and indicate employment growth is highly aspirational and optimistic. Employment Growth is almost entirely dependent on significant growth of logistic warehousing. ] (11)
10. The policy is considered 'supply side' - acquire sites and build the B8 warehouse units in the hope the units are let and employment generated. It is based on a subjective land requirement scenario that bucks the trend where the take up of logistics warehousing is sluggish. As such it is argued that it is not an objectively assessed need. There is a clear impression that the outcome has been prejudged with data presented to justify this outcome. ] (11)
11. The Liverpool City Region growth is also acknowledged to be considered as highly aspirational relying on a continuation of the strongest periods of growth over the next 25 years assuming no major downturns or recessions. This must be considered optimistic. ✓
12. There is no obvious evidence to support dynamic growth trend in value added or productivity as regards employment across the Liverpool City Region nor is there evidence to suggest a trend for higher paid jobs. Analysis suggests higher paid jobs are being lost and lower paid jobs have gained. ] (11)
13. There is also a concern that the region has a declining working age population and much lower level of immigration into the area than in other areas of the country. The growth assumes that mass UK immigration will need to occur to meet the employment growth predictions of the LPSD. ✓
14. Moreover, this trend is repeated across the whole of the Northwest with Greater Manchester Combined Authority (GMCA), Chester & Cheshire West (C&CW), Warrington and West Lancashire all having similar aspirational accelerated employment growth scenarios. All are reliant on UK or International immigration to meet employment growth forecasts. ] (11)
15. The resident population of across England is finite, so if St Helens gains one resident it has to be offset by a resident loss in another authority. All Regional combined and local authorities are therefore competing for residents to supplement their workforce in order to implement their aspirational accelerated employment growth scenarios. ✓
16. This is barely credible and not achievable nor sustainable. The LPSD does not indicate where the increase in population is to come from. Simultaneous above-trend growth can only be achieved by international immigration and that is currently not government policy. This situation calls ] (11)



into question what strategic decisions have been made under the statutory Duty to Co-operate and the Statements of Common Ground with neighbouring authorities in developing the LPSD. ✓

17. The economic scenarios for most authorities and St Helens are wholly dependent on the growth of B8 logistics warehousing. The employment land need is driven by this policy, particularly in St Helens. This is viewed as very highly aspirational even in the LCRCA SHELMA draft executive summary para 5.3. The Employment Land need assessment is viewed to be excessive. ✓
18. An Employment Land Need assessment based on such flawed economic data is questionable and cannot be considered as prepared as objectively assessed need. Aspirational growth cannot also be used to inflate housing need or the need to inflate Housing Land supply. Although, now governed by the Standard Method, it is argued that the real housing need for St Helens is around 383 indicated by the ONS 2016 Household figures (or 360 from Piers Elias report). It is hoped, the decision by Ministry of Housing Communities and Local Government (MHCLG) to use their 2014 figures household figures for the Standard Method is overturned before this Local Plan process is completed. ✓
19. The LPDS has been based on data prepared before the Brexit referendum and is overly optimistic given the uncertainty generated by negotiations. The economic evidence fails therefore to factor in the uncertainty resulting from Brexit. The government's own impact assessment indicating economic impact of 2, 5 or 8% downturn dependent on the success of negotiations. More recently the economic assessment has predicted a 3.9% downturn over 15 years for the agreed withdrawal deal and a 9.3 % reduction for a no deal. ] 11
20. A recent report by the Centre for Cities report in September 2018 has indicated that automation is predicted to impact heavily on national and regional jobs. This report estimated that up a fifth of jobs in the Northwest could be at risk because of automation over the coming 30 years due the technological advances particularly in respect logistic warehousing. There is clearly a trend by large organisations to reduce workforce numbers in the coming years that is contrary to the LPSD predications and not justified of achievable. ✓
21. Adding to the uncertainty, a government inquiry in 2017 raised concerns about whether the Construction Industry had sufficient capacity to deliver the homes required particularly where there is no incentive for volume housebuilders to increase supply that may impact on profits or their share of the market. ✓
22. The LPSD does not pay sufficient attention to the Farming community. The Local farming industry is considered successful in the region and should be supported. With the huge increases in population proposed in St Helens, food security must part of regional strategy influencing Local Plans. 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.

- **The economic data is not sound or justified and requires review to reflect up to date information particularly on Aspirational Accelerated Growth Employment Scenarios.**
- **Employment Land Needs Assessment appears excessive and requires review as a result.**
- **Housing Need should not be inflated as a result of flawed accelerated growth scenarios.**
- **A more robust Agricultural policy at Regional and local level is needed to ensure Food Security for the significant population increases predicted.**

Suggested  
✓ 11 Mon



- **Regional Strategy needs review to ensure achievable and sustainable economic growth that satisfies the obligations under the Duty to Cooperate and Statements of Common Ground.**

Please continue on a separate sheet if necessary

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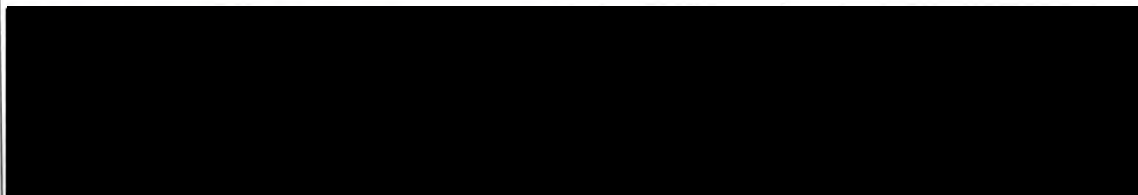
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Please keep a copy for future reference.**



## PART B – YOUR REPRESENTATION

### B3 HOUSING NUMBERS (LPA05) & SAFEGUARDING (LPA06)

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

3. To which part of the Local Plan does this representation relate?							
Policy  <b>LPA05 &amp; 6</b>		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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

#### Housing Need (LAP05)

- The Objectively Assessed Housing Need (OAHN) for the St Helens Local Plan Submission Document (SHLPSD or LPSD) has been set at 486 dwelling per annum. Previously in the Core Strategy Document of 2012 and the St Helens Local Plan Preferred Options (SHLPPO) of 2016, 570 homes per annum were proposed.
- The LPSD number has been set in accordance with the Government Standard Method (SM) introduced last year. The calculation uses the 2014 Ministry household formation rates rather than the later and lower 2016 ONS housing formation rates as the starting point. The Standard Method gives a value of 468 using the 2014 figures and 383 for the ONS 2016 figures. SHMBC have used the 2014 figures as instructed by government and confirmed in February following



Ministry of Housing Communities and Local Government (MHCLG) 's consultation in December 2018.

3. The government's decision to use the earlier 2014 figures is controversial. The Ministry of Housing Communities and Local government (MHCLG) should be recommending the use of the latest data. This decision is contrary to the UK Statistics Authority advises he use of the latest information "*when making important decisions, the best available data should be used*" and NPPF para 31 that states "*The preparation and review of all policies should be underpinned by relevant and up-to-date evidence*".
4. This decision is purely political, with government overruling the data in order to meet its commitment to building 300,000 homes nationally by the mid-2020s. Using the 2016 ONS figures results in a need for 159,000 homes a year. The results of the MHCLG consultation on this issue rejected the use of the later and lower 2016 ONS figures despite 55% of respondents voting against the use of the 2014 Ministry figures.
5. In February, the National Audit Office (NAO) also expressed concern at the flawed method of assessing housing need and the lack of developer contribution. They recommended the government take housing more seriously and ensure its new planning policies bring about the change that is needed.
6. Also, In February, the Housing Minister, Kit Malthouse announced in the house the Standard Method (SM) was not mandatory contradicting the NPPF, & PPG, and incurring the wrath of Andy Burnham, Greater Manchester Combined Authority (GMCA) Mayor. Andy Burnham said he could not deliver his promise for a Green Belt free revised Greater Manchester Spatial Framework (GMSF) in January because of government imposed housing targets, so is understandably outraged at this apparent change in policy and is seeking an early clarification of the situation.
7. The Standard Method (SM) using the 2014 MHCLG household projections is considered an interim measure. It is also contrary to earlier Planning Policy Guidance recommending that the latest data be used.
8. The process for arriving at an OAHN is therefore flawed and open to further modification. It is a very confused situation. Based on the above the loss of Green Belt Land resulting from this flawed Standard Method is unnecessary. Green Belt land should not be sacrificed whilst policy is still being debated and decided upon.
9. In addition, the Standard Method is perceived to not truly reflect differences in demand between various regions of the country particularly between the North and South, with he North subject to greater industrial legacy sites against green field areas in the south. An investigation undertaken for Sky News Line 18 in Sept 2018 by Ed Conway assesses the housing need under 6 headings. Ian Mulheirn of by Oxford Economics (OE), an economic forecaster and consultant, felt housing need calculations had been flawed for too long. The Investigation found St Helens to have no housing crisis.
10. Ian Mulhern was quoted in Tom Knowles Times article of the 21<sup>st</sup> Sept 2018

*Ian Mulheirn, director of consulting at Oxford Economics, said that the drop in projections demonstrated that there were several myths around Britain's housing shortage and argued that it was not necessary to build 300,000 homes a year. "Over the last 20 years, the various housing departments have used a methodology to predict household need that was flawed," he said. "It predicted that a significantly higher number of households would form and it was consistently shown to be incorrect at each census point. "The ONS has changed the methodology and if we had used their figures over the last 20 years we wouldn't have this figure of extremely high housing need being quoted everywhere."*

The piece concluded it was not necessary to build 300,000 homes per year to meet need.



11. Joint CPRE & Shelter articles have emphasised the importance of distinguishing between need and demand as demand inflates housing requirement.
  12. It is hoped, the decision by MHCLG to use their 2014 figures household figures for the Standard Method is overturned before this Local Plan process is completed.
  13. Table 4.6 of the LPSD indicates that 2056 homes from Green Belt are needed to meet housing needs to 2035, requiring 88.1 ha of Green Belt to be released.
  14. Table 4.6 exaggerates the need and is disputed for the following reasons
    - The starting point is based on a figure of 486 that is not consistent with the Standard Method figure of 468.
    - The way the small sites/windfall sites allowance of 93 pa in the table is questioned as it leading to higher housing demand.
    - The 15% non-delivery figure for stalled sites may be excessive given current figure from Strategic Housing Land Area Assessment (SHLAA) fig 3.12 is 3.8%.
  15. A reworked Table 4.6 using taking the above into consideration, reduces the need for new homes on Green Belt land significantly. There is, therefore, a much reduced or no need to release any Green Belt land to meet housing need. A review of the table 6.4 table is needed. At the very lest the 11-15 year housing requirement should be provisional pending the results of the next census point in 2021 to confirm the predicted LPSD trends.
  16. The Table 6.4 housing need varies from the Standard Method so is contrary to NPPF para 60 that requires variations from the Standard Method to be justified by exceptional circumstances.
  17. If exceptional circumstances are applied to Housing need an increase in the Housing need over the Standard Method cannot be made on aspirational and flawed economic grounds. An exceptional circumstance could equally be made for a OAHN of 360 as outlined in Piers Elias' demographic report.
  18. It is argued
  19. The need is based on a housing density of 30 dwellings per hectare (dph) on greenfield sites. Tables 4.5b & 4.8 suggest these are Net developable areas. Government policy suggests that a Gross figure of 40 dph is used.
- Safeguarded Land for Housing (LPA06)**
20. Policy LPA06 of the LPSD sets out that safeguarding is needed to ensure the long-term development needs for housing beyond 2035. It is not clear that the case for exceptional circumstances has been made to change the green belt boundaries.
  21. Nor does it accept the any safe guarded sites should be allocated as this contrary to NPPF planning policy para 139.
  22. That said, using the LPSD estimate for housing need beyond 2035 in conjunction with the windfall allowance there is no evidence to suggest the Housing Land Supply will be threatened in the 15 years beyond 2035.
  23. The safeguarding provisions in the LPSD are extraordinarily excessive and completely unnecessary. As such, the safeguarding provisions of the LPSD should be withdrawn completely. There is no need to modify the current Green Belt boundaries.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally



compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- The Housing Need is unsound as fails to comply with NPPF para 31 and National Audit Office guidance.
- The OAHN housing need needs review as it is contrary to NPPF para 60. An Alternative Method if adopted should result in an OAHN of 360/3838 homes per year.
- LPSD table 6.4 needs review as the number of houses on Green Belt land is greatly overestimated.
- The case for Exceptional circumstances in order to revise Green Belt boundaries for Employment, Housing and Safeguarded land has not been made.
- Safeguarded Land provisions are excessive and unnecessary.
- The use of Unsuitable and contaminated sites needs review as the LPSD fails to meet NPPF 137 & section 11 regarding brownfield development and effective use of Land.
- A more robust Agricultural policy at Regional and local level is needed to ensure Food Security.
- Regional Strategy needs review to ensure achievable and sustainable economic growth that satisfies the obligations under the Duty to Cooperate and Statements of Common Ground.

Please continue on a separate sheet if necessary

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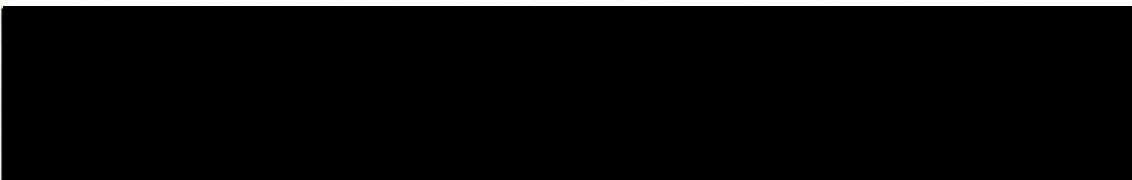
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## PART B – YOUR REPRESENTATION

### B4 TRANSPORT AND TRAFFIC (LPA07)

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

3. To which part of the Local Plan does this representation relate?							
Policy  <b>LPA07</b>		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				IDP Infrastructure Delivery Plan			

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"/> Not sure
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" 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"/>
Justified?	<input checked="" type="checkbox"/> X
Effective?	<input checked="" type="checkbox"/> X
Consistent with National Policy?	<input checked="" 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

#### Traffic Assessments.

1. The LPSD is underpinned by the *Sustainable Transport Impact Assessment Report* that is informed by two further Impact assessment reports.
2. Clearly it is beyond our capacity to engage consultant appraisal of the evidence. However, it is also evident that a valid method of assessing the scale of the traffic impact of the LPSD proposals



can be obtained with an appraisal of vehicle ownership using 2011 Census, Local Plan housing numbers and Local Planning Authority parking standard provisions for new homes.

#### Residential Traffic

3. The SHLPPO 2016 proposed a housing target build 570 homes per annum. This results for translates to 8,550 homes over 15 years and 17, 100 homes over the 30 years.
4. The LPSD 2019 proposes a housing target of 486 homes per annum over the 15 year plan period plus 5, 000 extra beyond 2035 from safeguarded land and excess housing allocation land. A total of 7,290 homes over 15 years and 12,290 new homes proposed over roughly 25 years.

#### Off Road Vehicle Parking Standards for new homes

5. St Helens LPA parking standards for new build homes set out that 2 off street parking spaces are to be provided for Semi and Detached houses and 1.5 for Affordable Housing and Flats.
6. These local planning requirements are less onerous than the parking provisions laid down in the National Parking standards Annex A tables 7 & 8 found.
7. Current Car and Van ownership/availability rates are recorded by the ONS based on the 2011 Census included on the <https://info4.sthelens.gov.uk/> website . They are considered conservative as car ownership levels must have risen in the intervening period since 2011.
8. My estimates of increases in vehicle ownership resulting from the LPSD proposals are made on the basis that the proposed 30% affordable homes will be implemented. Hence an average figure of 1.85 parking spaces per new dwelling is used in our analysis. (i.e  $70\% \times 2 + 30\% \times 1.5 = 1.85$ ).

#### Local & Regional Residential Traffic Growth.

9. The LPSD proposals is therefore forecast to add roughly 13,500 vehicles over 15 years and 22,750 beyond 2035.
10. There will be a significant increase in vehicle ownership across St Helens far greater that the increase in population. The 2011 census noted the vehicles per household was 1.11 – 84,445 vehicles for a housing stock of 74,736. It is estimated that 4, 452 homes will be completed in the period from 2011 to 2020 adding a further 8,236 vehicles at 1.85 vehicles per household to suit off street planning requirements. At the start of the plan in 2020 it is estimated that a total of 92,681 residential vehicles will be on St Helens roads.
11. From 2020-35, it is proposed that  $15 \times 468 = 7290$  homes will be built adding a further 13,486 vehicles at 1.85 vph and increase of 15% for an estimated 9.3% in population. A further 5000 homes yielding are be built beyond 2035 equalling a homes total of 12,290 adding 22,736 vehicles at 1.85 vph or a 25% increase for a population increase of around 16.0%.
12. This level of increase will be repeated across the North West as all authorities have the same growth policy.

#### Commercial Traffic

13. The growth in commercial traffic across St Helens is driven by the Liverpool Superport and new logistics warehousing in the borough.
14. According to the *Mersey Ports Master Plan* there will be 3 million containers per year passing through the port by 2030. This will be four times the 750,000 containers it handled in 2014 and this growth will become increasingly apparent when the Rimrose Valley road scheme at Bootle is completed.
15. 57% of this container traffic is destined for Merseyside and the North West, and forecasts from the *Transport for the North (TfN)* consultation document (2018), estimate that there will be at



least 5,000 vehicles per day using the East Lancashire Rd (A580). These will include 20' and 40' containers.

16. These commercial vehicles will be servicing the new large logistics warehouses 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.
17. In addition to the growth of HGV freight, these huge logistics warehouses will drive a significant increase in Light Goods Vehicles (LGVs) traffic such as internet shopping delivery vans (according to the Office of National Statistics (ONS), 77% of adults now shop on line).
18. Meanwhile, Amazon is about to open its massive warehouse at Florida Farm. This warehouse is understood to have an area of 361,000 sq ft, with 111 docking spaces and spaces for 211 HGVs. Increased internet shopping traffic will not just affect Haydock and J23 of the M6, but will impact all along the A580 to Liverpool and wider region.

#### Public Transport

19. Merseytravel makes no mention of improvements to local bus services and an older population relying on taxis for shopping and visits to doctors and chemists will add further traffic congestion.
20. The LPSD proposed allocated and safeguarded sites, 8HS in Eccleston in particular, tend to be situated on the rural fringe remote from transport hubs. This contrary to sustainable transport objectives of National Policy .

#### INFRASTRUCTURE AND FUNDING

##### Highways Infrastructure

21. The Highways Agency is responsible for motorways and motorway Junctions. Local Highway Authorities are responsible for local highway Infrastructure.
22. Development infrastructure is funded by developer contributions agreed with the Council at pre-planning and Planning Application stage under *Section 106 agreements* and *Community Infrastructure Levy (CIL)*. These funding agreements are for the provision of highways, utilities, schools, healthcare premises in order to satisfy a requirement for Sustainable Development.
23. In the case of highways, it is clear that the cumulative impact on what is essentially the legacy of a Victorian highway network of all individual developments will overwhelm the capacity of SHMBC to fund and complete the major improvements necessary to cope with a borough wide increase in household , commercial and light goods traffic in a timely manner to maintain sustainable development.
24. The public purse should not be called upon to make up any shortfalls in highways infrastructure funding.
25. Regional or Central Government have proved unreliable in funding local highway improvement. It has been shown that transport funding per head of population is 2.6 times higher in the south than the North<sup>8</sup>. The Department for Transport has spent billions on cross rail and have recently announced £26bn funding for a new Dartmouth tunnel in London, but can't find £2.6bn for a tunnel to save Rimrose Valley in Sefton. There can be no confidence therefore in assuming central government or regional funding will be available to meet the highways infrastructure demand outlined in the Local Plan Submission Draft or the Infrastructure Delivery Plan (IDP).

##### Traffic Studies

26. Transport for the North (TfN) have been set up by the government to support the Northern Powerhouse to look at strategic transport issues. TfN has no funds nor has it any authority been

<sup>8</sup><https://www.ippr.org/news-and-media/press-releases/new-transport-figures-reveal-north-to-receive-indefensible-2-555-less-per-person-than-london>



delegated to initiate projects. TfN aim in their Strategic Transport Plan (STP)<sup>9</sup> that 850,00 new jobs will be provided in the Northern Powerhouse region over 30 years.

27. The *National Infrastructure Commission (NIC)* in their September *National Infrastructure Assessment*<sup>10</sup> identified Manchester and Liverpool as the most congested Cities outside of London.
28. The CPRE study, the "End of the Road"<sup>11</sup> found that building new by-pass roads attracted more traffic and did not lead to shorter journey times. These new roads merely attract commercial and retail development at interchanges and alongside new link roads, killing investment and regeneration in local town centres, while damaging the countryside.
29. The Transport for New Homes (TfNH)<sup>12</sup> echo these concerns identifying that there is too much land given over to carparking in developments and that isolated edge of urban area developments are car dependent for access to community local services, healthcare, shopping and entertainment.

#### NPPF Transport guidelines and Summary

30. National Planning Policy Framework, NPPF Government guidelines state within the Promoting Sustainable Transport section 9 :- states

*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.*

31. NPPF Para 109 clearly emphasises the point "severe". The Local Plan and Regional Proposals for transport will clearly lead to a 'severe' impact on St Helens highways network. The LPSD transport proposals are not sustainable nor sound. 12
32. Considering that St Helens MBC is a partner in the Liverpool City Region and fully aware of the impending effect of the GMSF proposals and the Northern Powerhouse initiative, it is questionable that a "duty to cooperate" has been satisfied so the legitimacy of the LPSD is debateable. 12

#### Specific Local Traffic Issues

##### **B5201 Bleakhill Road/A570 Rainford Road Junction St Helens and A580 East Lancs Road/A570 Rainford Road (Windle Island ) & the Rainford bypass**

33. The junction is situated North of St Helens immediately adjacent the A580 East Lancs Road and A570 Rainford Road junction known as Windle Island. The junction has chronic long-standing intractable traffic issues.
34. The junction attracts traffic from Prescot and St Helens travelling north to Ormskirk and the M58. The junction is not controlled by traffic lights so queues form on Bleak Hill Road travelling north causing severe congestion generally during the day and particularly at peak periods. Traffic traveling south from the Rainford Road dual carriageway and bypass form long queues to the

<sup>9</sup> <https://transportforthenorth.com/stp/>

<sup>10</sup> <https://www.nic.org.uk/assessment/national-infrastructure-assessment/> September 2018

<sup>11</sup> <https://www.cpre.org.uk/resources/transport/roads/item/download/4851> Mar 2017

<sup>12</sup> <http://www.transportfornewhomes.org.uk/wp-content/uploads/2018/07/transport-for-new-homes-summary-web.pdf>



north as the road reduces to single carriageway on the south side in the short distance to the Bleakhill Road B5201 Junction.

35. A580/A570 junction improvements related to the Super port access and egress corridors are nearing completion and are aimed at relieving queuing and reducing queue idling but will not resolve the issues at the Bleakhill Road junction. These improvements to the A580/A570 junction are independent of the B5201 Bleakhill Road/A570 Rainford Road Junction which will remain unchanged.
36. An increase in local traffic Eccleston traffic as well the huge general increase in borough traffic, will greatly exacerbate the current situation. The East Lancs site, 8HS, will itself directly discharge some 1,850 residential vehicles onto this junction and the road network surrounding the site.
37. Unlike the 3HS Eccleston Park Golf Club site, The LPSD – IDP does not place housing development restrictions on 8HS East Lancs site until the traffic issues at this junction are resolved.

**A580 East Lancashire Road – A570 Rainford bypass to J23/M6 – approx 10 miles**

38. St Helens is geographically placed in the centre of the Northern Powerhouse Central Pennines Corridor. As such the A580 East Lancashire Road will see a massive increase in traffic resulting from the new warehousing and TftN proposals.
39. 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.
40. It has 17 junctions, roundabouts or traffic lights which impede the smooth flow of traffic in both directions and the addition of another one at the end of Catchdale Moss Lane (scene of recent fatal accidents) will not be beneficial. The more the traffic is forced to stop and idle, the more traffic pollution is generated.
41. The table below shows the extent of local traffic using A580, with car usage showing a continuing upward trend nearly 14% over the last 4 years for residential traffic.

Extract of a table of daily traffic statistics for the East Lancashire Road (A580)

	2014	2017	difference	% diff
Tot Cars	16008	18219	+ 2211	+ 13.82 %
Tot HGVs	2042	1570	- 472	- 23.1 %
Tot Vehicles (inc. Buses ,LGVs etc)	21916	24159	+ 2243	+ 10.23 %

Source: <https://roadtrafficstats.uk/traffic-statistics-st-helens-a580-eccleston-47329#data>

42. Building on 8HS is likely to produce a further 1850 cars which could increase the daily commuter traffic to at least 2019, an increase of 25% over 4 years. This is unsustainable and contrary to National Policy.
43. In addition, the West Lancashire Local Plan Preferred option 2018, designates 3 sites immediately to the north of Rainford, on which it is proposed to build 6000 houses. These sites are contiguous to the A570 (Rainford Bypass) and the B5240 (Lyelake Lane at Lathom), and although they straddle the M58 motorway, the preferred route to south east Liverpool and the burgeoning warehousing at Knowsley and Haydock it is clear much of the increased traffic would impact on the A570 and Windle Island.
44. The number of residential commuter vehicles estimated at 1.85 per household for new homes with a 30 % affordability ratio assuming LPA parking standards, could increase by over 11,000 in addition to the commercial vehicles leaving the industrial estates at north Skelmersdale again impacting on traffic to the north of St Helens.



**A57 Warrington Road/B5413 Rainhill Road Junction at Skew Bridge west of Rainhill Village**

45. This junction feeds directly east to J7/M62. The traffic at this junction is notorious and is a long-term intractable traffic issue to the South of St Helens. The skew bridge is Grade II listed and has a narrow dual carriageway that is subject to heavy congestion due to the acute angle junction with Rainhill Road immediately on its west side. Rainhill village and surrounding areas are also in a conservation area.
46. Congestion is general running west along the A570 Warrington road back beyond Whiston Hospital to Prescot. Congestion is understood to lead to Whiston Hospital regularly restricting admissions to emergencies only as a result of traffic congestion. A570 Congestion between the M62 J7 Rainhill Stoops and the M57 J2 to the west of Prescot is common.
47. A multi-storey carpark opposite Whiston Hospital is regularly full with queues extending onto the surrounding roads. It is believed many appointments are cancelled at the last minute when patients cannot find parking space. Access to Whiston A&E is impacted by traffic congestion.
48. The *Infrastructure Delivery Plan* offers no solutions to these severe traffic issues, and has included a restriction on housing development on the 3HS Eccleston Park Golf Club until traffic issues are investigated and resolved.

**M6 J23/A580**

49. The Highways Agency offered no objection to the Florida Farm planning application in 2017 where the traffic impact from the development on Junction J23 of the M6 was judged to be moderate.
50. The publication of the SHLPPO 2016 did invite comment from Wigan and the Highways England(HE) . The Local Plan traffic growth in St Helens, adjoining Authorities and the Super port will dramatically increase traffic at the junction.
51. Previous improvement works at the junction have had little effect in improving traffic flow at the junction. The SHLPSPD Infrastructure delivery Plan does outline how St Helens in conjunction with the Highways authority will improve the junction for the traffic flow nor how it will be funded. ECRA believe the St Helens Plan needs to give more definition to how the junction will be improved to avoid a cumulative severe impact at this junction.
52. The SHLLPO proposals for Logistics warehousing the east and west of the Junction and the industrial development on the Parkside site in addition to an estimated 38% increase in residential traffic will place increased strain on the junction that is already subject to severe congestion and capacity issues despite recent alterations and improvements.
53. The situation is compounded in that the junction also serves Greater Manchester to east along the A580. It is estimated the current SH LPSD & GMCA GMSF will increase residential traffic by approximately 25 % excluding commercial and LGV traffic increases. This is greater than the new homes due to the current off street planning requirements that are far greater than those used for the 2011 census.
54. The motorway between J23 A580 and J26/Wigan is subject to heavy congestion and is presently being upgraded to smart motorway status. In addition, a motorway link road from the M6 J26 /M58 into the central Wigan and beyond extending eventually to form a bypass link to the M61.
55. This Junction, despite improvements has been found in HE's recent evaluation report to be yielding adverse benefits<sup>13</sup> with traffic slightly improved flow at peak periods offset by reduced flow at other times.

**M6 J21/A580 and M6-J26 /M58**

56. This section of motorway is at present being upgraded to Smart motorway status in order to relieve congestion. It is not clear if the forecasting includes for the LPSD traffic growth over the Plan Period and beyond, in addition to similar growth in traffic in all neighbouring Regional and

<sup>13</sup> <https://www.gov.uk/government/publications/national-pinch-point-programme-one-year-after-evaluation-meta-analysis> Apr 2019



Local authorities that also have ambitious employment growth scenarios related to logistics warehousing.

57. West Lancashire is planning large scale housing of up to 16,000 homes and logistics warehousing to the west of the junction and Wigan are planning for logistics warehousing to the east alongside a new link road between M6/J26 and the M61. All adding to the congestion currently on the road network in this area.

#### Parkside Link Road

58. This link road has been given planning permission and has funding from regional and central government. It is understood that the Highways Agency, Warrington and Wigan have objected to the LPPO & LPSD proposals for this link.

#### Air Quality, Noise and Tranquillity

59. Air Quality in the borough is an issue particularly alongside busy main routes. The trend to electric vehicles during the LPSD period is unlikely to significantly beneficial due to the overall increase in traffic volume. Idling will be an issue with due to the volume of traffic, queuing and congestion.
60. The website Air Quality England, has no data for this area. However, Local Councils must take into account 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, “*

61. We must therefore protect and preserve our green spaces and provide a “green lung” for our families by protecting our Green Belt from development. Air quality local to proposed sites, should certainly have desk and field studies to inform the decision making process.
62. It is suspected that buffer zones to development alongside major routes , e.g A580 will require significant buffer zone depths to protect residential developments affecting the housing numbers and viability of developments
63. Traffic noise and lack of tranquillity due to the increase in traffic is also a major health concern.

#### Infrastructure Delivery Plan (IDP) – Highways

64. The LPSD Infrastructure Delivery Plan (IDP) is designed to consider the impact of the LPSD proposals on local Highways network and infrastructure and set out how these are to be managed and accommodated and more importantly how they are to be funded to meet demands the LPSD imposes on the existing road network.
65. The IDP unfortunately 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. Many of the issues marked TBA or TBC. The IDP falls well short of fulfilling its objective and needs a major review to furnish more detail on how the growth in traffic resulting from the LPSD is to be managed and funded.

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



- The Transport and Traffic proposals are not sound and contrary to NPPF section 9 as it promotes increased car dependency by favouring large scale rural fringe housing developments.
- Regional and neighbouring authority traffic growth from aspirational and accelerated growth scenarios require review as the growth cannot be accommodated under current Regional Local Plan proposals.
- The St Helens LPSD growth proposals will generate cumulated severe impacts contrary to NPPF para 108 & 109 and require review.
- There appears to be a lack of cross border discussions on Transport so may not satisfy under the Duty to Cooperate
- The Infrastructure Delivery Plan (IDP) fails to outline how the Traffic growth proposed in the LPSD will be implemented and funded. It falls well short of the detail needed for delivery and requires a major review.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

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

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

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



## PART B – YOUR REPRESENTATION

### B5 INFRASTRUCTURE DELIVERY & FUNDING (LPA08)

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

3. To which part of the Local Plan does this representation relate?							
Policy <b>LPA08</b>		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Infrastructure Delivery Plan (IDP)			

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"/> <b>Not sure</b>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> <b>X</b>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> <b>X</b>

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

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

#### Infrastructure Delivery Plan (IDP)

1. The LPSD Infrastructure Delivery Plan (IDP) is designed to consider the impact of the LPSD proposals on local Highways network and infrastructure and set out how these are to be managed and accommodated and more importantly how they are to be funded to meet demands the plan imposes on the existing road network.
2. Unfortunately, the report in general and does not set out how in sufficient detail how this will be achieved. The IDP unfortunately 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. There is a clear perception that the IDP pays lip service to important issues.

13



3. Infrastructure is required to satisfy the 3 strands of sustainable development as outlined in NPPF section 2 and para 8. The provision of infrastructure to support development cannot be left as an afterthought and lag behind housing development.
4. There is a Housing Delivery Test (HDT) to monitor housing build out but no equivalent Infrastructure Delivery Test to ensure sound, properly funded infrastructure is provided in advance of house building to ensure compliance with Nation Policy.
5. The IDP falls well short of what is necessary to demonstrate infrastructure has been properly considered over the plan period and beyond.

#### Infrastructure Delivery Plan (IDP) – Highways

6. The IDP unfortunately concentrates more on the current highways 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. Many of the issues marked TBA or TBC.
7. The issues are addressed in more detail under the response to LPA07 Transport and Traffic above. It is clear that the LPSD proposals will lead to a massive increase I residential traffic that will over whelm the local highway network and lead to cumulative severe impacts. The LPSD proposals do not explain how this is to be mitigated. The plan is not sound, justified, effective of consistent with National Policy.
8. The plan may also fail the Duty to Cooperate as it is evident that the regional situation is critical and has not been sufficiently addressed.

#### Infrastructure Delivery Plan (IDP) – Healthcare & Education.

9. The IDP fails to explain fully the impact of the LPSD on Healthcare, and 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.

#### GP Services

10. On Healthcare, although consultation has been made on local CCG's on GP services there is no indication or reference to significant collaboration with St H & K Teaching Hospitals NHS Trust. The IDP gives an overview of the Whiston and St Helens services but does not go on to say how the LPSD proposals will impact on demand and how this demand will be accommodated and funded over the Plan period and beyond.
11. 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 GP's per 100,000 people or 1,923 people per GP, in St Helens CCG area and adds that a quarter of GP's are over 55 and due for retirement during the Local Plan period. The National average is 65 GP's per 100,000 people or 1,538 people per GP. A recent GP practice review indicated that GP practices varied between 1,200 and 3,300 patients averaging 1,750 nationally. Staffing within the health service is a growing problem and St Helens is known to have difficulty attracting staff.
12. This issue has been reinforced over the last few weeks, where GP's numbers have fallen to 60 per 100,000 from 65. There is concern that lack of UK training and over reliance on foreign doctors to meet the need in an uncertain economic background is placing the system at risk.
13. At a recent British Medical Council (BMA) Local Medical Committee (LMC) meeting in November 2018, GP leaders proposed to limit GP patients to 1,500 and 25 consultations per day. They also wanted to set an unsafe number of 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.
14. The 12,290 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 GP's to meet 14-19 extra GP's together with approximately 25 retirement replacement GP's all in a challenging recruitment market. Eccleston 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 GP's and almost certainly another GP practice.

15. 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.

**Hospital provision.**

16. The IDP para 4.35 outlines the what the Whiston & St Helens Hospitals provide services for 350,000 people across St Helens, Knowsley, Halton Liverpool and further afield. With the planned huge population growth across the areas served (Estimated to around 15% ) and a higher proportion of elderly people, it is difficult to see how the Hospital Trust can justify with certainty that it sees no need to increase capacity and facilities. It is clear that the scale of population expansion will require hospital expansion and improvements to provide safe emergency and general medical care. The IDP does not reference any evidence documents to support the statement made in 4.38. This statement also appears in conflict with a response by [REDACTED] StH & K hospitals to RSOGB indicating that the services are continually under strain at present.
17. Such an important component of infrastructure provision to satisfy NPPF para 8 deserves more planning than the statement made in 4.38 of the IDP.
18. It is also known that attracting medical staff is challenging and the Royal College of Nursing estimated in May 2018 that there is a nursing shortfall of 40,000 nurses nationally and that currently more nurses are leaving than being replaced. This puts more pressure on Local services but the IDP fails to mention these challenges and how they may impact on the Hospital service and how they may be overcome. Brexit uncertainty is adding to the problem. Again, this issue made headline news in the last couple of weeks in respect of training and over reliance on foreign resources.
19. Moreover, it is known that patient appointments are disrupted and abandoned due to traffic congestion around Whiston Hospital as referred to above. There is no indication that St Helens highways or St H & K Trust has collaborated with Knowsley, Halton and the emergency service to ensure the Emergency services can access the Hospital as the population and traffic significantly increases across the region.

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 IDP proposals in support of the Transport and Traffic proposals are not sound, effective and contrary to NPPF section 9.
- The LPSD may not be legal as there are concerns over cross border issues on traffic and
- There appears to be a lack of cross border discussions on Healthcare matters that so may not satisfy the Duty to Cooperate
- The Infrastructure Delivery Plan (IDP) fails to outline in sufficient detail how the LPSD will be implemented and funded. It falls well short of the detail needed for delivery and requires a major review. As such it is not sound or effective nor consistent with National Policy.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation



*and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.*

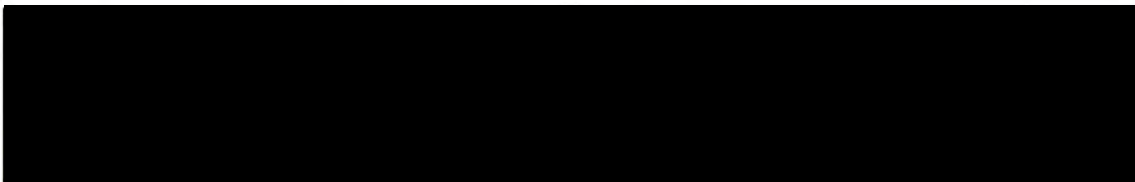
***After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.***

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

<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:

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



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

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

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

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

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



## PART B – YOUR REPRESENTATION

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

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

3. To which part of the Local Plan does this representation relate?							
Policy  <b>LPC01 &amp; 02</b>		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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

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



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

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

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

Please continue on a separate sheet if necessary

**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)

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

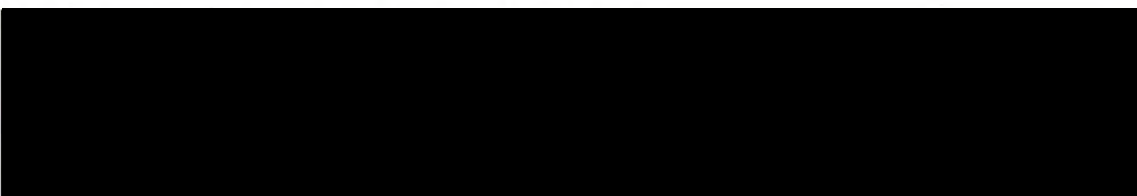
<sup>15</sup> CPRE Needless demand. Sept 2017.



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

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

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



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

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

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

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

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

15 NAMES  
13 SIGNATURES

## St Helens Local Plan Submission Draft 2019 Response to Representation (comment) Form

I give permission for Kenneth Marr of 7 Chapel Lane Eccleston WA10 5DA to submit a response to the St Helens Local Plan Submission Draft (SHLPSD) on my behalf in accordance with para 4.3 of the SHLPSD Representation Form Guidance Note. I fully support the views and comments ~~views~~ expressed.

This submission, made on our behalf, also complements the submissions made by Eccleston Community Resident Association and Windle Residents (ECRA & W) and the St Helens Green Belt Association (SHGBA) by Kirkwells Planning Consultations

NS

Number	Name	Date	Signature
	Mr B Heyes	12/03/2019	
	Mrs B Heyes	12/03/2019	
	Mr G Platt	12/03/2019	
	Mrs J Platt	12/03/2019	
	Mrs B Harris	12/03/2019	
	Mr D Carsley	12/03/2019	
	Mrs K Carsley	12/03/2019	
	Mr A Bland	12/03/2019	
	Mrs J Bland	12/03/2019	
	Mr G Ashcroft	12/03/2019	
	Mrs M Ashcroft	12/03/2019	
	Mr A Lee	12/03/2019	
	Mrs C Lee	12/03/2019	



## St Helens Local Plan Submission Draft 2019 Response to Representation (comment) Form

I give permission for Kenneth Marr of 7 Chapel Lane Eccleston WA10 5DA to submit a response to the St Helens Local Plan Submission Draft (SHLPSD) on my behalf in accordance with para 4.3 of the SHLPSD Representation Form Guidance Note. I fully support the views and comments expressed.

This submission, made on our behalf, also complements the submissions made by Eccleston Community Resident Association and Windle Residents (ECRA & W) and the St Helens Green Belt Association (SHGBA) by Kirkwells Planning Consultants.

<i>Number</i>	<i>Name</i>	<i>Date</i>	<i>Signature</i>
	Mr J Pritchard	12/05/2019	
	Mrs M Pritchard	12/05/2019	

RO1117





St. Helens  
Council

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

Ref: LPSD  
LPA05  
Site 2HA  
(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

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

01 MAR 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)

Title: Mr  
First Name: RON  
Last Name: MARSH  
Organisation/company: LOCAL RESIDENT / FR  
Address: 149 LIVERPOOL ROAD  
NEWALL, HAYDOCK.  
ST. HELENS  
Postcode: WA11 9RX

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

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

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

Date: 25/FEB/2019.

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

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

☐ Yes (via email)

☐ No

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

<sup>1</sup> 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](mailto:planningpolicy@sthelens.gov.uk)

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

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

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

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

Telephone: **01744 676190**

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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



## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
LPA 04		2 EA, 5 EA & 6 EA					
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 support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>- Not justified in population numbers.</p> <p>- The release of the greenbelt is to assist with cause significant harm to the future of the greenbelt.</p> <p>- The Council has already granted planning permission in the greenbelt in respect of site 2 EH - Florida Farm Nurseries with defuncting effect both local population.</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)

<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.**



214  
①-LPA04  
②-LPA05  
PFO194

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

Ref: LPSD

01 MAR 2019

(For official use only)

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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: DR

First Name: IAN

Last Name: MARSH

Organisation/company: LOCAL RESIDENT

Address: 149 LIVERPOOL ROAD

NEWFALL, HAYDOCK

ST. HELENS

Postcode: WA11 9RX

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

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

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

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

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

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

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

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

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

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

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

Date: 25/FEB/2019

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

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

☒ Yes (via email)

☐ No

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

## 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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## NEXT STEPS

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

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

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



## PART B - YOUR REPRESENTATION

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>LPA04</i> <i>S123</i> <i>26A</i> <i>52A</i> <i>634</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 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><i>- Not justified in the grounds of its relationship to the local population</i></p> <p><i>- Using greenbelt fails to encourage the recovery of brownfield sites.</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.

*Delete this land from the forest  
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)

<i>n/o</i>	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 LPA OS STE QHA		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:		
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Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

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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>- Not justified</p> <p>- The release of Greenbelt will cause significant harm to the purpose of the Greenbelt.</p> <p>- No safe access can be facilitated</p> <p>- Flooding is widespread in the area.</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

**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)**

140	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.**



RO1118

215

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

Ref: LPSD

01 MAR 2019  
(For official use only)

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

### 1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: MARION

Last Name: MARSH

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

Address: 149 LIVERPOOL ROAD

PEWELL HAYDOCK

ST. HELENS

Postcode: WA11 9RX

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

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

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

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

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

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

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

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

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

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

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

Date: 25 February 2019

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

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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

<sup>1</sup> 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:

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(open Monday-Friday 8.30am - 5.15pm)

or by email to:

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

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## **FURTHER INFORMATION**

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

Telephone: **01744 676190**

## **NEXT STEPS**

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

## **DATA PROTECTION**

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**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 WAO4 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?	<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 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>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>High volumes of predicted traffic will add to the already over capacity on the highways in this vicinity</p> <p>The release of Greenbelt is to assist in the urban regeneration by encouraging the recycling of derelict of other urban land. Main Greenbelt fails to encourage this</p> <p>* It is absolutely disgusting that the Council has already granted planning permission in the Greenbelt is reaped of the monstrosity of site 2EA - Florida Farm North which is surrounded on three sides with houses. The Council should be ashamed of itself. Note: no councilors live on Liverpool Road.</p> <p>The risk of flooding further down the Blisley Brook will be exacerbated by future development at this location</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.**

*This land needs to be deleted 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:**

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St. Helens  
Council

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

Ref: LPSD

01 MAR 2019

(For official use only)

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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>MARION</u>	First name: _____
Last Name: <u>MARSH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>149 LIVERPOOL ROAD</u> <u>PEWELL HAYDOCK</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA11 9RX</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>25th February 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

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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  
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(open Monday-Friday 8.30am - 5.15pm)

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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 211A		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 <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 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>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.</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.</p> <p>The access to the site is inadequate, entering &amp; exiting from the East Lancashire Road isn't safe &amp; the proposal for a junction at Liverpool Road &amp; Vicarage Road would put additional traffic on an already overstretched highway system.</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)

<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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RO1119





St. Helens  
Council

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

Ref: LPSD

01 MAR 2019  
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This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Ms</u>	Title: _____
First Name: <u>ROWENA</u>	First name: _____
Last Name: <u>MARSH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>9 DAKINMAN GROVE</u> <u>HAYDOCK</u>	Address: _____
Postcode: <u>WA11 0GU</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>25/2/19</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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post to:

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WA10 1HP**

or by hand delivery to:

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3. To which part of the Local Plan does this representation relate?									
Policy SITES	LPA04 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?	<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 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>- NOT JUSTIFIED DUE TO NUMBER OF EMPTY <del>AREA</del> WAREHOUSES IN THE AREA.</p> <p>- ENCROACHMENT OF WAREHOUSES ON FLOODA FORM NORTH ON THE ADEARBY RESIDENTIAL AREAS</p> <p>- PENNY LAKE DEVELOPMENT IS THREATENING THE SEPARATION OF HAYDOCK ASHTON. REMOVING THIS LAND FROM GREENBELT WILL THREATEN THIS FURTHER</p> <p>- RISKS FROM INCREASED AIR POLLUTION, ROAD CONGESTION</p> <p>- CONTRIBUTION TO FLOODING ISSUES AT CHESLEY BROOK / SHIP LANE</p>	

Please continue on a separate sheet if necessary

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- DELETE THIS LAND FROM PROPOSED REMOVAL FROM GREENBELT
- ENCOURAGE USE OF LAND FOR AGRICULTURE + FARMING TO HELP SAFEGUARD FOOD SUPPLIES POST BREXIT.

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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3. To which part of the Local Plan does this representation relate?									
Policy	LPA06 SITE 2ES	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 <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

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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> <ul style="list-style-type: none"> <li>- REMOVAL OF BOUNDARY BETWEEN MAYNOCK, ASHTON IN - MARKEFIELD, GOLBORNE</li> <li>- TRAFFIC IN AREA IS ALREADY CHOKED + INADEQUATE PUBLIC TRANSPORT</li> <li>- INCREASED AIR POLLUTION IS ALREADY DAMAGING THE HEALTH OF THE LOCAL POPULATION INCLUDING MINE - WHO IS GOING TO COMPENSATE US, PAY FOR OUR MEDICATIONS etc</li> <li>- NO JOINED-UP THINKING WITH NEIGHBOURING AUTHORITIES + HIGHWAYS ENGLAND.</li> </ul>

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- EXCLUDE THIS LAND FROM THE PROPOSED REMOVAL <sup>FROM</sup> ~~OF~~ GREENBELT  
- ENCOURAGE AGRICULTURE TO SAFEGUARD AFFORDABLE FOOD SUPPLIES  
POST BREXIT.

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First Name: <u>ROWENA</u>	First name: _____
Last Name: <u>MARSH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>9 OAKTHORN AVE</u> <u>HAYDOCK</u>	Address: _____
Postcode: <u>WA11 06U</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>25/2/19</u>
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Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<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 type="checkbox"/> <i>DON'T KNOW</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 <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>- LACK OF INFRASTRUCTURE - SEWERAGE, GP APPOINTMENTS, OPEN SPACE, TRANSPORT. ROADS ARE ALWAYS CHOKED AND WE ARE NEVER A PRIORITY FOR PUBLIC TRANSPORT</p> <p>- THIS AREA IS A NATURAL FLOOD PLAIN. REMOVING IT CAUSES EVEN MORE FREQUENT FLOODING IN THE SHIP LANE AREA.</p> <p>- LOSS OF FARMING TO PRODUCE AFFORDABLE FOOD + REDUCE RELIANCE ON IMPORTS POST BREXIT.</p> <p>- HEALTH RISKS RELATED TO INCREASED AIR POLLUTION</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.


DO NOT REMOVE THIS LAND FROM GREENBELT  
ADD IN INCENTIVES FOR POTENTIAL FARMERS. CONSIDER  
USING PIECES OF LAND FOR ALLOTMENTS TO BE USED BY  
RESIDENTS + LOCAL SCHOOLS

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.**



RO1120



St. Helens  
Council

610

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

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

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

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: RITA	First name:
Last Name: MARSH	Last Name:
Organisation/company:	Organisation/company:
Address: S ELLSFIELD RD ST HELENS	Address:
Postcode: WA10 5LH	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11 MARCH 2019

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

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

Yes ☒ (Via Email)No ☐

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



## RETURN DETAILS

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

post to:

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

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

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

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

### FURTHER INFORMATION

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

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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



## PART B – YOUR REPRESENTATION

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

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

Policy	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 <b>X</b>
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?	<b>X</b>
Justified?	<b>X</b>
Effective?	<b>X</b>
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

Adequate regional and cross border collaboration has not been undertaken. <sup>②</sup> 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

①



in 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.**

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

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

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

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

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

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

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

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



RO1121



St. Helens  
Council

611

12 MAR 2019

Ref: LPSD

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

(For official use only)

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

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: ERIC	First name:
Last Name: MARSH	Last Name:
Organisation/company:	Organisation/company:
Address: 5 ELLESFIELD RD ST HELENS	Address:
Postcode: WA10 5LU	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 11 MARCH 2019
-----------------------	---------------------

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

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

Yes ☒ (Via Email)

No ☐

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



## **RETURN DETAILS**

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post to:

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

**or** by hand delivery to:

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

**or** by e-mail to:

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

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

## **NEXT STEPS**

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

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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		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: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes	No
Sound?	Yes	No <b>X</b>
Complies with the Duty to Cooperate	Yes	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?	<b>X</b>
Justified?	<b>X</b>
Effective?	<b>X</b>
Consistent with National Policy?	

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

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

- The Green Belt Review (2018) contains questionable decisions. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land.
- Sustainable infrastructure has not been addressed and will cause problems if site 8HS is allowed to be safeguarded for development. The decision to include this parcel in the Plan leads to significant doubt that the Plan has been positively prepared.
- St Helens Council has used ONS(2014) statistics rather than later and more accurate ONS(2016) data. The Council are aware of this reduction in housing need but still chooses to uplift older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the need to build on Green Belt.
- The Plan does not make effective use of Brownfield and Previously Developed Land (PDL). St Helens Council states that 3,170 ha of the lowest priority contaminated brownfield land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites, barely 7% of the 3,170-ha available. There is little justifiable need to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. It is not reasonable to assume that sites cannot be made available within the 15- year Plan period being considered.
- The loss of Grade 1 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and food security is not considered.

2

1



**The Plan is not justified.**

- The lack of infrastructure and the poor healthcare and education offering means that St Helens is a less desirable place to live and work. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need.

**The Plan is not effective.**

Please continue on a separate sheet if necessary

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.**



RO1122



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>Bernie</u>	First name:
Last Name: <u>Marsh</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>22A Taunton Ave</u> <u>Sutton Leach</u>	Address:
Postcode: <u>ST Helens</u> <u>WA9 4NU</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

28/3/19

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.



RO1123

**Representor Details**

Web Reference Number	WF0472
Type of Submission	Web submission
Full Name	Mr Simon Marsh
Organisation	Battlefields Trust
Address	Kemp House, 152 City Road, London, EC1V 2NX HP27 0HS
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	LPC 11: Historic Environment
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:**

Consistent with national policy

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

I am responding to the consultation on the St Helens Local Plan on behalf of the Battlefields Trust, a national charity dedicated to the preservation, research and presentation of battlefields as historical and educational resources (see [www.battlefieldstrust.com](http://www.battlefieldstrust.com))

I am responding specifically to policy LPC11: Historic Environment and offer the following comments.

A. The policy covers the requirement in para 189 of the National Planning Policy Framework (NPPF) for a developer to provide a statement of significance relating to a heritage asset threatened by development, but appears silent on the provisions in para 190, which require local authorities to identify and assess the significance of a heritage asset based on available evidence. In the Trust's view this should be included to make clear that significance will be independently assessed by the Council rather than relying on the developers assessment.

B. The policy should also be clear that for designated heritage assets, great weight should be placed on their conservation as outlined by para 193 of the NPPF. This should be the starting point for any consideration of less than substantial harm assessments. The draft policy seems to water this down.

C. Para 3 of the draft policy relating to substantial harm also appears to dilute the NPPF statement that such harm should be wholly exceptional. In the Trust's view the NPPF language should be reflected in this section of the policy.

D. There is an inconsistency between paras 4 and 5 of the draft policy. Para 4 relating to designated assets links public benefits to optimum viable use, whereas para 5 relating to non-designated assets makes no such linkage. This seems to be the wrong way around as optimum viable use criteria could



be used to push through a planning application relating to a designated asset on public benefit grounds whereas it could not be similarly applied to a non-designated asset as the policy currently stands. As drafted this provision seems designed to make it easier for the Council's planning committee to agree applications which harm designated assets. This seems to the Trust to be contrary to the spirit of NPPF para 193.

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

Explicitly use the language of the National Planning Policy Framework and ensure all elements are covered.

**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	2/19/2019 10:52:58 PM
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RO1125



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1006

13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>ROY</u>	First name: .....
Last Name: <u>MARSHALL</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>29 CRAWFORD ST</u> <u>CLOCK FACE</u> <u>ST. HELENS</u>	Address: .....
Postcode: <u>WA9 4XR</u>	Postcode: .....
Tel No: [REDACTED]	Tel No: .....
Mobile No: [REDACTED]	Mobile No: .....
Email: [REDACTED]	Email: .....

Signature: [REDACTED]	Date: <u>11/03/19</u>
-----------------------	-----------------------

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

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

☒ Yes (via email)

☐ No

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



## RETURN DETAILS

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post to:

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

or by hand delivery to:

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

or by email to:

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

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

## FURTHER INFORMATION

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

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

Telephone: **01744 676190**

## NEXT STEPS

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

## DATA PROTECTION

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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.**



RO1126



St Helens  
Council

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

Ref: LPSD

(For official use only)

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This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1007

13 MAY 2019

### 1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: LINDA

Last Name: MARSHALL

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

Address: 29 CRAWFORD ST

CLACKFAX

ST HELENS

Postcode: WA9 4XR

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: 11/03/19

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

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

Telephone: **01744 676190**

## NEXT STEPS

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## DATA PROTECTION

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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.**

RO1127





St. Helens  
Council

339

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

Ref: LPSD

07 MAR 2019

(For official use only)

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

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This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ANNE</u>	First name: _____
Last Name: <u>MARTIN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>320 LIVERPOOL ROAD</u> <u>PEWFAW, ST HELENS</u> <u>MERSEYSIDE</u>	Address: _____
Postcode: <u>W11 9RY</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>-</u>	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>5/3/19</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

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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 OS SITE 2HA	1	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 type="checkbox"/> 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 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  
The housing application is not justified. St Helens Council should provide proof of estimated population increase as the population of St Helens has been declining since 1981. Where are all the extra people coming from?  
The local schools, doctors & dentists are already full & would not be able to cope with the extra demand.  
The access to the site from the very busy East Lancs Road is unsafe & the junction on Liverpool Road/Vicarage Road would put additional traffic on our already busy roads on top of the extra traffic from the warehouses being built on Florida Farm North.

Please continue on a separate sheet if necessary

Brownfield sites should be used before Greenbelt land is destroyed



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.**

✓

Yes, I wish to participate at the oral examination

1800756M



## 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 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?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>DONT 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 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.	
<p>I object to this application because of the scale of this development on Greenbelt land. The purpose of Greenbelt is to assist with the regeneration of derelict land, using Greenbelt land fails to do this. There is also a greater risk of flooding since planning was granted to 2 huge warehouses on Florida Farm North (Greenbelt land). High volume of traffic will be created on top of the extra HGV's to/from the warehouses being built on Florida Farm North, all in close proximity to residential houses.</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

**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
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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.**



RO1128

(340)

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Ref: LPSD

07 MAR 2019

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**Part A - Personal Details**

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

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>MICHAEL</u>	First name: _____
Last Name: <u>MARTIN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>320 LIVERPOOL ROAD</u> <u>PEWFAIR, ST HELENS</u>	Address: _____
Postcode: <u>WA11 9RY</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	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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**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 OS SITE 2HA	(1)	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 <b>Don't know</b>
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 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.	
<p>THERE IS NO NEED FOR 522 HOUSES TO BE BUILT ON FLORIDA FARM SOUTH AS ST HELENS POPULATION HAS BEEN DECLINING SINCE 1981. LOCAL FACILITIES ARE ALREADY STRETCHED TO THE LIMIT WITHOUT HAVING EXTRA DEMANDS ON THEM. ARE EXTRA SCHOOLS, DOCTORS ETC BEING BUILT TO ADDRESS THIS?</p> <p>THE PROPOSED ACCESS FROM THE A580 TO THE SITE WOULD BE UNSAFE AS THIS IS A VERY BUSY DUAL CARRIAGEWAY + THE JUNCTION OF LIVERPOOL ROAD / VICARAGE ROAD WOULD ONLY ADD TO THE CONGESTION ALREADY ON THE LOCAL ROADS. THERE WILL BE AN EXTRA 1600+ HGV'S PER DAY FROM THE 2 WAREHOUSES ON FLORIDA FARM NORTH, WHICH OUR ROADS WON'T BE ABLE TO COPE WITH.</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, 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.**

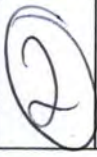
**Please keep a copy for future reference.**



## PART B - YOUR REPRESENTATION

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

Policy LPA 04 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?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input 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

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Positively Prepared?	<input checked="" type="checkbox"/>
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### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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

I OBJECT TO THIS APPLICATION BEING BUILT ON GREENBELT LAND. BROWNFIELD SITES SHOULD BE USED FIRST, WHICH THERE ARE PLENTY IN ST HELENS.

THERE IS ALSO A GREATER RISK OF FLOODING, ESPECIALLY SINCE 2 HUGE WAREHOUSES HAVE BEEN BUILT ON FLORIDA FARM NORTH (GREENBELT LAND).

THE VOLUME OF TRAFFIC WILL INCREASE ON TOP OF THE EXTRA 1600+ HGV'S ACCESSING THE WAREHOUSES ON FLORIDA FARM NORTH WHICH WILL IMPACT ON THE HEALTH + WELLBEING OF THE LOCAL RESIDENTS.

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

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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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<div></div>
-------------

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RO1129



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

PF1143

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

(we will correspond via your agent)

Title: Mrs

First Name: AILEEN

Last Name: MARTIN

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

### 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

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.**



RO1130

**Representor Details**

Web Reference Number	WF0201
Type of Submission	Web submission
Full Name	Mr Peter martin
Organisation	
Address	57 Rainford Road Windle Wa106dd
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	SHBPL
Paragraph / diagram / table	
Policies Map	HA8
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.**

1. St Helen's council have not consulted with other councils and haven't published statements of common ground.
2. Sustainability appraisal - 4 sites scored 4 negatives, HA8 is one of the sites. The other 3 sites were discarded. HA8 is the least appropriate greenbelt site allocated for housing.
3. HA8 is next to an industrial area. The risks associated are like other similar sites that were excluded during the site assessment phase.
4. We have not seen any consultation with National England over the loss of Grade 1 farmland.

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

The council should consult with other councils and publish statement(s) of common ground.

The council should amend the plan to consider the risks and impacts to continuing with HA8 through it's own assessments and the decisions made when other similar sites were excluded. The standard method of calculating housing needs should be used.

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

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



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

Response Date	3/11/2019 9:17:10 PM
---------------	----------------------

RO1131



**Representor Details**

Web Reference Number	WF0211
Type of Submission	Web submission
Full Name	Miss Lucy Martin
Organisation	
Address	11 Beech Gardens WA11 8DJ
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	SHBPL
Paragraph / diagram / table	
Policies Map	HA8
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.**

Other similar sites have been excluded in the site assessment phase, there are risks linked to this site so why go ahead with it?

Natural England haven't been consulted, the site is grade 1 farmland.

The site was assessed as least appropriate Greenbelt site for housing alongside 3 other sites. Those 3 were discarded.

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

The plan should be amended by keeping the Greenbelt land.

Use the standard method to calculate housing needs

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

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

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

Response Date	3/11/2019 7:49:50 PM
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RO1132





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

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

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



This form has two parts;

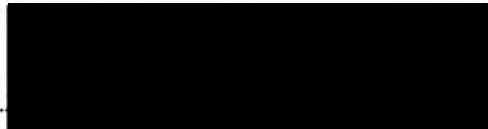
## Part A - Personal Details

## Part B - Your Representation(s)

### PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>NORMAN</u>	First name: _____
Last Name: <u>MARTINDALE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 CUNNING CLOSE</u>	Address: _____
<u>ECCESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5DP</u>	Postcode: _____
Tel No: 	Tel No: _____
Mobile: 	Mobile No: _____
Email: _____	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.

## **RETURN DETAILS**

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

or by hand delivery to:

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

or by email to:

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

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

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

Telephone: **01744 676190**

## **NEXT STEPS**

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## **DATA PROTECTION**

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

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

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

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



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

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

**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

**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.**

**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.**



RO1133

573

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)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JUDITH</u>	First name: _____
Last Name: <u>MARTINDALE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 GUNNING CLOSE</u>	Address: _____
<u>ECCELESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5DP</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>2nd March '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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St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

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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	<input checked="" type="checkbox"/>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input checked="" type="checkbox"/>
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<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"/> Based on Flawed methodology
Effective?	<input checked="" type="checkbox"/> Plan not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> Does not comply with NPPF 2018

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 the legal compliance or soundness of the Local Plan</u> , please also use this box to set out your comments.
<p>② The "plan" does <u>not</u> satisfy:- requirements for sustainable development, the criteria for sustainable transport as it promotes increased car dependancy remote from transport hubs, proposed housing targets are based on unrealistic employment growth predictions, does not satisfy effective land use by concentrating on Green Space development over town centre development, and it does not satisfy food security by ignoring Agricultural Land Quality.</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.

1 Consider all other reasonable alternatives seriously - brown field options, ex Pilkington sites, "contaminated" sites to be cleaned up (it is shortsighted not to do this) and town centre locations (Century House?) Why are we putting up an enormous bowling alley next to Aldi??? It should have been bought and used for new housing by the council. We are already the most congested area outside of London. If we must have more housing it should not be on the outskirts of the borough where people will need more cars to sustain lifestyles there. Air quality is already shocking - improve public transport with electric buses, and cheap fares so people will use them, and leave the green belt alone.

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.**

RO1134



① - LPA05      ② - LPA07

#### Representor Details

Web Reference Number	WF0159
Type of Submission	Web submission
Full Name	MR LAMBERT MARTLAND
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)**

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 plan is not consistent with national policy as no exceptional circumstances are demonstrated for so much green belt to be used.

Not surprisingly the positive comments detailed in the report of consultation all come from developers and land owners, looking to profit from the decimation of valuable green space.

Nor does it comply with sustainable development requirements.

It does not satisfy the criteria for sustainable transport as it promotes edge of town, isolated land parcels for housing.

These will require increased car dependency, even for short journeys, as they are also isolated from transport hubs.

The targets being aspired to are wildly optimistic and based on old data.

Warrington Council have delayed their local plan until the calculation method arguments can be solved.

\_\_\_\_\_ is seeking an urgent meeting with the housing minister in order to finalise the plans for the Manchester region.

It cannot be justified or a positively prepared plan given all this in-house arguing and disagreement over the right base data to use.

With all this continued debate over the right numbers to use, why can there not be option to use the lower number in the first instance and commit to reviewing the plan earlier than 15 years; say 10.

①

②

①

That would be a more sensible approach to take than simply removing hectares of land from green belt because some of it 'might' be needed.

It would allow a shallower growth trajectory in the short term, whilst all the infrastructure needs are properly assessed and reviewed.

The Haydock area is being marketed as logistics because it is on the doorstep of the motorway network but that junction of motorway does not work today – it is continually congested.

In 10 years' time, the plans for a station at Carr Mill might have happened.

The Parkside East freight rail interchange might be in place, taking the burden from the roads and a better laid local plan can be put forward.

The congestion/ pinch points span the length and breadth of the St Helens area; Windle Island is being reworked now, Lea Green also. M62 junction at Rainhill has issue as well as the M6 junction at Haydock.

On top of that, there are numerous congestion points at smaller junctions throughout the town.

This level of growth will simply cripple the road network and make it completely unusable.

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

Less employment, less housing, more infrastructure using the most up to date information possible.

Why base future plans on out of date information.

No green belt land to be used, it is of great importance and that should be respected

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

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

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

Response Date	3/12/2019 7:49:11 PM
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RO1135

12 MAR 2019

Ref: LPSD

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Representation (i.e. Comment) Form**

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**Part B** – Your Representation(s).

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Andrew	First name:
Last Name: Martlew	Last Name:
Organisation/company:	Organisation/company:
Address: 7 Acacia Grove, Eccleston, St.Helens. Postcode:WA105HD	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date: <span style="border: 1px solid black; padding: 2px;">10/3/19</span>

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

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Yes (Via Email) ☒

No

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St.Helens Council  
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St.Helens  
Merseyside  
WA10 1HP

or by hand delivery to:

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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	8HS	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: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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

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

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



The Council are not using the most recent data available, they use ONS 2014 stats were ONS 2016 stats are more accurate and the extra house building proposed in the Local Plan is not justifiable. It seems to be a way for the Council, Developers and Investment groups to benefit at the expense of local residents.

The town centre reflects the decline in growth of the Borough, numerous vacant retail premises, retailers closing down or relocating, leaving the bars, takeaways, charity shops and hairdressers. The housing at 8HS will be commuter belt to Liverpool or Manchester, increasing pollution and traffic congestion.

The Council does not appear totally committed to utilising brownfield sites for housing developments before taking Grade 1 and 2 agricultural land, as seen in their reluctance to develop a brown site register. Are we to assume this is evidence of land banking and there is a desire to grab greenbelt land as the opportunity arises? The Council should focus the LDP on; re purposing town centre buildings, then brownfield sites, before considering Grade 3 agricultural land - which compromises 27.7% (approx) of the Borough (Defra's Agricultural Land Classification Map).

The local infrastructure cannot manage the population of now and will be totally swamped by the increase in numbers of a new development. The work at Windle Island traffic lights has been designed to alleviate the traffic problems of 2016/17 with no consideration of the increase in traffic generated by future housing development across the borough.

Local schools are oversubscribed - demonstrating the council's lack of forward planning when they responded to the contemporary problem and amalgamated and closed schools in the 1990/2000's.

There is uncertainty regarding the UK's position following Brexit, decisions which destroy a community should not be made until there is a clearer picture of what demands are required in a post Brexit Britain.

The local Health Service providers struggle to cater for the population now with difficulty obtaining appointments. Local hospitals find it difficult to recruit due to the nature of the area. Public transport, Police, Fire services and the Courts have been moved out from St. Helens and will struggle to cater for the demands of increased population.

The Council have no regard for the importance of agriculture and are failing to support our farming community

The Plan is not effective.

The site 8HS should be **removed from** the Safeguarded for development category and remain as Greenbelt.

Please See Attached Letter.



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

**Retain the traditional Greenbelt areas in St.Helens.**

**Repurpose town centre buildings.**

**Utilise ALL brownfield sites.**

**Look at using the poorer quality land Grade 3 before wasting the best 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.***

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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:

***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.**



7 Acacia Grove,  
Eccleston,  
St. Helens.  
WA105HD  
10th March 2019

Planning Inspector,  
Local Plan,

Dear sir,

As a resident of Eccleston I am writing to oppose the Local Plan's proposed building development 8HS. The site 8HS should be removed from "Safeguarded for Development" and remain as greenbelt land, for the following reasons;

1. This is valuable countryside and should be protected from urban sprawl, these fields in Eccleston are prime agricultural land. The loss of these fields would irreversibly destroy the nature, character and individuality of Eccleston. This semi rural aspect with open farmland and wide vistas to the horizon is at the centre of our community and it is part of our heritage - the name Eccleston means church farm or settlement. The area is historically agrarian with crops having been grown year round for centuries. Historically well managed, fertile and easily worked arable land is valuable, to destroy such an commodity is very shortsighted.

- *NaturalEngland.org.uk's map Series Agricultural Land Classification classifies the land as Grade 1 - Excellent and Grade 2 - Very Good. The housing development would destroy 45% (+/- 5% mapping accuracy) of the Grade 1 in Eccleston and 100% of Grade 2 in Windle.*

- *Liverpool Museums Historic Settlements Survey (2011) describes the geology as The solid geology is Triassic sandstones and pebble beds. Overlying drift deposits are mainly boulder clay. Areas of carboniferous coal measures lie to the west. The 1845 OS map shows Windle Colliery on 8HS site, Windle farm was Windle Colliery Farm.*

*Liverpool Museums Historic Settlements Survey (2011) states, 'Topography: Stretches of mossland used to exist in some parts of Eccleston, but were drained during the post-medieval period. Early Activity: There is scant evidence for settlement in Eccleston during the Prehistoric and Roman period. There is reference to two mounds in the vicinity of Burying Hill, near Eccleston Hall. It is doubtful that they are '...the graves of Roman soldiers...' (9), instead they are more likely to be burial mounds of the mid - late prehistoric period. No evidence of mounds exists today due to partial development of the site.*

*Chance discoveries include two perforated stone implements. Significant Post-Med Activity: No major industry developed in Eccleston during the medieval period; instead the agricultural economy provided for local needs until the mid nineteenth century when a number of small scale industries became established.'*

*The area is historically agrarian with crops having been grown year round for centuries. Historically well managed, fertile and easily worked arable land is valuable, to destroy such a commodity is very shortsighted.*

*The Council's recalcitrant attitude toward cleaning up brownfield sites for housing because of the financial cost should be compared with how much it would cost to make the contaminated brownfield sites suitable for growing arable crops combined with the time needed to develop Grade 1 tilth.*

- *Landscape is described by defra.gov.uk's MAGIC mapping utility as 'Soilscape classification, 15 - Naturally wet very acidic sandy and loamy soils'.*

2 The development of greenbelt land along the A580 Will effectively produce a contiguous residential and commercial built environment stretching from the M6 all the way into the Liverpool city centre.

3 Eccleston has been subject to considerable housing development in recent years, Indeed our status as a village on the outskirts of St Helens has been spoilt by major local development sites. Any further development on open spaces would effectively 'swamp' Eccleston's existing architectural style with modern house designs and housing estate layout that would aesthetically overpower and destroy the character and amenity of the area.

4 The roads through and around Eccleston were designed to service a village and as such are narrow. The 'main' roads through Eccleston are clearly shown on *Greenwood's 1818 map and Yates' 1786 map* and where used by hand carts, horse and cart, horses and people/animals walking, they evolved to accommodate light vehicular traffic and subsequent new roads have all been for lightweight traffic feeding onto them from small housing developments. They do not have the capacity for huge volumes of traffic. The highways cannot cope with the volume of traffic that currently uses them, locals regularly experience delays on routes into and out of St Helens town centre, Particularly at nodal points therefore it is reasonable to assume that with an increased volume of traffic there will be gridlock throughout the area. The condition of existing road surface must also be considered. Many of the roads in Eccleston show or have shown heavy wear with potholes, cracking and subsidence (eg. Walmesley Road, Broadway, Houghton's and Howard's Lanes and Catchdale Moss) all of which will increase with more vehicles on the road. Highway maintenance costs will increase dramatically.

5 Farmland and green spaces provide an invaluable resource for the health and well-being of local residents as it provides:

- a sense of well-being by seeing the natural landscape, fields, hedgerows and wildlife and the range of biodiversity therein.
  - as space to escape the claustrophobic built environment
  - a space to exercise in - modern studies advocate exercise in green spaces
  - 'fresh air' that vegetation produces
  - historically people who lived in the countryside were healthier and lived longer than town dwellers
  - greenbelt is available for the benefit of all regardless of social class income or education.
- Growing up in the countryside or leafy suburb can protect you from mental illness later in life according to a recent Danish study by Kristine Engemann of Aarhus University, writing in the Proceedings of the National Academy of Sciences Journal, stating, '...reducing access to greenspaces and parks could lead to worse mental health among residents'.*

6 This greenbelt land plays a significant role in absorbing carbon and preventing flooding. The Eccleston greenbelt land is low-lying (110ft) and is on the edge of Moss lands and, Indeed we have CatchDale Moss, Moss being an Old English word for bog land (As mentioned in St.Helens Historic Settlement Study). The areas mentioned contain several extensive Brook systems, so we have the land absorbing rainfall and releasing it at a naturally controlled rate into the streams. Many of these streams flow back into St Helens. Building on this land would destroy this system and increase problems caused by flooding across Eccleston. Construction of a conurbation will produce an excess of water run-off from hard surfaces such as roofs, driveways and roads with the effect of a flash flood. Fields within the proposed development have areas that are water logged, some even forming pools for several months in the winter e.g. Along Houghton's Lane, Watery



2

Lane and Ecclesfield Road. The area has historically been very wet as the road names reflect-Watery Lane, Springfield Lane, Brooklands Road, Brookside Avenue, Brookhouse Grove, etc.

- *The gov.uk's Flood Map planning shows 8HS the area with sections of high/medium risk from surface water flooding. Building on that spongy land will cause compaction problems and interfere with the established drainage system. What is not shown is the direction of flow of Windle Brook, into which the fields drain. Windle brook flows into St. Helens, along a corridor that the gov.uk flood map shows as high risk now. Additional drainage and run-off will affect the brook and impact on 1000s of houses.*

7 Developing this greenbelt site could result in costing the council more than it generates in terms of-lost food production capability, ecological services, reduced accessibility, higher public infrastructure costs, longer trip distances, greater congestion which in turn produces more pollution and is detrimental to public health which produces greater strain on local health services.

- *A recent paper by Mitch Hunter of Penn State University published in the Journal Bioscience stated that food production must increase between 25% and 70% between 2005 - 2050 in order to feed the increase in projected world population.*

8 An increase in traffic and associated traffic congestion will not encourage people to travel to the town, rather they will head away from the town, comparable with pathways trodden across grass as 'desire (direction) lines' or lines of least resistance/easiest travel, thus making the development alongside the A580 city based commuter housing.

9 The argument for this development is based on research, the question is how up-to-date is the research? The population of St Helens has, based on the councils own figures, fallen rather than increased as predicted. If the Council is expecting mass migration to St. Helens then has the public been provided with all of the facts? The purpose and the interpretation of the research should also be questioned, who commissioned and paid for the information and where any major developers involved in the process, are the facts that are being forced on the public the full and true representation or are they being interpreted for the benefit of housing developers. Much of this research was done prior to the Brexit vote, there is much national speculation and uncertainty as to the effect leaving the EU will have on the British economy, surely it would be prudent to wait and reassess the need to remove land from the greenbelt.

10 Has the physical geography of the region being considered? According to the U.K.'s meteorological service the borrower of St Helens prevailing wind direction is from West Southwest which means the Wind blows over the countryside across Eccleston then over the town centre. The topography the area shows that the Town benefits from the fresh air generated over the greenbelt as the air flows up slightly over Eccleston/Windle and helps to draw pollution away from the town, in a similar way to the Venturi effect. This is important as St. Helens sits in a hollow in the landscape which is evident from sampling spot heights across the town.

11 Building thousands of new houses will mean an influx of people which will have a huge detrimental impact on the area and destroy the history, character and amenity of Eccleston as we know it. These actions seem to contradict the St. Helens LPPO Strategic Aim 6 Safeguarding and enhancing Quality of life in St. Helens Strategic Objective 6.2 'To safeguard the quality of the environment, protecting and enhancing local character and distinctiveness together with bio and Geo diversity'.

12 New development of this scale will result in a huge increase in:

- Air pollution from vehicles, wood burning stoves and the barbecues which studies (eg. *Danish Professor Steffan Loft - Chemical Research in Toxicology*) all cite as being detrimental to health, in particular children's health.
- Light pollution from street lamps and houses
- Noise pollution from vehicles construction traffic and people
- Environmental pollution from littering and fly tipping.

13 The main access to these new developments would be via Houghton's Lane, an ancient route through Ecclestone which is very narrow and has several tight corners, any work to widen or construct a new road would destroy ancient field boundaries, drainage ditches and the hedgerows along it, further destroying the character and heritage of Ecclestone. Any improvements to Houghton's Lane would exacerbate the rat run effect as motorists attempt to avoid the congestion at the junction of the A560 and A580. This has become more apparent in recent years with the volume of traffic on Springfield Lane (Houghton's Lane becomes Springfield Lane and is a Residential Character Area) and the need to install speed reduction signs and junction platform close to St Julie's primary school. The lack of access to the proposed new developments will funnel traffic into already very busy, narrow and dangerous junctions (ie. Gunning Avenue/Bleak Hill Road/ Kiln Lane; Houghton's Lane/Springfield Lane/Broadway/Church Lane; Walmesley Road/ Broadway/Gunning Avenue; Church Lane/Burrow's Lane/Millfields; Howard's Lane/ Catchdale Moss Lane/ Gillar's Lane; Burrows Lane/Gillar's Lane) causing gridlock.

14 There are historic footpaths within the proposed development area that appear on the earliest tithe map of Ecclestone as routeways, these include Watery Lane, Green Lane and Sadler's Lane. This greenbelt release means that five of the eight public footpaths will be destroyed or have their character detrimentally affected i.e., ALL of the rural footpaths will be affected.

The consideration of these proposals seem weighted in favour of the land owners and developers and demonstrate little regard for the knowledge, opinions and desire of the local residents whose quality of living will be affected by these developments the most.

The Plan is not effective.

Yours faithfully,



Andrew Martlew



RO1136

① - LPA05

② - LPA06

PF0570

622

12 MAR 2019

Ref: LPSD

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

(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: Mrs	Title:
First Name: Edith	First name:
Last Name: Martlew	Last Name:
Organisation/company:	Organisation/company:
Address: 7 Acacia Grove, Eccleston, St.Helens. Postcode:WA105HD	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date: <u>10<sup>th</sup> 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 - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

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

post to:

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

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

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

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Telephone: 01744 676190

## **NEXT STEPS**

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

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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	8HS	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: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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

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



The Council has not committed to building on all brownfield sites before taking Grade 1 and 2 agricultural land, as seen in their reluctance to develop a brown site register. Are we to assume this is evidence of land banking and there is a desire to grab greenbelt land as the opportunity arises? The Council should focus the LDP on; re purposing town centre buildings, then brownfield sites, before considering Grade 3 agricultural land. ①

The Council have not used the most recent statistics, they use the ONS 2014 statistics were the ONS 2016 statistics provide a more reasonable assessment when considering building. The extra house building proposed in the Local Plan is not justifiable.

The plan seems to be a way for the Council, Developers and Investment groups to prosper at the expense of local residents.

I have seen the slow continual decline in growth of the Borough from the 1960's, and most recently an increase in vacant retail premises, retailers closing down or relocating. The only premises left seem to be bars, takeaways, charity shops and hairdressers. Most children who go to university in other parts of the country do not want to return to St. Helens. The housing at 8HS will be commuter belt to Liverpool or Manchester, increasing pollution and traffic congestion. Thus increasing the associated health issues for local residents.

The local infrastructure cannot manage the population of now and will be totally swamped by the increase in numbers of a new development. Local schools are oversubscribed, the local Health Service provision struggles to cater for the population now with difficulty obtaining appointments. Local hospitals find it difficult to recruit due to the nature of the area. Public transport, the Police and Fire services will not support the increase in population. ②

There is uncertainty regarding the UK's position following Brexit, decisions which destroy a community should not be made until there is a clearer picture of what demands are required in a post Brexit Britain.

The Plan is not effective.

The site 8HS should be **removed from** the Safeguarded for development category and remain as Greenbelt.

Please See Attached Letter.

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

**Retain the traditional Greenbelt areas in St.Helens.**

**Repurpose town centre buildings.**

**Utilise ALL brownfield sites.**

**Look at using the poorer quality land Grade 3 before wasting the best 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.***

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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 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.**



7 Acacia Grove,  
Eccleston,  
St. Helens.  
WA105HD  
10th March 2019

Planning Inspector,  
Local Plan,

Dear sir,

As a resident of Eccleston [REDACTED] I am writing to object to the Local Plan's proposed building development 8HS. The site 8HS should be removed from 'Safeguarded for Development' and remain as greenbelt land,

1 The destruction of farmland will have a negative impact on the quality of life for local residents as the rural landscape is what makes Eccleston a pleasant and desirable place to live.

2 I have seen several large housing estates built into Eccleston over the years and on each occasion these have stolen a small part of the traditional country village ambience we had grown up with. To overcrowd greenbelt land with yet more houses would destroy the character and amenity of Eccleston.

3 As children we delighted in playing in and around the fields, we learnt so many valuable lessons about wildlife and the countryside and we played in fresh country air. To deprive future generations of children of asset that our countryside is, is not merely shortsighted but criminal.

4 Wildlife will be adversely affected when I was young we regularly saw and heard lapwings and skylarks in the fields alongside Houghton's Lane but it has been many years since I have seen or heard them in the fields.

5 The local farmers used to maintain the ditches, streams and ponds in Eccleston as they said it protected the fields and crops especially during Winter from becoming sodden and they could get onto the land to start sowing earlier. It would be very unwise and would increase flooding in the area if the drainage is disturbed, disrupted or overwhelmed by new housing developments.

6 The roads in Eccleston are already extremely busy and by putting a greater number of vehicles on them will make them more dangerous for road users and pedestrians, especially schoolchildren and the elderly. Some roads now are almost impossible to walk across during busy periods and we need more pedestrian crossing. More houses will create more cars which in turn will cause gridlock.

7 I am concerned Eccleston will lose its identity and character if more housing is built. Eccleston will be encompassed and overwhelmed by tarmac, concrete and brick. In a Time when individuality is seemingly promoted and valued we must maintain and promote local community and the value of open, greenbelt landscape.

2

8 [REDACTED] I am concerned with the increase in chronic lung diseases and asthma that will arise with the increase in air pollution associated with an increase in traffic and houses. We were always taught the importance and benefit of fresh air.

Building thousands of new houses will mean an influx of people which will have a huge detrimental impact on the area and destroy the history, character and amenity of Eccleston as we know it. These actions seems to contradict the St.Helens LPPO Strategic Aim 6 Safeguarding and enhancing Quality of life in St.Helens Strategic Objective 6.2 'To safeguard the quality of the environment, protecting and enhancing local character and distinctiveness together with bio and Geo diversity'.

The Plan is not effective.

Yours faithfully,

[REDACTED]

Edith Martlew B.E.M.



RO1137

623

① LPA05

② LPA06

PF0571

12 MAR 2019

Ref: LPSP

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Representation (i.e. Comment) Form**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Alan	First name:
Last Name: Martlew	Last Name:
Organisation/company:	Organisation/company:
Address: 7 Acacia Grove, Eccleston, St.Helens. Postcode:WA105HD	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date: <span style="border: 1px solid black; padding: 2px;">10-03-19</span>

Please be aware that comments received after the deadline cannot be accepted and that in order for your comments to be considered you must include your details above.

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St.Helens  
Merseyside  
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**Telephone:**

01744 676190

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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> No
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Please tick as appropriate

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The Council was very reluctant to develop a brown site register but has recently promised to take part in a national pilot scheme with an 'innovative approach' to using brownfield sites - just in time for the next stage of the Local Plan?

The Council say it is too expensive to clean up brownfield sites, is this land banking and they really to grab greenbelt land as the opportunity arises? The Council should focus the LDP on; re purposing town centre buildings, then brownfield sites, before considering Grade 3 agricultural land.

The Town has been in a state of slow decline for many, many years. A walk around the own centre shows the number of vacant shops or retailers closing down or relocating. In the 1950's Church Street and Ormskirk Street was a bustling commercial hub, the place to own a shop, but now many of the shops are closed. There were busy, quality shops along Duke Street and Church Street but now there seem to be bars, takeaways, charity shops and hairdressers.

The housing at 8HS will be commuter belt to Liverpool or Manchester, increasing pollution and traffic congestion.

The Council have not used the most recent statistics, they use the ONS 2014 statistics were the ONS 2016 statistics provide a more reasonable assessment when considering building. The extra house building proposed in the Local Plan is not justifiable.

The plan does not seems to account for the views of local residents. It appears to be weighted in favour of the Developers, Investment groups and the Council as a way to make money.

The local infrastructure cannot manage the population of now and will be totally swamped by the increase in numbers of a new development. Roads are narrow and are regularly blocked by traffic. The roads were established pre 1900's and based on farmers horse and cart it is dangerous to attempt to cross some roads with the volume of modern traffic. Local schools are oversubscribed, the local Health Service provision struggles to cater for the population now with difficulty obtaining appointments. Local hospitals find it difficult to recruit due to the nature of the area. Public transport, the Police and Fire services will not support the increase in population.

There is uncertainty regarding the UK's position following Brexit, decisions which destroy a community should not be made until there is a clearer picture of what demands are required in a post Brexit Britain.

The Plan is not effective.

The site 8HS should be **removed from** the Safeguarded for development category and remain as Greenbelt.

Please See Attached Letter.

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WA105HD  
10th March 2019

Planning Inspector,  
Local Plan,

Dear sir,

As a resident of Eccleston [REDACTED] I am writing to object to the Local Plan's proposed building development 8HS. The site 8HS should be removed from "Safeguarded for Development" and remain as greenbelt land,;

1 The rural landscape and open fields are the amenities that give Eccleston its unique character and make it a pleasant and desirable place to live. Building on our greenbelt land will detract from the character and affect the quality of life for residents.

2 I remember the atmosphere of Eccleston before it became developed to its present extent. It was one of rural peace and quiet, with a local population that knew each other. The inhabitants enjoyed a decent lifestyle that revolved around the Church and the agricultural seasons. As the housing developments of the 1950s and 1960s gradually took farmland and more people moved into the area, the village lost some of its character. Allowing more housing on this scale would obliterate any semblance of what Eccleston was, turning it into a town.

3 The wildlife and countryside and the space they provide are important for local residents and must be considered as an asset both for education and well being, and can provide important lessons for life.

4 I remember a wide range of wildlife, both flora and fauna. [REDACTED] I learned about nature and the great outdoors and about weather and which cloud formations meant good weather ahead and at night we could see the stars and constellations. I learned about insects, [REDACTED] I liked to hear the skylarks singing as they flew above the fields. People these days spend hundreds of pounds sending their children on outward bound adventure holidays - we enjoyed our outdoor adventures at home and for free. The countryside offers so much more than just land and should be protected and preserved.

5 The Welsh have a word - hiraeth for which there is no English translation but it describes a deep feeling for home. Only after you have spent a long time living in an area do you come to appreciate the connection and association with an area. Local people do not want their homelands destroyed. Many of the people making these decisions in St. Helens have moved into the area an will, once it is irrevocably changed and ruined, undoubtedly move on.

6 [REDACTED] during the Second World War, England struggled to feed its population, which was considerable less than it is now and at a time when its agricultural production was more widespread we relied on food convoys from America and Canada and we were subject to strict rationing. I am concerned that if England faced a natural disaster, fuel

crisis, trade disruption or war then people would starve. It is vital to maintain good farmland in Eccleston.

7 The roads in Eccleston are too narrow to accommodate more traffic and where built primarily for farmers' horses and carts. Eccleston was very much bypassed by traffic and as such there are no main routeways through Eccleston that are capable of providing increased vehicular capacity to St.Helens.

8 I have experienced the negative impact that additional building development brings.

Building thousands of new houses will mean an influx of people which will have a huge detrimental impact on the area and destroy the history, character and amenity of Eccleston as we know it. These actions seems to contradict the St.Helens LPPO Strategic Aim 6 Safeguarding and enhancing Quality of life in St.Helens Strategic Objective 6.2 'To safeguard the quality of the environment, protecting and enhancing local character and distinctiveness together with bio and Geo diversity'.

The Plan is not effective.

Yours faithfully,

Alan Martlew

②



RO1138

**Representor Details**

Web Reference Number	WF0014
Type of Submission	Web submission
Full Name	Dr Joshua Masheder
Organisation	
Address	14 The Pastures New Bold St Helens WA9 4ZB
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	Greenbelt Building
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified

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

I work in the local hospital and community as a Doctor, I regularly work in the local ED and regularly see trolley waits of over 6 hours. This not only puts residents at risk due to prolonged waits to see a doctor and receive treatment it also adds a pressure for patients to be discharged in order to make further space. I feel should this building work go ahead there is not enough infrastructure in neither Whiston or Warrington hospital to cope with the increased demand. This puts the current residents at increased risk, and the new residents in an area with not enough facilities to cope with the demand. This does not only apply to the hospital but local GP, Dentists, Ambulance Services. The country nationally is struggling for health care professionals, building more houses in an area where these essential facilities are already bursting at the seams but the current residents lives at risk. The Road infrastructure around the area including the M62, local roads and schools WOULD NOT COPE WITH THE EXTRA DEMAND.

Before any further houses are passed, I feel that a consultation with health suppliers, schools, local amenities needs to happen to find how these services will cope.

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

Reduce the housing planned.



Build on Brown Sites.

**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:**

A prospective of a health professional in an area where the resources are already saturated. I feel it necessary to have an input from a residents and employee perspective.

Response Date	5/2/2019 11:48:11 PM
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RO1139





St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

### 1. Your Details

(we will correspond via your agent)

Title: MR

First Name: JOHN

Last Name: MASON

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

Address: 14 CRAWFORD STREET  
CLOCK FACE  
ST. HELENS

Postcode: WA9 4XD

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

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

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

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

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

Telephone: **01744 676190**

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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



RO1140



St.Helens  
Council

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

Ref: LPSD

11 MAR 2019

(For official use only)

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

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: JEAN	First name:
Last Name: MATHER	Last Name:
Organisation/company: /	Organisation/company:
Address: 17 ARNIAN RD, RAINFORD.	Address:
Postcode: WA11 8BU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: /	Mobile No:
Email: /	Email:

Signature: [REDACTED]	Date: 9-3-2019
-----------------------	----------------

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 13<sup>th</sup> 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.

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

## NEXT STEPS

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

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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)				All policy					

### 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 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 proposed site is agricultural land and should be kept as such. The number of houses to be built will mean a very high increase in cars which will put a great strain on the already busy roads in Rainford Village & surrounding area. There will be a need for extra doctors, Surgeons, dentists, school places and a review of bus services.

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.**

<input checked="checked" type="checkbox"/>	<b>No, I do not wish to participate at the oral examination</b>	<input type="checkbox"/> <b>Yes, I wish to participate at the oral examination</b>
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<p>8. Please indicate the order in which you wish to be heard at the oral examination. Please list the matters and issues you wish to raise at the oral examination in the order you wish to be heard. Please be as precise as possible.</p>
--

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

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

RO1141





St. Helens  
Council

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

Ref: LPSD

11 MAR 2019

(For official use only)

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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: DEREK	First name:
Last Name: MATHER	Last Name:
Organisation/company:	Organisation/company:
Address: 17 ARNIAM ROAD RAINFORD	Address:
Postcode: WA11 8BU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	mail:

Signature: [REDACTED]

Date: [REDACTED]

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

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

Yes ☒ (Via Email)

No ☐

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

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

**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)				ALL POLICY					

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 type="checkbox"/>

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

The country is a big net importer of food and cannot afford to lose this high quality land to building.

The roads are already dangerous in the village due to being too narrow with insufficient parking. The footpaths by the church are too narrow for pedestrians.

The medical services are very limited now and there is no NHS clinic and it takes weeks to get a doctor's appointment. No improvements have been made for years.

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.**

<p>By submitting this representation, you are asked to confirm that you wish to participate at the oral examination, if necessary.</p>	
<input checked="checked" type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination

By submitting this representation, you are asked to confirm that you wish to participate at the oral examination, if 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.



RO1142



St. Helens  
Council

19

13 MAR 2019

Sim 3HS

LP00191A-E

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).

① - LP006

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: JOHN	First name:
Last Name: MATTHEWS	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 3, GEORGIAN CLOSE ECCLESTON PARK, PRESCOT MERSEYSIDE Postcode: L35 7LR	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 12 MARCH 2019
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

Yes ☒ (Via Email)

No ☐

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



## **RETURN DETAILS**

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

post to:

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

or by hand delivery to:

**Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:00pm)**



or by e-mail to:

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

**Put 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	<b>LPA06</b>	Paragraph / diagram / table	<b>3HS</b>	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<b>x</b>	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?	<b>Don't Know</b>	<b>Don't Know</b>
Sound?		<b>No X</b>
Complies with the Duty to Cooperate		<b>No X</b>

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?	<b>X</b>
Justified?	<b>X</b>
Effective?	<b>X</b>
Consistent with National Policy?	<b>X</b>

**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.

- For a project of this size and likely complexity, existing local schools and facilities will be totally inadequate with increased pressure on medical and dental practices already under severe restraint. This will be further pressurised by the recently proposed Government 7 day GP. opening hours and further impositions on the already stretched Whiston Hospital A & E department will be inevitable. The ripple effect on all social services must be given close scrutiny bearing in mind the fragile condition of the NHS and Council budgets and the ever-increasing burden on Borough citizens.
- It is evident that brownsite availability is considerable, able to support over 80% of the Table 4.6 requirement and distribution would be spread thus negating the loss of Green belt in 3HS.
- Whilst it is accepted that the 3HS is a confirmed two and three flood zone with a high water table, the loss of this area with hard landscape building will dramatically affect soft landscape drainage and in parts is likely to be subject to flooding, particularly near the existing brook. Portico Lane is the main link between the A57, Warrington Road (via B5201) Delph Lane) and the A58, St Helens Road and currently it cannot support the amount of traffic at times.
- Both the Warrington Rd/Rainhill Rd. (Skew Bridge) junction and the Portico Lane/Prescot Rd. junction are confirmed with council figures at capacity. The road width restrictions at the Eccleston Park railway bridge and Warrington Rd. Skew bridge would negate any possible advantages of major road works to facilitate extra traffic.
- Car parking between Georgian Close and the almost 90 degree bend near the Lodge constantly stops and restricts buses on this busy route and, when the schools are open standing traffic can be found on a regular basis from the traffic lights at Scotchbarn Lane/Two Butt Lane. The housing development on the ex. school site in Scotchbarn Lane is exacerbating this situation.
- If Portico Lane would be used for traffic access it could only be between Portico House and the Lodge which would mean the exit would be directly opposite Portico Avenue or Georgian Close. Either of these would be most hazardous due to the obstructed views from the rising hill after the railway station and the sharp right hand bend at the Lodge (children's nursery). Experience has shown that despite the road signs and chevrons installed, traffic approaches the latter at excessive speeds out of rush-hour. Exit from both Portico Avenue and Georgian Close is always fraught with danger.
- Two Butt Lane is a narrow single carriageway with a series of calming measures and, mainly due to the traffic build-up from the Warrington Road traffic lights up Delph Lane many drivers use Two Butt Lane as an 'escape' route, taking them into the congested Holt Lane and school traffic with 20mph restrictions. Other small estates in the Rainhill/Eccleston Park/Thatto Heath areas are likely to be affected in the same manner.

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

(continued)

- It should be noted that most main carriageways bounding the proposed site are called 'Lanes' and, not having changed since their inception when the area was principally rural are not suitable for even the current usage. In most cases the local infrastructure is such that to accommodate the likely increase of traffic of all types, weights and sizes would be almost impossible and the increase in pollution would be intolerable. With Thatto Heath and St Helens as a whole averaging just under 52 deaths per 100,000 from respiratory disease this concentrated proposed development no doubt will be severely detrimental to health in these localities. ✓
- Bearing in mind the limited access/egress for the site, which must be subject to Developer proposals if the plan is approved by public consensus, there must be consideration given for the likely 'rabbit warren' planning probability which no doubt will give rise to Fire engine and policing problems. ] 0
- The objection by Sport England to the closing of the golf course has not yet been answered by the St Helens Council, which is a statutory requirement. ] 0
- During the years from when the land was a farm for the now demolished hospital through its occupation by a local farmer and then the golf club, the site has supported many species of flora and fauna including over 13 which are protected. To lose these would be a natural disaster. ] 0
- It is of concern that whilst the St Helens Council have publicised the Local plan etc. at no time have they called for public meetings for open discussion. All local meetings have been organised by a volunteer steering group with information provided during the past two years, supported by public donations. ?



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 green belt 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)**

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

**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.**

RJM  
1. NAME ROSEMARY MATTHEWS PRINT NAME .....

ADDRESS

DATE 12/03/2019

SIGNATURE

I give explicit permission for my name to be used in this response.

AJW  
2. NAME ALISON MATTHEWS PRINT NAME .....

ADDRESS

DATE 12.3.19

SIGNATURE

I give explicit permission for my name to be used in this response.

AH  
3. NAME SIOBHAN WADE PRINT NAME .....

ADDRESS

DATE 12.3.19

SIGNATURE

I give explicit permission for my name to be used in this response.

PAF  
4. NAME PATRICIA STIRLING PRINT NAME .....

ADDRESS

DATE 12-3-19

SIGNATURE

WCOBROW  
POSTCODE FOR THIS ADDRESS

I give explicit permission for my name to be used in this response.

WE HAVE WORKED TOGETHER ON THIS  
SUBMISSION.



RO1143



St. Helens  
Council

① - LPAOS

② - Statement of Common Ground

198 PFO178

Ref: LPSD

01 MAR 2019  
(For official use only)

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

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

### 1. Your Details

(we will correspond via your agent)

Title: MR

First Name: WILLIAM

Last Name: M'ALISTER

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

Address: 15 CHIRTON CLOSE  
HAYDOCK

Postcode: WA11 0FG

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

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

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

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

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

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

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

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

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

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

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

Date: 25 FEB 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:

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## **FURTHER INFORMATION**

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

Telephone: **01744 676190**

## **NEXT STEPS**

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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?									
Policy LPA05 SITE 24A		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 <u>DON'T KNOW</u>
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 <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><u>NOT JUSTIFIED</u> - DECLINE OF POPULATION SINCE 1981</p> <p>DOES NOT PRESERVE GREEN BELT + RE-USE DERELICT LAND</p> <p>LACK OF BASIC INFRASTRUCTURE TO SUPPORT THE EXTRA HOUSING + POPULATION</p> <p>ACCESS IS INADEQUATE CAUSING FURTHER CONGESTION ON THE A580. "MORE TRAFFIC LIGHTS"!</p> <p>NO STATEMENT OF COMMON GROUND. ] ②</p> <p>USING THE GREENBELT HARMS IT'S PURPOSE ] ①</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

**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
---	--	--	--

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

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RO1144



199

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

Ref: LPSD

01 MAR 2019

(For official use only)

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**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>McALISTER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>15 CHIRTON CLOSE</u> <u>HAYDOCK</u>	Address: _____
Postcode: <u>WALL OFG</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	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.

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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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☐ No

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Town Hall  
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St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
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**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 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:		
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Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <b>DON'T KNOW</b>
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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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><b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b></p> <p><b>NOT JUSTIFIED</b> Decline of population since 1981. Does not preserve the greenbelt and use derelict land. Release of greenbelt will cause significant harm to the purposes of greenbelt. Will be turning in a concrete jungle. Housing not sustainable due to lack of schools, doctors surgeries, bus routes and other services. Access to site is inadequate. Not safe from East kness Rd, because of the additional 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.**

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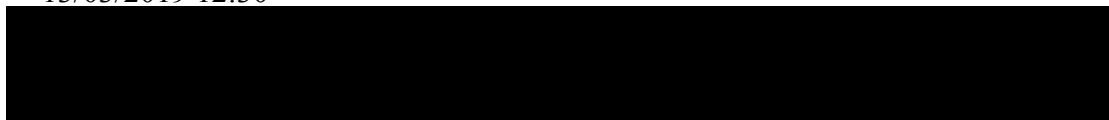
**Thank you for taking the time to complete and return this response form.**

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

RO1145



St Helens Local Plan Submission Draft  
 McBride, Sean  
 to:  
 'planningpolicy@sthelens.gov.uk'  
 13/03/2019 12:30



## 5 Attachments



St Helens Local Plan Submission Draft Rep - March 2019.pdf



Vision Document - Land at Weathercock Hill Farm Rev A 13 03 19\_compressed (2).pdf



Weathercock Hill Farm\_Ecological Statement(1.1).pdf



Landscape Feasibility Statement - Land at Weathercock Hill Farm.pdf 2503.TN.pdf

Dear Sir/Madam

Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards  
 Sean

**Sean McBride**  
 Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH





We are proud to be an official partner of Team GB.



As part of our partnership with Team GB, we're **Building Futures**, giving away £1 million to the next generation of stars. [Find out more....](#)

---

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

Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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

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Representations submitted on behalf of Persimmon Homes North West

**March 2019**



**St Helens Borough Local Plan 2020-2035 – Submission Draft**  
**Representation submitted on behalf of Persimmon Homes North West**

---

**Introduction**

- 1.1 Thank you for providing Persimmon Homes North West [‘the Company’] with the opportunity to inform the production of a new Local Plan for St Helens. This representation has been prepared in response to St Helens Council’s [‘the Council’s’] publication of its Submission Draft Local Plan [the ‘Local Plan’] (January 2019) and follows submission of representations to earlier stages of the Local Plan including the Preferred Options Consultation.
- 1.2 It is important that the Council continues to engage with key stakeholders including the development industry in the formulation of an aspirational but deliverable Local Plan, which seeks to identify a level of housing which supports economic growth and which maximise opportunities for the delivery of new homes to meet this identified need.
- 1.3 The Company has traditionally been very active within St Helens, as evidenced by our current schemes at Vulcan Park, Newton-le-Willows and the former Deacon Trading Estate, Earle Street, Newton-le-Willows and is actively pursuing new opportunities within the Borough.
- 1.4 The Company control and are actively promoting land South of Billinge Road, East of Garswood Road and West of Smock Lane (Site Ref: 1HA) [‘Weathercock Hill Farm’], and are committed to working with the Council and other key stakeholders to bring the site forward for housing early in the plan period.

**Spatial Vision and Strategic Aims**

---

- 2.1 The Company broadly supports the overall spatial vision and strategic aims for St Helens, particularly the provision of good quality new market and affordable housing, and broadening the housing stock to meet local needs
- 2.2 The Company generally supports the Council’s strategic aims and objectives including, Strategic Aim 1 ‘Supporting Regeneration and Balanced Growth’ and its associated strategic objectives including to enable steady and sustainable economic and population growth, and



ensuring efficient re-use of previously developed; and Strategic Aim 4 which acknowledges the need to identify sufficient land for a sufficient number and range of new homes.

01

- 2.3 Whilst supportive of SA4, it is considered that its wording to identify *sufficient* land for a *sufficient* range of new homes does not necessarily fully represent Government objectives to '*significantly boost the supply of homes*', as set out within the National Planning Policy Framework [the Framework] (para. 59). It is considered that this strategic objective should be revised to reflect the objectives of the Framework.

02

- 2.4 The Company also supports Strategic Aim 5 which seeks to maximise the contribution of St Helens to the economy of the Liverpool City Region [City Region] and adjacent areas, by ensuring an adequate supply of employment land and premises to meet local employment needs. It is imperative that the Council aligns its housing requirement to support delivery of such economic growth aspirations. We would also encourage reference to the Northern Powerhouse within Strategic Aim 5, given the significant contribution that the City Region will play in its delivery.

03

04

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

- 3.1 The Company broadly supports Policy LPA02 which seeks to focus regeneration and growth in St Helens to the key settlements of St Helens, Blackbrook and Haydock, Newton-le-Willows and Earlestown, Rainford, Billinge, Garswood and Rainhill; and direction of new development to sustainable locations, which will enable movements between homes, jobs and key services and facilities by non-car modes of transport.

05

- 3.2 The Company supports the development of previously developed land and policy mechanisms which can ensure their delivery. However, it should not be expected that the Local Plan be worded to sequentially prioritise their delivery over other sites allocated for development. Such a position is considered to accord with the Framework, which states that policies should '*promote an effective use of land...in a way that makes as much use as possible of previously developed or brownfield land*' (para. 117).

06

- 3.3 The Company supports the Council seeking to deliver its full housing and employment needs across the Plan period, including the release of land from the Green Belt where required; the

07

EL 0177

Framework stating that Green Belt boundaries should only be altered 'through the preparation or updating of plans' (para 135).

- 
- 3.4 Whilst addressed in more detail later in this representation, the Council's Strategic Housing Land Availability Assessment 2017 [SHLAA] identifies an existing housing land supply of 6,344 homes; significantly short of the emerging Local Plan housing requirement of 9,234 net additional dwellings. The Company considers that exceptional circumstances exist to release land from the Green Belt, as required at para 137 of the Framework.

08

- 
- 3.5 It is necessary that the Council seeks to identify sufficient sites to meet St Helens' full objectively assessed need within its own authority area. Given Warrington and Halton, those neighbouring authorities who form the Mid-Mersey HMA, are also undertaking a Green Belt review to accommodate their future housing needs; it being confirmed that they (along with nearby districts in Liverpool and Greater Manchester City Regions, and West Lancashire) will be unable to accommodate St Helens' unmet needs.

- 
- 3.6 The Company also supports the Council's identification of land for safeguarding to meet the longer term housing and employment needs of St Helens, considering this approach to be in accordance with para. 139 of the Framework.

09

---

#### **Policy LPA03: Development Principles**

- 4.1 The Company are broadly supporting of the development principles set out within policy LPA03 particularly the creation of sustainable communities and the requirement that new development assists in meeting the challenges of population retention and growth, by providing a mix of homes, including types and tenures to meet needs and aspirations of all existing and future residents.

10

---

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

- 5.1 The Company generally supports policy LPA04 which seeks to maximise opportunities for economic growth, job creation and skills development.

11

- 
- 5.2 Whilst acknowledging the importance of protecting sites allocated for employment and viable employment sites from being developed for alternative uses, it is considered that paragraphs 4 and 5 of the policy do not fully accord with the Framework.

5.3 Para. 120 of the Framework sets out that planning policies and decisions need to reflect changes in the demand for land; where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in the plan, they should:-

- reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
- Support applications for alternative uses, where the proposed use would contribute to meeting an unmet need for development.

12

5.4 Paragraph 121 further states that Local Planning Authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help meet identified development needs, including the use of retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors.

5.5 Reuse of historic employment sites has been a constant source of housing land supply in St Helens in recent years, as evidenced by the Company's current sites at the former Vulcan Works and Deacon Trading Estate; it should be considered that such sites will continue to form part of the housing land supply in the Plan period.

---

#### **Policy LPA05: Meeting St Helens Borough's Housing Needs**

##### Housing Requirement

6.1 The Company acknowledges the Council seeking to adopt a housing requirement figure in accordance with the standard method figure, whilst having regard to economic growth projections in the Liverpool City Region Strategic Housing and Employment Land Market Assessment [SHELMA] and the St Helens Employment Land Needs Assessment [ELNA].

6.2 Of concern to the Company however is that the proposed annual requirement of 486 dpa represents a significant drop in housing requirement from the requirement identified within the Preferred Options Plan (2016) and also the currently adopted Core Strategy (2012) of 570 dpa – amounting to 1,680 homes across the plan period.

13



- 6.3 The Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) identifies an OAN range of 397 to 855 dpa for St Helens; the upper range being based on an economic growth scenario, which factors in planned/potential development and regeneration projects whilst the lower figure represents projected growth if economic growth remains stagnant.
- 6.4 It is considered that reducing the Council's currently adopted housing requirement fails to support Government's objective of 'significantly boosting the supply of homes' (para 59 of the Framework) and increasing housing delivery across the Country to 300,000 homes per annum.
- 6.5 The Framework is clear that the standard method figure is a minimum (para 60); PPG also confirming that an uplift to a housing requirement above standard method may be appropriate, where additional growth is likely to occur over the plan period (Ref: 2a-010-20180913).
- 6.6 PPG further sets out that 'where a strategic policy-making authority can demonstrate an alternative approach identifies a need higher than that identified using the standard method for assessing local housing need, the approach should be considered sound as it will have exceeded the minimum starting point (2a-015-20180913).
- 6.7 Notwithstanding, the Council's Strategic Housing Market Assessment Update 2019 [SHMA] sets out a range of economic growth scenarios, the emerging housing requirement being derived from scenario 2 (Development prioritisation) in the ELNA, which would require a housing OAN in the range of 504 - 514 dpa to support.
- 6.8 This OAN figure has been subject to further sensitivity tests (or options) based on different emerging employment allocations not coming forward in the Plan period, Option 3 reducing the OAN to 486 dpa.
- 6.9 The Company is not aware of any evidence to support the Council's assumptions that emerging employment allocations will not come forward in the Plan period, which would justify a housing requirement figure below the objectively assessed need set out in the

SHMA; nor would it seem sensible to allocate sites for development (employment or otherwise) which do not have realistic prospects of coming forward in the Plan period, unless acknowledging that they are safeguarded for development beyond the Plan period.

6.10 It is considered that setting a housing requirement on this basis is contrary to the Framework, which is clear that plans should be 'prepared positively, in a way that is aspirational but deliverable' (para 16).

13

6.11 We would encourage the Council to review its housing requirement and plan for a scale of housing which supports its economic growth aspirations, including delivery of those emerging employment allocations.

---

#### Density

6.12 The Company is generally supportive of paragraph 3 of Policy LPA05, which seeks to make efficient use of land, including those sites within or adjacent to key centres or well served by public transport connections.

6.13 We would however discourage adoption of a policy which seeks to place minimum density requirements on housing sites; as such policies fail to reflect individual sites' technical constraints or surrounding settlement context; and further fails to reflect market area or Companies' distinct product range and target market.

14

6.14 It is considered appropriate that density is determined throughout the pre-application and planning application process, informed by appropriate technical and design context.

---

#### Maintaining a sufficient housing land supply

6.15 The Company supports paragraph 4 of the policy, which seeks to ensure an adequate supply of housing throughout the Plan period, including a rolling 5 years supply of deliverable housing sites to meet identified needs; and makes provision for a partial or full plan review in the event that deliverable supply falls significantly below required levels.

15

6.16 PPG is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period (Ref: 61-045-201809013); and Local Plans should be reviewed to assess whether they need updating at least once



every 5 years to ensure that they remain relevant and address the needs of the local community (Ref: 61-043-20180913).

- 
- 6.17 The Company supports the Council's approach to meeting its housing requirement and how its housing land supply is sourced, including the release of land from the Green Belt. 16

- 
- 6.18 The Company supports the provision of a 15% reduction for non delivery of SHLAA sites and a 20% increase allowance for sites removed from the Green Belt; this being in accordance with the recommendations of the Local Plans Expert Group's (LPEG) Report to the Communities Secretary and to the Minister of Housing and Planning (March 2016).

- 6.19 It is considered that the Council should apply a further allowance for non delivery to those sites which currently have a planning permission but which have not been started, as receipt of a planning consent is not necessarily an assurance of delivery. This is particularly the case for sites which benefit from an outline consent; the Framework now requiring 'clear evidence' if such sites are to be considered deliverable.

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Sites allocated for new housing development

- 6.20 The Company strongly supports the allocation of Site 1HA '*Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood*' [the Site] as identified at Table 4.5 and are committed to working with the Council and other key stakeholders throughout the Local Plan process to bring the site forward for housing.

- 6.21 As evidenced by the information appended to this representation and the Council's evidence base; the Site is considered to be a logical site to release from the Green Belt, having regard to Green Belt policies set out within the Framework. 17

- 6.22 The site is not encumbered by any technical, legal or viability constraints which would preclude its development for housing, and is considered to be suitable, available and achievable.

- 
- 6.23 The Company supports the increase in indicative capacity of the site from the Preferred Options Local Plan and considers this to represent an efficient use of land, appropriate for 18



the Site's location. There are no technical encumbrances which would prevent the site delivering this scale of homes.

6.24 The Parameters Masterplan appended to this representation demonstrates that the site can accommodate circa 265 new homes, having regard to the site's known physical and technical constraints; and the Council's open space requirements.

18

6.25 It is requested that the indicative site capacity is revised accordingly within table 4.5 to reflect this and to ensure that the Council is making the most efficient use of land.

6.26 Subject to the release of the land from the Green Belt upon adoption of the Local Plan, it is considered that the site can deliver homes early in the Plan period; the Company would welcome the opportunity to work with the Council to provide the necessary assurances to the Local Plan inspector.

#### Phasing

6.27 As set out at para 4.18.18; the Company supports the council not seeking to phase the release of allocated sites; acknowledging that lead-in times for larger sites will result in delivery occurring later in the Plan period.

19

#### **Policy LPA05.1: Strategic Housing Sites**

7.1 The Company supports the Council's approach to housing allocations, including a separate policy for those allocations considered to be strategic in scale (300 homes upwards).

7.2 It is considered appropriate that a range of sites are allocated in order to ensure a continuous and constant supply of homes throughout the Plan period. Sites' such as the Company's at Garswood (1HA) which are not identified as strategic in scale, present the opportunity to make a significant contribution to the Borough's housing supply early in the Plan period and are less likely to be encumbered by the requirement for significant additional supporting infrastructure, complicated land ownership patterns or disputes over land value equalisation.

20

7.3 Site 1HA is within a single private ownership and is controlled and being promoted by a FTSE-100 housebuilder with significant experience of delivering new homes in St Helens; its

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

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**Policy LPA06: Safeguarded Land**

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

21

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

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

22

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**Policy LPA08 Infrastructure Delivery and Funding**

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

23

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**Policy LPC01: Housing Mix**

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

24



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

---

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

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

25

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

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

26

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



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

26

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**Policy LPC02: Affordable Housing**

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

27

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

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

28

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

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

- 12.6 The Ministerial Statement of 9<sup>th</sup> November 2015 urges planning authorities to *'respond constructively, rapidly and positively to requests for such renegotiations and to take a pragmatic and proportionate approach to viability. Where it is simply proposed that the tenure mix is adjusted, with the overall affordable housing contribution remaining the same, it is our view that this is unlikely to justify reopening viability by either side.'*
- 12.7 The Ministerial Statement further notes that should there be a need to reduce the overall amount of affordable housing, local authorities should seek the minimum amount of viability information necessary, also encouraging flexible arrangements in the original agreement (for example through cascade mechanisms) so that it allows the delivery of alternative forms of affordable housing if necessary.
- 12.8 Policy LPA08 sets out that developers would be expected to contribute, where appropriate to the provision of on-site or directly ancillary infrastructure to support new development; and the provision of strategic infrastructure to support local communities and Borough wide development as identified in the Infrastructure Delivery Plan.
- 
- 12.9 The Company accepts the Council's approach to obligations in order to make a development acceptable in planning terms, although would wish to highlight para 173 of the Framework, which is clear that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking and therefore the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'. Planning Practice Guidance is clear that where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking planning obligations' (Ref: 10-019-20140306). 29
- 12.10 Moreover, the Framework is clear that planning obligations should only be sought where they meet all of a number of tests, namely that they are necessary to make the development acceptable in planning terms; directly related to the development and fairly and reasonably related in scale and kind to the development.



12.11 On sites of challenging viability, it is clear that a balance has to be found between the need for scheme delivery in the face of challenging viability and the requirement for planning obligations.

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### Summary

13.1 The Company is supportive of the preparation of a Local Plan for St Helens which seeks to support the delivery of new homes to meet identified housing needs. Our key comments concerning this Submission Draft Local Plan can be summarised as follows:-

- Whilst generally supportive of the Council's spatial vision; the Company considers the Council's prioritising of previously developed sites to be contrary to those policies contained within the Framework, which whilst seeking to encourage brownfield development does not prioritise their development over greenfield sites, instead supporting a presumption in favour of sustainable development and seeking to significantly boost the supply of new homes.
- The Company is concerned at the significant reduction in the Local Plan housing requirement from 570 dpa as currently adopted, and also proposed in the Preferred Options Local Plan. Whilst acknowledging that the proposed requirement has been defined using the standard method, the Framework is clear that this figure should be used as a minimum. Reducing the housing requirement does not accord with Government objectives to 'significantly boost' the supply of housing and the target to deliver 300,000 new homes per annum across the UK.
- The Company would stress that the delivery of the Council's housing requirement should not be threatened by overly onerous policy obligations, including the requirement to provide a particularly product type or optional standards which would have significant implications on scheme viability. Should the Council insist on implementing such policies, including optional standards, planning practice guidance is clear that it should provide evidence demonstrating a need for the requirement, and have regard to the overall impact on viability. Where scheme viability is demonstrated to be impacted, the Council should provide flexibility in the implementation of the policy.



- The Company supports the need to release sites from the Green Belt in order to meet future housing needs, also supporting the Council's approach to the release of further land for safeguarding, in order to meet housing requirements beyond the plan period.
- The Company broadly supports the spatial distribution of housing development in seeking to distribute development across the Borough to sustainable developments to address the needs of all key settlements, including Garswood.
- The Company supports the identification of land at Weathercock Hill Farm (Site 1HA Land south of Billinge Road, east of Garswood Road and west of Smock Lane, Garswood) as a housing allocation. The site is controlled by the Company and is a logical and sustainable development site which can deliver housing early in the Plan period.

13.2 We trust that full consideration will be given to the comments made within this representation. The Company looks forward to the opportunity to engaging further in the preparation of the Local Plan.

## **Appendix One**

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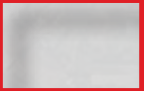










Land at Weathercock Hill Farm, Garswood - Parameters Masterplan



## Accommodation Schedule

Site Area: 9.90 hectares  
 Green Infrastructure: 2.40 hectares  
 Net Development Area: 7.50 hectares  
 Number of Homes: 265  
 Gross Density: 27 homes/ha  
 Net Density: 35 homes/ha

## Key

-  Site Boundary
-  Green Infrastructure
-  Development Parcels
-  Avenue
-  Street
-  Lane
-  Shared Drive
-  Mews & Squares
-  Primary Pedestrian/Cycle Routes
-  Primary Gateways (Multi-modal)
-  Secondary Gateways (Pedestrian/Cycle)

Simm's  
Lane End

Weathercock Hill

Downall  
Green

Parcel 1  
0.98 ha  
@ 40 homes/ha  
38 homes

Simm's  
Green

Mews

Parcel 2  
2.63 ha  
@ 35 homes/ha  
91 homes

Weathercock  
Green

Square

Village  
Green

Triangle

Parcel 3  
1.47 ha  
@ 30 homes/ha  
44 homes

Parcel 5  
1.33 ha  
@ 40 homes/ha  
52 homes

Parcel 4  
1.17 ha  
@ 35 homes/ha  
40 homes

Square

Garswood Road

Allotments  
& POS

Smock Lane



Scale 1:2,500 (@A3)  
 Ordnance Survey © Crown copyright 2019  
 All rights reserved. Licence number LIG1024

**e\*SCAPE** 10 years  
 urbanists 2009 - 2019

Project Title  
 Weathercock Hill Farm, Garswood

e\*SCAPE Job No.  
 019-009

Client  
 Persimmon Homes North West

Drawing Number Revision  
 019-009-P003 REV -

Drawing Title  
 Parameters Masterplan

Scale Date  
 1:2,500 @ A3 March'19



## **Appendix Two**

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Land at Weathercock Hill Farm, Garswood

Vision Statement



# LAND AT WEATHERCOCK HILL FARM, GARSWOOD, ST HELENS

## VISION STATEMENT

MARCH 2019



U R B A N  
G R E E N

URBAN GREEN

CROFT

e\*SCAPE

LUC

DESIGN AND SITE ASSESSMENT

TRANSPORT

MASTERPLANNING

ECOLOGY, LANDSCAPE AND GREEN BELT ASSESSMENT





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FIGURE 1: SITE LOCATION



# 1.0 INTRODUCTION

- 1.1 Land at Weathercock Hill Farm (south of Billinge Road and east of Garswood Road) presents an opportunity to create a sustainable, distinctive and attractive urban extension to the existing settlement of Garswood. Allocation of the site through the development plan process would constitute sustainable planned growth to the north east of St Helens.
- 1.2 The land represents a logical development site, in a sustainable location that is suitable, available and achievable. The site is unencumbered by technical constraints and will provide much needed new homes early in the Plan period.
- 1.3 The site is controlled by Persimmon Homes, one of the UK's largest housebuilders, who have a proven track record of delivering new homes in St Helens and Merseyside.
- 1.4 This document seeks to highlight the feasibility and suitability of the site to deliver residential development in the short term.

# 2.0 STRATEGIC LOCATION

- 2.1 Garswood lies to the north east of St Helens Borough, to the east of the Liverpool City Region in eastern Merseyside, approximately 1.13km to the west of the M6 and 1.25km south west of the M6 Junction 25.
- 2.2 The site has easy access to a range of destinations, including St Helens, Wigan, Bolton, Warrington, Manchester and Liverpool, providing access to a range of services and employment opportunities.
- 2.3 The site also has easy access to the local settlements of Garswood, Ashton-in-Makerfield, Haydock and Billinge, all of which lie within 3km of the site boundary.
- 2.4 As well as access to the strategic road network, the site is also close to Garswood train station, which provides direct services to Wigan and Liverpool. There are also numerous bus stops along Billinge Road to the north east, and Garswood Road to the west of the site.
- 2.5 Thus the site has excellent transport connectivity to the main highway and public transport networks, with a range of local and regional destinations and facilities nearby.



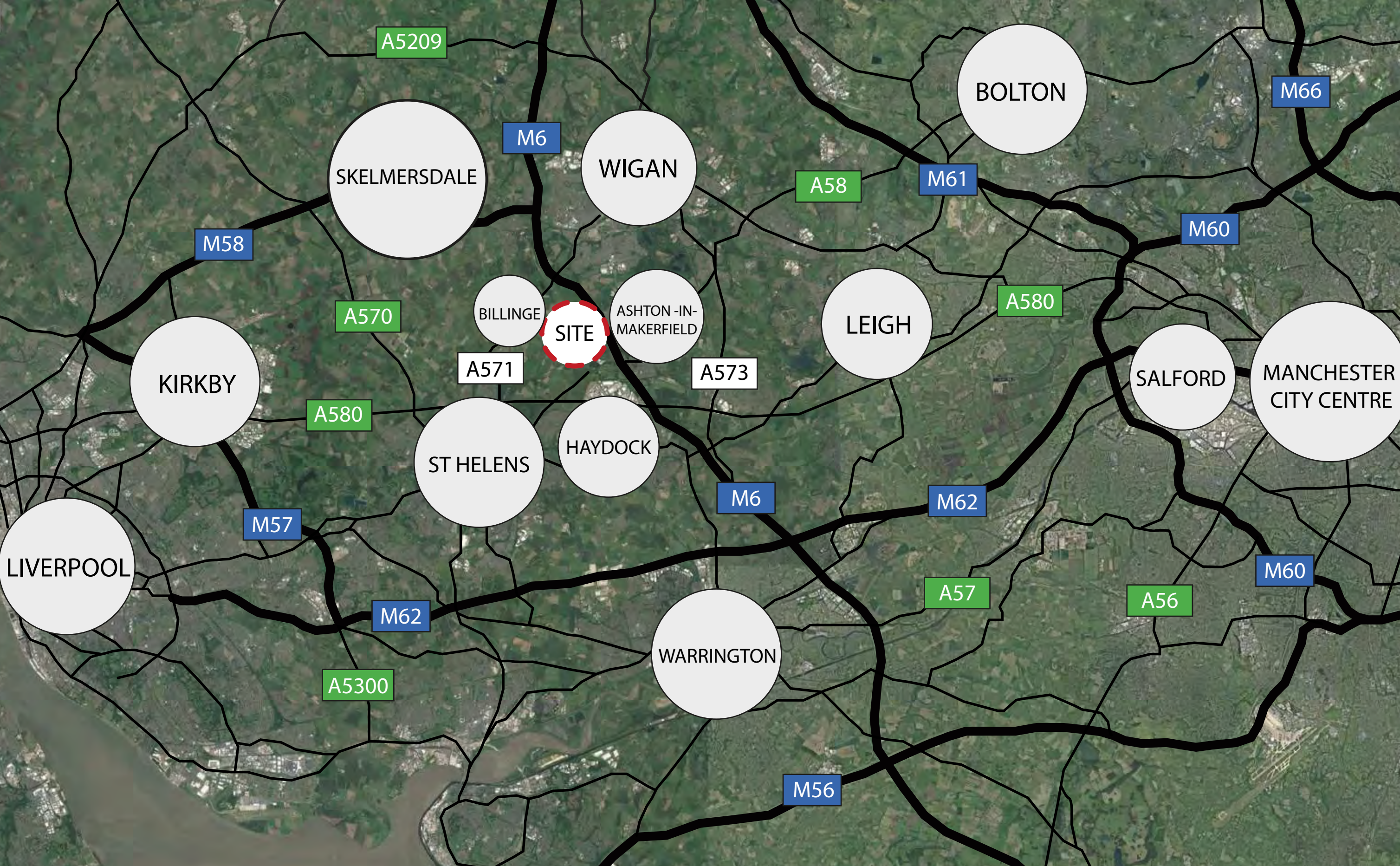


FIGURE 2: STRATEGIC LOCATION



## 3.0 SITE LOCATION & CONTEXT

- 3.1 The proposed development site is located on land currently utilised as arable farmland, and covers an area of approximately 9.93 hectares (24.5 acres).
- 3.2 The immediate context of the site is characterised by the following land uses:
- To the immediate north of the site lies Billinge Road, beyond which comprises greenfield land primarily used for arable farming and playing pitches;
  - The existing settlement of Garswood lies to the immediate east and south of the site, the immediate surroundings characterised by residential development and local amenities; and
  - The settlement of Billinge is located approximately 1.37km to the west of the site.
- 3.3 The boundaries to the site follow existing highways infrastructure and field boundaries, resulting in a well defined and contained development area.
- 3.4 There is presently one point of access into the site, located along Garswood Road to the west. Proposed vehicular access points will be based on highways recommendations and suitability.
- 3.5 There are no Public Rights of Way (PRoW) which traverse the site, however there are 6 footpaths within 1km of the site boundary, the closest being footpath 935, to the north east.
- 3.6 The topography on site is gently undulating, with an overall fall from north west to south east.
- 3.7 In terms of vegetation, the site comprises open arable farmland, with field boundaries defined by a combination of hedgerows and hedgerow trees.
- 3.8 Built elements on site are reserved to the boundaries and include post-and-wire fencing and built form associated with the curtilages of adjoining residential properties.
- 3.9 There are currently no permanent water bodies on the site, although there is currently a semi-permanent pond to the north east of the site, caused by a drainage defect. There is also a drainage channel which runs parallel to the eastern site boundary.



## 3.1 SITE PHOTOGRAPHS





## 3.2 LOCAL CONTEXT PHOTOGRAPHS





### 3.3 WIDER CONTEXT

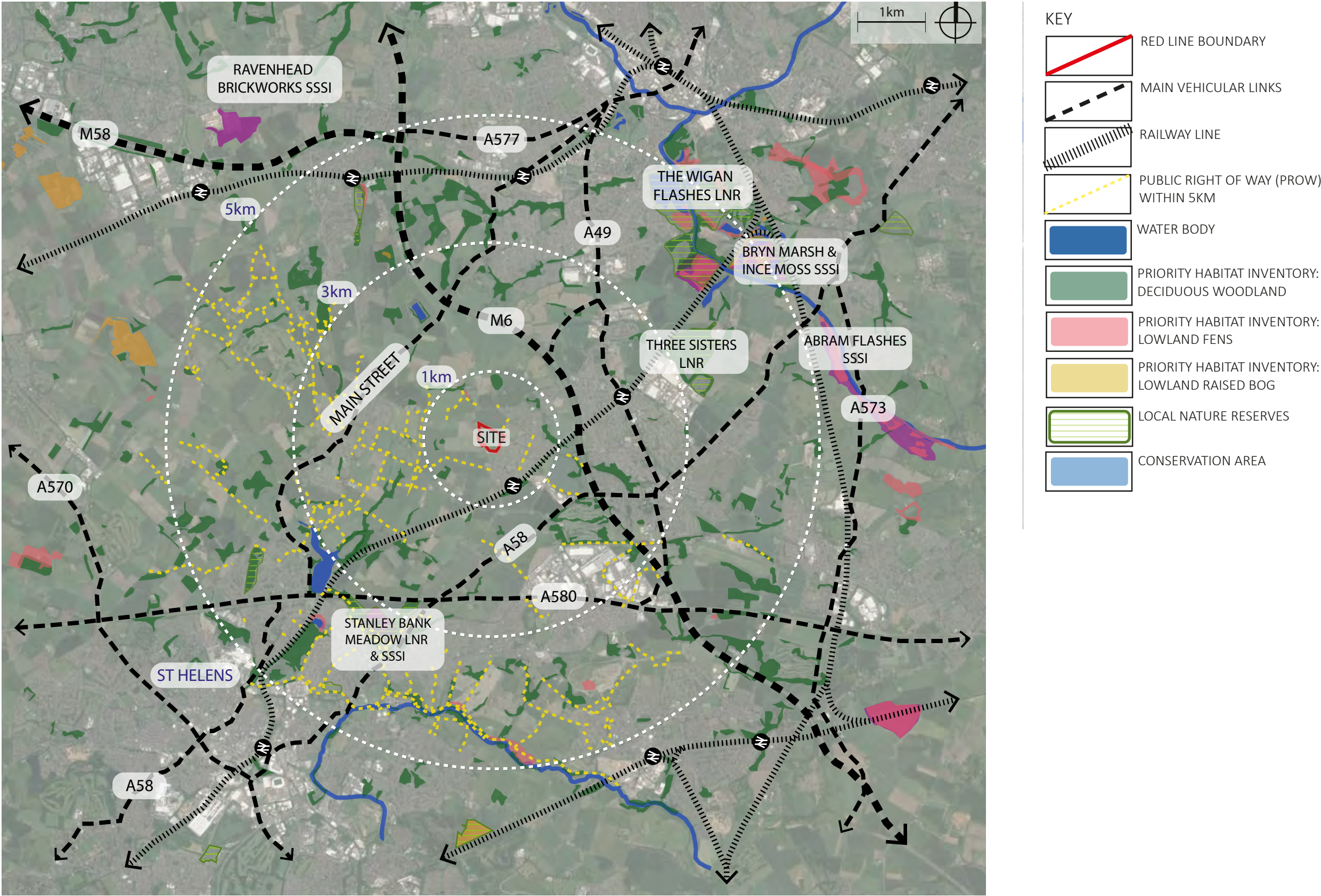


FIGURE 3: WIDER CONTEXT PLAN



## 4.0 PLANNING POLICY CONTEXT

### NATIONAL PLANNING POLICY

- 4.1 The National Planning Policy Framework ('the Framework') was published on 19th February 2019 and sets out the Government's planning policies and how they should be applied; such policies being a material consideration in both plan-making and decision-taking.
- 4.2 At the heart of the Framework is a presumption in favour of sustainable development (para. 10); identifying three overarching objectives in achieving sustainable development – economic, social and environmental.
- 4.3 The Framework sets out that plans and decision should apply the presumption in favour of sustainable development and positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (para 11).
- 4.4 Policies within the Framework support Government's objective of 'significantly boosting the supply of homes' and state the importance that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed (para 59).
- 4.5 The Framework is clear that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability; and should identify specific, deliverable sites for years one to five of the plan period, and
- developable sites or broad locations for growth, for years 6-10 and where possible years 11-15 (para. 67); identifying and updating annually its supply of deliverable sites to provide a minimum of five years worth of housing against their housing requirement (para. 73).
- 4.6 The Framework is clear that small and medium sized sites can make an important contribution to meeting housing requirements of an area, and are often built out early (para. 68), however also noting that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (para. 72).
- 4.7 The delivery of new homes at Weathercock Hill Farm would contribute towards achieving the overarching aims of national policy as it would make a significant contribution towards housing land supply in St Helens.
- 4.8 The development of the site would perform a positive economic, social and environmental role and, therefore, represent sustainable development in accordance with the Framework.

# 4.0 PLANNING POLICY CONTEXT

## ST HELENS LOCAL PLAN

- 4.9

St Helens Council are currently preparing a new Local Plan, which once adopted will supersede the St Helens Core Strategy Local Plan (October 2012). The Submission Draft Local Plan ('the Local Plan') identifies a requirement for a minimum of 486 dwellings per annum in the period to March 2035 (Policy LPA05).
- 4.10

The Local Plan seeks to meet the challenges of population retention and growth by providing for a mix of types and tenures of quality homes to meet the needs and aspirations of all existing and future residents in sustainable locations (LPA03).
- 4.11

The Local Plan seeks to focus regeneration and growth to the key settlements of St Helens Core Area, Blackbrook and Haydock, Newton-le-Willows and Haydock, Rainford, Billinge, Garswood and Rainhill (LPA02).
- 4.12

Whilst encouraging the reuse of the previously developed land and seeking to optimise the amount of housing developed on a site, the Local Plan releases land from the Green Belt to enable housing and employment needs to be met in full over the Plan period; also releasing further land from the Green Belt for safeguarding to meet development needs beyond March 2035 (LPA02).
- 4.13

Table 4.5 of the Local Plan identifies sites allocated for new housing development. The site at Weathercock Hill Farm is identified as Site Ref 1HA (referred as 'Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood') which is expected to deliver at least 216 new homes in the Plan period.
- 4.14

Housing development on the Weathercock Hill Farm site would contribute towards meeting St Helens' housing requirement and provide a range of high-quality housing that reflects local needs and aspirations. As evidenced in this document, there are no technical or legal encumbrances which would preclude its development for housing early in the Plan period.



## 5.0 THE NEED FOR GREEN BELT RELEASE IN ST HELENS

- 5.1 The need for Green Belt release is inseparable from objectively assessed housing need (OAN).
- 5.2 Given historic housing delivery and the reliance on the development of previously developed sites to meet housing needs, it is considered that a step change is necessary in order to accelerate housing delivery in St Helens. The Council should seek to diversify the supply towards truly deliverable, sustainable and unconstrained sites. Land at Weathercock Hill Farm presents such an opportunity.
- 5.3 It is noted that Green Belt accounts for approximately 65% of the total land area of St Helens (approx. 88km<sup>2</sup> of 135km<sup>2</sup>), with the Green Belt boundaries last being reviewed in 1984 and only being subject to minor alterations since.
- 5.4 The requirement for a review of the Green Belt to accommodate long term housing needs has been accepted by St Helens Council both in their adopted Core Strategy and also in the current Submission Local Plan; table 4.6 of the Local Plan identifying that sites with an overall capacity of 2,034 homes must be released from the Green Belt to meet housing needs up to 2033.
- 5.5 The Submission Local Plan identifies a housing land supply of 6,344 homes - equivalent to 13 years supply and insufficient to meet housing requirements across the Plan period (2020-2035); this figure reducing to 5,550 homes (11.4 years) when allowing for an 15% non-delivery allowance.
- 5.6 St Helens Council have acknowledged that due to a lack of brownfield land and Green Belt constraint, there has been relatively little housing development in settlements such as Garswood, with housing growth not reflecting population size.
- 5.7 Given Garswood is identified as a key settlement, it is considered appropriate that a proportionate amount of future housing is distributed to the settlement. Given current Green Belt constraint, this can only be achieved by releasing sites from the Green Belt.
- 5.8 In accordance with the Local Plans Expert Group, the Council have made provision for a 20% buffer which results in a total requirement for Green Belt sites to accommodate 4,105 homes in the first 15 years of the Local Plan.
- 5.9 National policy is clear of the permanence of Green Belt boundaries and the need to ensure their duration beyond the plan period, the Council also make provision or the release of further Green Belt sites to be safeguarded beyond the Plan period.
- 5.10 NPPF advocates such an approach, stating that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan, further stating that the supply of new homes can sometimes be best achieved through planning for larger scale development such as extensions to existing villages and towns.



# 5.0 THE NEED FOR GREEN BELT RELEASE IN ST HELENS

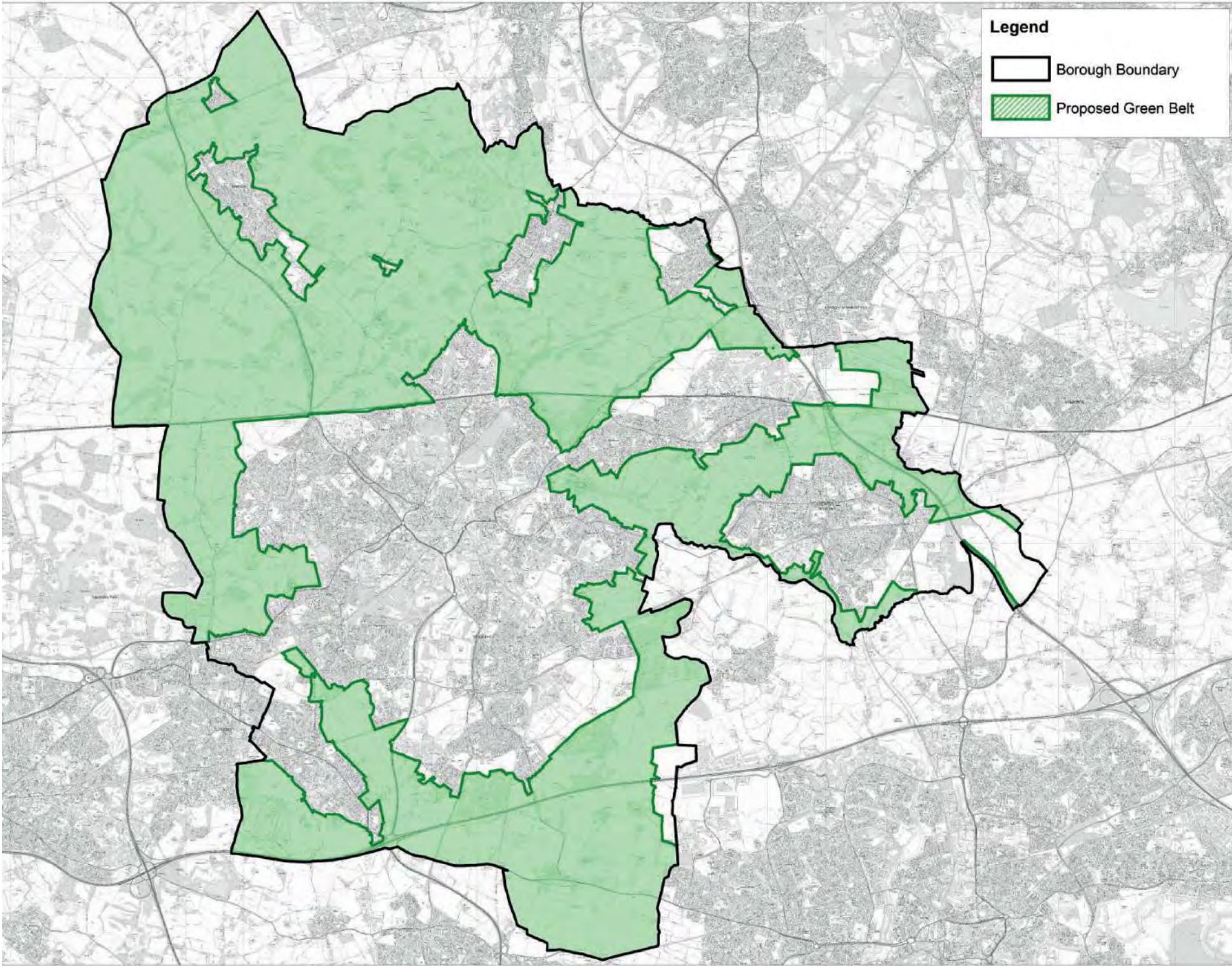


FIGURE 4: ST HELENS BOROUGH LOCAL PLAN 2020-2035  
GREEN BELT REVIEW DECEMBER 2018

5.11 The site forms an area of land to be removed from the Green Belt and allocated for housing in the St Helens Local Plan (Site Ref: 1HA). The site at Weathercock Hill Farm has the potential to accommodate 265 new homes in the period to 2035 and making a significant contribution to meeting housing needs in the Borough.

In assessing the site as part of the Green Belt  
5.12 Review (Dec 2018) (Site Ref: GBP\_025b); it is concluded that:

*'the sub-parcel has strong boundaries and is located west of Garswood, with existing residential development to the east and south, and pockets of development along its western boundary. The sub-parcel is in a sustainable location within walking distance of a local convenience shop and public transport, including the nearby railway station.*

*Whilst the sub-parcel includes agricultural land, the quality of this (grade 3) is lower than in some parts of the Borough. Safe vehicular access into the sub-parcel can be provided from Garswood Road and Billinge Road.*

*Whilst surface water flooding occurs in the north east section of the sub-parcel, this can be addressed by a suitable sustainable drainage scheme (SuDS). Development on this sub-parcel could help solve flooding issues in the surrounding urban area. Located to the north is sub-parcel GBP\_025a which, whilst also*



## 5.0 THE NEED FOR GREEN BELT RELEASE IN ST HELENS

*being considered suitable to be released from Green Belt, extends out further to the west, potentially resulting in development being constructed in isolation, incompatible visually with the existing settlement of Garswood. If sub-parcel GBP\_025b were to be developed first, development within sub-parcel GBP\_025a could then be viewed as a natural further expansion of the settlement.*

*The 2018 SA concluded that development of this sub-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 and natural greenspace, the sub-parcel is in a sustainable location with good access to public transport, education and health facilities, and employment opportunities. In summary, the sub-parcel has many positive attributes which would justify its allocation for development.'*

- The site has the potential to meet housing needs in Garswood without harming the Green Belt in this location;
- The site has good accessibility to services and facilities;
- The release of the site will assist and help the Council to meet its housing requirement.

5.13 The principle of residential development at Weathercock Hill Farm should be supported because:

- The site is well enclosed by existing residential development and infrastructure and its development would not have a significant landscape impact

# 6.0 ASSESSMENT OF THE SITE AGAINST GREEN BELT POLICY

6.1 Chapter 3 of the Green Belt Assessment undertaken by LUC (February 2019) presents the findings of the St. Helens Green Belt Review (2018), and also outlines LUC’s own review of the contribution of the site to the NPPF Green Belt purposes. A summary of the findings from this report is given below.

## ASSESSMENT OF THE SITE IN RELATION TO GREEN BELT PURPOSE 1

6.2 “Green Belt purpose 1 seeks to ‘check the unrestricted sprawl of large built-up areas’. The St Helens Green Belt Review does not identify Garswood as one of the large built up areas. LUC agrees with this finding. “

### St Helens Green Belt Review (2018) Score: Low

6.3 “The sub-parcel is triangular in shape and is bounded by strong physical boundaries to the north by Billinge Road, to the west by Garswood Road, to the east and south by Smock Lane and the built development of Garswood.

6.4 Residential properties run along Garswood Road to the north west and a significant pocket to the south, the remaining of the sub-parcel is agricultural field. All sides of the sub-parcel have strong boundaries and therefore the sub-parcel is well contained.”

### LUC Green Belt Assessment (2019) Score: Low or No Contribution

6.5 “The Site is not associated with a settlement that is a large built up area and therefore the Site makes no contribution to purpose 1 (the prevention of sprawl from the large built up area).

6.6 The Site is also well contained by existing development along Garswood Road. This containment means the Site has a strong relationship with the existing built up area of Garswood, as opposed to the wider countryside and hence any development within the parcel would not be perceived as sprawl.

## ASSESSMENT OF THE SITE IN RELATION TO GREEN BELT PURPOSE 2

6.7 “Green Belt purpose 2 seeks to ‘prevent neighbouring towns merging into one another’. The St Helens Green Belt Review methodology sets out the settlements which it considers to be ‘towns’. It states that the Council has included towns, but also some smaller settlements (including Rainhill, Rainford, Billinge and Garswood).”

### St Helens Green Belt Review (2018) Score: Low

6.8 “The sub-parcel contributes broadly, along with other parcels (GBP\_026), to the physical and visual separation of Billinge and Garswood. A strategic gap between Billinge and Garswood could be maintained if this sub-parcel was released from the Green Belt.

### LUC Green Belt Assessment (2019) Score: Low

6.9 “The Site is immediately to the west of Garswood, and approximately 1.4km from Billinge both of which are considered as ‘towns’ under purpose 2.

6.10 The Site is relatively well contained by development along Garswood Lane including Sims Lane End and as such the perception of the narrowing of the gap between Billinge and Garswood would be limited. A significant gap between the settlements would remain.

6.11 There are no other relevant settlements under purpose 2 that should be considered in relation to the Site.”

## ASSESSMENT OF THE SITE IN RELATION TO GREEN BELT PURPOSE 3

6.12 “Green Belt purpose 3 seeks to ‘assist in safeguarding the countryside from encroachment’.”



# 6.0 ASSESSMENT OF THE SITE AGAINST GREEN BELT POLICY

## St Helens Green Belt Review (2018)

Score: Low

6.13 “The parcel is very well enclosed on all sides by highway and residential properties.”

## LUC Green Belt Assessment (2019)

Score: Medium

6.14 “Whilst the majority of the Site is open, there is some existing development within the parcel in the form of residential properties along Garswood Road before the junction with Billinge road. Billinge Road also represents a ‘readily recognisable’ Green Belt boundary to the north.

6.15 The Site is relatively well contained by existing development and has a stronger association with the built up area than the open countryside. Whilst release of the Site would lead to the loss of open land within the Site itself, it would not lead to encroachment on the wider countryside.”

## ASSESSMENT OF GREEN BELT PURPOSES 4 AND 5

6.16 “Purpose 4 of Green Belt policy is ‘to preserve the setting and special character of historic towns’. The Green Belt Review states in relation to purpose 4, that the Borough

contains a number of Conservation Areas, Listed Buildings and other designated and non-designated heritage assets, some of which fall within its towns. However, the towns contain substantial areas that are not subject to any recognised heritage designation and their settings have already been affected by extensive modern suburban and industrial development. Given these circumstances, the different parcels of Green Belt land cannot be reliably differentiated in terms of their contribution to Green Belt purpose 4. The assessment therefore does not assess each individual parcel in relation to Green Belt purpose 4.

6.17 LUC therefore agrees that purpose 4 – protection of the setting and special character of historic towns – is not relevant in this locality.

6.18 Similarly, with regard to purpose 5, ‘to assist in urban regeneration, by encouraging the recycling of derelict and other urban land’, the Green Belt Review sets out that the contribution of each individual parcel to purpose 5 cannot be differentiated, and therefore does not assess each individual parcel in relation to

6.19 We agree that purpose 5, is not something that can be assessed on a parcel-by-parcel basis. This is in line with the PAS guidance as cited in the Review which states that: ‘...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose’.”

## LUC SUMMARY

6.20 “It is clear that the review of Green Belt undertaken by St. Helens Borough Council has found the Site does not make a significant contribution to the purposes of Green Belt.

6.21 LUC has undertaken its own review and similarly concludes that the Site makes little contribution to any of the Green Belt purposes and therefore its allocation as a housing site (in terms of Green Belt issues) should not be considered unacceptable.”

## 7.0 SUSTAINABILITY APPRAISAL

### PUBLIC TRANSPORT CONNECTIVITY

- 7.1 Public transport connections are available by train and bus. There are train services from Garswood station, located approximately 500m to the south east of the site. Direct services provided from the station include Wigan and Liverpool, with connections to the regional centres of Manchester and Bolton.
- 7.2 In addition to linkages from Garswood station, there are several bus services that run in close proximity to the site along Garswood Road. High frequency bus connections provide services to Wigan, Haydock, Ashton-in-Makerfield, Newton-le-Willows and St Helens.

### WALKING & CYCLING

- 7.3 The site is within easy walking distance of local amenities such as retail, leisure and employment facilities at Garswood, and also slightly further afield in Billinge and Ashton-in-Makerfield. All routes to these town centres have footways and are generally of good quality, suitable for walking.

### ACCESSIBILITY TO FACILITIES & SERVICES

- 7.4 There are several primary schools within walking distance of the site, including:

- Garswood Primary School
- Rectory C of E Primary School
- Our Lady Immaculate Catholic Primary School
- Bryn St Peters C of E Primary School
- Billinge Chapel End School
- RL Hughes Primary School
- Landgate School
- St Thomas' C of E Primary School

- 7.5 There are also four high schools within the vicinity of the site. These are:

- Byrchall High School
- St Edmund Arrowsmith Catholic High School
- Haydock High School
- Hawkley Hall High School

### HEALTHCARE

- 7.6 There are three GP Surgeries in close proximity to the site, including Garswood Surgery to the east, and Ashton Medical Centre and The Medicentre, both located in Ashton-in-Makerfield to the east. There are also three Pharmacies in the vicinity, including Garswood Pharmacy, Boots Pharmacy and Rowlands Pharmacy.

- 7.7 Three dentists are located within proximity of the site, including Bryn Dental Practice to the north east, BA Rimmer Dental Practice to the east, and Haydock Dental Practice to the south east.

### RETAIL & LEISURE

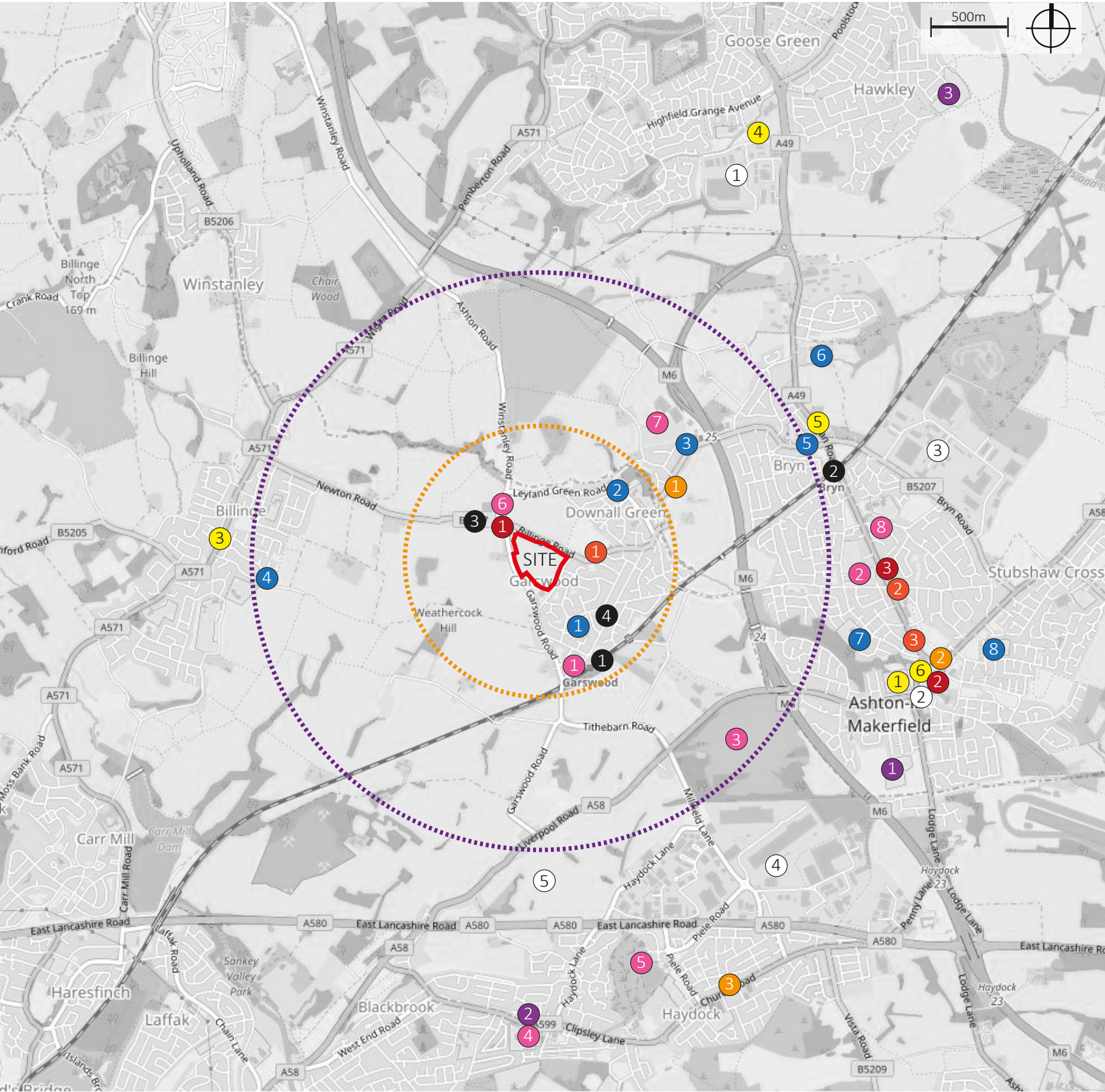
- 7.8 Station Road, located approximately 320m to the south of the site, has a range of retail and leisure facilities, including a post office, take-aways, hair dressers and public houses. Approximately 2km to the east, Wigan Road in Ashton-in-Makerfield has a wide range of retail and leisure facilities with more amenities including banks, restaurants and supermarkets.

### EMPLOYMENT

- 7.9 A range of employment opportunities are available in the vicinity, including South Lancashire Industrial Estate, Fishwick Park Industrial Estate and Haydock Lane Industrial Estate which is located approximately 1.75km to the south east of the site.
- 7.10 Moreover, Florida Farm North has recently been granted consent for 135,000 sq.m. of employment and 10,000sqm of office space, providing further future employment opportunities.



# 7.0 SUSTAINABILITY APPRAISAL



KEY

CATCHMENTS

- 1km
- 2km

LEISURE

- 1 Garswood Library
- 2 Ashton Leisure Centre
- 3 Ashton-in-Makerfield Golf Club
- 4 Haydock Community Leisure Centre
- 5 Haydock Cricket Club
- 6 Garswood United FC
- 7 Ashton Athletic Football Club
- 8 Garswood Hall Bowling and Community Club

RETAIL

- 1 Ashton-in-Makerfield Town Centre
- 2 Prescott Shopping Centre
- 3 Local shops in Billinge
- 4 Sainsbury's Supermarket
- 5 Co-operative Supermarket
- 6 Aldi Supermarket

EMPLOYMENT

- 1 Goose Green Business Park
- 2 Ashton-in-Makerfield Town Centre
- 3 South Lancashire Industrial Estate
- 4 Haydock Lane Industrial Estate
- 5 Florida Farm North (consented)

PUBLIC TRANSPORT

- 1 Garswood Railway Station
- 2 Bryn Railway Station
- 3 Bus stops along Newton Road
- 4 Bus stops along Victoria Road

PRIMARY SCHOOLS

- 1 Garswood Primary School
- 2 Rectory C of E Primary School
- 3 Our Lady Immaculate Catholic Primary
- 4 Billinge Chapel End School
- 5 Bryn St Peters C of E Primary School
- 6 Landgate School
- 7 RL Hughes Primary School
- 8 St Thomas' CE Primary School

SECONDARY SCHOOLS & COLLEGES

- 1 Byrchall High School
- 2 Haydock High School
- 3 Hawkley Hall High School

HEALTH

PHARMACIES

- 1 Garswood Pharmacy
- 2 Boots Pharmacy
- 3 Rowlands Pharmacy

DOCTORS

- 1 Garswood Surgery
- 2 Ashton Medical Centre
- 3 The Medicentre

DENTISTS

- 1 Bryn Dental Practice
- 2 BA Rimmer Dental Practice
- 3 Haydock Dental Practice

FIGURE 5: LOCAL AMENTIES AND SERVICES PLAN

## 7.1 OTHER TECHNICAL MATTERS

### TOPOGRAPHY

- 7.1.1 The site is gently undulating, with elevations of approximately 92m AOD (Above Ordnance Datum) at the northwestern extent of the site, and approximately 82m AOD to the east of the site.

### NATURE CONSERVATION & ECOLOGY Ecological Statement (LUC, 2019)

- 7.1.2 “The Site was considered of negligible ecological value due to the lack of valuable habitats present, absence of protected species evidence and limited suitability of habitats to support protected species. There were no statutory designated sites located within 2 km of the Site. Three non-statutory designated sites were located within 2 km of the Site, however there is no functional connectivity between these designated sites and the Site.
- 7.1.3 The majority of the Site comprises improved grassland with small areas of scrub, tall ruderal vegetation, hedgerows, trees, and a dry ditch. These habitats are regarded as being common and widespread, and as such, of low intrinsic ecological value. However, hedgerows, trees, and scrub within the Survey Area, although not of particular botanical interest (in terms of species richness), offer potential opportunities for low numbers of protected species (such as breeding birds).”

- 7.1.4 Three stands of the invasive, non-native Japanese knotweed were identified on the southern and western boundaries of the Site.

### LANDSCAPE AND VISUAL

#### LUC Landscape Feasibility Statement (LUC, 2019)

- 7.1.5 “It is not considered that development of the Site will alter any of the wider key landscape characteristics or introduce a discordant element in the existing setting when viewed from the wider landscape. Although the ridgeline accommodating the Site is visible in wider views, the Site itself offers an opportunity to improve the character and quality of the settlement edge of Garswood.
- 7.1.6 The St. Helens Landscape Character Assessment (2006) considers that opportunities exist to accommodate small scale development to the west and north of Garswood, whilst retaining the wider separation from Billinge. The findings of the St. Helens Council Green Belt Review (2018) also states that settlement coalescence of Billinge and Garswood would not occur, as a strategic gap between the settlements would

be maintained if the Site was released from the Green Belt. Subject to architectural proposals which are consistent in scale and composition with the setting of Garswood, the residential development would not appear incongruous with the established settlement pattern. The least sensitive parts of the Site are located in the south and where the Site abuts existing residential development along Smock Lane and also benefits from partial visual shelter provided by the rising landform to the north.

- 7.1.7 Following consideration of the identified opportunities and constraints, it is concluded that the Site should be able to accommodate sensitively designed residential development.”

### WALKING AND CYCLING

- 7.1.8 The local area has good provisions for walking and cycling, with key routes to local services having footways. The development proposals will seek to enhance existing PRowS and improve pedestrian connectivity both throughout the site and within the wider area.



# 7.2 OPPORTUNITIES AND CONSTRAINTS



FIGURE 6: OPPORTUNITIES AND CONSTRAINTS PLAN



## 8.0 A DELIVERABLE SITE

8.1 According to the Framework, to be considered deliverable, a site should be available now, offer a suitable location for development, 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.

### SUITABLE

8.2 This report demonstrates that the site at Weathercock Hill Farm is suitable for residential development, with there being no natural or technical constraints which would hinder its suitability to accommodate housing; namely:

- Technical advice provided by Croft Transport Solutions concludes that a number of access points can be created off Billinge Road and Garswood Road to serve the site; these access points can be provided in accordance with the design guidance contained within the Manual for Streets document;
- The site is considered to be located in an attractive market area and in a settlement where there has been relatively little new housing. The development of the site provides a significant opportunity to sustainably meet the needs for both affordable and market housing in Garswood;

- The site is currently greenfield and is occupied and tenanted by a local farmer. There are few known constraints which would hinder the delivery of the site in the short term. There are no statutory ecological designations on or near the site;
- The site is in an area at low risk of flooding and there are no watercourses on site;
- It is considered that the site can be sensitively developed so as not to have any detrimental impact on the landscape. Further, the site is not considered to serve the purposes of retaining land in the Green Belt and is bound on all sides by permanent and defensible boundaries, protecting the adjacent countryside from further encroachment.

8.3 The site is currently designated as Green Belt which precludes its suitability for housing development. Upon the adoption of the Local Plan, within which the site is a draft allocation, it is considered that the site will be deliverable within five years.

### AVAILABLE

8.4 The site is within the control of Persimmon Homes, one of the largest housebuilders in the UK and who has significant experience of

delivering new homes in St Helens and intends to commence development of the site at the earliest opportunity. There are no legal impediments or known constraints which would impede the delivery of the site in the short term. As a result, the site is considered to be available for housing development.'

### ACHIEVABLE

8.5 Persimmon Homes have undertaken initial due diligence work and are confident that there are no technical or environmental constraints that would prevent or significantly delay the delivery of new housing on the site. The site is greenfield and located within a strong local market housing area. Persimmon currently anticipate that 30-40 dwellings could be completed per year on due to the site being located within a popular market area where demand for new housing is strong.

8.6 Subject to the land being released from the Green Belt, the Company expect to submit a planning application within six months of adoption of the Local Plan. It is considered that there are realistic prospects that new homes will be delivered on the site in the short term; and the site could make a significant contribution towards meeting identified housing needs within St Helens within 5 years.



## 9.0 A SUSTAINABLE SITE

9.1 NPPF sets out that there are three dimensions to sustainable development: economic, social and environmental. The development of the land at Weathercock Hill Farm would have significant positive economic, social and environmental benefits and would constitute sustainable development.

### ECONOMIC

9.2 The economic benefits of house building include employment during and after the construction phase, ongoing household expenditure supporting local shops and services, and contribution to local revenues through the New Homes Bonus and Council Tax. Persimmon Homes have quantified these benefits for 265 Homes. This analysis shows that a development of this scale could provide the following economic benefits:

- New Homes Bonus (over 6 years) - **£1,256,100;**
- Increased Council Tax Revenues (per annum) - **£314,025;**
- Estimated increase in household expenditure (per annum) - **£6,355,336;**
- 265 person years of construction jobs, which equates to **41 full time construction jobs** per year of construction, assuming a 6.5 year build period;

- **62 full time indirect or induced jobs** supported per year of construction in the local community over the course of the development;
- Gross Value Added per annum - **£7,041,006**

9.3 The development of the site for approximately **265 new homes** and associated public open space has the potential to generate significant social benefits. In particular the proposed development will:

- Provide a range of house types, sizes and tenures which complement existing properties in the local area and help to diversify the local housing market;
- Enhance the overall quality of the local area by creating an attractive place to live;
- Provide areas of public open space and green infrastructure that will provide recreational opportunities for both existing and future residents;
- Include opportunities for a range and type of affordable housing for local people;
- Encourage the use of non-car modes of transport, especially cycling and walking, through the provision of new connections across and within the site.

### ENVIRONMENTAL

9.4 A substantial proportion of the site will be retained as open space and made available for use by prospective and existing residents. Existing hedgerows and trees will be retained where possible to facilitate increased ecological and biodiversity enjoyment, and a comprehensive landscaping and planting scheme will be introduced as part of any residential development, presenting opportunity to enhance the ecological value of the site.

# 10.0 DEVELOPMENT VISION AND OBJECTIVES

- 10.1 A Parameters Masterplan has been prepared for the site, to demonstrate how the design and form of the proposed development responds sensitively to on-site opportunities and constraints, as well as the characteristics of the wider area.

## ACCESS

- 10.2 There are a number of logical and feasible site access options and combinations, which have been determined by the existing road network and highways principles. The preferred site access locations are therefore:

- Garswood Road, to the west of the site;
- Billinge Road, to the north of the site;

- 10.3 Access to the site would be agreed through consultation with the local highway authority and detailed through any future transport assessment as required.

- 10.4 A comprehensive network of green infrastructure and pedestrian links has also been demonstrated, increasing connectivity and permeability through the site by retaining and enhancing Public Rights of Way and the local cycle network, which improves access to local public transport routes, local amenities and public open space.

## MOVEMENT AND STREETS

- 10.5 The street design throughout the development aims to prioritise non-vehicular movement, by using methods to reduce vehicle speed, and also by providing strong pedestrian connectivity and attractive social spaces.

## LANDSCAPE FRAMEWORK

- 10.6 The conceptual layout is shaped by the local landscape features and context, and will complement the topography of the site. Green infrastructure will be utilised to the boundaries and throughout the site to provide connectivity and enhance habitats and biodiversity where appropriate.
- 10.7 Existing PRowS are to be retained and improved to create attractive green spaces and connections.

## URBAN FORM

- 10.8 Secure development blocks would be created, with houses orientated to maximise views of greenspace and promote natural surveillance, as per Secure by Design requirements.
- 10.9 The aesthetics and massing of the proposed dwellings will reflect local vernacular and satisfy local planning policy.



# 11.0 PARAMETERS MASTERPLAN



FIGURE 8: PARAMETERS MASTERPLAN

## 12.0 CONCLUSIONS

- 12.1 The land at Weathercock Hill Farm is within the control of Persimmon Homes, one of the largest housebuilders in the UK with significant experience of building new homes in St Helens. The Company has undertaken a detailed analysis of the physical and constraints and opportunities of the site and has prepared an indicative masterplan to demonstrate how the site could be developed.
- 12.2 It has been demonstrated that the site does not make a significant contribution to the purposes of retaining land in the Green Belt, and its development would fully accord with the economic, social and environmental objectives of sustainable development; and can be delivered in full accordance with the policies within the Framework, and should therefore be allocated for residential development in the St Helens Local Plan.
- 12.3 It has been demonstrated through this Vision Document that the Weathercock Hill Farm site is available, suitable and achievable, and could deliver new homes within the short to medium term. The development of the site for housing has the potential to contribute towards meeting the identified need for new housing within St Helens.





## **Appendix Three**

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Land at Weathercock Hill Farm, Garswood

Ecological Statement





# Ecological Statement

Land at Weathercock Hill Farm, Garswood

Prepared by LUC

February 2019

Planning & EIA  
Design  
Landscape Planning  
Landscape Management  
Ecology  
GIS & Visualisation

LUC GLASGOW  
37 Otago Street  
Glasgow  
G12 8JJ



Offices also in:  
Bristol  
Edinburgh  
Glasgow  
Lancaster  
London  
Manchester



FS 566056 EMS 566057

Land Use Consultants Ltd  
Registered in England  
Registered number: 2549296  
Registered Office:  
43 Chalton Street  
London NW1 1JD  
LUC uses 100% recycled paper

**Project Title:** Weathercock Hill Farm

**Client:** Persimmon Homes

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.1	08/02/19	First Version	MO	JT	HL



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# 1 Introduction

- 1.1 LUC was commissioned by Persimmon Homes (**the 'Client'**) to undertake an Ecological Assessment (EA) of a parcel of land (hereafter referred to as **the 'Site'**) located at Garswood, Merseyside. The Site is located to the west of Garswood, bound by Billinge Road, Garswood Road and Smock Lane (centred at SJ 55153 99968).

## Project Understanding

- 1.2 St Helens council has submitted a Draft Local Plan for public consultation which details the land for which the council district has designated for housing, employment and other development. This EA was required to support the **council's** allocation for the development of housing within the Site.
- 1.3 This Ecological Statement will detail the survey methods and results undertaken to inform the EA, and provide a summary of the overall ecological value of the Site.



## 2 Methodology

### Desk Study

- 2.1 A desk study was undertaken to obtain baseline ecological information in relation to the Site, and the local area. The desk study sought information on all designated sites located within 2 km of the Site using freely-available, online data sources. The Multi-Agency Geographic Information for the Countryside (MAGIC)<sup>1</sup> database was reviewed for information on locally, nationally and internationally statutory designated sites of nature conservation importance. Additional information on non-statutory designated sites was also gathered from St Helens Council.

### Field Surveys

- 2.2 A field survey (**hereafter referred to as the 'Survey'**) was undertaken on 14<sup>th</sup> January 2019 by LUC consultant ecologist, Michal Ostalowski Grad CIEEM<sup>2</sup>. All features of ecological significance were recorded on a field tablet, using a georeferenced map-based application. Photographs were also taken and accompany this report, where necessary.

#### Habitats

- 2.3 The Survey followed the Joint Nature Conservation Committee (JNCC) guidelines<sup>3</sup> to classify the habitats located within the Site, up to and including a 50 m buffer (hereafter referred to as the Survey Area) as shown in **Figure 1, Appendix 1**. The Surveys aimed to rapidly map the broad habitat types located within the Survey Area, recording plant species, where applicable. Target Notes (TN) were also taken to provide detailed information relating to ecological features of interest recorded during the Survey.

#### Protected Species

- 2.4 The Survey also aimed to assess the potential for the Survey Area to support protected species including, but not limited to, bats, badger and reptiles. Where field signs of such faunal species were observed, this was recorded and provided within this ES.

#### Invasive Non-Native Species (INNS)

- 2.5 A check for invasive, non-native species (INNS), which could pose constraints to development, was also carried out during the Survey. Species searched for included Japanese knotweed, Himalayan balsam, giant hogweed and rhododendron.

### Survey Limitations

- 2.6 The Survey was undertaken outside of the optimum period for Phase 1 habitat surveys (April to September, inclusive). However, given the broad habitat types found within the Survey Area this constraint is not considered to be a limitation to the current assessment of the value of the Site.
- 2.7 It is worth noting that the time frame in which the Survey was undertaken provides a snapshot of activity for the Site and will not necessarily detect all evidence of use by a species. Ecological surveys are limited by a variety of factors which affect the presence of flora and fauna such as

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<sup>1</sup> MAGIC. Available online at [www.magic.gov.uk](http://www.magic.gov.uk). [Accessed February 2019]

<sup>2</sup> Chartered Institute of Ecology and Environmental Management

<sup>3</sup> Joint Nature Conservation Committee (2010) Handbook for Phase 1 Habitat Survey: a technique for environmental audit. Peterborough.

season, migration patterns, and species behaviour. Evidence of species is not always discovered during the Survey. This does not mean that a species is absent and as such, the survey aims to assess the suitability of habitats to support protected species.



## 3 Results

- 3.1 The desk study and Survey results are summarised below, with reference to **Figure 1, Appendix 1**.

### Desk Study

- 3.2 There were no statutory designated sites located within the Site, or within a 2 km buffer. The Site falls within a Site of Special Scientific Interest (SSSI) Impact Risk Zones. SSSI IRZs have been adopted to identify areas within which the Local Planning Authority (LPA) should consult Natural England (NE) before granting planning permission on a development. This SSSI IRZ has been put in place to recommend consultation for specific developments such as airport runways and aviation developments, and farm-related developments (such as slurries). As the Site has not been allocated for development of these kinds, the developer would not be required to undertake consultation with NE with regards to impacts on the SSSI.
- 3.3 There were three non-statutory Local Wildlife Sites (LWS) within 2 km of the Site. Information relating to these non-statutory designated sites is provided in Table 1, below.

**Table 1: Non-Statutory Designated Sites Located within 2 km of the Site**

Site Name	Distance and Direction from Site	Designated Feature
Barton Clough Local	0.5 km northwest	Ancient semi-natural woodland
Mine Spoil	0.5 km west	Wetland
Goyt Hey Wood	1.4 km southwest	Ancient semi-natural woodland

- 3.4 No further non-statutory designated sites were located within 2 km of the Site.

### Field Surveys

#### Habitats

##### *Scattered Scrub (A2.2)*

- 3.5 A small area of bramble and elder scrub was present in the east corner of the Survey Area, situated on the Site's boundary.

##### *Mixed Scattered trees (A3.3)*

- 3.6 Broadleaved trees were scattered along south-western and eastern Site's boundaries. Species present include sycamore, alder, and silver birch.
- 3.7 A single tree line was recorded along the southern boundary of the Site. Species present include Leyland cypress, sycamore, elder, silver birch and poplar sp.

##### *Improved Grassland (B4)*

- 3.8 Improved grassland was the dominant habitat recorded within the Survey Area, dominating the land within the Site and fields to the northeast and southwest (**Photograph 1, Appendix 2**). At the time of the Survey, this grassland was under intensive agricultural management. Species present include perennial ryegrass, thistle species, and buttercup species.

### *Tall ruderal (C3.1)*

- 3.9 A narrow strip of tall ruderal vegetation was present along the Billinge Road, in the north of the Survey Area. Species recorded include rosebay willowherb, bramble, broadleaved dock, and grass, such as **cock's-foot**.

### *Arable (J1.1)*

- 3.10 An arable field was recorded in the north-eastern of the Survey Area. At the time of the Survey, the crop had been harvested and therefore resembled a stubble field.

### *Intact hedge (J2.1)*

- 3.11 A single section of intact hedge was present in the west of the Survey Area, located along the **Site's** western boundary. The hedge was considered to be species-poor with only two species present, including hawthorn and bramble.

### *Defunct hedge (J2.2)*

- 3.12 A single line of defunct hedge was recorded in the east of the Survey Area, along Smock Lane. Species present include blackthorn, hawthorn, bramble, and holly.

### *Dry ditch (J2.5)*

- 3.13 A dry ditch was recorded along the north-eastern boundary of the Site, adjacent to the Billinge Road. Vegetation within the ditch was similar to the surrounding habitat (tall ruderal; comprising **rosebay willowherb, bramble and cock's-foot**).

### *Buildings (J3.6)*

- 3.14 Residential buildings, with associated gardens were present within the Survey Area. Residential buildings appeared to be occupied, in good condition and evidence of recent human presence.

### *Other habitat (J5)*

- 3.15 A lawn bowling pitch and a number of allotments were recorded in the south on the Survey Area.

## **Protected Species**

### *Bats*

- 3.16 The trees, scrub, and hedgerows, recorded within the Survey Area, were considered to provide limited foraging and commuting potential for bats. Residential buildings recorded within the Survey Area were considered to provide some bat roosting potential. They appeared to be in relatively good condition, with no visible evidence of cracks or fissures in brickwork but a few potential bat roosting opportunities were recorded within the roof of the buildings (e.g. gaps between tiles).
- 3.17 There were no buildings recorded within the Site **and therefore the Site's potential to support bats** is considered negligible.
- 3.18 The majority of the trees adjacent to Site offer no roosting opportunities (e.g. cracks, crevices, splits, woodpecker holes). However, a single sycamore tree, recorded to the south of the Site was considered of moderate bat roost potential due to the presence of a narrow crevice located on its limb (**Photograph 2, Appendix 2**).

### *Badgers*

- 3.19 No sign of badger activity was recorded on, or within close proximity to, the Site. The field margins and improved grassland were considered to provide suitable foraging habitat for badgers to feed on earthworms. The Site was considered to offer suboptimal habitat for sett creation due to the lack of suitable cover and likely regular disturbance from dog walkers and local residents.

### *Nesting Birds*

- 3.20 Two bird nests were observed within the Site; the first nest was located in a hedgerow along the eastern boundary of the Site, and the second was on a silver birch tree. Carrion crow, woodpigeon, magpie, goldfinch, blackbird, and robin were present within the Survey Area at the time of the Survey.



- 3.21 The trees, hedgerows, scrub and improved grassland were considered suitable for foraging and/or nesting bird species.

*Other species*

- 3.22 No evidence of other species, or suitable habitat to support species, was identified at the time of Survey.

**Invasive non-native species**

- 3.23 Three small stands of scattered Japanese knotweed were recorded on Site (**Figure 1, Appendix 1; Photograph 3, Appendix 2**; NGRs, SD 55014 00144, SD 55013 00170 and SJ 55192 99773). The largest stand was located in the north of the Survey Area (SD 55013 00170), recorded at a length of approximately 10 m, and at a height of approximately 40 cm.

## 4 Conclusion

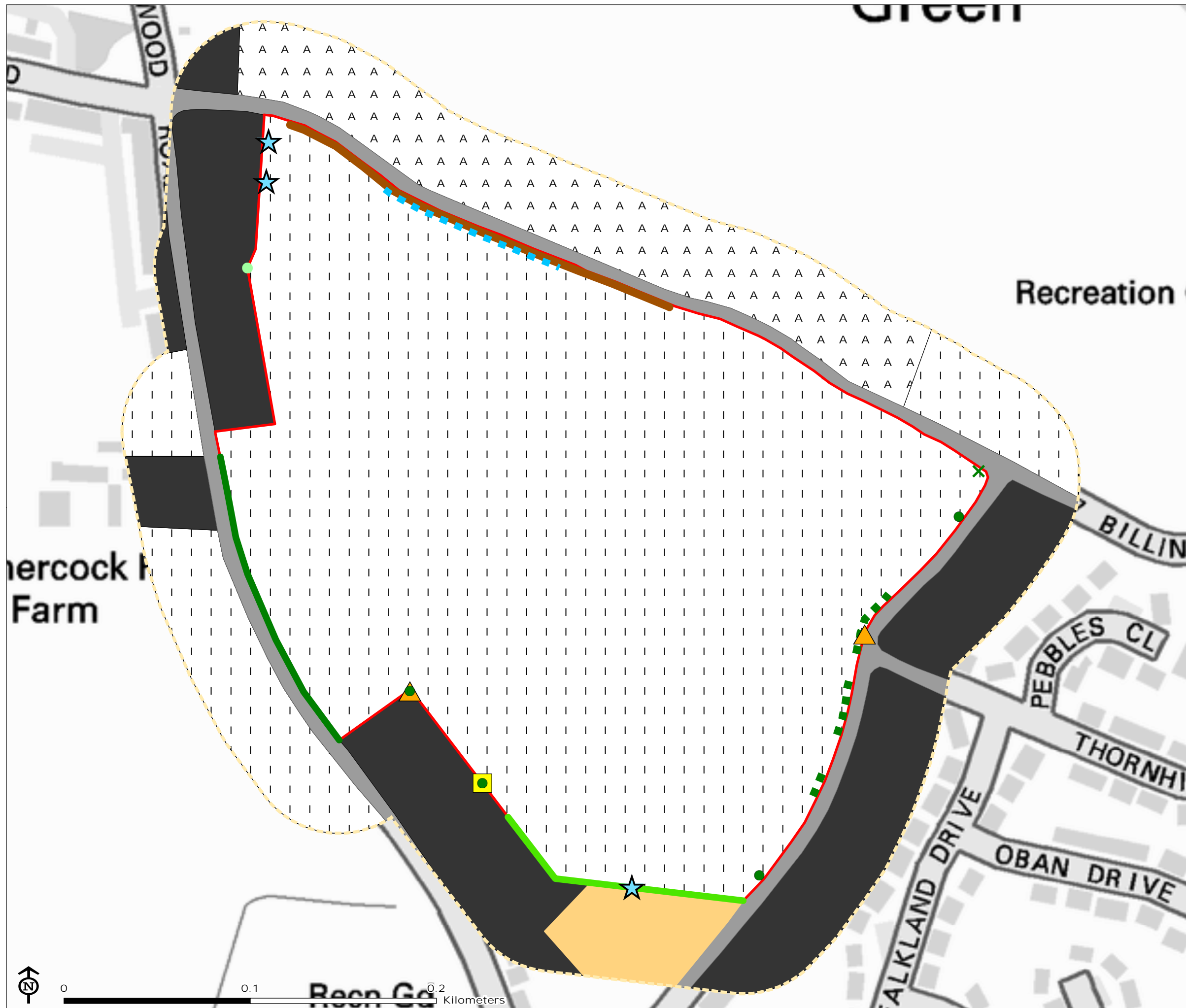
- 4.1 The Site was considered of negligible ecological value due to the lack of valuable habitats present, absence of protected species evidence and limited suitability of habitats to support protected species.
- 4.2 There were no statutory designated sites located within 2 km of the Site. Three non-statutory designated sites were located within 2 km of the Site, however there is no functional connectivity between these designated sites and the Site.
- 4.3 The majority of Site comprised improved grassland with small areas of scrub, tall ruderal vegetation, hedgerows, trees, and a dry ditch. These habitats were regarded as being common and widespread, and as such, of low intrinsic ecological value. However, hedgerows, trees, and scrub within the Survey Area, although not of particular botanical interest (in terms of species richness), offer potential opportunities for low numbers of protected species (such as breeding birds).
- 4.4 Three stands of the invasive, non-native Japanese knotweed were identified on the southern and western boundaries of the Site. Strict controls on soil movement will be required to facilitate any development which may cause the spread of this species, and therefore this could pose a constraint to development.



# Appendix 1

## Figures

Figure 1: Phase 1 Habitat Survey Results



## Weathercock Hill Farm

Figure 1: Phase 1 Habitat Survey Results

- The Site
- Survey Area - 50m Buffer of the Site
- ★ Japanese Knotweed
- ▲ Bird nest
- Tree with moderate bat roost potential
- Phase 1 Code**
  - ✕ A2.2 Scrub (scattered)
  - Broadleaved trees
  - Coniferous tree
  - Other Tall herb and fern (ruderal)
  - J2.1.2 Intact hedge (species-poor)
  - - - J2.2.2 Defunct hedge (species-poor)
  - - - J2.6 Dry ditch
  - TL Tree line
  - B4 Improved grassland
  - HS Hard standing
  - J1.1 Arable
  - J3.6 Buildings
  - J5 Other habitat

Map Scale @A3: 1:2,000



## Appendix 2

### Photographs



**Photograph 1:** Improved grassland located within the Site. Photograph was taken looking east, from the northern residential buildings, located on Garswood Road.



**Photograph 2:** Sycamore tree considered of moderate bat roost potential recorded on the southern boundary of the Site





**Photograph 3:** A stand of Japanese knotweed recorded in the north of the Site

## **Appendix Four**

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Land at Weathercock Hill Farm, Garswood

Landscape Feasibility Statement



# **Landscape Feasibility Statement**

## **Land at Weathercock Hill Farm, Garswood**

Prepared by LUC  
February 2019





**Project Title:** Land at Weathercock Hill Farm, Garswood – Landscape Feasibility Statement

**Client:** Persimmon Homes (North West)

Version	Date	Version Details	Prepared by	Checked by	Approved by
V1	06/02/19	First Draft	SC	SO	SO



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

# Landscape Feasibility Statement

## Land at Weathercock Hill Farm, Garswood

Prepared by LUC

February 2019

Planning & EIA  
Design  
Landscape Planning  
Landscape Management  
Ecology  
GIS & Visualisation

LUC MANCHESTER  
6<sup>TH</sup> Floor, 55 King Street  
Manchester  
M2 4LQ

Offices also in:  
Edinburgh  
Glasgow  
Lancaster  
Bristol  
Manchester



FS 566056 EMS 566057

Land Use Consultants Ltd  
Registered in England  
Registered number: 2549296  
Registered Office:  
43 Chalton Street  
London NW1 1JD  
LUC uses 100% recycled paper

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# 1 Introduction

## Context

- 1.1 LUC was commissioned by Persimmon Homes (North West) to produce a high level review of the current landscape and visual condition of a proposed site in Garswood, St. Helens (herein referred to as the 'Site'). This report describes the key opportunities and constraints affecting the potential development of the Site in relation to landscape character and visual amenity.
- 1.2 Lying at the western limit of Garswood within the St. Helens administrative boundary (see **Figure 01: Site Location Plan**), the Site occupies land currently used as pastoral agricultural land.

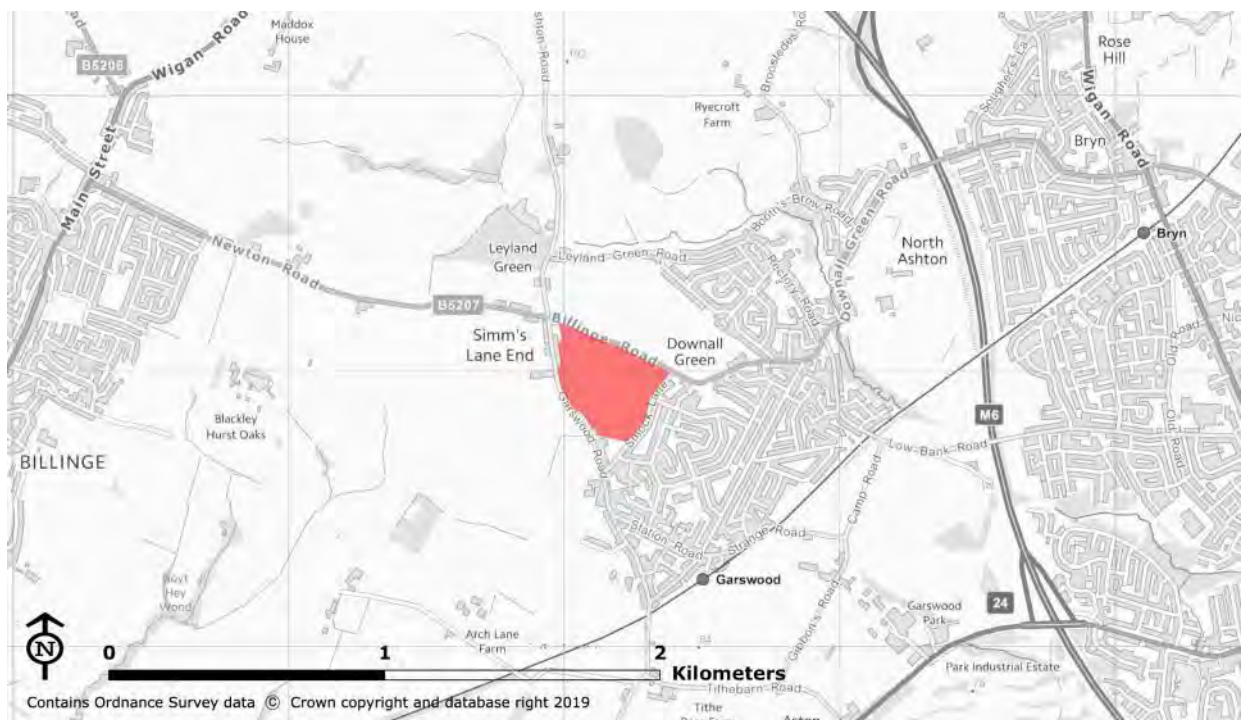


Figure 01: Site Location Plan

## Objectives

- 1.3 This study aimed to highlight any landscape or visual issues that would potentially impede delivery of development at the Site. An indication of any specific constrained areas or areas of landscape opportunities have been highlighted has been provided, and used to develop potential design objectives for the Site. Relevant landscape policies and existing baseline material have also been reviewed to inform the planning context of the Site, supported by the findings of a site visit, held in January 2019.
- 1.4 This report is not a Landscape and Visual Impact Assessment (LVIA), although some reference has been made to the *Guidelines for Landscape and Visual Impact Assessment* (GLVIA) (3rd Edition) (2013)<sup>1</sup> which forms the standard reference for undertaking this work in the UK.

<sup>1</sup> Landscape Institute and the Institute of Environmental Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment*, 3rd Edition, Routledge.

## Scope and Structure of the Report

- 1.5 The report is structured as follows:
- Section 1: Introduction
  - Section 2: Landscape Baseline
  - Section 3: Visual Baseline
  - Section 4: Analysis
  - Section 5: Summary and Conclusions

## 2 Landscape Baseline

### Policy Context

#### **St. Helens Council Local Plan Core Strategy (2012)**

- 2.1 Relevant landscape policies relating to St. Helens Borough have been reviewed to inform the planning context of the Site.
- 2.2 Proposed development of the Site would be subject to policies contained within the **St. Helens Local Plan Core Strategy**<sup>2</sup> which was adopted on 31<sup>st</sup> October 2012 and incorporated 'saved' policies from the **St. Helens Unitary Development Plan** (UDP) dated 1998<sup>3</sup>. St. Helens Council is also currently in the process of preparing the new **St. Helens Borough Local Plan 2020-2035**<sup>4</sup> which will replace existing planning documents.
- 2.3 Landscape policies of relevance to the Site are set out below.
- **Saved Policies S1(Green Belt) and GB1 (Green Belt)** – states that land defined as Green Belt on the Proposals Map will be maintained in order to check the unrestricted sprawl of large built-up areas, prevent neighbouring towns from merging into each other and assist in safeguarding the countryside from encroachment. The Policy also aims to assist urban regeneration by encouraging the recycling of derelict land and other urban land. The Site is within the Green Belt as defined in the extant **St. Helens Local Plan Core Strategy**<sup>2</sup>. This policy also encompasses land lying between the settlements of Garswood and Billinge.
  - **Policy CAS 5: Rural St. Helens** – states that development will be restricted to within existing rural settlement boundaries. Outside of these areas development will comply with Green Belt policy. The Site itself is located on the settlement edge of Garswood.
  - **Policy CQL 1: Green Infrastructure** – seeks to protect, manage, enhance and where appropriate expand the Green Infrastructure network by reinforcing the protection of greenways and linkages between sites. The Policy also aims to promote and improve the accessibility of open space within walking distance of housing, health, employment and education facilities. The Site itself is located on the settlement edge of Garswood, although devoid of Public Rights of Way (PRoW) / recreational use.
  - **Policy CQL 2: Trees and Woodlands** – states that trees, woodlands and hedgerows should be protected and enhanced by conservation, enhancement and management. Developers will be required to plant new trees, woodlands and hedgerows on appropriate sites or contribute to off-site provision and elsewhere support new planting. The boundaries of the Site are currently comprised of both intact and fragmented hedgerows, with some trees located on the Site's eastern boundary.

#### **St. Helens Council Green Belt Review (2018)**<sup>5</sup>

- 2.4 Published in December 2018 with the aim of guiding the location and form of new development in the emerging **St. Helens Borough Local Plan 2020-2035**<sup>4</sup>, the review identifies areas where development could be accommodated whilst causing least harm to the Green Belt itself. The document also assesses the contribution that different parts of St. Helens make to the purposes of the Green Belt. The study divided the full extent of the St. Helens Green Belt into parcels of land for assessment. The Site itself was separated out as land sub-parcel GBP\_025\_B, incorporating land situated to the north west of Garswood.

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<sup>2</sup> St. Helens Council (2012) *St. Helens Local Plan Core Strategy*

<sup>3</sup> St. Helens Council (1998) *St. Helens Unitary Development Plan*

<sup>4</sup> St. Helens Council (2019) *St. Helens Borough Local Plan 2020-2035 – Submission Draft*

<sup>5</sup> St. Helens Council (2018) *St. Helens Borough Local Plan 2020-2035 – Green Belt Review (December 2018)*



- 2.5 The findings of the review stated that whilst sub-parcel GBP\_025\_B contributes to the physical and visual separation of Billinge and Garswood, with strong vegetated boundaries, a strategic gap between the settlements could be maintained if this sub-parcel was released from the Green Belt. The study concluded that GBP\_025\_B makes only a limited contribution to the purposes of the **Green Belt land and has 'many positive attributes which would justify its allocation for development'**.

#### **The New St. Helens Borough Local Plan 2020-2035<sup>4</sup>**

- 2.6 St. Helens Council is in the process of preparing a new Local Plan which will set out the framework for growth and development of the Borough. The document is currently in the publication period, after which the Submission Draft will be submitted to the Secretary of State for Examination in Public. The Site is currently allocated within the Submission Draft document and the Submission Draft Policies Map as housing within **Policy LPA05: Meeting St. Helens Borough's Housing Needs**. Reference **1HA Land South of Billinge Road, East of Garswood Road and west of Smock Lane, Garswood** wholly encompasses the Site itself.

#### **Wigan Council Local Plan Core Strategy (2013)<sup>6</sup>**

- 2.7 The corridor of Down Brook, approximately 300m north of the Site, delineates the boundary separating St. Helens District from Wigan District. The Wigan Local Plan Core Strategy outlines the spatial vision and strategic objectives of the borough through to 2026. Due to the close proximity of Wigan District to the Site, the policies considered relevant are listed below:
- **Policy CP8: Green Belt and Safeguarded Land** – states that development within the Green Belt will only be allowed in accordance with national planning policy.
  - **Policy C1E: Greenway Network** – seeks to develop a network of safe, attractive, off-road routes linking the countryside and recreational facilities with urban areas across the Borough. The Network will be protected from development which would negate its purpose.

## **Landscape Character**

- 2.8 The use of published landscape character assessments is a widely accepted tool, used to inform an understanding of the landscape context for potential development sites. Landscape character is described at both national and local levels.
- 2.9 At a national level, mapping and written descriptions published by Natural England classify the landscape character of England into 159 distinct National Character Areas (NCAs). These NCAs provide a broad landscape context for individual development schemes.

#### **GLVIA3<sup>1</sup> paragraph 5.14, suggests that:**

*"broad scale assessments set the scene and reference can be made to the descriptions of relevant character types or areas to indicate the key characteristics that may be apparent in the study area".*

#### **Published Character Assessment – National Level**

- 2.10 At a national level, the Site lies within **National Character Area (NCA) 56: Lancashire Coal Measures**. Encompassing the towns of Wigan and St. Helens, this NCA is characterised by a mosaic of scattered urban centres, industry, farmland and active or derelict mineral sites. Key characteristics of this NCA are summarised below:
- densely populated fragmented landscape reflecting a complex pattern of mining and industrial activity intermixed with housing;
  - gentle hills and valleys running north-west to the south-east, **creating a soft but varied topography**;

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<sup>6</sup> Wigan Council (2013) *Wigan Local Plan Core Strategy*

- associations with industrial heritage and long history of mineral working;
- limited woodland coverage, with the exception of the area north-west of Wigan;
- large tracts and isolated pockets of agricultural land within the urban fabric, principally used for permanent grassland or cereal production, although horse grazing and stabling are also common;
- **field patterns are predominantly medium to large and rectangular, with field boundaries defined by poorly managed hedges** or post-and-wire fencing;
- presence of subsidence flashes due to widespread ground subsidence, caused by coal mining activities;
- strong cultural and industrial heritage, although the majority of the pits, spoil heaps and open cast sites have now been reclaimed and landscaped; and
- influence of transport and utilities infrastructure, with motorways, major roads and rail lines criss-crossing the landscape.

2.11 A site visit confirmed that the Site and surrounding landscape share some of the key attributes and character qualities of this NCA, particularly the aspects highlighted in **bold** text above. However, as NCAs cover extensive areas they are of limited relevance to the scale of the Site. It is noted within the **Summary** of the NCA profile that the continued pressure to accommodate both housing and industry forms a future challenge of the area. However, opportunities to incorporate environmental and social benefits; including improving habitat quality, distribution and connectivity through urban linkages is also recognised.

2.12 The Statement of Environmental Opportunities for **NCA 56: Lancashire Coal Measures** contain suggested opportunities that are relevant to the Site as outlined below.

- SEO 3: Manage and support the agricultural landscape through conserving, enhancing, linking and expanding the habitat network (including grasslands, woodlands, ponds, hedges and field margins) – to increase connectivity and resilience to climate change, and reduce soil erosion and diffuse pollution, while conserving the qualities of the farmed landscape and improving opportunities for enjoyment of the open countryside.
- SEO 4: Expand and link green infrastructure through restoring and enhancing post-industrial sites and creating new habitat mosaics that raise the overall quality, design and location of new development, bringing multiple environmental benefits including functioning networks for wildlife and access and recreational amenities for people to enjoy.

### Published Landscape Character Assessment – Local Level

2.13 The *Landscape Character Assessment for St. Helens* (2006)<sup>7</sup> was prepared to assess the landscape character of the Borough of St. Helens, to inform its future growth and development. The landscape of the study area is divided into Landscape Character Types (LCTs) reflecting the results of desk study and field survey undertaken as part of that study. These LCTs are then further refined into Landscape Character Areas (LCAs) forming discrete named geographical units. The townscape character of Garswood has been classified under the broader character type of **Separate Settlements**, reflective of its broad pattern of land use and age of development.

### LCA Weathercock Slopes (3 BRS 2)

2.14 The Site lies within the Broad Rural Slopes LCT, subdivided further into **LCA Weathercock Slopes (3 BRS 2)**. Located primarily to the north of the Borough on the rolling topography, this LCT comprises a large area of agricultural landscape. Key characteristics of this area are summarised within the *Landscape Character Assessment for St. Helens*, as below:

- **gently undulating agricultural landscape** or broad smooth ridgeline with slopes of either a southern or northern aspect;
- availability of open views and strong intervisibility with the wider landscape and settlement of St. Helens;

<sup>7</sup> St. Helens Council (2006) *Landscape Character Assessment for St. Helens*

- generally intact woodland blocks and shelterbelts which creates a strong interplay between open and enclosed space;
- **medium sized fields of improved pasture bound by hedgerow field boundaries** form the dominant land use, providing a strong rural character;
- various settlement type of local built vernacular, ranging from small villages to a scattering of farmsteads. Later infill housing is often poorly sited and constructed of contemporary materials which contrast with the vernacular properties;
- **network of small 'B' roads enclosed by hedges** cross the landscape, broadly following the contours of the undulating terrain; and
- the strong rural character emphasizes the physical separation of the landscape, elevated above the adjacent urban landscape.

2.15 The *Landscape Character Assessment for St. Helens*<sup>7</sup> includes a criteria used to evaluate the opportunities and constraints of each LCA, as summarised below:

- **Developed Edge Analysis** – considers the overriding character and robustness of the existing urban / rural interface.
- **Landscape Evaluation** – provides an overall classification of the inherent sensitivity of both the landscape and visual resource.
- **Landscape Strategy** – determined by the consideration of strength of character and landscape condition.
- **Judgement about Potential to Accommodate Development** – provides a judgement which considers the character and condition of the landscape as well as its inherent sensitivity.

#### *Developed Edge Analysis - LCA Weathercock Slopes (3 BRS 2)*

2.16 The settlement edges at Billinge and Garswood are assessed as **Weak to Moderate**. The Garswood edge, encompassing the Site itself, is described as less well defined than the eastern edge of Billinge because of sporadic settlement expansion along roads which often give the impression of multiple settlements.

#### *Landscape Evaluation - LCA Weathercock Slopes (3 BRS 2)*

2.17 Landscape sensitivity is judged to be **medium to high** with a strong landscape pattern. However, a general degradation of hedgerows is noted as well as an encroachment of urban features. The presence of the prominent ridge affords intervisibility to other areas, resulting in a **medium to high** visual sensitivity.

#### *Landscape Strategy- LCA Weathercock Slopes (3 BRS 2)*

2.18 The landscape strategy for the area is described as **Conserve and Restore**, derived from the assessment of strength of character and landscape condition.

#### *Judgement about Potential to Accommodate Development - LCA Weathercock Slopes (3 BRS 2)*

2.19 The assessment **suggests that further development at Garswood 'may provide a more robust edge and improve the character and form of the settlement, although siting development here should be sensitive to the surrounding more elevated and prominent land'**. It is noted that the area is not suited to accommodating large scale change or vertical structures as a result of its high visibility which would protrude against the skyline in views.

#### *LCA Garswood (12 SS 4)*

2.20 Located within the wider LCT 12: **Separate Settlements, LCA Garswood (12 SS 4)** encompasses land running parallel the route of Smock Lane and adjoins the Site at its south eastern limit. Lying within the north east of the Borough, the settlement is bounded to the south east by the route of the Wigan to Liverpool Rail Line and to the east and north by the incised valley of the Down Brook. Built form at the western extent of the settlement is focused on the lower slopes, although **is less well defined, described as exhibiting 'an irregular layout only partially responding to landform characteristics'**.



#### *Developed Edge Analysis - LCA Garswood (12 SS 4)*

- 2.21 The western developed edge of Garswood incorporating the Site is described as an often abrupt and prominent edge that follows existing road alignments. Although a clear separation exists between Billinge and Garswood, the experience of arrival from the west is less well defined. The contrast between the strong edge to Garswood in the south with the western developed edges results in a varied overall character judged to vary from **Strong to Weak**.

#### *Landscape Evaluation - LCA Garswood (12 SS 4)*

- 2.22 The area is identified as exhibiting medium landscape sensitivity in virtue of the presence of the historic urban core and road layout. However, the area lacks a cohesive settlement layout due to the proliferation of infill development. Visual sensitivity is judged to be **medium to high**, as a result of locally elevated topography and opportunities for intervisibility within an area containing a high number of receptors.

#### *Landscape Strategy - LCA Garswood (12 SS 4)*

- 2.23 The landscape strategy for the area is described as **Conserve and Enhance**, derived from the assessment of strength of character and landscape condition.

#### *Judgement about Potential to Accommodate Development - LCA Garswood (12 SS 4)*

- 2.24 The report concludes that opportunities exist to the west and north of Garswood to accommodate small scale development to improve the settlement layout, whilst retaining the wider separation from Billinge. Improvement to the layout in this location would potentially improve the settlement edge and sense of arrival.

#### *Key Visual Gateways*

- 2.25 A number of **Key Visual Gateways** were identified within the published *Landscape Character Assessment for St. Helens* (2006)<sup>7</sup>, related to the transition from one landscape to another and forming the first impressions of a settlement or landscape. The subtle reduction in topography from the north to the south of the Borough creates a gateway '*travelling south over Billinge Hill ridgeline on the minor roads north of Garswood*', located approximately 250m from the Site itself. This location was visited as part of the field survey although the Site was not visible in the view due to the presence of intervening vegetation parallel to Garswood Road.



View looking south from the junction of Garswood Road and Leyland Green Road (identified as a **Key Visual Gateway** within *St. Helens Landscape Character Assessment* (2006)<sup>7</sup>)

## Historic Landscape

- 2.26 Published in 2011, the *Merseyside Historic Characterisation Project: St. Helens Report*<sup>8</sup> divides the landscape of the locality into identifiable LCTs, derived from modern field patterns and land use.

<sup>8</sup> Merseyside Archaeological Advisory Service and Museum of Liverpool (2011) *Merseyside Historic Characterisation Project: St. Helens Report*

The assessment further refines Landscape Character Broad Types, providing a description and historical rationale as well as a list of key characteristics. The Site itself is contained within **Field System** Landscape Character Broad Type. Garswood is not included within the Historic Settlement Study encompassed within the document.

## Topography

- 2.27 Located to the north east of St. Helens District, the Site is underlain by a broad band of Carboniferous Silesian period geology, forming part of the wider Lancashire Coalfield. The Site and immediate area are formed by an elongated ridge running broadly south east to north west and forming a plateau of surrounding farmland. The Site itself exhibits localised undulations but generally slopes from 92m AOD at its northern extent to 84m AOD at its eastern limit.
- 2.28 Located approximately 2km north west of the Site, Billinge Hill forms the principal landform feature in the locality and reaches a height of 179m AOD at its summit. This pronounced feature of the ridgeline with an asymmetrical form is visible in views from the Site itself. **Tatlock's Hillock** also forms an important undeveloped visual horizon in immediate and wider views.
- 2.29 The Site does not contain or directly border any hydrological features. However, the incised channel of Down Brook denotes the administrative boundary with Wigan District and drains a dense network of drainage channels in the landscape to the north of the Site.

## Land Use

- 2.30 Located on the north western edge of Garswood, the Site is dominated by improved pastures. An intact hawthorn hedge characterises the western boundary of the Site, along Garswood Road, reducing visual permeability into the Site from this location. However, hedgerow boundaries along both Smock Lane and the B5207 Billinge Road are somewhat fragmented, allowing views in.



Scrub vegetation forming the boundary of the B5207 Billinge Road



Fragmented hedge with mature hedgerow trees in the immediate foreground of Smock Lane

- 2.31 The immediate landscape is dominated by the settlement pattern of Garswood, separated from Billinge in the west by undulating farmlands. The eastern boundary of the Site abuts existing housing on Smock Lane whereas the western extent of the Site lies adjacent to residential dwellings, forming the frontage to Garswood Road. A suburban context typifies Garswood itself, characterised by continuous urban development of predominantly semi-detached and terraced residential properties.
- 2.32 The wider agricultural landscape comprises both arable fields and grazed pastures. Medium to large scale field patterns predominate, subdivided by mainly post and wire fencing or hedgerows. Where woodland forms the horizon in views, such as at Weathercock Hill or the roundel at **Tatlock's Hillock**, they form prominent features in the landscape. A tract of ancient woodland at Barton Clough, associated with the incised channel of Down Brook, also contributes to landscape character in the area.

## Settlement

- 2.33 The settlement edge of Garswood typifies the immediate Site, where ribbon development and groups of residential dwellings form a partial frontage to Garswood Road. More recent residential development on Smock Lane has a suburban character and contrasts in character with the darker red brick of the vernacular buildings. The settlement extent of Garswood is constrained to the south by the route of the Liverpool to Wigan Rail Line, whereas the course of Down Brook envelops the town to the north and east. To the west the settlement boundary of Garswood is less defined, although retained on lower slopes.
- 2.34 Garswood is connected to Billinge in the west by the route of the B5207 Billinge Road. Scattered farmsteads such as Blackley Hurst Farm occupy the landscape dividing the settlements, forming prominent features set within a wooded backdrop.



Residential properties forming the frontage to Garswood Road



Residential dwellings located at Simm's Lane End, bordering the Site at its northern limit

## Communications

- 2.35 The corridor of the B5207 Billinge Road runs in a broadly east-west alignment, linking the settlements of Billinge and Garswood. Both Garswood Road and Smock Lane adjoin this route, forming the western and eastern limits of the Site. The carriageway of the M6 lies to the east of Garswood, accommodated largely in cutting as it divides Garswood from Aston-in-Makerfield in the east. Garswood is also bounded to the south east by the cutting landform of the Liverpool to Wigan Rail Line.
- 2.36 The Site itself is devoid of PRow. However, a network of PRow characterise the landscape to the north and west of the Site, predominantly following the line of existing field boundaries.

## Establishing the Value of the Landscape

- 2.37 The Site does not lie within any area designated in terms of specific national statutory landscape designation such as National Park or Area of Outstanding Natural Beauty (AONB).
- 2.38 Conservation Areas, whilst not specific landscape designations, reflect landscape and architectural quality and are relevant to development proposals which may impact upon them. The Site does not encompass any land defined as a Conservation Area.
- 2.39 Forming part of the Development Plan for the Borough, the *St. Helens Unitary Development Plan Saved Policies Addendum* (2013)<sup>9</sup> includes Policy **GB1 General Criteria for Development Control in the Green Belt** which encompasses large stretches of land dividing the settlement of Garswood and Billinge, including the Site itself. However, Green belt is a planning designation that seeks to maintain openness between settlements rather than act as an indication of landscape quality. Areas defined *as Policy ENV1 Public Open Space* within the *St. Helens Unitary Development Plan*

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<sup>9</sup> St. Helens Council (2013) *St. Helens Unitary Development Plan Saved Policies – 2013 Addendum*



*Saved Policies Addendum* (2013)<sup>9</sup> lie within 50m of the Site itself, on both Garswood Road and the B5207 Billinge Road.

- 2.40 A section of *Policy C1E Greenway Network* within the *Wigan Local Plan Core Strategy* (2013)<sup>6</sup> also lies approximately 2km north of the Site, within close proximity to the corridor of the M6. Located approximately 2.5km from the Site at its closest extent, the *Stanley Bank, Carr Mill Dam and Billinge Hill Corridor* is identified within *St. Helens Local Plan Core Strategy* (2012)<sup>2</sup> as a significant priority for action within *Policy CQL1 Green Infrastructure*. However, the relatively long distance dictates that development of the Site is not likely to directly affect these areas.



Public Open Space located on Garswood Road



View towards the Public Open Space from the B52017  
Billinge Road

## 3 Visual Baseline

### Key Visual Receptors

- 3.1 Following the preliminary assessment of the landscape context it was considered that there would be potential views from:
- users of the local PRow network, principally Public Footpath 929 (St. Helens) and Public Footpath 935 (St. Helens);
  - users of the Public Open Spaces on Garswood Road and the B5207 Billinge Road;
  - motorists on the local road network, including Garswood Road, the B52017 Billinge Road and Smock Lane, which form the perimeters of the Site.
  - local community within Garswood; and
  - local community at Billinge.

### Views to the Site

- 3.2 Six publically accessible viewpoints were selected and visited as part of the field study to demonstrate the range of potential views into the Site (see **Figure 02: Viewpoint Location Plan**). The selected viewpoints are listed below.
- Viewpoint 1: View looking north east from Public Footpath 929 (St. Helens);
  - Viewpoint 2: View looking south Public Footpath 07/10 (Billinge and Winstanley) (forming a section of *Policy C1E Greenway Network* within the *Wigan Local Plan Core Strategy* (2013)<sup>6</sup>);
  - Viewpoint 3: View looking south east from Public Footpath 868 (St. Helens), Billinge Hill;
  - Viewpoint 4: View looking south east from the B5207 Newton Road, Billinge;
  - Viewpoint 5: View looking south from Public Footpath 935 (St. Helens), Downall Green; and
  - Viewpoint 6: View looking north from the Public Open Space on Garswood Road.
- 3.3 Viewpoint photography is provided for illustrative purposes and has been annotated to indicate the visible extents of the Site. Photography was recorded in January 2019 and represents maximum visibility as the vegetation is devoid of leaf cover.

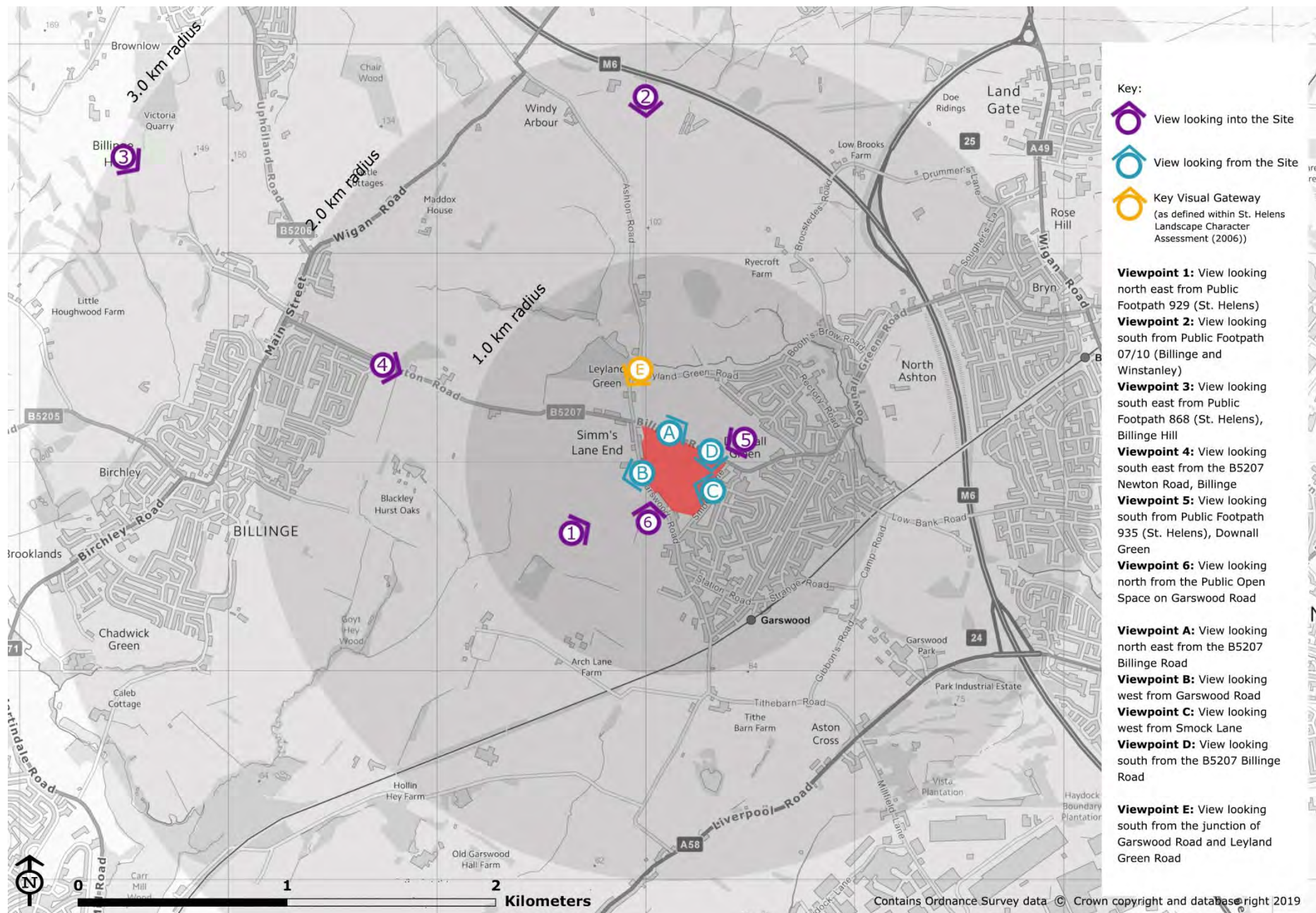


Figure 02: Viewpoint Location Plan (views in and out)





**Viewpoint 1: View looking north east from Public Footpath 929 (St. Helens)**

The panorama provides views towards the Site and western settlement edge of Garswood from a locally elevated position on the rising slopes of Weathercock Hill. The gap in the continuity of built form along Garswood Road is apparent in the central frame of the view.



**Viewpoint 2: View looking south from Public Footpath 07/10 (Billinge and Winstanley) (forming a section of Policy C1E Greenway Network within the Wigan Local Plan Core Strategy (2013))**

Representative of recreational users, views looking south towards the Site are foreshortened by undulating farmland to the north of Garswood. Direct views towards the Site are unavailable from this location.



### Viewpoint 3: View looking south east from Public Footpath 868 (St. Helens), Billinge Hill

The view looks south-east from Billinge Hill, the principal landform feature in the locality. Fiddlers Ferry Power Station is visible protruding against the skyline and the wooded corridor of the M6 is evident in the background view. The Site itself is barely perceptible in the view due to viewing distance.



### Viewpoint 4: View looking south east from the B5207 Newton Road, Billinge

The view affords a locally elevated vantage point at the residential edge of Billinge. However, views towards the Site itself are interrupted by a combination of intervening vegetation and distance of view. The location of Billinge on elevated landform enforces the sense of separation between the settlement and Garswood.





**Viewpoint 5: View looking south from Public Footpath 935 (St. Helens), Downall Green**

The Site is visible in the central frame, beyond the agricultural pastures bound by post and wire fencing in the immediate foreground. The existing settlement edge of Garswood is apparent in the left frame of the view with residential properties at the junction of the B5207 Billinge Road and Garswood Road occupying the middle distance of the view.



**Viewpoint 6: View looking north from the Public Open Space on Garswood Road**

Located at the Public Open Space on Garswood Road, this viewpoint offers views towards the Site in the central frame of the view, albeit partially interrupted by the existing residential properties on Garswood Road. The gap in the continuity of built form offers views towards the hedge and pastoral farmland beyond.



## Views from the Site



**Viewpoint A: View looking north east from the B5207 Billinge Road**

Views looking north east are afforded to the settlement edge of Downall Green, with the spire of the Church of the Holy Trinity perceptible above the residential land use. Agricultural land forms the immediate foreground of the view.



**Viewpoint B: View looking west from Garswood Road**

Weathercock Hill provides containment and a visual backdrop in views to the west. The woodland block at this location is prominent in the view and is visible against the skyline. Direct views towards the settlement edge of Billinge are precluded at this location due to the nature of the intervening topography.



**Viewpoint C: View looking west from Smock Lane**

Residential properties on Garswood Road are visible in the middle distance with long distance views foreshortened by intervening topography at Weathercock Hill. The woodland tract at Weathercock Hill forms a partially wooded horizon.



**Viewpoint D: View looking south from the B5207 Billinge Road**

Two storey residential development of suburban character forms the frontage to Smock Lane. The fragmented hedge bordering the Site offers a limited visual buffer with open views available to the western settlement edge of Garswood.

## 4 Analysis

### Landscape Opportunities

- 4.1 The study and review of the recommendations within the *St. Helens Landscape Character Assessment* (2006)<sup>7</sup> has led to the identification of the following key opportunities and recommendations (see **Figure 03: Landscape Opportunities and Constraints**):
- soften and strengthen the existing harsh settlement edge along Smock Lane;
  - ensure that development responds to the landform, taking advantage of the natural screening provided by topography at the north of the Site;
  - encourage future linkages between the recreational assets on the edge of Garswood, including the areas of Public Open Space on the B5207 Billinge Road and at Garswood Road;
  - maintain views across to wider landscape and townscape features such as Weathercock Hill and Tatlock's Hillock and the church spire at the Church of the Holy Trinity, Downall Green;
  - replicate the existing pattern of ribbon development along Garswood Road;
  - take the opportunity to improve the settlement gateway and sense of arrival into Garswood; and
  - supplement the strong framework of existing boundary vegetation parallel Garswood Road and restore / supplement the degraded hedge boundaries along the B5207 Billinge Road and Smock Lane. Vegetated boundaries will to assist in landscape and visual integration and avoid the introduction of abrupt urban fringe characteristics.

### Landscape Constraints

- 4.2 The following constraints are applicable to the Site:
- the location of the Site on an open ridgeline dictates that sympathetic design is required to ensure any proposed development does not protrude above the ridgeline within the wider landscape;
  - fragmented and gappy hedgerows along field boundaries along the B5207 Billinge Road and Smock Lane, afford views in from residential properties or users of local roads; and
  - the existing undulating landform may require minor contour remodelling to accommodate any proposed development.



Figure 03: Landscape Opportunities and Constraints



## Design Principles

4.3 The following design principles should be considered when developing options for proposed development of the Site:

- avoid locating development in the more elevated northern portion of the Site;
- secure a scale and form of residential development which reflects the adjoining urban areas of Garswood;
- consider an architectural response that integrates well and takes visual cues from the local vernacular (dark red brick) as well as the potential for attractive frontages visible on Garswood Road and Smock Lane;
- ensure an appropriate scale of development which retains existing views towards locally elevated landscape features such as Billinge Hill as well as local townscape features such as the spire of church;
- create a defined urban edge with appropriate mitigation treatments. The western edge of Garswood appears to have expanded sporadically with pockets of development lining roads; and
- enhance the sense of arrival on approach through the creation of a gateway entrance feature at the junction of Garswood Road and the B5207 Billinge Road.

## 5 Summary and Conclusions

- 5.1 It is not considered that development of the Site will alter any of the wider key landscape characteristics or introduce a discordant element in the existing setting when viewed from the wider landscape. Although the ridgeline accommodating the Site is visible in wider views, the Site itself offers an opportunity to improve the character and quality of the settlement edge of Garswood.
- 5.2 The *St. Helens Landscape Character Assessment* (2006)<sup>7</sup> considers that opportunities exist to accommodate small scale development to the west and north of Garswood, whilst retaining the wider separation from Billinge. The findings of the *St. Helens Council Green Belt Review* (2018)<sup>5</sup> also states that settlement coalescence of Billinge and Garswood would not occur, as a strategic gap between the settlements would be maintained if the Site was released from the Green Belt.
- 5.3 Subject to architectural proposals which are consistent in scale and composition with the setting of Garswood, the residential development would not appear incongruous with the established settlement pattern. The least sensitive parts of the Site are located in the south and where the Site abuts existing residential development along Smock Lane and also benefits from partial visual shelter provided by the rising landform to the north.
- 5.4 Following consideration of the identified opportunities and constraints, it is concluded that the Site should be able to accommodate sensitively designed residential development. However, it is recommended that a Landscape and Visual Appraisal is undertaken of the proposed development to thoroughly assess potential landscape and visual effects within the locality and inform the masterplanning process.

## **Appendix Five**

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Land at Weathercock Hill Farm, Garswood

Transport Technical Note





## POTENTIAL RESIDENTIAL DEVELOPMENT, BILLINGE ROAD, GARSWOOD – TRANSPORT ISSUES NOTE – JANUARY 2019

### Introduction

Croft have been instructed by Persimmon Homes to provide a Transport Issues Note for proposals for residential development on land off Billinge Road in the Garswood area of St Helens.

### Location and Accessibility

The site is located approximately 750 metres north-west of the centre of Garswood, whilst Ashton-in-Makerfield is located 2.7 kilometres east of the site, where primary shopping and local facilities can be found. In addition, there are a range of services and facilities in the vicinity of the site itself.

### Education

Garswood County Primary School is located to south east of the site on Hamilton Road, pedestrian access can be achieved via Billinge Road, Smock Lane, Thornhill Road, Falkland Drive, Langholm Road and Hamilton Road.

The Rectory Church of England Primary School is located north east of the site on Rectory Road and can be accessed via the footway provision provided on Billinge Road and Rectory Road.

The most accessible secondary school to the site is Cansfield High School. Although this is located just outside the 2 kilometre pedestrian catchment, it's accessible via an 11 minute bus journey (156 Bus Service) and a short walk.

### Healthcare

Garswood Surgery which is located on Billinge Road, approximately 600m from the centre of the site, can be accessed via the pedestrian footways located on Billinge Road. In addition, various healthcare facilities such as Boots Pharmacy and Rowlands Pharmacy can be found in Ashton-in-Makerfield, just a short bus journey from the site.





## Employment

Although major employment opportunities may be limited within the vicinity of the site, with the exception of some small businesses, there are a number of large employment opportunities close by such as Wigan, Ashton-in-Makerfield and Haydock.

## Retail

There are local retail facilities within the vicinity of the site; a Texaco Petrol Station/Londis convenience store, Bargain Booze and The Store are located within 2 kilometres of the site, all of which can be accessed via the extensive pedestrian infrastructure located in the vicinity of the site.

## Sports and Recreation

A local recreation park and a football pitch are located to the south of the site on Garswood Road, approximately 400 metres from the centre of the site. In addition, Ashton leisure centre is located in Ashton-in-Makerfield, just a short bus journey from the site.

## Day to Day Accessibility

Table 1 below, shows the walking distances from the centre of the site to the local facilities/amenities in the vicinity of the site:



Local Amenity	Distance from Sites (Metres)
Bus Stops	300 (Billinge Road) 300 (Garswood Road)
Post Box	410 (Garswood Road)
Garswood Surgery	630 (Billinge Road)
Garswood County Primary School	880 (Hamilton Road)
Convenience Store (Londis)	1,120 (Garswood Road)
Garswood Railway Station	1,300 (Station Road)

**Table 1 – Distance from Key Day to Day Amenities**

The table clearly shows that the development site is within a short walk of a range of day to day amenities.

There is the scope for pedestrian improvements along Billinge Way and Garswood Road, in the form of footway enhancements as well as improvements to the bus stop facilities within the vicinity of the site.

### Transportation

Bus stops are located on Billinge Road and Garswood Road, which consist of a bus stop pole with passing services shown and a bus service timetable. Table 2 below, summarises the bus services that operate within close proximity of the site.





Service No	Route	Monday – Friday Frequency per hour				Sat	Sun
		AM Peak	Midday	PM Peak	Eve		
156	St Helens – Ashton-in-Makerfield	1	1	1	1	1	1
157	Ashton-in-Makerfield – Rainford Junction	1	1	1	0	1	0

**Table 2 - Existing Bus Services Operating Along Billinge Road and Garswood Road.**

As can be seen in Table 2, the bus services that operate along Billinge Road provide 2 peak hour services to and from St Helens and Ashton-in-Makerfield. Journeys to Ashton-in-Makerfield take 15 minutes whilst journeys to St Helens take approximately 26 minutes, therefore, the bus services available from Billinge Road provide the opportunity for residents to travel to St Helens, Ashton-in-Makerfield and surrounding areas by public transport.

### Infrastructure

The site benefits from extensive frontage onto Billinge Road and Garswood Road, due to this there is scope to provide vehicular access from both roads. For the purpose of this note, it is proposed that primary access into the site will be provided from both Billinge Road and Garswood Road.

To cater for the volume of traffic movements turning into the site the proposed designs incorporates right turning lanes on Billinge Road and Garswood Road can be provided. This will require widening into the site frontage but does not require the acquisition of third-party land to implement, as all additional land is within the existing limits of adopted highway or within the site boundary. The running lanes on Billinge Road and Garswood Road will be 3.0 metres wide with a 3 metre wide right turning lane. It is unlikely that both access points will require ghost-island access arrangements and this will form part of any masterplanning of the site.



The vehicular access arrangements will need to be agreed with the highways officers at St Helens Metropolitan Borough Council (SHMBC) regarding the suitability of the Site Access options. However, in our view there are no constraints to accessing the site that can't be overcome whilst actually improving the environment in the vicinity of the site for all road users.

As part of the proposals to develop the site pedestrian connectivity through the site will need to be promoted, this can be achieved by creating new pedestrian links through the site and connecting to the nearby existing right of ways. The site will also link with the existing cycle routes and local amenities in the vicinity of the site.

In terms of off-site impact the proposals are likely to generate in the region of 300 plus vehicular trips in the two busiest hours of the day which are likely to be between 0800 and 0900 hours and 1700 to 1800 hours. The majority of the traffic will be travelling towards Wigan, St Helens, Manchester and the Strategic Highway Network.

As part of any subsequent planning application there is likely to be a requirement to provide off-site highway improvement to mitigate the impact of the residential development at Billinge Road. The necessary mitigation measures will need to be agreed with the local highway authority to demonstrate that the development of the Billinge Road site can be delivered.

## Summary

In summary, this note clearly demonstrates that the site in Garswood is very well located for new residential development. The site is in close proximity to a good range of shops, employment opportunities, education provisions and other facilities and services.

The site can be satisfactorily accessed and will generate a modest number of additional vehicular trips onto the local highway network which can potentially be mitigated by a range of improvements.

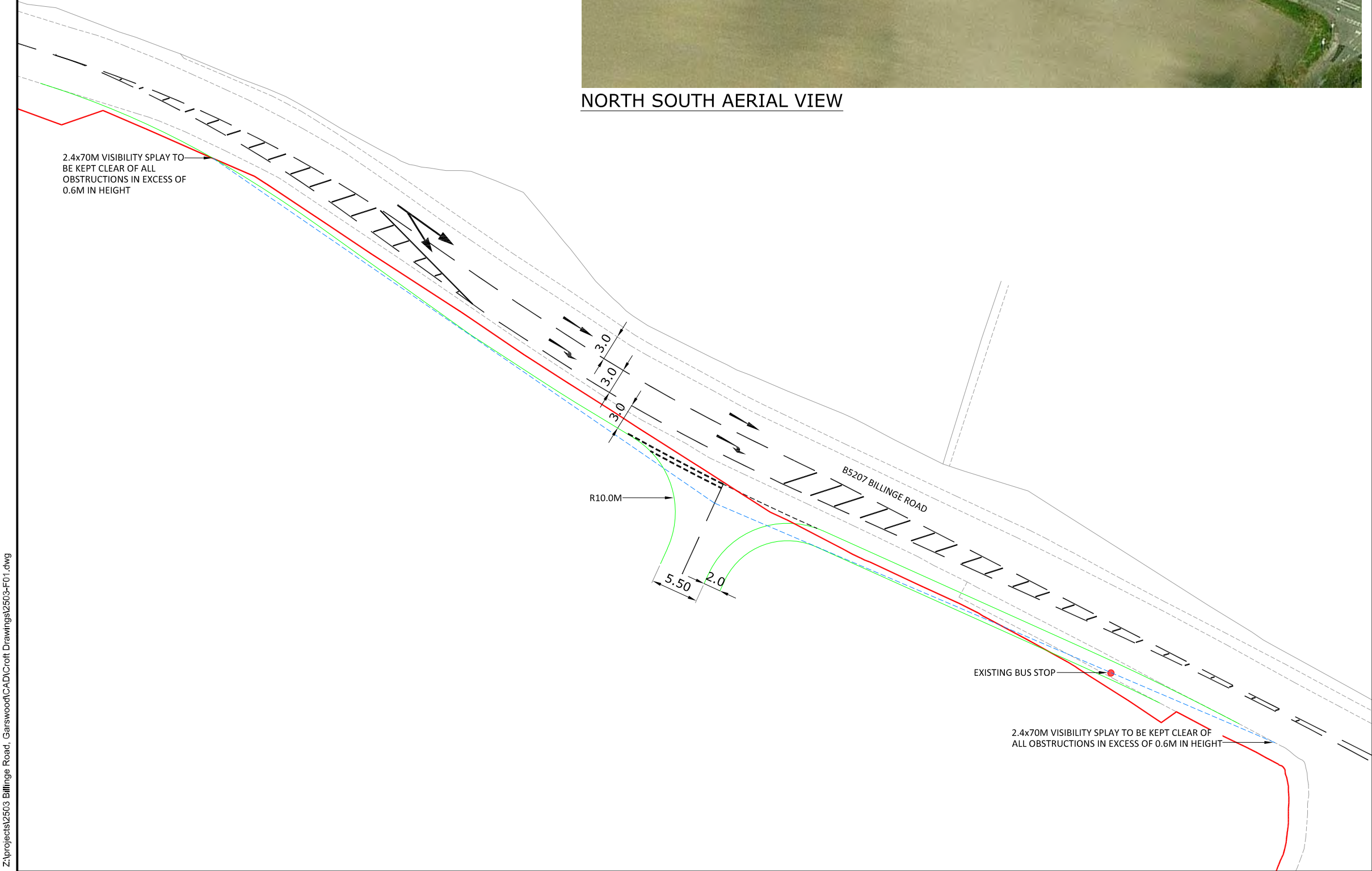
## DRAWINGS



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NORTH SOUTH AERIAL VIEW



NOTES

THIS LAYOUT IS FOR INDICATIVE PURPOSES ONLY AND IS SUBJECT TO FURTHER DESIGN ANALYSIS, TOPOGRAPHICAL MAPPING & HIGHWAY/THIRD PARTY LAND BOUNDARIES.

- SITE BOUNDARY
- ADOPTED HIGHWAY

REV	DETAILS	DRAWN	CHECKED	DATE

CLIENT:  
**PERSIMMON HOMES**

PROJECT:  
**BILLINGE ROAD, GARSWOOD**

DRAWING TITLE:  
**POTENTIAL SITE ACCESS  
ARRANGEMENT  
BILLINGE ROAD**

SCALES:  
**1:500 @ A3**

DRAWN: JC	CHECKED: TSB	DATE: JAN 19
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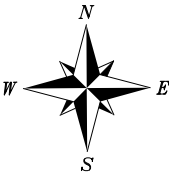
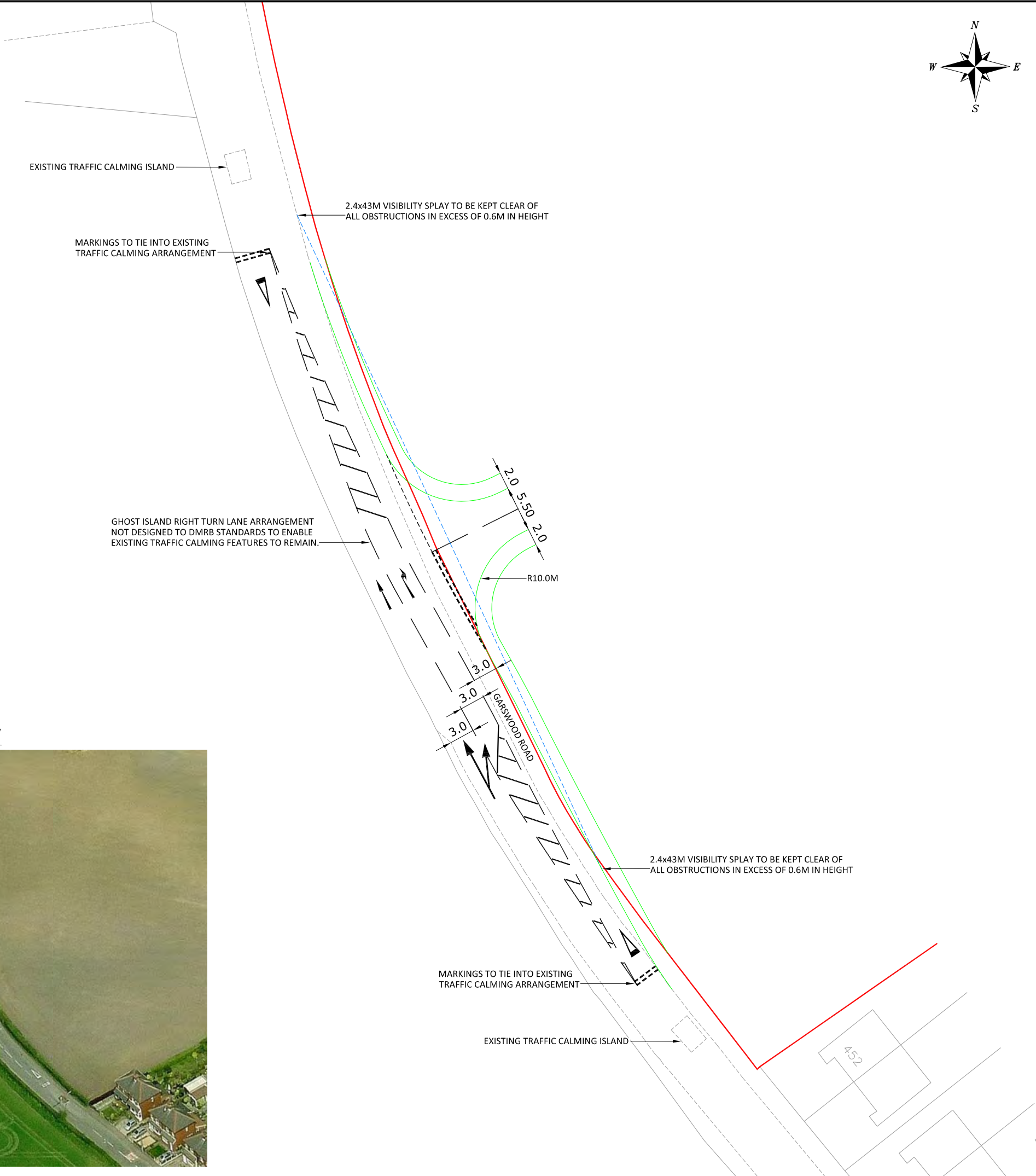
Croft Transport Planning & Design  
Hill Quays  
9 Jordan Street  
Manchester  
M15 4PY

**2503-F02**

**CROFT**

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NORTH SOUTH AERIAL VIEW



NOTES

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- SITE BOUNDARY
- ADOPTED HIGHWAY

-	-	-	-	-
REV	DETAILS	DRAWN	CHECKED	DATE

CLIENT:  
**PERSIMMON HOMES**


PROJECT:  
**BILLINGE ROAD, GARSWOOD**

DRAWING TITLE:  
**POTENTIAL SITE ACCESS  
ARRANGEMENT  
GARSWOOD ROAD**

SCALES:  
**1:500 @ A3**

DRAWN:	JC	CHECKED:	TSB	DATE:	JAN 19
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Croft Transport Planning & Design  
Hill Quays  
9 Jordan Street  
Manchester  
M15 4PY

  
**CROFT**

DRAWING NUMBER:  
**2503-F01**

REVISION:  
**-**

## PLANS

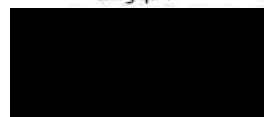




PERSIMMON HOMES

PROPOSED RESIDENTIAL DEVELOPMENT  
BILLINGE ROAD, GARSWOOD  
SITE LOCATION PLAN

Croft Transport Planning & Design  
Hill Quays  
9 Jordan Street  
Manchester  
M15 4PY



DRAWN:	DATE:	CHECKED:	DATE:	SCALE:	DRAWING NUMBER:	REVISION:
GM	07.01.19	SM	07.01.19	N.T.S	2503-01	.



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NOTES

Site Location

800m Pedestrian Catchment

2km Pedestrian Catchment

Train Station

Nearest Bus Stop

Cafe/Takeaway/Public House

Education

Healthcare/Medical

Leisure/Sport

Post Office

Retail

PLAN 2

REV

DETAILS

DRAWN

CHECKED

DATE

CLIENT:

PERSIMMON HOMES

PROJECT:

BILLINGE ROAD, GARSWOOD

DRAWING TITLE:

800M & 2KM PEDESTRIAN CATCHMENTS WITH AMENITIES

SCALES:

NTS @ A3

DRAWN:

GM

CHECKED:

SM

DATE:

JAN 19


Croft Transport Planning & Design  
Hill Quays  
9 Jordan Street  
Manchester  
M15 4PY

DRAWING NUMBER:

2503-G03

REVISION:

-

  
CROFT



RO1146





St. Helens  
Council

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

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

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

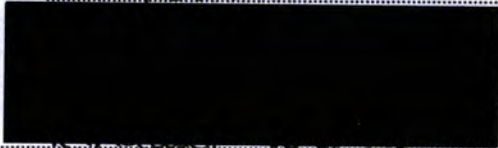

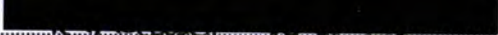
This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>KIERON</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: 	Tel No: _____
Mobile: 	Mobile No: _____
Email: 	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.



## RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

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

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## FURTHER INFORMATION

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Telephone: **01744 676190**

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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



## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy <b>LPA</b>	<b>04</b>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <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</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>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. 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

**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.**

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

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### 1. Your Details

(we will correspond via your agent)

Title: KIERON MR

First Name: KIERON

Last Name: MCCABE

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

Address: 35 HILLBECK CRESCENT

GARSWOOD ASHTON - IN-MAKERFIELD

Postcode: WN4 0RP

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

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

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

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

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

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

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

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

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

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

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

Date: 26/2/19

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3. To which part of the Local Plan does this representation relate?									
Policy <b>LPA06</b>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
	<b>SITE 1HS</b>								
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>
<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 all the extra people coming from?</p> <p>Housing in this area isn't 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> <p>The release of Greenbelt will cause significant harm to the purposes of the Green belt</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.**

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

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

# 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>MR</u>	Title: _____
First Name: <u>KIERON P</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: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	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)

☐ 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:

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## 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  
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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 LP05	2+1A	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"/>

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

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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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RO1147



St. Helens  
Council

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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: MISS

First Name: JODIE

Last Name: MCCARTHY

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

Address: 16 CRANOCK GR

WINDLE, ST. HELENS,

MERSEY SIDE,

Postcode: WA10 6ES

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: 8/3/19

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

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

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

Please continue on a separate sheet if necessary

Dear Sir,

I object to the safeguarding of Green Belt at 8HS formally HA16, I cannot believe they wish to develop this area as they could not have picked a worse piece of land in a more awkward place in the whole of the borough, with the amount of problems that will be caused by traffic, infrastructure and lack of amenities in the area.

In the borough, there is still adequate brown field sites, previously developed land and a massive amount of 3170 HA of contaminated land sites which are the lowest priority contaminated land that can be remediated. This massive amount dwarves the 148 HA needed, it equates to only 7% of the contaminated land. If the council had an adequate brownfield, previously developed and contaminated land register which was up to date it could identify favourable sites for development, instead of losing grade 1 and 2 farm land which has been in constant use since the 1850's.

The amount of houses required seems to be ever changing by what figures the council wish to use, but the latest estimate produced by the ONs in 2016 predicts that the 383 houses per year will be required, not the older forecast the council are using from ONs in 2014 of 486.

By the councils figures they will need 7290 new homes by 2035 but are only predicting POTENTIALLY 7000 new jobs over the next 15 years. Which then leads onto infrastructure and the obvious problems of transport if only half of these houses have two cars that could mean a potential 1500 extra cars on or around the A580, Bleak Hill Road and Rainford Bypass areas. The Junction is already heavily used with an average of 43,000 vehicles a day which equates to 1792 every hour or 30 a minute. With the borough always having a long term problem at the junction of Bleak Hill Road and Rainford Road the improvements they have put in place don't solve this with the junction looking basically the same.

Concerns have been raised with Arriva and MerseyTravel about the punctuality and reliability of the no.38 with the service being late or not even turning up on some days. The local schools of which St. Thomas of Canterbury is one that has been warned of budget pressures and face losing teaching staff.

The other local school Bleak Hill is expending just to keep pace with existing needs locally, bringing the school capacity from 435 to 630, an increase of another 195 pupils meaning more traffic around the surrounding area of Bleak Hill at school times.

The plans show that there will be a road leading of 8HS site onto Crantock Grove and as both ends of Crantock Grove lead onto Bleak Hill Road this is bound to add to the traffic problems one of these right onto the junction of Bleak Hill, Rainford Road and the A580, any other roads leading of 8HS onto neighbouring estates will only lead to rat runs onto Bleak Hill Road causing more traffic problems. There is hardly a mention of how provision for doctors, dentists or other NHS services are to be provided and how much it will cost. With local doctors and hospitals feeling budget pressures and waiting times getting longer, just how everything will go hand in hand are hardly cold hard facts or reassuring words.

Finally, the land has an abundance of wild life and is well used by dog walkers and ramblers with several rights of way on it. If this land is built on the nearest open countryside would then be on the otherside of the busy A580 which will only get busier.



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 INSTEAD OF  
BUILDING ON OUR GREEN BELT FOR THE  
BENEFIT OF HOUSE BUILDERS AND A QUICK  
PROFIT FOR THE COUNCIL.

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.**

RO1148



596

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

This form has two parts;

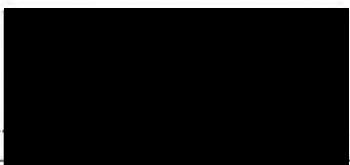
**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>JESSICA</u>	First name: _____
Last Name: <u>MCCARTHY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>16 CRANTOCK GR,</u> <u>WINDLE, ST. HELENS,</u> <u>MERSEYSIDE,</u>	Address: _____
Postcode: <u>WA10 6EJ</u>	Postcode: _____
	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: 	Date: <u>8/3/19</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)

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☒ No

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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 <del>1005</del> <b>LP</b> <b>AOS</b> <b>8HS</b>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input 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:	
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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 type="checkbox"/>

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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:

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

RO1149





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

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

This form has two parts;

## Part A - Personal Details

## Part B - Your Representation(s)

### PART A - YOUR DETAILS

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

#### 1. Your Details

(we will correspond via your agent)

Title: MR

First Name: LUKE

Last Name: MCCARTHY

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

Address: 16 CRANTOCK GR,

WINDLE, ST. HELENS,

MERSEYSIDE,

Postcode: WA10 6ET

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: 8/3/19

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

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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  
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## 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 <del>LP</del> LP AOS / SHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

<p><b>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></b></p> <p><b>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.</b></p>



Dear Sir,

I object to the safeguarding of Green Belt at 8HS formally HA16, I cannot believe they wish to develop this area as they could not have picked a worse piece of land in a more awkward place in the whole of the borough, with the amount of problems that will be caused by traffic, infrastructure and lack of amenities in the area.

In the borough, there is still adequate brown field sites, previously developed land and a massive amount of 3170 HA of contaminated land sites which are the lowest priority contaminated land that can be remediated. This massive amount dwarves the 148 HA needed, it equates to only 7% of the contaminated land. If the council had an adequate brownfield, previously developed and contaminated land register which was up to date it could identify favourable sites for development, instead of losing grade 1 and 2 farm land which has been in constant use since the 1850's.

The amount of houses required seems to be ever changing by what figures the council wish to use, but the latest estimate produced by the ONs in 2016 predicts that the 383 houses per year will be required, not the older forecast the council are using from ONs in 2014 of 486.

By the councils figures they will need 7290 new homes by 2035 but are only predicting POTENTIALLY 7000 new jobs over the next 15 years. Which then leads onto infrastructure and the obvious problems of transport if only half of these houses have two cars that could mean a potential 1500 extra cars on or around the A580, Bleak Hill Road and Rainford Bypass areas. The Junction is already heavily used with an average of 43,000 vehicles a day which equates to 1792 every hour or 30 a minute. With the borough always having a long term problem at the junction of Bleak Hill Road and Rainford Road the improvements they have put in place don't solve this with the junction looking basically the same.

Concerns have been raised with Arriva and MerseyTravel about the punctuality and reliability of the no.38 with the service being late or not even turning up on some days. The local schools of which St. Thomas of Canterbury is one that has been warned of budget pressures and face losing teaching staff.

The other local school Bleak Hill is expending just to keep pace with existing needs locally, bringing the school capacity from 435 to 630, an increase of another 195 pupils meaning more traffic around the surrounding area of Bleak Hill at school times.

The plans show that there will be a road leading of 8HS site onto Crantock Grove and as both ends of Crantock Grove lead onto Bleak Hill Road this is bound to add to the traffic problems one of these right onto the junction of Bleak Hill, Rainford Road and the A580, any other roads leading of 8HS onto neighbouring estates will only lead to rat runs onto Bleak Hill Road causing more traffic problems. There is hardly a mention of how provision for doctors, dentists or other NHS services are to be provided and how much it will cost. With local doctors and hospitals feeling budget pressures and waiting times getting longer, just how everything will go hand in hand are hardly cold hard facts or reassuring words.

Finally, the land has an abundance of wild life and is well used by dog walkers and ramblers with several rights of way on it. If this land is built on the nearest open countryside would then be on the otherside of the busy A580 which will only get busier.

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 INSTEAD OF  
BUILDING ON OUR GREEN BELT FOR THE  
BENEFIT OF HOUSE BUILDERS AND A QUICK  
PROFIT FOR THE COUNCIL.

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.**



RO1150

598

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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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>KAREN</u>	First name: _____
Last Name: <u>MCCARTHY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>16 CRANTOCK GR,</u> <u>WINDLE, ST. HELENS</u> <u>MERSEYSIDE</u>	Address: _____
Postcode: <u>WA10 6EJ</u>	Postcode: _____
Mobile No: _____	Tel No: _____
Email: _____	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>8/3/19</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)

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

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

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

Dear Sir,

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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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RO1151





St Helens  
Council

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(we will correspond via your agent)

Title: MR

First Name: DAVID

Last Name: MCCARTHY

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

Address: 16 CEANTOCK GR

WINDLE, ST. HELENS

MERSEYSIDE

Postcode: WA10 6ET

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

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

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

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

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

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

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

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Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Please tick as appropriate

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RO1153





St. Helens  
Council

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

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(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>Michael</i>	First name:
Last Name: <i>McCarthy</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>15 ORCHID WAY</i>	Address:
Postcode: <i>WA9 4ZN</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <i>13 / 04 / 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)

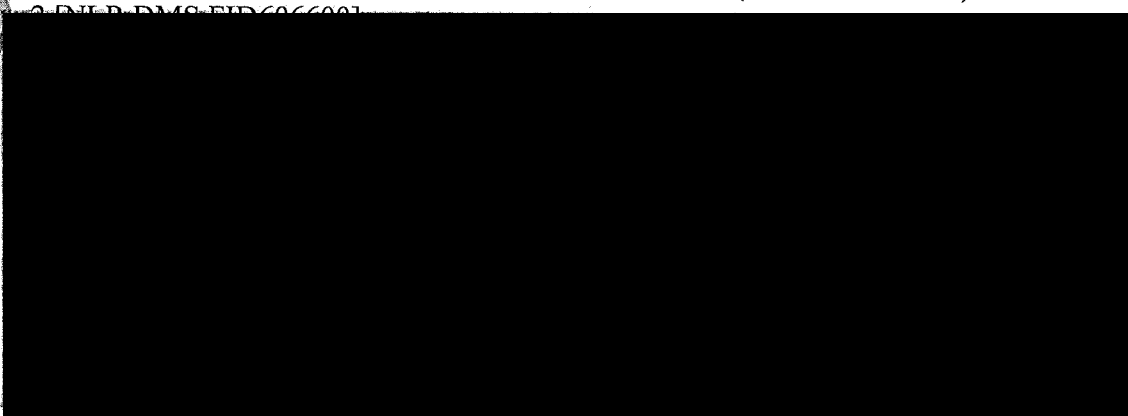
No ☐

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.

RO1154

ELO211


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


 1 Attachment


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

Sir/Madam,

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

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

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

(10) LPA07

(11) LPA08

(12) LPA09

(13) LPA11

(22) LPC17

(23) LPD01

(24) LPD01

(25) LPD01

(31) GBR

(32) EVA

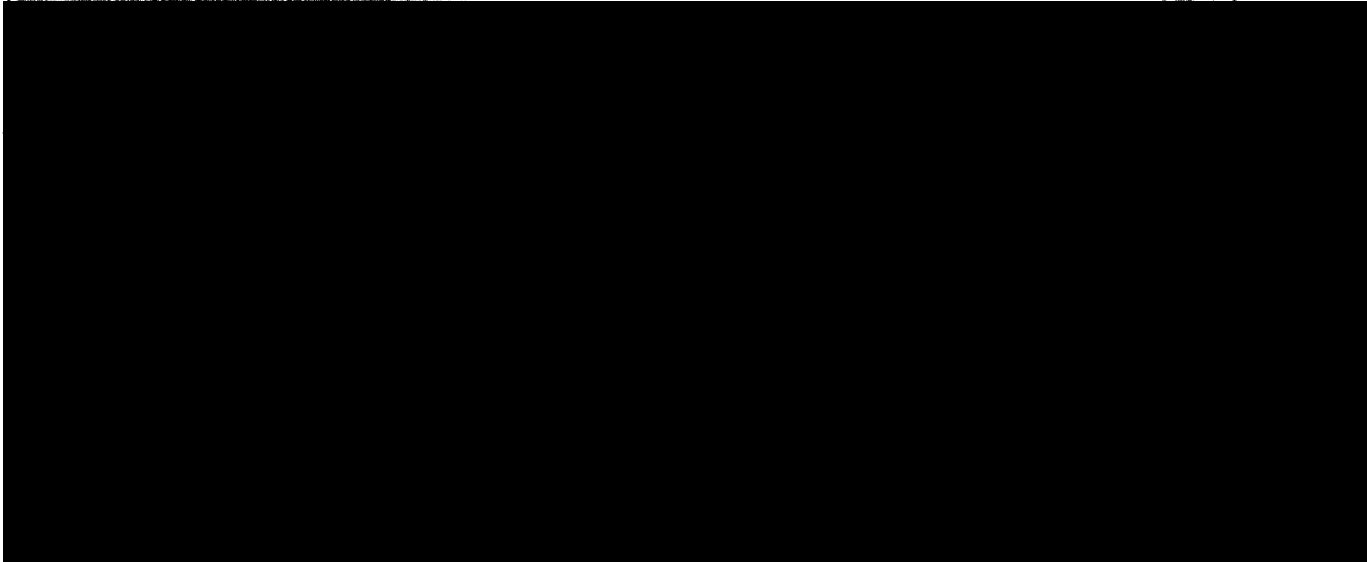
(26) LPD01

(27) LPD02

(28) LPD03

(29) LPD07

(30) SHMA


 Sir/Madam,

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

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

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



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

Kind regards  
Brian

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

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

**lichfields.uk**

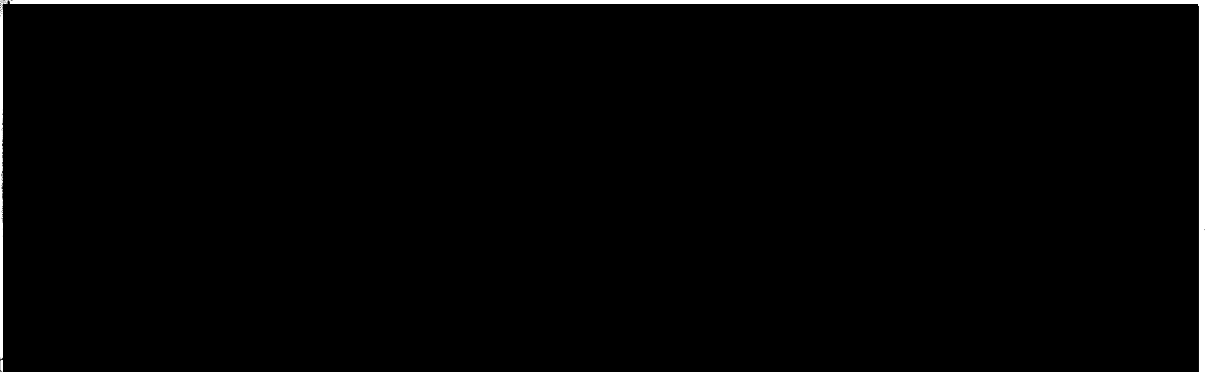
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Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2  
[NLP-DMS.FID606600]  
Brian O'Connor



1 Attachment



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

Sir / Madam

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

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

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

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

Kind regards  
Brian

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

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

**lichfields.uk**

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St. Helens  
Council

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

Ref: LPSD

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

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

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title: Mr
First Name: Kate	First name: Brian
Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood	Address: Ship Canal House 98 King Street Manchester
Postcode: WA3 6GR	Postcode: M2 4WU
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

<b>Signature:</b> [REDACTED]	<b>Date:</b> 13/03/2019
------------------------------	-------------------------

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



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

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

### **PART B – YOUR REPRESENTATION**

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

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

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

Please tick as appropriate

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

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

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

See supporting Representations and Appendices

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

**See supporting Representations and Appendices**

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

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

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

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

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

To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

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

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

EL0211

# **St Helens Local Plan Soundness Representations**

Taylor Wimpey UK Limited

13 March 2019

**LICHFIELDS**

41874/03/SPM/MWI  
17081285v8  
17081285v8



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1.0

## Introduction

### Purpose

1.1

Lichfields is instructed by Taylor Wimpey UK Limited [TW] to make representations to the St Helens Local Plan [Local Plan] published for consultation by St Helens Council in January 2019. ✓

1.2

These representations are made in the context of TW's development interests in St Helens at:

- 1 Gartons Lane, Clock Face; 5HA
- 2 Gorsey Lane, Clock Face; 4HA
- 3 Vista Road, Newton-le-Willows; and 2HS
- 4 Common Road, Newton-le-Willows. H506

1.3

TW fully supports the inclusion of the Gartons Lane and Gorsey Lane sites as Strategic Housing Sites under Policy LPA05. It is acknowledged that part of the Vista Road site is included as Safeguarded land under Policy LPA06. However, as these representations outline, we consider that there is also a need to allocate the wider Vista Road site for residential development. Furthermore, Taylor Wimpey considers that additional allocations are required in Newton-le-Willows and their Common Road site constitutes a deliverable site for residential development to meet St Helens housing need and growth aspirations. Taylor Wimpey's interests in St Helens only relate to residential developments and as such, the focus of these representations is primarily on residential related matters. ✓

1.4

It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to a number of matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the National Planning Policy Framework [the Framework]. ✓

1.5

There is no statutory definition of "soundness". However, the Framework<sup>1</sup> states that to be sound a Local Plan should be:

- 1 **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; ✓
- 2 **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 3 **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
- 4 **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.6

In addition, the Framework<sup>2</sup> states that:

*"Plans and decisions should apply a presumption in favour of sustainable development."*

<sup>1</sup> The Framework - §35

<sup>2</sup> The Framework - §11

*For plan-making this means that:*

- a *Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b *Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
  - i *The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

- 1.7 This report demonstrates that a number of policies within the Local Plan require amendments in the context of the tests of soundness established by the Framework.

## **Structure**

- 1.8 This report provides detailed representations in relation to the following Local Plan policies:

- 1 Policy LPA01: Presumption in Favour of Sustainable Development
- 2 Policy LPA02: Spatial Strategy
- 3 Policy LPA03: Development Principles
- 4 Policy LPA04: A Strong and Sustainable Economy
- 5 Policy LPA05: Meeting St. Helens Borough's Housing Needs
- 6 Policy LPA05.1: Strategic Housing Sites
- 7 Policy LPA06: Safeguarded Land
- 8 Policy LPA07: Transport and Travel
- 9 Policy LPA08: Infrastructure Delivery and Funding
- 10 Policy LPA09: Green Infrastructure
- 11 Policy LPA11: Health and Wellbeing
- 12 Policy LPC01: Housing Mix
- 13 Policy LPC02: Affordable Housing
- 14 Policy LPC05: Open Space
- 15 Policy LPC10: Trees and Woodland
- 16 Policy LPC12: Flood Risk and Water Management
- 17 Policy LPC13: Renewable and Low Carbon Energy Development
- 18 Policy LPD01: Ensuring Quality Development
- 19 Policy LPD02: Design and Layout of New Housing
- 20 Policy LPD03: Open Space and Residential Development
- 21 Policy LPD07: Digital Communications



### **Accompanying Documents**

- 1.9 Taylor Wimpey has prepared a detailed Technical Note on St Helens Housing need (Appendix 1) and a separate Technical Note on the St Helens Green Belt Review (Appendix 2). Both notes are appended to these representations and are relied upon to inform the representations. Taylor Wimpey also enclose four landscape led masterplans for their sites in St Helens for consideration by the Council (Appendix 3). ✓
- 1.10 Taylor Wimpey commissioned Grasscroft Development Solutions [Grasscroft] to prepare a detailed review of Keppie Massie's St Helens Local Plan Economic Viability Assessment. Grasscroft's Assessment accompanies these representation (Appendix 4) and its conclusions and recommendations inform the discussion and arguments set out in these representations. ✓

## 2.0 **Policy LPA01: Presumption in Favour of Sustainable Development**

①

### **Introduction**

- 2.1 Policy LPA01 sets out the Council's commitment to a presumption in favour of sustainable development that improves the economic, social and environmental conditions in the Borough as set out in the Framework.

### **Consideration of Policy**

- 2.2 TW supports the inclusion of this Policy and its accordance with the provisions set out in the Framework.

- 2.3 With reference to the need for planning applications to be in accordance with relevant Neighbourhood Plans, TW notes the Framework<sup>3</sup> which states that Neighbourhood Plans "*should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*" and that they "*must be in general conformity with the strategic policies in any development plan that covers their area.*"

- 2.4 In this context, the Council will need to be vigilant in ensuring that Neighbourhood Plans accord with the Local Plan, support strategic policies and are pro-growth development rather than used as a vehicle to restrict growth. Equally, it will be required to ensure that Neighbourhood Plans are not being used as a method to promote less development than set out in the Local Plan.

### **Tests of Soundness**

- 2.5 TW considered Policy LPA01 to be sound.

### **Recommended Change**

- 2.6 TW considers that no further change to the policy is required.

---

<sup>3</sup> NPPF 2019 §29 and Footnote 16

## 3.0 Policy LPA02: Spatial Strategy

✓ ②

### Introduction

- 3.1 Policy LPA02 sets out the spatial strategy for St Helens over the plan period and identifies locations for sustainable growth.

### Consideration of Policy

- 3.2 TW supports the strategy for sustainable growth as set out in Policy LPA02 and the Council's acknowledgement of the need for development to be delivered in sustainable locations (Part 1 and 2). TW broadly supports the spatial strategy identified by Policy LPA02 and the directing of development to Key Settlements including St Helens Core Area, Newton-le-Willows and Earlestown and Garswood.
- 3.3 TW supports the settlement hierarchy as set out in the explanatory text §4.6.3. TW agrees that the greatest focus for new development should be on St Helens Core Area and Newton-le-Willows and Earlestown which is the '*largest distinct Key Settlement after the Core Area*'. TW supports the provisions of the explanatory text [§4.6.7] which identifies that the "*Borough has a substantial need for new housing development that is linked to demographic needs and the need to provide sufficient housing to support employment growth*".
- 3.4 Ensuring a sufficient housing supply will help to deliver a wider housing mix that is suitable of meeting the market and affordable requirements of the local population. It will also help to support service provision and maintain the vitality of the borough. In this context, TW supports the allocation of the land at Gorsey Lane and Gartons Lane under Policy LPA05. However, TW are of the opinion that Newton-le-Willows, as largest Key Settlement, should be apportioned a higher quantum of development; and the allocation of the wider Vista Road and Common Road site would further contribute to overall housing requirement in this area whilst aligning with the spatial strategy overall. Lichfields, on behalf of TW has undertaken a technical review of the Strategic Housing Market Assessment (SHMA) Update 2019; which identified concerns over the proposed housing figures. The findings of this review inform TW's response to Policy LPA05. This Technical Note is at Appendix 1.
- 3.5 In relation to Part 3 of the policy, TW supports the delivery of development of previously developed land in Key Settlements. TW does note, however, that the supply of previously developed sites is finite and should not prejudice the delivery of sustainable residential development on other suitable sites. It is noted that the prioritisation for reusing brownfield land does not impact, or limit, the delivery of sustainable development on other suitable and available sites. It is also noted that these sites must also be considered 'developable' in accordance with Annex 2 of the Framework. TW supports the provisions of Point 3 in lowering developer contribution thresholds, but would require this to be appropriately evidenced through the Council's Economic Viability Assessment.
- 3.6 TW supports the release of Green Belt to meet employment and housing needs over the Plan Period (Point 4) in line with the Framework [§136] as it has been identified that surrounding authorities cannot accommodate housing needs arising from the Borough. TW would note that the Council must ensure that adequate, deliverable land is released from the Green Belt in order to meet the housing requirement and longer-term needs of the Borough. The Local Plan period being pursued by the Council runs to 2035 which is the minimum necessary to meet national policy<sup>4</sup>. However, planning to 2035 allows no margin for delays in the adoption process and

<sup>4</sup> The Framework 2019 - §22



②

Taylor Wimpey would advocate an elongated plan period to ensure the Plan can meet the requirements of national policy when it comes to being adopted.

3.7 Lichfields, on behalf of TW has undertaken a review of the Green Belt Review supporting the Local Plan and this appended to these representations (Appendix 2).

3.8 Furthermore, it is considered the Policy accords with the Framework [§139] in respect of identifying Safeguarded Land subject to our further comments. TW would note that, in line with the Preferred Options Document, it would be beneficial to set out the provision of Safeguarded Land available i.e. 15 years post plan period to align with the Plan Period. Furthermore, Taylor Wimpey would advocate the use of a Plan B approach to the safeguarded sites whereby they could come forward in the event of the authority not being able to demonstrate a 5-year supply of housing land. This approach has been successfully used in the neighbouring authority of West Lancashire.

3.9 In respect of Part 8, TW acknowledges the need for new development to support the natural environment. However, it has concerns over Part (c) that requires new development to “mitigate their contribution to climate change and to adapt to its impacts”. The Local Plan fails to provide a clear strategy or guidance as to how developments are expected to incorporate climate changes mitigation or adaption measures or, in what capacity. This part of the Policy therefore conflicts with the provisions of the Framework<sup>5</sup> and it is impossible to understand the viability implications of this vague policy requirement.

3.10 In respect of 8(d) Taylor Wimpey supports the delivery of improvement projects in locations such as the Bold Forest Park.

### Tests of Soundness

- 1 **It is not effective:** The Policy fails to provide a clear strategy for how developments mitigate for and adapt to the impacts of climate change. Furthermore, Taylor Wimpey consider that a Plan B approach to the safeguarded land would be appropriate.
- 2 **Consistent with national policy:** In the event of any delay in the plan preparation process through to adoption, the local plan timeframe is too short.

### Recommended Change

3.11 To address the conflict above and ensure the Policy is sound, it is requested that the Council:

- 1 Elongate the local plan timeframe and allocate sufficient land to meet the needs of the plan period. Include a Plan B approach to the safeguarded land to allow them to come forward in the event of the Council not being able to demonstrate a 5-year supply of housing land.
- 2 Provide a clearer strategy and guidance as to how developments are to include measures to mitigate for and adapt to climate change.

<sup>5</sup> The Framework 2019 - §149

## 4.0 **Policy LPA03: Development Principles**

### **Introduction**

- 4.1 Policy LPA03 seeks to ensure that all developments minimise their impact on the environment and provides a number of principles that all new development proposals within St Helens will be expected to comply with, to ensure that they contribute towards achieving the sustainable growth of strong, thriving and healthy communities.

### **Consideration of Policy**

- 4.2 TW broadly supports the principles of Policy LPA03 and the need for new developments to contribute towards the sustainable growth of the Borough. TW welcomes the requirement as Part 2a seeks to provide for a mix of types and tenures of quality homes. TW requests that the proposed mix and tenure is justified and based on sound evidence with appropriate viability testing. TW's comments on this further in response to Policy LPC01 Housing Mix.
- 4.3 Part 3 includes for improving the economic well-being of the Borough's residents; TW would stress that the provision of high quality housing and communities will support these aspirations. TW has concerns over the misalignment between St Helens economic growth aspirations and housing provisions which are further addressed as part of its response Policies LPA04 and LPA05.
- 4.4 As a responsible developer, TW is committed to provide housing for inclusive communities (Part 4) and well-design developments (Part 5) and supports these provisions as part of this policy.
- 4.5 TW acknowledges the importance of reducing its carbon footprint and adapting to the effects of climate change [Part 8], however, TW would note that parts (a) to (f) would need to be factored into any viability work; and appropriately evidenced as part of any further viability assessment. Taylor Wimpey has concerns that the Viability Assessment prepared by Keppie Massie is flawed and underestimates the actual viability of schemes in St Helens. Further detail on Taylor Wimpey's concerns is included at Appendix 4.

### **Tests of Soundness**

- 4.6 TW considers Policy LPA03 to be sound provided the requirements of Part 8 of the policy are fully considered and justified as part of the viability appraisal exercise.

### **Recommended Change**

- 4.7 TW considers that no further change to the policy wording is required but the accompanying evidence base needs to be updated to robustly demonstrate that the requirements of part 8 do not undermine the viability of development.



5.0

## Policy LPA04: A Strong and Sustainable Economy

✓ (4)

### Introduction

5.1

Policy LPA04 recognises the importance of achieving economic growth in the Borough to increase aspirations, skills and employment in St Helens.

### Consideration of Policy

5.2

TW is supportive of the Council's aspirations to maximise economic prosperity and promote employment development as identified in Policy LPA04. However, TW would note the important link between integrating economic growth and housing need and both must be viewed symbiotically. It is considered that if the objective of employment growth is to be realised, then it will need to be supported by an adequate supply of suitable housing (identified in LPA05). Failing to provide sufficient homes to align with economic growth will result in unsustainable levels of commuting into St Helens for employment purposes and undermine the Spatial Vision (achieving sustainable growth), the Strategic Objectives (Promoting Sustainable Transport) and Policy LPA01 (Presumption in Favour of Sustainable Development).

5.3

TW believe that efforts have been made to positively prepare a strategy which seeks to meet the areas objectively assessed needs in terms of employment development. The SHMA considers the housing needed to support the potential growth in the Borough's workforce at proposed major employment sites identified for release from the Green Belt, as set out in the St Helens Employment Land Needs Assessment [ELNA<sup>6</sup>] and this Policy. It also considered the growth in the non-employment land related workforce, as assessed in the Liverpool City Region Strategic Housing & Employment Land Market Assessment [SHELMA]<sup>7</sup>.

5.4

The ELNA takes a supply-led approach to considering jobs growth based on a range of data to estimate the jobs yield of the Borough's employment sites. The ELNA considers 3 scenarios that set out three 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 latter two scenarios were modelled as part of the ELNA. As noted in Appendix 1 and further explored in TW's representations to LPA05, TW do not consider that the aspirations set out within Policy LPA04 can be supported with the current housing target as informed by the SHMA.

5.5

The Framework states that planning policies should "seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or poor environment". TW considers that St Helens should ensure that barriers to investment in terms of housing provisions have been addressed. This is especially important if through further review it is considered that St Helens can provide additional employment allocations.

### Tests of Soundness

5.6

TW considers Policy LPA04 to be sound but a greater alignment of the economic and housing needs of St Helens is required.

### Recommended Change

5.7

TW considers that no further change to this policy is required.

<sup>6</sup> BE Group (January 2019): Employment Land Needs Study Addendum Report

<sup>7</sup> GL Hearn (January 2017): Liverpool City Region: Strategic Housing and Employment Land Market Assessment [SHELMA]



6.0

## Policy LPA05: Meeting St. Helens Borough's Housing Needs

4HA  
5HA

### Introduction

6.1

Policy LPA05 sets out the requirement for St Helens to deliver a wide choice of new housing in sufficient quantities to meet local needs; to align with the objectively assessed need [OAN] for the Borough.

### Consideration of Policy

6.2

TW acknowledges the Council's efforts to meet its identified housing requirement through the allocation of housing sites however, it has concerns relating to the justification of Policy LPA05 in ensuring that the employment and housing need targets in the Borough are aligned.

6.3

Subject to a minor amendment to the allocation boundary TW strongly supports the allocation of the following sites for new housing development and welcomes the Council's acknowledgement that they are suitable, achievable and deliverable:

- Land at Gorsey Lane (Site reference: 4HA-Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb); and,
- Land at Gartons Lane (Site reference: 5HA – Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold).

6.4

Taylor Wimpey requests that the proposed Gartons Lane allocation boundary is amended to include the land currently occupied by the farm buildings fronting Gartons Lane. This small parcel of land is also controlled by Taylor Wimpey and should be included in the overall allocation to ensure a comprehensive masterplan can be delivered for the entire site. Call for Sites forms have previously been submitted in relation to this parcel of land and there are no reasons why it cannot be delivered in conjunction with the wider allocation.

6.5

TW previously submitted call for Sites forms and representations on earlier iterations of the Local Plan, supported by Development Statements relating to the Gorsey Lane site, the Gartons Lane site and the Vista Road site. Updated masterplans for each of Taylor Wimpey's sites in St Helens were prepared following discussions with the LPA and are attached to these representations (Appendix 3). The information submitted in relation to each of the above sites demonstrates that they should be allocated as housing sites on the basis that they:

- 1 No longer fulfil their Green Belt purpose and should be removed and allocated for housing development for future development needs;
- 2 Residential development of the site would constitute sustainable development and perform a positive economic, social and environmental role aligning with the principle of the Framework; and,
- 3 There are no technical constraints preventing the future development of the sites and the sites are fully deliverable.

### Objectively Assessed Housing Need

6.6

The Framework is clear that local authorities must use their evidence base to ensure their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.

5

6.7

The Council has identified a housing requirement of 9,234 net additional dwellings, which equates to 486 dpa over the plan period. The figure is derived from the St Helens SHMA update 2019 [SHMA update], which updated the 2016 Mid Mersey SHMA. This is based on using the 2014-based SNHP as a demographic starting point; which TW agree is acceptable. Lichfields, on behalf of TW has reviewed the content of the SHMA (Appendix 1) and has concerns regarding the methodology and modelling as set out below; if the objective of employment growth is to be realised (based on scenarios identified in the ELNA) then it will generally need to be supported by an adequate supply of suitable housing:

- 1 Section 3.0 of the SHMA models a new scenario which takes account of the Mid-Year Estimates [MYE] and applies these to its 2016-based SNPP scenario modelling; however this was not done for the 2014-based SNPP and this would likely have increased the housing need under this scenario.
- 2 There are inconsistencies in the timeframes between the SHMA (up to 2033) and the Local Plan (up to 2035) and it is not clear how this has been addressed.
- 3 Job projections in the ELNA exclude B-Class job growth in 2016 and 2017 from the modelling. During this time there has been strong economic growth and the inclusion of these figures is likely to increase overall job growth; and housing need would need to respond accordingly.
- 4 Inconsistencies in the methodology set out in Section 4.0 of the SHMA which undermines the reliability of the modelling. There is a suggestion that only 40% of B-Class employment jobs will be taken up by local residents, with the remainder taken up by people commuting into St Helens. This relates directly to the 10 strategic employment sites and is considered a pessimistic stance, with job growth relating to these sites and associated housing more likely to increase above 40%.
- 5 It is unclear how the exclusion of the Omega South site has been modelling in the SHMA and the ELNA; it is therefore suggested that the modelling should recognise that local residents will still take up a significant proportion of the jobs on offer at this site which would increase housing need accordingly.
- 6 The PPG is clear that where previous housing delivery has exceeded the minimum need it should be considered whether the level of delivery is indicative of greater housing need. In the past 5 years; housing delivery has exceeded the OAN figure of 486dpa. As such it is clear that the borough can absorb these quantities of housing.

6.8

TW considers that there is a misalignment between the housing and employment land requirements. This positive and proactive approach to employment land is not consistent with the approach that has been taken towards calculating local housing need. Failure to align its housing requirement with its economic growth aspirations in Policy LPA04 will lead to barriers to achieving economic growth and unsustainable levels of inward commuting.

6.9

Furthermore, considering the errors in the demographic analysis and taking account of previous housing completions, TW consider there to be an argument to further review the OAN requirement. On this basis it is considered that the Council should opt for a higher housing figure, based on refined evidence in the SHMA to encourage a reasonable level of housing to support economic growth aspirations.

6.10

**Taylor Wimpey reserves the right to comment on any future changes to the OAN requirement and associated evidence base and, if necessary undertake demographic modelling to inform representations to later iterations of the Plan.**



## Density

- 6.11 TW broadly supports the principles set out in Part 3 of the Policy in relation to development density and acknowledges the Council's efforts to ensure the efficient use of land. With regards to strategic sites, consideration needs to be given to the provision of infrastructure and how this might impact on their development density. TW considers that flexibility to increase the density requirements for sites that are required to provide community facilities and social infrastructure, will ensure that land is being used efficiently and could in turn prevent viability issues arising associated with the cost of delivering infrastructure. When increased densities are required, it will generally result in smaller properties being required to meet the aspirations and this must be factored in when determining a housing mix policy. Conversely, flexibility to reduce the densities (across part 3a, b and c) would allow developers to take into account local and site characteristics, market aspirations, viability and landscaping requirements on sites on the urban edge.

5

## Housing Supply

- 6.12 TW supports Policy LPA05 Part 4 and the Council's acknowledgement of the importance of maintaining a 5-year supply of deliverable land across the borough in line with the Housing Delivery Test. To further support this, TW suggests that the Local Plan introduces a policy mechanism that allows for the release of 'Plan B' sites on Safeguarded Land to come forward (as has been done in other local authorities adjacent to St Helens, West Lancashire). This will ensure flexibility and accounts for the potential non-delivery of committed sites and any other short comings in its housing land supply.
- 6.13 TW agrees with a small sites windfall allowance but considers that a level of delivery of 93dpa is not fully justified based on previous delivery rates. Furthermore, once the emerging Local Plan is adopted and allocates sites for development, it is reasonable to assume that the delivery of units from windfall sites will reduce. TW therefore requests that the Council identifies sufficient housing land within the Local Plan, so that, once adopted it reduces/diminishes the level of windfall development as a source of supply. Taylor Wimpey agrees with the explanatory text that no windfall allowance should be made for sites above 0.25ha.
- 6.14 TW supports §4.18.11 of the explanatory text that references an allowance of 15% for reduced delivery of SHLAA sites.
- 6.15 Drawing all these points together, whilst it is important that the Council plans for its current plan period, it is inappropriate to assume that the development requirements for the borough will not change. The Council will be required to monitor their housing delivery against its projected housing requirements; this information combined with an updated evidence base will form the basis of calculating the borough's future OAN. The Council should not treat their identified OAN requirement as a ceiling and ensure that a flexible approach is adopted to ensure that it is able to achieve a rolling 5-year supply, as required by the Framework<sup>a</sup>.
- 6.16 TW considers that a plan period between 2020-2035 to cover 15 years as required by the Framework is the minimum that the Council should be pursuing. TW would suggest that the plan period is elongated to account for any delays in the plan making process and to ensure it aligns with the Framework<sup>a</sup>. Taylor Wimpey considers that additional housing and employment allocations will need to be identified to meet the extended plan period.

7

<sup>a</sup> The Framework 2019 - §73

<sup>a</sup> The Framework 2019 - §22



## Tests of Soundness

6.17 TW considers that Policy LPA05 fails to meet the following tests of soundness because:

- 1 **It is not positively prepared:** Taylor Wimpey considers that the housing requirement should be higher for the reasons set out above and as such the housing requirement has not been positively prepared. Taylor Wimpey also considers that the inclusion of a Plan B policy for the safeguarded land would assist in future proofing the plan and ensuring the Council can continue to demonstrate a 5-year supply of housing land throughout the plan period.
- 2 **It is not justified:** The development strategy fails to reflect the Council's evidence base and account for growth aspirations as set out in the ELNA. The future OAN should be based on an up-to-date evidence base and informed by monitoring of housing delivery against the Council's projected housing requirement. The evidence as set out in the SHMA is not robust and there are inaccuracies that need addressing.
- 3 **It is not consistent with national policy:** The policy fails to align with the Framework<sup>10</sup> to ensure that a sufficient amount of housing can come forward and the plan will have at least a 15-year period from adoption.

## Recommended Change

6.18 In order to address the conflict above and ensure that the policy criteria set out within Policy LPA05 are sound, TW requests that the Council:

- 1 Reconsiders its OAN for the area, in the context of economic growth aspirations of the borough and use this as a basis for calculating requirement.
- 2 Identifies additional housing land to accommodate the housing requirement of the economic growth scenario set out in the ELNA and the elongated plan period.
- 3 Considers whether it would be appropriate to allow for flexibility in densities figures.
- 4 Consider whether there is a requirement to review the Plan Period if it is not certain that adoption will be in 2020.
- 5 Revise the policy wording to include a Plan B requirement to allow safeguarded land to come forward in the event that the Council's cannot demonstrate a 5-year supply of housing land.

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<sup>10</sup> The Framework 2019 - §59

## 7.0 **Policy LPA5.1: Strategic Housing Sites**

⑧

### **Introduction**

- 7.1 Policy LPA05.1 sets out the strategic residential sites allocated to meet the borough's housing requirement.

### **Consideration of Policy**

- 7.2 As noted in TW's response to Policy LPA05; TW strongly supports the allocation of sites 4HA and 5HA in St Helens. Taylor Wimpey notes that neither the Vista Road (Allocation 2HS) or the Common Road, Newton-le-Willows sites are identified as part of Policy LPA5.1. However, Taylor Wimpey considers that these sites should be included as housing allocations within this Policy. The development of all four sites provide an opportunity to comprehensively boost housing and investment by a known housebuilder committed to early delivery.

- 7.3 With reference to the comments made in LPA05 TW has concerns over the alignment of economic and housing growth aspirations. In this regard, TW believes the Council has failed to identify sufficient land to meet the housing requirement and deliver economic growth aspirations promoted in LPA04.

- 7.4 TW welcomes the Council's acknowledgement that the Gorsey and Gartons Lane sites are suitable, achievable and deliverable sites in allocating them for residential development. As identified in the preceding paragraphs, the delivery of housing is important in order for the borough to meet its economic growth aspirations.

- 7.5 Site 4HA has the capacity to delivery 2,988 units, with the TW parcel delivering up to 290 dwellings. TW notes that the Plan allows for 480 dwellings to be brought forward up to 2035. TW in the attached masterplan (Appendix 3) highlight that the Gorsey Lane site can make a significant contribution to this requirement within the plan period and would welcome clarity over where it is intended that these units are delivered. Taylor Wimpey consider that their element of the overall allocation should be brought forward in the first instance as it is adjacent to the existing settlement boundary and will be deliverable immediately after the adoption of the plan.

⑧

- 7.6 Allocation 5HA has the capacity to deliver 569 dwellings. The appended masterplan (Appendix 3) and previously submitted Delivery Statement demonstrates that the Site is deliverable and available for development and Taylor Wimpey is committed to its early delivery upon adoption of the plan. As set out earlier, Taylor Wimpey requests a minor amendment to the allocation boundary is made to include the area of land containing the farm buildings fronting Gartons Lane.

- 7.7 It is therefore requested that the Council continues to support the sites and their allocation in the Local Plan on account of their suitability, deliverability and sustainability, and on the premise that it would make a significant contribution to meeting the OAN requirement. Indeed, the sites would assist the delivery of a sustainable form of development and would provide economic, social and environmental gains in accordance with the Framework.

- 7.8 Notwithstanding the above, TW has concerns over the comments made in Part 2 of the Policy. It is not clear, for those allocations which are made up of multiple site ownerships, where the infrastructure would be required to be delivered and timescales. TW considers that without this clarity, this could result in piecemeal development.

- 7.9 TW would comment that in respect of Part 3, it is important that where development proposals only cover part of a strategic housing site, any financial contributions are proportionate to the



scheme and fully evidenced. It is currently not clear how this would be split, or what would be required as part of each individual site. The wording of the policy should be amended to recognise that each site should 'contribute' to defined elements; and ensure that the Policy does not prevent large housing sites coming forward where a masterplan is not agreed for a wider strategic allocation.

- 7.10 Any funding requested, as detailed in Appendix 5 of the SDLP will need to comply with the tests set out in the CIL Regulations [§122&123] and the Framework [§34] and be justified as part of any viability work. The current Viability Assessment makes a very small allowance for S.106/S.278 contributions and it is considered on the larger strategic sites that the allowance is insufficient to account for public transport, highway improvements, education contributions, community facilities etc. It is imperative that all likely costs associated with the delivery of strategic sites are fully considered.

### Alternative Housing Sites

- 7.11 Taylor Wimpey is disappointed that their Vista Lane site was removed as a potential residential allocation and instead included as safeguarded land. Taylor Wimpey are of the opinion that given the sustainability credentials of Newton-le-Willows and given its high standing in the settlement hierarchy, a higher proportion of housing should be directed towards the area. Taylor Wimpey's Vista Lane site is deliverable immediately and there are no insurmountable constraints which would preclude its delivery. A detailed masterplanning exercise has already been undertaken and the Council have been party to this exercise. As such, Taylor Wimpey consider that the site should be included as an allocation rather than safeguarded land in the emerging Local Plan.
- 7.12 Similarly, Taylor Wimpey were disappointed that their Common Road site was removed as a safeguarded site and is proposed to be retained within the Green Belt. Taylor Wimpey consider that their Common Road site forms a logical Phase 2 extension to their 'Whittle Chase' development currently under construction.
- 7.13 The proposed Phase 2 extension has been specifically designed in a manner to deliver a high quality landscaped edge to the Green Belt which will minimise the impact on the openness of the Green Belt. The proposed development site is bounded to the west by a high-pressure pipeline and this acts as a very strong long term defensible boundary which cannot be built upon. Given Taylor Wimpey's knowledge of the Newton-le-Willows housing market, they consider that both sites are deliverable and request that the Council includes both sites as allocations to meet their housing need over the plan period.
- 7.14 Taylor Wimpey are a responsible housebuilder and offer apprenticeship opportunities for local youths when delivering developments and support other community organisations. Numerous examples of this have already been done in St Helens and Taylor are committed to this going forward.

### Tests of Soundness

- 7.15 TW strongly supports Allocation 4HA and 5HA for residential development on the basis that:
- 1 **It is justified:** There are exceptional circumstances to justify the removal of land from the Green Belt; both sites have the capacity to make a significant contribution towards meeting the housing OAN requirement for the borough. They are appropriate sites in the context of the alternatives.



### **Recommended Change**

- 7.16 To would comment that further clarity in respect of how strategic sites in multiple ownership address Part 2 of the Policy is provided in the explanatory text; as well as identify additional housing land to delivery economic growth aspirations. ✓
- 7.17 Taylor Wimpey requests that their site at Vista Road and Common Road, Newton-le-Willows are included in Policy LPA5.1 as allocations.

## 8.0 Policy LPA06: Safeguarded Land

⑨

### Introduction

- 8.1 Policy LPA06 sets out the sites identified as Safeguarded Land on the policies map that have been removed from the Green Belt in order to meet the long-term development needs of St Helens beyond the plan period.

### Consideration of Policy

- 8.2 TW supports the allocation of safeguarded land in principle as it will provide greater certainty over the Green Belt boundaries beyond the plan period. TW welcomes and fully supports the designation of the Vista Road site, however as detailed in the response to Policy LPA05 and LPA05.1, it is considered that this should be allocated, alongside the Common Road site, to increase the available housing supply to support the economic aspirations of St Helens and an elongated plan period.
- 8.3 As detailed in Policy LPA05, TW suggests that the Local Plan introduces a policy mechanism that allows for the release of 'Plan B' sites on Safeguarded Land to come forward (as has been done in other local authorities including West Lancashire) in the event that the Council cannot demonstrate a 5-year supply. This will ensure flexibility and accounts for the potential non-delivery of committed sites and any other short comings in its housing land supply.
- 8.4 The approach of allocating Plan B sites would build in more flexibility to the Local Plan, allowing the reserve sites to be taken out of the safeguarded land if certain triggers, such as the lack of a five-year supply or delivery below the housing trajectory. This would provide greater flexibility within the plan as it would remove the need for a formal plan review process to be undertaken if additional sites that aren't allocated for housing are needed to boost the Borough's supply of housing land.
- 8.5 If the Council does not allocate the Vista Road site as a housing allocation or 'Plan B' site, then its retention as safeguarded land is supported. Similarly, if the Common Road site is removed from the Green Belt but not allocated for housing, an allocation for Safeguarded land would be welcomed as a fall-back position.

⑨

### Tests of Soundness

- 8.6 TW does not consider that Policy LPA06 is sound.
- 1 **It is not positively prepared:** As set out in our response to LPA05, Taylor Wimpey considers that the housing requirement in the Local Plan is not robust and additional land is required to be allocation for it to be positively prepared.

### Recommended Change

- 8.7 TW considers that the addition of a Plan B option to release safeguarded sites is added into the policy. Appendix 5 contains Policy GN2 (Safeguarded Land) from the West Lancashire Local Plan and St Helens should adopted a similar approach.

9.0

## Policy LPA07: Transport and Travel

(10)

### Introduction

- 9.1 Policy LPA07 sets out the Council's strategic priorities for the transport network to facilitate economic growth, improve accessibility between homes, jobs and services and improve air quality and minimise carbon emissions.

### Consideration of Policy

- 9.2 TW broadly supports the provision of Policy LPA07 which seeks to ensure adequate transport provision to meet the Council's strategic objectives. However, TW has concerns of the effectiveness and justification of Part 3 of the policy.
- 9.3 Part 3c requires new development to "*provide appropriate provision for charging points for electric vehicles*", TW has no objection to a requirement for all new properties to have access to vehicle charging infrastructure provided the full cost of this infrastructure is factored in to the viability evidence.
- 9.4 There is a significant cost to installing electric vehicle infrastructure in new developments and TW considers the reference in the Economic Viability report to having a "limited impact on overall viability" is unsound. Furthermore, it is considered unreasonable to require residential developments to provide electric vehicle charging infrastructure as the take up of electric cars in the UK is still very uncertain due to the expense purchasing the cars in the first instance. It may also be the case that alternative forms of powering private transport become more prominent as research into relevant technology progresses. Additional commentary is provided within Grasscroft's Assessment on viability (Appendix 4) but it is considered that the assumed cost of installing charging points is flawed and unrealistic particularly when associated and consequential infrastructure such as additional primary sub-stations are required as a result of the additional EUV charging points.
- 9.5 TW requests that the full and realistic cost of installing vehicle charging infrastructure is considered in the Viability Assessment.

(10)

### Tests of Soundness

- 1 **It is not justified:** The evidence base does not factor in the true cost of providing this infrastructure on large scale strategic sites.
- 2 **It is not effective:** The policy as worded is vague and ineffective as it does not provide a clear justification as to the number of charging points required on developments to meet the policy requirement.

### Recommended Change

- 9.6 To address the conflict above and ensure the Policy is sound, it is requested that the Council:
- 1 Ensure the evidence base (Viability Assessment) takes account of the full cost of installing this infrastructure on large scale strategic sites.



10.0

## Policy LPA08: Infrastructure Delivery and Funding

### Introduction

10.1

Policy LPA08 seeks to establish a framework for the provision of necessary infrastructure and developer contributions through Section 106 obligations or CIL.

### Consideration of Policy

10.2

TW broadly supports Policy LPA08 and accepts that financial contributions may be required to mitigate the impact of development proposals on infrastructure and services. However, TW notes that the requirements for any financial obligations should still enable the development to be deliverable in accordance with the Framework.

10.3

With reference to Policy LPA08, TW considers that any requirement for financial contributions must be; fully justified and based on credible and robust evidence base which identifies an actual need for the facilities; reasonable in terms of the relationship to the development; and, not unduly restrictive so as to affect the viability and deliverability of development. Furthermore, TW notes that any financial contributions sought should meet the tests as set out in the CIL Regulations [§122] and the Framework<sup>11</sup>:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and,
- Fairly and reasonably related in scale and kind to the development.

10.4

TW requests that the Policy is updated to make reference to the aforementioned tests and that it is made clear that any financial contributions required by the Council will be considered in this context.

10.5

In relation to Part 2b and §4.30.6, TW notes that as the Council has no proposals to introduce CIL, accordingly it will be confined to pooled contributions from up to 5 separate planning obligations for any item of infrastructure that is not locally intended to be funded by the levy. Furthermore, should the Council be minded to adopt a CIL they should ensure this does not result in developments being subject to double charging.

10.6

TW has undertaken a detailed review of the Council's Viability Assessment (Appendix 4) and considers that there are a number of areas which require additional work and justification prior to the examination of the plan. Taylor Wimpey supports the Council's acknowledgement that developer contributions can impact on the viability of schemes (Part 5) and site-specific development appraisals can be submitted during the determination of planning applications. However, Taylor Wimpey consider that policy threshold should be set taking a conservative stance to viability and submitting site specific assessment should be the exception rather than the rule.

### Tests of Soundness

10.7

TW considered Policy LPA08 to be sound provided a more robust and fully justified Viability Assessment is prepared to justify the requirements set out in the Local Plan.

<sup>11</sup> The Framework - §56

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

### **Introduction**

- 11.1 Policy LPA09 seeks to ensure that new development makes adequate provisions for the protection and enhancement of Green Infrastructure.

### **Consideration of Policy**

- 11.2 TW acknowledges the importance of providing an appropriate amount of green infrastructure to support new development and broadly supports the provisions as set out in Policy LPA09.
- 11.3 TW supports the provision of Part 1 and 2 but would note that this cannot conflict with the Council's requirement to increase housing density (Policy LPA05) where Green infrastructure would result in a significant loss of developable areas of sites.
- 11.4 TW would note in respect of Part 4, any funding as required to provide compensation for the loss of green infrastructure assets will need to comply with CIL Regulations.

12

### **Tests of Soundness**

- 11.5 TW considered Policy LPA09 to be sound. ✓

### **Recommended Change**

- 11.6 TW considers that no further change to the policy is required. ✓

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

### **Introduction**

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

### **Consideration of Policy**

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

13

### **Tests of Soundness**

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

### **Recommended Change**

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










## 13.0 Policy LPCo1: Housing Mix

### Introduction

- 13.1 Policy LPCo1 seeks to ensure that new development delivers a wide choice of high quality homes that reflects St Helens Borough's housing needs.

### Consideration of Policy

- 13.2 Policy LPCo1 *Housing Mix* states that new market and affordable housing must be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by relevant evidence including the Borough's latest SHMA. TW is supportive of the need to provide a range of homes to meet the local needs of the area, but would note that other elements would feed into the provision of a suitable housing mix including viability, local aspirations and site characteristics.
- 13.3 It states that on greenfield sites capable of accommodating over 25 homes, at least 20% of the new dwellings across the whole site must be designed to the "accessible and adaptable" standard set out in Part M4(2); and at least 5% of the new dwellings across the whole site must be designed to the "wheelchair user" dwellings standard. It also requires that at least 5% of dwellings on these sites be bungalows.
- 13.4 TW  object to Part 2 of this Policy which states that where a development is for 25 or more new homes on a greenfield site the Council will apply optional standards for accessible and adaptable homes (M4(2) and M4(3)), with at least 20% required to be to M4(2) standard and 5% to be to M4(3) standards. TW would note that the SHMA provides limited evidence in relation to this; and it is contrary to national policy to enforce higher standards without appropriate evidence of local need. The viability implication of pursuing these optional building standards has not been properly assessed and this could undermine the deliverability of some sites.  (14)
- 13.5  Part 3 provides for at least 5% of new homes on greenfield sites of 25 dwellings or more should be bungalows. TW objects to this policy as it is currently unjustified and not based on national policy. The 2016 SHMA identified a demand for bungalows (but does not support this with evidence on the number requirement) and the 2019 SHMA states that it is difficult to quantify the need/demand for bungalows; therefore there is no sound evidence base to support this policy requirement. Furthermore, the provision of 5% of bungalows across all greenfield sites does not allow for flexibility to address site constraints and characteristics or the implication of applying the densities associated with Policy LPA05. Finally,, the provision of bungalows affects the achievable density on sites and as such, it will be difficult to achieve the Council's density standards with the requirement for bungalows. This point was acknowledged in the SHMA Update 2019 (§7.40) which stated that *'the downside of providing bungalows is that they are relatively land intensive for the amount of floorspace created'*.  (15)
- 13.6 TW welcomes the inclusion of Part 4 and the reference to viability implications on Part 1-3. However, TW would note that this should not be used to justify unsustainable and unjustified requirements. 
- 13.7 In respect of Part 5, the Policy states that the "Council will work with partners to facilitate the provision of specialist and supported housing for elderly and vulnerable people." However, there is no explicit target for special needs/elderly housing provided.  (16)
- 13.8 Part 6 of the Policy sets out that the Council will support the delivery of suitable designed and located self-build and custom-build schemes in the Borough. However, limited evidence has been presented by the Council to justify that there is a sufficient demand for such a requirement.  (17)

Taylor Wimpey do not consider that self-build and custom-build should not be required on large scale strategic sites which are generally brought forward in accordance with a comprehensive masterplan. ] (7)

### Tests of Soundness

13.9 TW considers that Policy LPC01 fails to meet the following tests of soundness because:

- 1 **It is not justified:** The provision of 5% bungalows and optional building regulations is not based on robust or clear evidence. Similarly, there is insufficient evidence to justify the necessity for a self-build/custom build requirement.
- 2 **It is not effective:** The policy does not make it clear how development would be expected to provide for special needs/elderly housing in terms of number of units.
- 3 **It is not consistent with national policy:** The requirement to deliver development higher at an optional higher standard is not reflective of national guidance, if not fully evidenced.

### Recommended Change

13.10 In order to address the concerns raised above, TW would suggest the following changes:

- 1 Amend Part 1 of the policy to extend the evidence informing housing mix or remove reference to SHMA. ✓
- 2 Delete Part 2 of the Policy unless evidence can be provided to support the requirements. ✓
- 3 Remove Part 3 of the Policy; or if a demand for bungalows can be robustly evidenced amend this to a supportive policy context that encourages the provision of bungalows without apply a fixed threshold. ✓
- 4 Provide explicit targets for special needs/elderly housing based on robust evidence base and ensuring viability is not impacted upon.



14.0

## Policy LPCo2: Affordable Housing

### Introduction

14.1

Policy LPCo2 sets out the affordable housing requirements for new developments. ✓

### Consideration of Policy

14.2

TW acknowledges the need to provide affordable housing and strives to provide the maximum amount of affordable housing on all sites. However, any such requirement should be based on robust and sound evidence which demonstrates that viability is not affected.

14.3

Policy LPCo2 requires all proposals for new open market housing developments of 11 units or more to provide at least 30% of new dwellings on greenfield sites in Affordable Housing Zones 2 and 3 to fall within the definition of 'affordable housing'; this falls to 10% on brownfield sites in Affordable Housing Zone 1.

14.4

The SHMA Update concludes that there is an overall need for affordable housing equal to 117 units per annum over the 17 years to 2033. It concludes that the typical cost of buying a house in St Helens is sufficiently affordable so there is no need for a discounted new-build product. TW has concerns over the assessment for calculating affordable housing that has been carried out as part of the SHMA update, this is detailed further in the SHMA Response in Appendix 1. In summary these main concerns relate to:

- 1 The increase in household income estimates – it is not clear where this increase has come from and it does not align with ONS' Annual Survey of Hours and Earning; and,
- 2 It is unclear whether the report is based on the 2016-SNHP or the 2014-SNHP to inform its estimate of gross household formation, which plays a key role in affordable housing need calculations.

14.5

As noted above, the SHMA suggests that St Helens has an affordable housing need of 117 dpa. In simple terms, this would equate to 24% of the overall housing target of 486 dpa, which sits below the 30% target in Part 2i; and does not provide clear evidence base for the Policy requirement.

14.6

Taylor Wimpey has a number of concerns in relation to the Viability Assessment including a number of concerns in relation to affordable housing which need to be addressed before the Local Plan will be deemed sound by an Inspector. Further detail on Taylor Wimpey's concerns are detailed in Appendix 4.

### Tests of Soundness

14.7

TW considers that Policy LPCo1 fails to meet the following tests of soundness because:

- 1 **It is not justified:** The evidence base in the SHMA is not robust.

### Recommended Change

14.8

In order to address the concerns raised above, TW would suggest the Council review the evidence base relating to affordable housing provision further.

18

18

18



## 15.0 **Policy LPCo5: Open Space**

### **Introduction**

- 15.1 Policy LPACo5 seeks to ensure that new development contributes to the protection and management of Open Space in St Helens.

### **Consideration of Policy**

- 15.2 TW acknowledges that need for new development to make a contribution towards the provision of open space.
- 15.3 Part 3 makes reference to the requirement for development to contribute towards open space needs in accordance with Policies LPAo8 and LPDo3. TW has made separate representations on the soundness of each of these policies.
- 15.4 Part 2 of the Policy (a) makes reference to Table 6.9; TW notes that this is a minor typo and should state 'Table 7.1'. TW broadly supports the provisions set out in the table identified in Policy LPCo5 which state the Open Space Standards as identified in the St Helens Open Space Sport and Recreation Assessment (2016). TW supports the Council's commitment to update the standards as part of a future Local Plan review or within a Supplementary Planning Document [SPD] but this must take full account of viability when being prepared.
- 15.5 TW suggest quality standards for open space are well placed within a SPD and reserve the right to comment on the SPD and its contents in the future.

### **Tests of Soundness**

- 15.6 TW considered Policy LPCo5 to be sound.

### **Recommended Change**

- 15.7 TW considers that no further change to the policy is required.

16.0

## Policy LPC10: Trees and Woodland

### Introduction

16.1

Policy LPAC05 seeks to ensure that new development contributes to the protection and management of Open Space in St Helens.

### Consideration of Policy

16.2

TW acknowledges that need for new development to make a contribution towards the provision and protection of trees and woodland.

16.3

Part 6 requires developments to replace any lost trees at a ratio of 2 to 1. TW objects to this requirement and have undertaken a review of the evidence base and cannot find evidence to support this policy objective.

20

### Tests of Soundness

16.4

TW considers the policy fails to meet the following tests of soundness because:

- 1 **It is not justified:** there is no evidence to identify the need for trees to be replaced at a ratio of 2 to 1.

### Recommended Change

16.5

TW considers that to ensure the policy is sound, the Council will be required to remove reference to the need for a 2 for 1 ratio replacement on trees lost. ✓

17.0

## Policy LPC12: Flood Risk and Water Management

### Introduction

17.1

Policy LPC12 requires all developments to manage flood risk and ensure identified risks have been appropriately mitigated.

### Consideration of Policy

17.2

TW is broadly supportive of Policy LPC12; however, TW would note that Part 3 does not align with national policy in respect of Sequential Tests. The Practice Guidance<sup>12</sup> states the developments which would not require a Sequential Text; for example, minor development, change of use and sites that have been allocated in development plans through the Sequential Test, also supported by §162 and §164 of the Framework. As a result, the wording of the Policy in its current form is not consistent with national policy.

21

### Tests of Soundness

17.3

TW considers that Policy LPC12 fails to meet the following tests of soundness because:

- 1 **It is not consistent with national policy:** As presently worded, the policy does not reflect national policy and guidance in respect of sites not required to undertake a Sequential Test.

### Recommended Change

17.4

In order to address the conflict above and ensure Policy LPC12 is sound, it is requested that the Council:

- 1 Amend the policy wording of Part 3 to align with national policy and guidance to make it clear which sites are not required to undertake a Sequential Text.

<sup>12</sup> Practice Guidance Reference ID: 7-033-20140306



18.0

## Policy LPC13: Renewable and Low Carbon Energy Development

### Introduction

- 18.1 Policy LPC13 outlines that development that would produce low carbon or renewable energy will be supported and new development should try to incorporate sustainable design and construction measures to minimise carbon emissions.

### Consideration of Policy

- 18.2 TW is committed to sustainable development and does not object to the need to minimise carbon emissions or include renewable or low carbon energy sources, where practical, however TW object to the wording of Part 4 of the Policy.

- 18.3 Part 4 states that large scale schemes that generate source or demand for heat should consider *"the feasibility of serving the development by means of a district heating scheme."* Part 4 also states that within strategic employment and housing sites, unless shown to be unpractical or unviable new development must *"ensure that at least 10% of their energy needs can be met from renewable and/or other low carbon energy sources"*. Whilst TW welcomes the reference to practicability and viability in the Policy, it is not considered that inclusion of these provisions is justified, or in accordance with national policy.

- 18.4 It is considered that there is no justification in the Policy or explanatory text to justify these requirements above those required by applicable nationally described standards; nor is it adequately addressed as part of the viability report.

### Tests of Soundness

- 18.5 TW considers that Policy LPC13 fails to meet the following tests of soundness because:
- 1 **It is not justified:** there is no evidence as part of the Local Plan to justify this requirement.
  - 2 **It is not consistent with national policy:** It is not consistent with the Housing Standards Review which specified energy requirements for new housing to be a matter for Building Regulations.

### Recommended Change

- 18.6 In order to address the conflicts above and ensure that Policy LPC13 is sound, it is requested that the Council:
- 1 Omit Part 4 reference to the requirement to consider 'district heat systems' and that "10% of their energy needs can be more from renewable and/or other low carbon energy source(s)".

## 19.0 Policy LPD01: Ensuring Quality Development

### Introduction

- 19.1 Policy LPD01 seeks to ensure that new development is of a high quality and provides buildings and places that will function well and be visually attractive and resource efficient.

### Consideration of Policy

- 19.2 TW acknowledges the importance of ensuring that new developments are of high quality and that they respect the local vernacular and character of the surrounding area. In this respect, TW supports the principle of the policy but has concerns over the effectiveness of the Part 1c, 1h and 1i. (23)

- 19.3 Part 1c requires development to ensure that "*occupiers enjoy an appropriate standard of amenity*" whilst TW agree this is important, it is not clear how developers are expected to demonstrate this.

- 19.4 Similarly, Part 1h requires development to "*include or contribute to the provision of public art in appropriate circumstances*" but there is no clear definition of "appropriate circumstances". Furthermore, having reviewed the evidence base, TW is unable to find any reference to the requirement for new developments to make provisions for Public Art; any policy included in the Local Plan must be justified and based on robust and sound evidence. Moreover, it does not appear that contributions to public art have been assessed as part of the viability report; therefore, the financial implications have not been tested. (24)

- 19.5 Part 1i) requires the provision for the needs of special groups in the community such as the elderly and those with disabilities. TW, as a responsible developer, fully support inclusive design but object to the effectiveness of the policy as it is not clear what the requirements are to meet this objective. (25)

- 19.6 TW would note in respect of Part 3c, it has made comments relating to the soundness of Policy LPC13, and would suggest that its reference to Policy LPC13 is removed. (26)

### Tests of Soundness

- 19.7 TW considers that Policy LPC13 fails to meet the following tests of soundness because:
- 1 **It is not justified:** A requirement to provide public art has not been considered as part of the viability report.
  - 2 **It is not effective:** The policy fails to provide clear guidance as to how to quantify an "appropriate standard of amenity". It fails to provide guidance as to what circumstances public art would be appropriate. The policy is not clear in respect of Part 1i as to how the provision of needs of special groups in the community will be provided for, who it will be delivered by and the quantum required.
  - 3 **It is not consistent with national policy:** The requirement would fail the tests set out in the Framework.

### Recommended Change

- 19.8 In order to address the conflicts above and ensure that Policy LPD01 is sound, it is requested that the Council:

- 1 Consider whether Part 1c, 1h and 1i are necessary and justified and provide a clear strategy for how developers contribute to these objectives.
- 2 Remove reference to Policy LPC13.



## 20.0 **Policy LPDo2: Design and Layout of New Housing**

### **Introduction**

- 20.1 Policy LPDo2 sets out the design and layout of new housing required to achieve high standards of design and environmental sustainability, and provide a good standard of amenity for all existing and future occupants and those of neighbouring land and buildings.

### **Consideration of Policy**

- 20.2 TW acknowledges the importance of ensuring that new developments are of high quality and that they respect the local vernacular and character of the surrounding area. TW supports the provision of LPDo2 but notes that it is important that any policy requirements relating to amenity, design and layout of new development is in accordance with national policy and building regulations.
- 20.3 TW note that supporting guidance will be set out in an update to the New Residential Development SPD and reserve the right to comment on this at the appropriate time.
- 20.4 TW would note that in respect of Part 10, it has made representations on the effectiveness of Policy LPCo1.

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### **Tests of Soundness**

- 20.5 TW considered Policy LPDo2 to be generally sound.

### **Recommended Change**

- 20.6 TW considers that no further change to the policy is required.

## 21.0 **Policy LPDo3: Open Space and Residential Development**

### **Introduction**

- 21.1 Policy LPDo3 sets out the open space requirements for new residential developments.

### **Consideration of Policy**

- 21.2 TW acknowledges the need for new residential developments to make a contribution towards the provision of open space. TW broadly supports the provisions set out in Figure 7.1 identified in Part 2 of Policy LPDo3 on account of its accordance with national guidance, namely the Outdoor Sport and Play – Fields in Trust standards; and, the identified typologies in accordance with the Green Infrastructure definition as set out in the Framework.
- 21.3 Furthermore, TW supports the inclusion of Part 3 of Policy LPDo3 and the degree of flexibility that the Council has adopted whereby it will allow for off-site provision or financial contributions to be made where it can be demonstrated that this would be more suitable.
- 21.4 Notwithstanding this, it is important that any financial contribution made meets the test set out in the Framework<sup>13</sup> and avoids causing undue impact on the cost of delivering units.

28

### **Tests of Soundness**

- 21.5 TW considered Policy LPDo3 to be sound.

### **Recommended Change**

- 21.6 TW considers that no further change to the policy is required.



<sup>13</sup> The Framework 2019 - §56

## 22.0 Policy LPDo7: Digital Communications

### Introduction

- 22.1 Policy LPDo7 sets out the requirement for housing and employment development to make provision for the latest generation of information and digital communication networks.

### Consideration of Policy

- 22.2 TW considers that digital infrastructure is an important part of the integrated development within an area. Whilst §112 of the Framework establishes that local authorities should seek to support the expansion of electronic communications network it does not seek to prevent development that does not have access to such networks.

- 22.3 Part R of the Building Regulations clearly sets the appropriate standards for high speed electronic networks. TW do not consider there to be justification for St Helens to seek additional local technical standards above this requirement.

- 22.4 Any developer contribution would need to be fully viability tested.

### Tests of Soundness

- 22.5 TW considers that Policy LPDo7 fails to meet the following tests of soundness because:
- 1 **It is not justified:** there is no evidence as part of the Local Plan to justify this requirement.
  - 2 **It is not consistent with national policy:** It is not consistent with the Framework or Building Regulations.

### Recommended Change

- 22.6 In order to address the conflicts above and ensure that Policy LPDo7 is sound it should omit reference to development making provision for digital communications as part of the policy requirement.



## **Appendix 1 Technical Note Housing Need – ST Helens SHMA**

# Technical Note

**Our ref** 41874/03/SPM/CRo  
**Date** 13<sup>th</sup> March 2019

**Subject** St Helens Housing Needs - Review

## 1.0 Introduction

1.1 This note has been prepared by Lichfields on behalf of Taylor Wimpey UK Ltd to inform its representations to the St Helens Borough Council [the Council] Local Plan 2020-35 Submission Draft consultation [the emerging Local Plan]. This note reviews the Council's housing need evidence published to date. It specifically considers the St Helens Strategic Housing Market Assessment [SHMA] Update, prepared by GL Hearn in January 2019. The Council are relying upon this SHMA for its housing requirement in the emerging Local Plan.

### The St Helens Borough Submission Draft Local Plan 2020-35

1.2 In January 2019 the Council published its emerging Local Plan for consultation with a housing target of 486 dwellings per annum [dpa] over the period 2016 to 2035 (Policy LPA05). This was underpinned by the aforementioned SHMA Update which concluded that housing needs in St Helens ranged from 479 dpa to 514 dpa between 2016 and 2033.

1.3 The Council's target of 486 dpa is derived from the 'economic scenario 2', Sensitivity Option 3, set out in the SHMA Update, albeit extended to cover the whole Plan period to 2035. This option excluded implications arising from site 2ES Land North East of Junction 23 M6 (55.9 ha) from the calculations (which is identified as safeguarded land in the emerging Local Plan, Policy LPA06), and Omega South (1EA, 31.22 ha), which is allocated to meet employment needs arising in Warrington.

1.4 The Reasoned Justification alongside the Council's Housing Needs Policy sets out why the Council has departed from the Local Housing Need generated by the Government's standard method, which would indicate a need for 482 dpa<sup>1</sup> (based on the 2014-based Sub-National Household Projections [SNHP]):

*"A key disadvantage of relying on the standard method to identify housing need is that it does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development in Policy LPA04. This employment growth is likely to lead to increased housing need. In addition, the long term trend of declining affordability is likely, if continued in the future, to present an upward pressure on the outputs of the standard method. To address these points the Council has considered a range of other evidence to identify the housing OAN..." [4.18.5]*

*"The St Helens SHMA update 2018 used more recently published household and population projections, together with updated data linked to the development of the employment site allocations in Policy LPA04 of this Plan, to assess the housing OAN figures. It did so by assessing a range of demographic and economic led scenarios, for example: using*

<sup>1</sup> Note: the 482 dpa is based on 2014-based household projections for St Helens Borough over the period 2018-2028. If the average is taken from 2019-2029, then the figure calculated by the standard methodology falls to 468 dpa.

*assumptions concerning the expected rate of jobs growth; the numbers of supporting jobs that would be generated; employment rates; and commuting patterns.” [4.18.8]*

*“Whilst the scenarios in the SHMA update 2018 indicate a range of annual housing needs figures, the scenario that is considered to be the most realistic gives rise to a figure of 486 net new dwelling completions per annum.” [Submission Draft Local Plan, 4.18.8]*

- 1.5 Regarding other relevant housing/economic policies in the Local Plan, Policy LPC01 *Housing Mix* states that new market and affordable housing must be designed to address local housing needs and include a range of types, tenures and sizes of homes as informed by relevant evidence including the Borough’s latest SHMA. It states that on greenfield sites capable of accommodating over 25 homes, at least 20% of the new dwellings across the whole site must be designed to the “accessible and adaptable” standard set out in Part M4(2); and at least 5% of the new dwellings across the whole site must be designed to the “wheelchair user” dwellings standard. It also requires that at least 5% of dwellings on these sites be bungalows which we object to in our representation and associated viability Assessment.
- 1.6 Policy LPC01 states that the Council will work with partners:  
*“to facilitate the provision of specialist and supported housing for elderly and vulnerable people. Provision of sheltered housing, extra care housing, retirement accommodation and residential care homes should be easily accessible by walking and public transport to a suitable range of services to meet the needs of future occupiers.”*
- 1.7 However, no explicit target for special needs/elderly housing is provided in the Policy.
- 1.8 The reasoned justification for this Policy sets out that the SHMA Update identifies that there is a need for 1,987 affordable housing units to be delivered in the Borough between 2016 and 2033 at an average of 117 units per year. The SHMA Update also identifies that between 1,215 and 1,241 specialist housing units for older people are needed between 2016 and 2033 and that there is a need for 6-7% of all dwellings to be for wheelchair users. It goes on to advise that:  
*“Having regard to these factors (including the findings of the St Helens Local Plan Economic Viability Assessment 2018), Policy LPC01 requires that in new developments of 25 or more dwellings, at least 20% of the new homes will be constructed to ‘accessible and adaptable’ standards, as contained in Part M4(2) of the Building Regulations, and that at least 5% of the new homes should be designed to the ‘wheelchair user dwellings’ standards set down in Part M4(3) of the Building Regulations. This will ensure that a proportion of all homes available in the Borough will be suitable and / or can be adapted, without undue difficulty, for occupation by residents who are wheelchair users and to ensure that these homes will also be accessible to visitors with limited mobility.” [paragraph 6.3.8]*  
*“The SHMA Update 2018 also identifies that bungalows are often the first choice for older people seeking suitable accommodation and there is generally high demand for such accommodation when it becomes available. As the population ages, many older residents wish to downsize locally but have a limited range of suitable housing stock to move into. Therefore, the Council will require that, as a general guideline, at least 5% of the market homes provided on developments of 25 or more dwellings on green-field sites should be bungalows.” [paragraph 6.3.9]*
- 1.9 Policy LPC02 Affordable Housing requires all proposals for new open market housing developments of 11 units or more to provide at least 30% of new dwellings on greenfield sites in



Affordable Housing Zones 2 and 3 to fall within the definition of 'affordable housing'; this falls to 10% on brownfield sites in Affordable Housing Zone 1.

## St Helens SHMA Update (January 2019) Overview

- 1.10 As identified above the GL Hearn SHMA Update supersedes the previous 2016 Mid Mersey SHMA. This was intended to provide an updated assessment of housing needs in accordance with the revised National Planning Policy Framework [the Framework] and Planning Practice Guidance [PPG]. It considers the Objectively Assessed Need [OAN] for housing using the standardised methodology (both current and proposed), as well as considering demographic-led housing need using the latest population projections.
- 1.11 The report also considers the housing needed to support the potential growth in the Borough's workforce at proposed major employment sites identified for release from the Green Belt, as set out in the St Helens Employment Land Needs Assessment [ELNA<sup>2</sup>]. It also considers the growth in the non-employment land related workforce, as assessed in the Liverpool City Region Strategic Housing & Employment Land Market Assessment [SHELMA]<sup>3</sup>. The SHMA Update also considers affordable housing need and provides an updated assessment of specialist housing needs, and for older persons and housing mix.

### *The Standard Methodology*

- 1.12 The SHMA Update reports that, based on the 2016-based SNHP, the average annual change in household growth in St Helens is 349 between 2018 and 2028. Applying an uplift in accordance with the standard methodology of 9.94% (reflecting a median house price affordability ratio of 5.59) equates to a demographic starting point figure of **383 dpa**. No cap is applied.
- 1.13 GL Hearn recognises that the Government's consultation document on the standard methodology proposes a shift back to the (higher) 2014-based SNHP, which would increase the starting point to **482 dpa** (uplifting household growth of 439 hpa by 9.94% again).
- 1.14 The SHMA Update proceeds to provide some sensitivity tests to take into account the Office for National Statistics [ONS] 2017 Mid-Year Population Estimates [MYE] and applies these to the 2016-based SNPP. This has the effect of increasing the dwellings per annum from 391 to 398. This exercise is not undertaken for the 2014-based SNPP despite this being the required approach set out in the revised NPPF (February 2019).

### *Economic-Led Housing Need*

- 1.15 The SHMA Update provides a number of projections based on economic data drawn from Oxford Economics and the St Helens ELNA. The ELNA takes a supply-led approach to considering jobs growth based on a range of data to estimate the jobs yield of the Borough's employment sites. The ELNA considers 3 scenarios that set out three 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. GL Hearn modelled the implications of the latter 2 scenarios. Scenario 2 identifies a jobs growth of 7,380 jobs by 2033. Scenario 3 identifies a jobs growth of 6,078 by 2033.
- 1.16 As these job growth figures only include B-Class employment, GL Hearn has added on jobs growth in non B-Class sectors using data from the OE forecasts used in the SHELMA, which

<sup>2</sup> BE Group (January 2019): Employment Land Needs Study Addendum Report

<sup>3</sup> GL Hearn (January 2017): Liverpool City Region: Strategic Housing and Employment Land Market Assessment [SHELMA]

equates to a baseline forecast growth of 3,018 non-B Class jobs over the period 2016-33. Applying a multiplier to these jobs to reflect the economic relationships resulting from the B-Class employment increases this figure by 1,569 for Scenario 2 and 1,293 for Scenario 3.

- 1.17 The SHMA Update concludes that the net increase in jobs 2016-33 for **Scenario 2 will be +11,967, falling to +10,389 for Scenario 3.**
- 1.18 GL Hearn adjusted these jobs figures to allow for commuting patterns, suggesting that 8,503/7,622 of these jobs will be filled by St Helens' residents (for Scenarios 2 and 3 respectively)> An adjustment is also made for double jobbing (resulting in a resident labour supply required of 8,272/7,415). The SHMA Update also assumes that the increase in the economically active population matches the increase in the resident workforce required. Importantly, paragraph 4.14 of the Update states that it has been assumed that the economic activity rate increases above the baseline position (as set out by OE) and rises to half the difference between the current rate and the national rate by 2037.
- 1.19 The projected housing need linked to the economic forecasts equates to 514 dpa for Scenario 2 and 479 dpa for Scenario 3. Four sensitivity tests are applied which assume that particular sites do not come forward. The emerging Local Plan's preferred housing target equates to that generated by Scenario 2 Option 3 of the SHMA Update, which involves the removal of EA1 (Omega South Extension, 31.2 ha and 1,240 jobs) and EA4 (Land North East of Junction 23 M6, Haydock – 42.34 ha, 2,666 jobs). This has the effect of reducing the number of jobs filled by residents of St Helens from 8,503 to 7,797 under Scenario 2 and a housing need reduction from 514 dpa to **486 dpa.**

## *Affordable Housing Need*

- 1.20 The SHMA Update analyses the following variables:
- Housing costs (private sector rent levels) – drawing on the VOA data covering a 12-month period to March 2018;
  - Income data – taking account of new data about local incomes (including information from the Annual Survey of Hours and Earnings (2017) and small area income estimates from ONS (published in December 2016);
  - Estimates of the number of newly forming households – a direct output of the demographic modelling; and,
  - Estimates of the supply of affordable housing from relets – taken from Continuous Recording of Lettings data [CoRe] up to 2017.
- 1.21 The SHMA Update concludes that there is an overall need for affordable housing equal to 117 units per annum over the 17 years to 2033. It concludes that the typical cost of buying a house in St Helens is sufficiently affordable so there is no need for a discounted new-build product.

## *Housing Technical Standards – Older Persons Needs*

- 1.22 The analysis undertaken by GL Hearn suggests that, based on the 2016-based SNPP, of the 12,036 net population growth 2016-33, 85% will comprise residents aged over 65 (+10,222 – see Table 22).
- 1.23 There are clearly significant needs for older residents in the Borough. GL Hearn concludes that this equates to 71 specialist housing for older people annually (2016/33), rising to 73 if it is linked to economic growth.

- 1.24      The SHMA Update also concludes that there is likely to be an increase of 470-480 older people living in institutions over the 2016-33 period (28 annually).



## 2.0 Analysis of the SHMA Update

- 2.1 The revised Framework (February 2019) states that to determine the minimum number of homes needed in an area, strategic policies should be informed by a Local Housing Need [LHN] assessment, conducted using the standard method as set out in the PPG, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

### Starting Point – Standard Methodology

- 1.8 At present, the standard methodology would result in a local housing need figure of **468 dpa** for St Helens Borough. This is based on the 2014-based household projections for 2019-2029, which equates to household growth of 425 per annum (4,254 over the 10-year period), plus a market signals uplift of 9.9%. This latter figure has been based on an affordability ratio data for St Helens Borough of 5.59<sup>4</sup>.
- 1.9 SHBC's adopted Local Plan figure is 570 dpa (Policy SP2). This dates from October 2012 and is therefore more than 5 years old. The PPG<sup>5</sup> states that where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:
- a the projected household growth for the area over the 10-year period identified in step 1; or,
  - b the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).
- 1.10 The cap would not apply as the 468 dpa figure is lower than the current Local Plan housing target. This is a lower figure than the 482 dpa currently in the SHMA, because the ten-year average is taken from 2018-28, not 2019-29.

### Deviation from the Standard Method

- 1.11 The revised Framework is clear that this standard methodology is the default approach for calculating local housing need unless there are exceptional circumstances which could justify an alternative approach which also reflects current and future demographic trends and market signals [paragraph 60].
- 1.12 The Government is also clear that the figure derived by the LHN target is intended to be a minimum figure, with justifications to go below this relating to environmental or policy constraints rather than issues over the reliability of the household projections:
- "Local housing need does not represent a mandatory target – it is simply a starting point for planning, and local authorities may either choose to plan in excess of this or to conclude that they are not able to meet all housing need within their boundaries, for example due to constraints such as protected designations and Green Belt, or whether that need is better met elsewhere. This means there is flexibility for local authorities to manage movements in local housing need locally."*<sup>6</sup>

<sup>4</sup> ONS (2018): Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2017

<sup>5</sup> 2a-004-20180913

<sup>6</sup> MHCLG (October 2018): *Technical consultation on updates to national planning policy and guidance*, page 13

1.13 The PPG states that once a strategic policy-making authority has established a housing need figure, it will need to consider the extent to which it can be met, which presumably factors in the aforementioned policy considerations. These are therefore outwith the scope of the SHMA Update and are for SBC to consider as part of its plan-making process.

1.14 However, the 2019 PPG also sets out that there will be circumstances when a higher figure than that generated by the standard method might be considered. This is because 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.

1.15 Circumstances which might justify an uplift include (but are not limited to) situations where increases in housing need are likely to exceed past trends because of<sup>7</sup>:

- *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.*

1.16 The PPG also provides guidance<sup>8</sup> on how the housing needs of particular groups relate to the overall housing need calculated using the standard method:

*“The need for housing for particular groups of people may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method.*

*When producing policies to address the needs of specific groups strategic policy-making authorities will need to consider how the needs of individual groups can be addressed within the overall need established.*

*The standard method for assessing housing need does not break down the overall figure into different types of housing. Therefore the need for particular sizes, types and tenures of homes as well as the housing needs of particular groups should be considered separately.*

*The household projections that form the baseline of the standard method are inclusive of all households including travellers as defined in Planning Policy for Traveller Sites.”*

<sup>7</sup> PPG Reference ID: 2a-010-20190220

<sup>8</sup> PPG Reference ID: 2a-017-20190220

- 1.17 Finally, the PPG also requires a calculation to be made of the total annual need for affordable housing, as follows:

*“The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.*

*The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. **An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.**”<sup>9</sup> [Lichfields’ emphasis]*

- 2.2 GL Hearn has attempted to grapple with some of these issues in Sections 2.0, 3.0 and 4.0 of the SHMA Update. The remainder of this chapter addresses each of the aforementioned elements to assess whether GL Hearn has appropriately adjusted the demographic starting point figure in the light of the Framework/PPG requirements.

## Demographic Analysis

- 2.3 Section 3.0 of the SHMA Update models a new scenario which takes account of the 2017 MYE and applies these into its 2016-based SNPP scenario modelling. As set out above, this has the effect of increasing the 2016-based SNPP housing need figure from 391 dpa to 398 dpa. Neither figure appears to have been uplifted to address affordability issues as required by the PPG.
- 2.4 However, setting this to one side, it is inconsistent to factor in the 2017 MYE population figures to the 2016-based SNPP, but not the 2014-based SNPP. This would clearly have an impact on GL Hearn’s modelling figures.

Table 1 Population Estimates for St Helens Borough

	2016	2017	Difference
2014-based SNPP	178,226	178,824	598
2016-based SNPP	178,480	178,960	480
Mid-Year Population Estimates		179,331	851

Source: ONS 2014-based SNPP / 2017 Mid-Year Estimates

- 2.5 As can be seen in Table 1 (and recognising that only so much can be inferred from one year’s worth of data), the MYE suggests that population growth between 2016 and 2017 has been 42% higher than was forecast in the 2014-based SNPP. It is our view that if GL Hearn considered it appropriate to model the 2016-based SNPP+MYE as one of its main scenarios, it ought to have done this for the 2014-based SNPP as well; this would almost certainly have increased the housing need under such a scenario above the 482 dpa proposed under their standard method scenario.

<sup>9</sup> PPG: ID: 2a-024-20190220



## Economic-Led Housing Need

- 2.6 Paragraphs 80-81 of the Framework deal with economic growth. It states at paragraph 81c that planning policies should “*seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*”. This retains the link between integrating economic growth and housing need. There is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment. This sub-section explores whether, in light of likely future job growth, there is likely to be a knock-on increase in the housing need for St Helens Borough (above that indicated by the demographic-led generated by the standard methodology).
- 2.7 Ensuring a sufficient supply of homes within easy access of employment opportunities represents a central facet of an efficiently functioning economy and can help to minimise housing market pressures and unsustainable levels of commuting (and therefore congestion and carbon emissions). If the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. The challenge of meeting employment needs is clearly given great importance, and the NPPF highlights this by stating that “*significant weight should be placed on the need to support economic growth and productivity*” [para 80].
- 2.8 In this regard, and as summarised above, GL Hearn has attempted to integrate job growth forecasts into its demographic modelling to align with the ELNA, and specifically with allocated employment sites. The Council has taken forward Scenario 2 Option 3 in its Local Plan. This is based on 7,380 net jobs growth 2018-33 relating to the employment land allocations in the ELNA, plus 4,587 non B-Class jobs estimated using the OE projections (including a multiplier effect enhancement), which totals 11,967 jobs.
- 2.9 GL Hearn has then assumed that 8,503 of these jobs will be filled by St Helens residents, and that by removing EA1 (Omega South Extension) and EA4 (Land North East of Junction 23), this figure will reduce still further, to 7,797 jobs under Scenario 2. GL Hearn’s modelling calculates that sustaining this level of workforce growth locally will require 486 dpa, a 4 dpa uplift on the standard methodology approach.
- 2.10 Whilst the approach by GL Hearn in linking economic growth with housing need is generally to be welcomed, Lichfields has serious concerns with how this has actually been done. These concerns are set out below.

## Inconsistent timeframes

- 2.11 Setting to one side the fact that the SHMA Update provides housing needs for a time period finishing in 2033 rather than the 2035 in the emerging Local Plan, its modelling has a base date of 2016. However, the job projections in the ELNA are at least partly based on translating B-Class Local Plan employment allocations into jobs. As can be seen in Tables 9, 10 and 11 of the ELNA, the start date for jobs coming forward on these sites is 2018. GL Hearn has made no adjustment for B-Class job growth in the years 2016 or 2017 in its modelling, and assumes that the only job growth in these years will be in non B-Class uses.
- 2.12 This is clearly unreliable. Indeed, there has actually been very strong economic growth since 2016 in the Borough. ONS provides Business Register and Employment Survey [BRES] data for 2016 and 2017 at district-level. This indicates that in just one year, 2016-2017, total employment increased in the Borough from 60,825 to 64,645 – **an increase of 3,820**.

- 2.13 This represents almost a third of the total job growth GL Hearn is allowing for the entire period to 2033 and it is erroneous to exclude it from the modelling. To include it would be likely to significantly increase the overall job growth, and the housing need would need to rise accordingly.

## Internal Inconsistencies

- 2.14 The methodology set out in Section 4.0 of the SHMA Update provides a number of peculiar figures that on the face of it, appear to undermine the modelling's reliability.
- 2.15 The first and most obvious of these is GL Hearn's approach to translate the jobs growth based in St Helens, into jobs growth filled by St Helens residents. This is set out in Tables 4 and 5 of the SHMA Update, and discussed in paragraphs 4.7-4.11.

Table 2 St Helens SHMA Update - Jobs Growth for Local Residents, Scenario 2

	Jobs Growth based in St Helens	Jobs filled by St Helens Residents	Difference
B-Class Jobs	+7,380	+2,959	-4,421
Non B-Class Jobs	+4,587	+5,544	+957
<b>Total Jobs</b>	<b>+11,967</b>	<b>+8,503</b>	<b>-3,464</b>

Source: GL Hearn (January 2019): St Helens SHMA Update

- 2.16 In the Table above, the first column represents the total amount of net jobs growth based in St Helens; the second shows the estimated number of additional resident workforce needed for these jobs in the first column to be filled, factoring in commuting patterns.
- 2.17 According to this data, GL Hearn is suggesting that only 40% of the B-Class employment jobs are actually going to be taken up by local residents, with the remaining 60% (4,421 jobs) taken up by people commuting into the Borough from elsewhere in the North West. Bearing in mind that this relates directly to the 10 strategic employment sites covering 234 hectares of greenfield land across St Helens (Policy LPA04 in the emerging Local Plan excluding Omega South), it would seem pessimistic in the extreme, and presumably not what residents/elected members would envisage in sanctioning such large Green Belt land releases. This equates to less than 13 local jobs for every hectare of land released for B-Class employment use.
- 2.18 Conversely, GL Hearn's modelling indicates that whilst there will be a net increase of 4,587 non B Class jobs based in the Borough, this will somehow be filled by 5,544 local St Helens residents, a difference of +957. Further explanation is necessary to explain the discrepancy.

## Exclusion of the Omega South site

- 2.19 Scenario 2, Option 3 of the GL Hearn SHMA removes EA1 (Omega South) and land north east of junction 23 M6 (EA4). This has the effect of reducing the number of jobs filled by St Helens residents from 8,503 to 7,797, a reduction of 706. This reduces the housing need figure from 514 dpa to 486 dpa (a reduction of 28 dpa).
- 2.20 Omega South has been removed as this is a Local Plan allocation that is intended to meet employment land needs arising in Warrington. However, the Council is still assuming that the 31.2 B2/B8 development would get built; just that it meets Warrington's employment needs and not St Helens'. It is unclear from both the SHMA Update and the ELNA exactly how this has been modelled, but it appears that BE Group has assumed that none of these jobs based on the Omega South site would be occupied by St Helens residents, even though employment

opportunities will of course be available to local residents just as they will be to people commuting from Warrington. This is even acknowledged in the ELNA:

*“Omega South Extension could form part of Warrington’s employment land supply in the forthcoming revised Warrington Local Plan. St. Helens and Warrington Council officers both agree that the site would form an expansion to the existing Omega South strategic employment location and therefore would have a direct relationship with Warrington, although it would continue to provide employment opportunities to the residents of St Helens and other areas in the same manner that Omega already does. If Omega South Extension forms part of Warrington’s employment land supply then the full time equivalent positions to be provided on the remaining St Helens sites would be approximately 13,430”. [ELNA, paragraph 3.4]*

- 2.21 Lichfields’ view is that recognition should be made in the modelling that local residents will take up a significant proportion of the jobs on offer at Omega South, which would increase the housing need accordingly. This is particularly relevant given that the Council has chosen this scenario as its housing target of 486 dpa.

## Translating Job Growth to Housing Need

- 2.22 GL Hearn’s modelling assumes a comparatively high level of job growth, 11,967 (accepting the subsequent adjustment for EA1 and EA4) to 2033, which is presumably significantly higher than the baseline and represents a ‘policy on’ position (given that it uplifts the OE baseline to address multiplier effects and factors in a vast quantity of B-Class employment land). However, this apparently would only equate to 511 dpa – an increase of just 29 dpa from the 482 dpa generated by GL Hearn’s 2014-based SNPP standard method.
- 2.23 Unhelpfully, GL Hearn does not provide the level of job growth that might be associated with 482 dpa, although Scenario 3’s housing need of 476 dpa is associated with net job growth of 10,389 between 2016 and 2033 (385 annually). By way of context, comparing the 2017 LCR SHELMA - which was also undertaken by GL Hearn - suggested that the baseline of 4,630 jobs 2014-37 (201 annually) could equate to a housing need of 397 dpa – hence a 92% increase in annual net jobs growth (compared to Scenario 3) on the face of it equates to a 20% increase in annual housing need.
- 2.24 Of course, we accept that modelling is significantly more complex than this would suggest, but it appears that there have been significant changes made to the methodology by GL Hearn since they produced their SHELMA, given that both documents rely on the 2014-based SNHP. We have noted the apparent discrepancies concerning the translation of jobs to labour supply (above), but we have further concerns regarding how GL Hearn has accelerated economic activity rates in its model. Their approach is set out below in extracts from the SHMA Update:
- “To convert the above labour-supply changes into a population projection, migration assumptions within the modelling have been changed so that across the local authority the increase in the economically active population matches the increase in the resident workforce required.” [paragraph 4.13]*
- “One key part of this analysis is around how **economic activity** might change in the future, the assumptions used in this report are the same as in the SHELMA – essentially this assumes that the economic activity rate increases above the baseline position (as set out by OE) and rises to half of the difference between the current rate and the national average rate by 2037.” [paragraph 4.14]*



- 2.25 So we can take from this explanation that GL Hearn has artificially accelerated economic activity rates that exceed even the OE internal forecasts. This essentially means that fewer people are needed to take up the employment opportunities as more people already living in the area will re-enter the labour market.
- 2.26 GL Hearn does not provide the precise figures so it is difficult to analyse the economic activity rate assumptions in detail, but it appears that choosing to increase the rates at levels above OE is a 'policy on' decision that risks suppressing housing need and will ultimately mean that either job vacancies go unfulfilled, or higher levels of net in-commuting are experienced.
- 2.27 A final cautionary point about the reliability of this modelling relates to the nature of the population growth in GL Hearn's model. Table 22 of the SHMA Update indicates that of the 12,036 net population growth under the economic based projections scenario, a massive 10,222 of those residents will be over 65. This means that **85% of the population growth will either comprise local residents who are retired, or winding down towards retirement.**
- 2.28 **GL Hearn's modelling is essentially assuming that the 1,814 net growth in residents under 65 (which includes children under 16) will be able to support an economy targeting 11,967 net jobs over the same time period.** This sheds light on the extent to which GL Hearn's model is highly reliant on either existing residents re-entering the job market, or people commuting in from outside the Borough to take up the job opportunities.
- 2.29 Given that as of September 2018, St Helens Borough actually had a very low level of unemployment, at 3.7% (3,100 individuals) compared to 4.1% across the wider region and 4.2% nationally<sup>10</sup>, the idea that there is going to be over 10,000 local residents ready and waiting to take up these opportunities is over-optimistic.

## Previous Delivery

- 1.18 As set out above, the PPG is clear that where previous housing delivery has exceeded the minimum need (i.e. 486 dpa, according to the Council/GL Hearn) it should be considered whether the level of delivery is indicative of greater housing need. What is clear is that on an annual basis, there have been years, notably four of the last five, when the Council has exceeded this figure (see Table 3). In particular, over the past 15 years, 632 dwellings were delivered in 2014/15, whilst going back further delivery peaked at 728 dwellings in 2003/04. Even allowing for the worst recession in living memory, and delivery plunging to just 69 dwellings in the immediate aftermath (2011/12), delivery has still comfortably averaged 434 dpa.
- 1.19 As such, it is clear that the Borough has a market which is readily able to absorb these quantities of housing and consideration should be given as to whether delivering housing higher than the minimum starting point of the standard method is appropriate on this basis.

Table 3 Net housing completions in St Helens 2003/04 to 2017/18

	2003/04	2004/05	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	15-year Average
Net completions	728	607	442	512	348	152	311	69	419	264	551	632	575	487	434

Source: MHCLG Table 122 Net Additional Dwellings by local authority district

<sup>10</sup> Source: ONS annual population survey October 2017-September 2018

## Affordable Housing Needs

2.30 In line with the Framework, LPAs should identify:

*“...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.” [paragraph 61].*

2.31 The PPG<sup>11</sup> sets out a staged approach to identifying affordable housing needs, and states that affordable housing need should be:

*“...The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”*

2.32 Having identified affordable housing needs, the PPG therefore requires an assessment of its likely delivery to consider whether there is a need to uplift or adjust the LHN and planned housing supply in order to address affordable housing needs.

2.33 The SHMA Update concludes that there is a need for 117 affordable housing units annually over the plan period (1,987 2016-33), which is a reduction from the 132 dpa figure in the previous SHMA.

2.34 Lichfields has not analysed in detail the figures forming the assessment of affordable housing needs, due in part to limitations on accessing the underlying data. That is not to say that we do not have concerns with how the assessment has been carried out.

2.35 For instance, one of the key changes in the approach GL Hearn has taken since the previous SHMA relates to the average household income estimate. Table 13 of the SHMA Update indicates that this has apparently increased from £30,194 in 2014 to £35,952 – a change of 19%. Whilst this of course means that more St Helens households can theoretically afford a house on the open market, the scale of increase appears unusual, particularly as the ONS' Annual Survey of Hours and Earnings suggests that resident-based wages increased by only 5% over the same time period (from £475.2 per week in 2014 to £497.7 in 2017).

2.36 Similarly, it is not clear whether GL Hearn has used the 2016-based SNHP or the 2014-based SNHP to inform its estimate of gross household formation, which plays a key role in affordable housing need calculations. Given that the overall housing need figure of 486 dpa is based on the 2014-based SNPP, it would be consistent to use the same projections to calculate affordable housing need, which are significantly higher than the more recent iterations.

2.37 As noted above, taking the SHMA Update methodology at face value would suggest that St Helens has an affordable housing need of 117 dpa. This would equate to 24% of the overall housing target of 486 dpa. As set out above, this sits below the 30% affordable housing target advocated for large greenfield sites in Affordable Housing Zones 1 and 2; however, it must be questioned whether all of these sites are going to deliver the requisite target, particularly as Zone 3 has a much lower 10% target.

<sup>11</sup> 2a-024- 20190220

**Housing Technical Standards – Older Persons Needs**

- 2.38 The Updated SHMA concludes that there is a strong need for older peoples' housing in the light of demographic change over the Plan period, with a need for 71 specialist homes annually for older people (rising to 73 dpa with the economic growth scenario). This appears to be within the overall housing need; however, a subsequent section of the SHMA Update, entitled '*Registered Care Bedspaces (C2 use class)*' states that as a direct output of the demographic modelling, there will be an increase of 28 residents annually over 75 who will be living in institutions (e.g. nursing homes).
- 2.39 GL Hearn makes no comment as to how this latter figure relates to the housing need; however, as their methodology makes use of the ONS 2014-based household projections, these explicitly remove those living in institutionalised accommodation from the projections; therefore the 486 dpa target would not include C2 needs, which should be addressed separately. As summarised in Section 1.0 above, the emerging St Helens Local Plan states that SHBC will work with partners "*to facilitate the provision of specialist and supported housing for elderly and vulnerable people. Provision of sheltered housing, extra care housing, retirement accommodation and residential care homes should be easily accessible by walking and public transport to a suitable range of services to meet the needs of future occupiers.*"
- 2.40 No explicit target for special needs/elderly housing is provided; therefore Lichfields would have concerns if the Council attempted to reduce its overall market housing target by 'netting off' care home completions from the 486 dpa figure as this would be comparing apples with pears.



## 3.0 Conclusions

1.20 Although the current standard method figure for St Helens is 468 dpa, delivering more than its minimum starting point is supported through the NPPF and PPG in several ways. Indeed, it is a key part of the Local Plan process to test higher rates of delivery. Lichfields' view is that the evidence on the St Helens LHN that is provided is not sound or robust.

1.21 In particular, we consider that the alignment with the economic growth set out in the ELNA is flawed, and that the aspiration to grow the local economy by almost 12,000 jobs over the period to 2033 cannot realistically be achieved with a housing target of 486 dpa. The inevitable consequence of providing employment opportunities without the labour force to supply them will be a further increase in commuting rates into the Borough from further afield, which is not sustainable.

## **Appendix 2 Technical Note – St Helens Green Belt Review**

## Briefing Note

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Our ref 41874/03/SPM/MWI  
Date 13 March 2019

Subject St Helens Green Belt Assessment

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### 1.0 Introduction

- 1.1 This note has been prepared by Lichfields on behalf of Taylor Wimpey UK Ltd to inform its representations to the St Helens Borough Council [the Council] Submission Draft Local Plan [SDLP] consultation. This note reviews the robustness of the **Council's** Green Belt Review [GBR] (December 2018) which the Council is relying upon to justify the Green Belt land proposed for release in its emerging Local Plan. This note focuses on the general approach taken in the GBR **in the context of Taylor Wimpey's land interest in the Borough.**
- 1.2 This note should be read in conjunction with the accompanying representations prepared by Taylor Wimpey on the St Helens Local Plan. **Taylor Wimpey's interests in St Helens only relate** to residential development and as such, the focus of this note is on Green Belt land released for residential development.

#### The St Helens Borough Submission Draft Local Plan 2020-35

- 1.3 In January 2019, the Council released its SDLP (2020-2035) for consultation. A key role of the SDLP is to plan positively to ensure the communities needs for housing and employment are met. The Council has acknowledged that there is a shortfall of suitable and developable land within its existing urban areas (and in urban areas of neighbouring authorities) to meet the needs over the plan period. As such, the Council consider that the lack of sufficient supply of development land represents exceptional circumstances. This therefore justifies the Councils review of the Green Belt boundaries within the Borough.
- 1.4 It has been established in the SDLP that at least 9,234 dwellings will be needed to meet local needs up to 2035. Of this it is anticipated that land to accommodate up to 2,034 dwellings must be released from the Green Belt. It should be noted that Taylor Wimpey consider that the housing requirement should be higher than that set out in the Local Plan.
- 1.5 The current proposed plan period for the SDLP is 15 years, between 2020 and 2035. As noted in the response to the representations (Policy LPA05), Taylor Wimpey believe that in line with the Framework<sup>1</sup> this should be extended as it does not currently allow for any flexibility in the event of delays in the adoption process. Elongating the plan period would result in the requirement to identify additional land (above that set out in the SDLP) to be removed from the Green Belt to meet the additional needs.

#### Taylor Wimpey's Interests

- 1.6 Taylor Wimpey has two sites that have been allocated for residential development in the SDLP:

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<sup>1</sup> The Framework 2019 - §22



- 1 Land at Gorsey Lane (Site reference: 4HA-Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb); and,
- 2 Land at Gartons Lane (Site reference: 5HA – Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold).

**Taylor Wimpey's Vista Road site is also proposed to be removed from the Green Belt but is safeguarded for future development rather than allocated for residential development in this plan period.**

- 1.7 **Taylor Wimpey fully supports the draft allocation of these two sites and welcomes the Council's** acknowledgement that they perform limited Green Belt purposes, are not constrained, and are deliverable sites which should be allocated **to meet the Borough's housing needs.**

- 1.8 Taylor Wimpey is seeking to secure further allocation of the following two sites for residential development in the SDLP:

- Vista Road, Newton-le-Willows; and,
- Common Road, Newton-le-Willows.

Taylor Wimpey has prepared masterplans for all of its land assets in St Helens and these masterplans are appended to the overall representations on the St Helens Local Plan.

#### Vista Road, Newton-le-Willows

- 1.9 It is noted that a small parcel of the Vista Road Site (southern most area) has a draft allocation as Safeguarded Land in the SDLP (Site Reference: 2HS). In the previous Submission Draft the wider site was allocated for residential development with the eastern area allocated as Safeguarded Land.

- 1.10 A Vision Statement has been completed for the Vista Road site; and submitted with representations to earlier iterations of the Local Plan to assist the Council in their approach to the assessment of the site as part of the GBR. The Vision Statement identifies that the site is appropriate for future development because:

- 1 It will remove a site which logically forms part of the surrounding urban area on the northern edge of Newton-le-Willows and will consolidate existing residential development in the area.
- 2 It would not result in the unrestricted sprawl of Newton-le-Willows nor would it result in the merging of any settlements. The site does not perform an important strategic gap role between Haydock and Newton-le-Willows and has existing defensible boundaries which support its release.
- 3 It does not have any impact on the preservation of the setting of any historic town and Newton-le-Willows is not a nationally recognised historic town.
- 4 It will not prevent the recycling of brownfield land, but will be complementary to it as there is insufficient previously developed land in the Borough to meet future housing and employment needs. The Council accepts that Green Belt is required to accommodate the SDLP development requirement as well as its needs beyond the Plan period.

#### Common Road, Newton-le-Willows

- 1.11 The Common Road site has also been put forward by Taylor Wimpey. A masterplan was submitted in support of residential development on this site. Taylor Wimpey believes that this

site also performs a limited contribution to the purposes of the Green Belt. Taylor Wimpey has already built out the area immediately to the east of the site (the Whittle Chase development) and as such it would form a natural and logical extension to the western edge of Newton-le-Willows. It would deliver a high quality, sensitively designed, landscaped urban edge to the settlement.

1.12

The Masterplan shows that the site is appropriate for future development because:

- 1 Currently the Green Belt is not defined by any physical landscape features at the urban edge. The establishment of a wooded buffer as proposed by Taylor Wimpey at the perimeter of the site will create a strong and permanent defensible Green Belt boundary to the adjacent open countryside that ties into the existing physical landscape features to the north and south of the site.
- 2 The existing high-pressure gas pipeline which passes along the western edge of the site will prohibit any future urban expansion to the west beyond the Common Road site. This constraint further ensures that the edge of the development will provide a firm and defensible boundary to the western edge of Newton-le-Willows, and the adjacent Green Belt designation.
- 3 As noted above, it does not have any impact on the preservation of the setting of any historic town as Newton-le-Willows is not a nationally recognised historic town; nor does it prevent the recycling of brownfield land.

## 2.0 Analysis of the Green Belt Review

2.1

Whilst there is no single method for undertaking Green Belt Reviews, the general approach set out by the Council is supported, although Taylor Wimpey has some queries and concerns over the assessment conclusions.

### Defining Green Belt Parcels

2.2

The GBR has used existing boundary features to define Green Belt parcel boundaries. Taylor Wimpey has the following concerns in respect of the boundary features that have been used:

- 1 It appears that underground features that are not readily identifiable (such as pipelines) have been excluded from Table 2.1. Whilst it is acknowledged that these features do not contribute in visual or openness terms, Taylor Wimpey considers that these do represent long-term, defensible boundaries that provide permanent barriers to development. **As such, they should be categorised as a “strong” boundary feature.**

2.3

In addition, Taylor Wimpey considers that the parcels of land should have also been identified by land ownership to provide a more balanced assessment of the contribution of this land to the purposes of the Green Belt and its actual deliverability.

2.4

Taylor Wimpey considers that in respect of the Common Road site, the inclusion of the “pipelines” as strong boundary features and reference to land ownership boundaries, would have allowed Green Belt parcel GBP\_057\_A (shown in Figure 3) to be further broken up to separate the Common Road site from the area to the west which includes Sankey Valley Park. This would provide a more logical parcel for assessment and the remainder of this parcel could then be assessed separately. Furthermore, St Helens Council should be looking for a range of sites, including smaller and medium-sized sites that can come forward quicker to deliver housing. For Vista Road, the inclusion of the pipeline as a defensible boundary would also have

strengthened the sites assessment against the purposes of the Green Belt and Taylor Wimpey cannot see why the underground pipeline has not been factored into the assessment.

- 2.5 It is suggested that a re-assessment of these sites should be undertaken taking into account those points above and the discussion below.

## Consistency in the Assessment and Selection of Sites for Release

- 2.6 Taylor Wimpey notes that the justification and overall assessment for some of Taylor Wimpey's sites has changed between the 2016 GBR and 2018 GBR as shown at Table 1. For Common Road and Vista Road, there does not seem to be adequate explanation for why this is the case. It is, however, difficult to fully compare the two as the methodology has been amended for the 2018 GBR. This now includes **a new Stage 3 'review of results'** and the overall assessment is given a number rather than a ranking. The 2016 GBR considered that both sites were appropriate for release. No reasoned justification is provided as to why the Common Road site and part of the Vista Road site is no longer considered appropriate for release.
- 2.7 Nonetheless it is clear to see that the allocations for these sites have changed considerably between the two assessments, whilst Gorsey Lane and Gartons Lane have remained largely unchanged.

Table 1 Assessment of Taylor Wimpey Land Interests

Green Belt Assessment 2016	Overall Assessment	Green Belt Assessment 2018	Overall Assessment
<b>Land at Vista Road</b> (GBS_037)	Allocated as Residential Development - HA7	<b>Land at Vista Road</b> (GBP_053_C)	Part Safeguarded Land and part Green Belt
<b>Land at Vista Road</b> (GBS_036)	Safeguarded Land - HS07	<b>Land at Vista Road</b> (GBP_051_A)	Green Belt
<b>Land at Common Road</b> (GBS_158)	Safeguarded Land – HS06	<b>Land at Common Road</b> (GBP_057_A)	Green Belt – <i>Discounted at Stage 1B.</i>
<b>Land at Gorsey Lane</b> (GBS_051)	Safeguarded Land – HS03	<b>Land at Gorsey Lane</b> (GBP_074_D)	Allocated for Residential Development as part of a wider parcel of land – 4HA
<b>Land at Gartons Lane</b> (GBS_050)	Allocated as Residential Development – HA5	<b>Land at Gartons Lane</b> (GBP_080)	Allocated for Residential Development – 5HA

Source: Lichfields

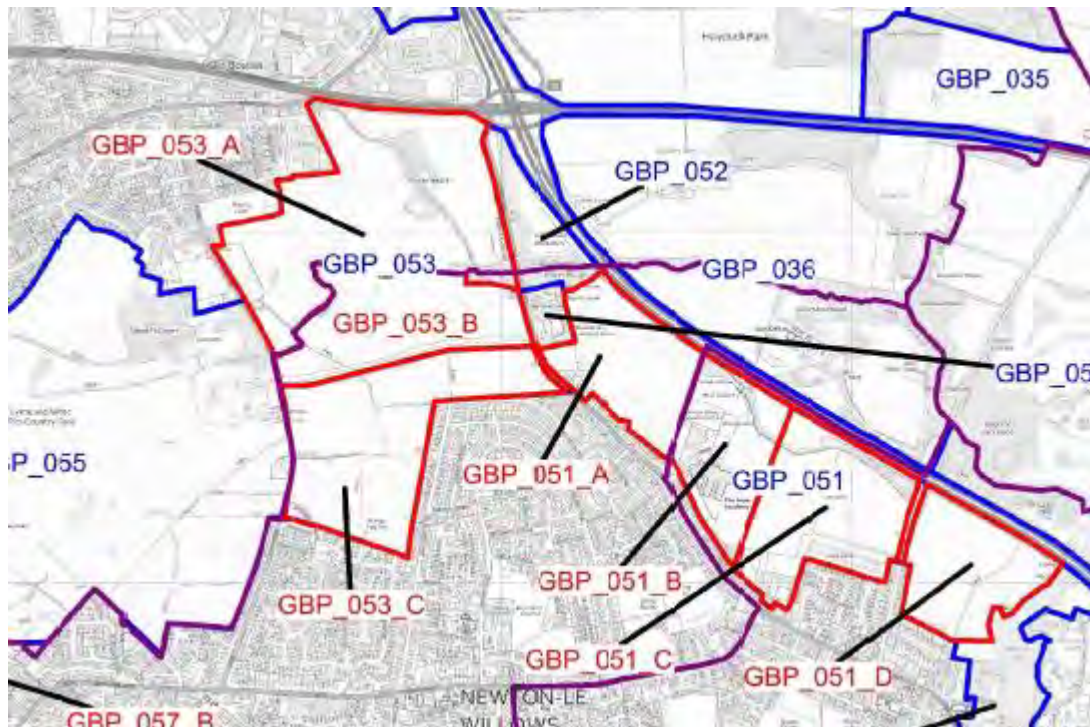
- 2.8 In respect of Vista Road, whilst the individual parcel references have changed, the boundaries of the above land parcels in the 2016 and 2018 GBRs are largely the same. The 2018 GBR splits the Vista Road site across three parcels (GBP\_053\_B, 053\_C and 051\_A, as shown at Figure 1.



This note excludes parcel GBP\_053\_B as it is proposed this area would comprise an extension to the Country park rather than be promoted for residential development.

Vista Road (2018 Ref:053\_c) - Part allocated as Safeguarded Land

Figure 1 Vista Road - GBR 2018 References 053\_C and 051\_A



Source: St Helens Borough Local Plan Green Belt Review December 2018

2.9 Turning to a review of the Green Belt purposes 1 to 3, as assessed in the GBR, Taylor Wimpey would note the following:

*Purpose 1 – To check the unrestricted sprawl of large built-up areas:*

2.10 The 2018 GBR reviews Parcel 053\_C as “being bound on 3 sides by strong boundaries; with a single temporary highway to the north”. It is noted that a certain amount of development could be accommodated without it leading to unrestricted sprawl as it prevents ribbon development along Ashton Road and Vista Road. It is assessed as making a “Medium” contribution to this purpose. The justification in the 2016 GBR is similar (albeit briefer) and notes the site is well contained on three sides; however, this is given an assessment of making a “Low” contribution. It is unclear why this justification has changed. Taylor Wimpey considers that the removal of parcel 053\_C will not result in the unrestricted sprawl of large built up areas for the following reasons:

- It is accepted that a large portion of the parcel is surrounded by development which forms part of the existing urban area;
- The temporary access road provides an opportunity to deliver a strategic link road with appropriate landscape treatments which will provide a long term defensible boundary between Vista Road and Ashton Road; and,
- The pipeline to the west of the site provides a strong, defensible boundary.

*Purpose 2 – To prevent neighbouring towns merging into one another*

- 2.11 **The parcel is given a “Medium” contribution to Purpose 2; as it forms a ‘strategic gap’** (with parcels 53\_a and 53\_b) to the physical and visual separation of Haydock and Newton-le-Willows, although it is noted that should the other parcels remain; then the strategic gap would still be retained. The 2016 GBR **also acknowledges the ‘strategic gap’** between Haydock and Newton-le-Willows. Taylor Wimpey considers that the sites contribution to this purpose is low as the landform ties it to the urban area, and given the higher ground to the north, it has visual separation from Haydock; thereby not contributing to the strategic gap.

*Purpose 3 – To assist in safeguarding the countryside from encroachment*

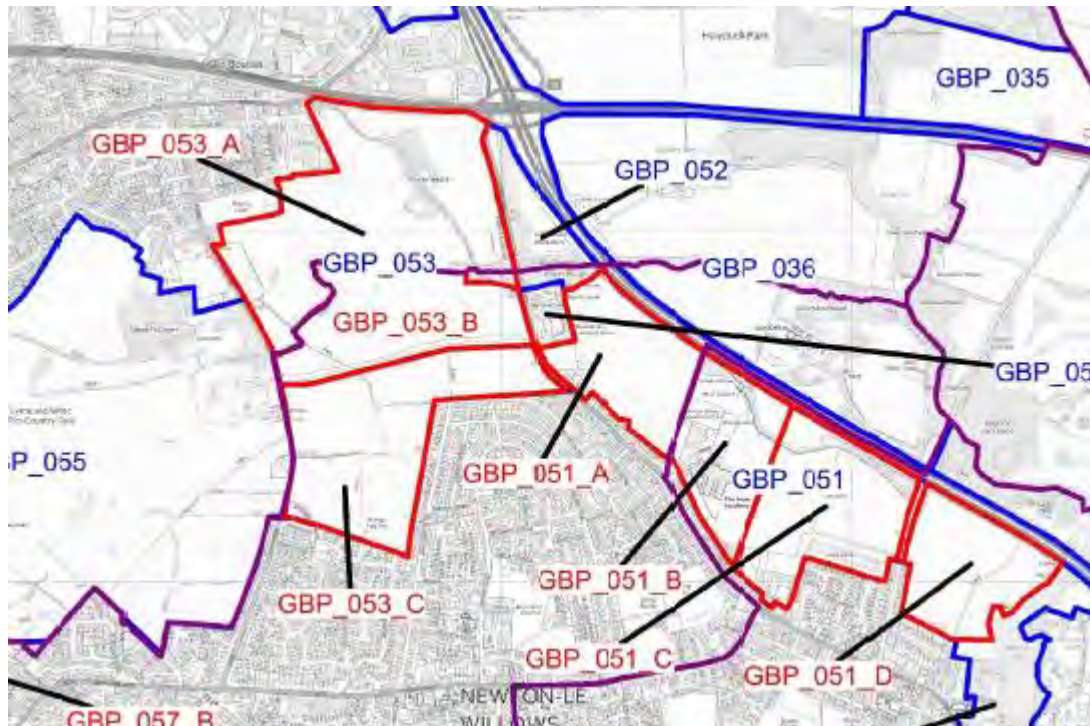
- 2.12 **The parcel is given a “Medium” contribution to this purpose as there** *is no built development and it has a semi-rural character when viewed against the existing urban fringe*. The 2016 GBR noted that the site was over 2/3rds enclosed and it is noted as providing a **“Low”** contribution to this purpose. Again, it is not clear what the justification is for the change in assessment. Taylor Wimpey believe that the removal of this parcel will not contravene the purpose of safeguarding the countryside from encroachment as:
- It is dominated by existing built development being defined by existing boundaries including roads and residential development.
  - It would result in the delivery of a natural extension to the existing built up area of Newton-le-Willows and not extend into the countryside much beyond the existing built development.

*Overall*

- 2.13 The overall comments in the 2018 GBR notes **that “although a large part of the sub-parcel was proposed by the Council as an allocated site at LPPS stage, a number of constraints affect it that would have significant impact on the NDA and the deliverability of the site. These constraints, considered in the context of new housing that is now identified as being required in the Borough, have led the Council to change its conclusions relating to this sub-parcel”**. As noted above, Taylor Wimpey has shown that the site serves limited contribution to the Green Belt purposes and is available, suitable and deliverable for housing. It will not encroach into the countryside and it has existing and potential strong, permanent boundaries on all sides of the site. The GBR notes there is a potential for impact on J23 of the M6; however, the additional link road (as shown on the masterplan) will alleviate pressure on the motorway.

Vista Road (2018 Ref: 051A) - remain in Green Belt

Figure 2 Vista Road - GBR 2018 References 053\_C and 051\_A



Source: St Helens Green Belt Review December 2018

- 2.14 In respect of this parcel of Vista Road, following a review of Green Belt purposes 1 to 3 as assessed in the GBR, Taylor Wimpey would note the following:

*Purpose 1 – To check the unrestricted sprawl of large built-up areas:*

- 2.15 The **site is considered to serve a “Low” contribution to Purpose 1** in both the 2016 and 2018 GBRs given it has strong boundaries that would ensure development containment. Taylor Wimpey agrees with this assessment.

*Purpose 2 – To prevent neighbouring towns merging into one another*

- 2.16 The 2018 GBR **assesses the site as serving a “Medium” contribution to this purpose, this is** because the western edge of the parcel is noted as *“broadly contributing to the physical and visual separation of Haydock and Newton-le-Willows”*. Considered against the remaining parcels in **GBP\_051 which all score “low” it is not considered this is** assessment is correct. The 2016 GBR **assessed this parcel as having a “Low” contribution as there is a wide gap between** Haydock and Newton-le-Willows. **Taylor Wimpey do not believe this is an important “strategic”** parcel as it does not contribute to the functional separation of Newton-le-Willows and Haydock.

*Purpose 3 – To assist in safeguarding the countryside from encroachment*

- 2.17 The site is again scored as having a *“Medium”* contribution to this purpose in the 2018 GBR as it has a semi-rural character due to encroachment from existing urban development on three of its four sides. The 2016 GBR **scored this as “Low” as more than 2/3<sup>rd</sup>** of the site is enclosed by built



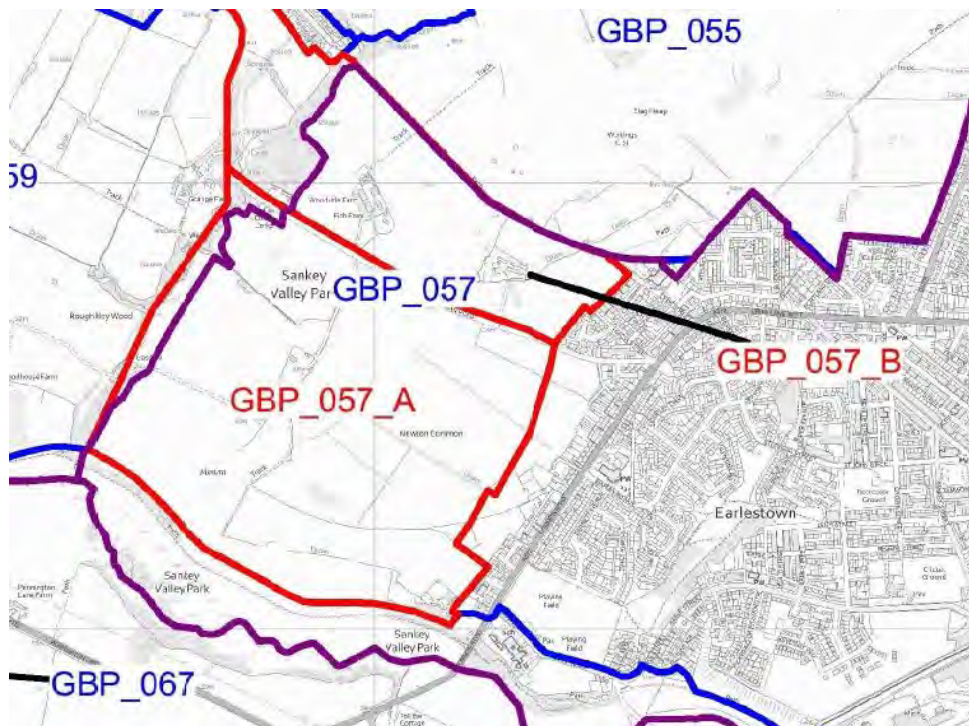
development. It is not clear why this scoring has changed. Taylor Wimpey consider this site does not contribute to the open nature of the countryside.

## Overall

- 2.18 The overall discussion is similar to that for Parcel 053c in that it is no longer considered that the **‘constraints’ justify an allocation as a result of the reduction in housing numbers. The Council** raises concerns in respect of constraints; however, Taylor Wimpey consider the site to be fully deliverable.
- 2.19 Taylor Wimpey considers that the allocation of both parcels of land comprising the Vista Road site provides a more logical extension to Newton-le-Willows and will result in a **comprehensively masterplanned development that maximises the site’s full potential.**

Common Road (2018 Ref: 057A) – Remain in Green Belt

Figure 3 Common Road Parcel - GBR 2018 Reference 057A



Source: St Helens Green Belt Review December 2018

- 2.20 For Common Road, the 2016 GBR reviewed the Taylor Wimpey site as two separate parcels (2016 GBR Ref: GBS\_158 and GBS\_127; Parcel GBS\_127 was subsequently taken out of the Green Belt and has now been developed by Taylor Wimpey). The 2018 GBR reviewed the Common Road site as part of a much wider parcel of land.
- 2.21 In respect of the Green Belt purposes 1 to 3 as assessed in the GBR, Taylor Wimpey would note the following:

*Purpose 1 – To check the unrestricted sprawl of large built-up areas:*

- 2.22 In the 2018 GBR, the wider parcel scored a “High” contribution to this purpose as a result of weak boundaries (other than the eastern side adjoining Common Road). The parcel is

considered to have a strong sense of countryside character with open views; with a lack of containment leading to a potential sprawl. The 2016 GBR **assessed this site as “Medium” as it** was partially contained to the west by woodland and east by Newton-le-Willows/Earlestown. Taylor Wimpey considers that when considered on its own, the introduction of a woodland buffer around the perimeter of the site would create a strong and defensible Green Belt boundary. Similarly, the pipeline adjacent to the western boundary of the site restricts development in this direction and provides a long term boundary to the western edge of the site.

*Purpose 2 – To prevent neighbouring towns merging into one another*

- 2.23 The parcel was assessed as making a “High” **contribution to this purpose** in both the 2016 and 2018 GBRs **as it ‘forms a significant strategic gap between Haydock and Earlestown’**. Taylor Wimpey considers that the Common Road site, on its own, forms a natural extension to the residential development to the west of Newton-le-Willows; and the implementation of landscape treatments will strengthen Green Belt boundaries in this area to prevent the merging of settlements.

*Purpose 3 – To assist in safeguarding the countryside from encroachment*

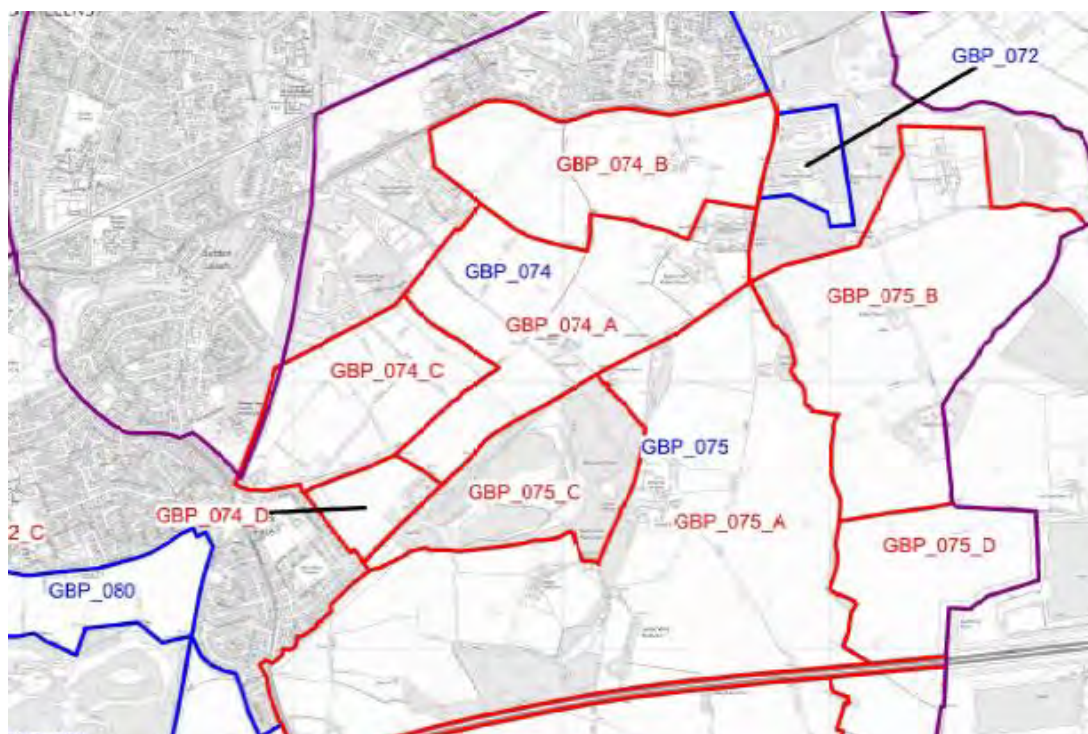
- 2.24 The parcel was scored as making a “High” contribution to this purpose in the 2016 and 2018 GBR as it has a strong rural, open character where any development is likely to give rise to significant encroachment. Although it is acknowledged by Taylor Wimpey that the site has a semi-rural character, the development of Whittle Chase gives the eastern boundary a relatively urban appearance and it is considered that appropriate landscaping of the western edge of the site will provide a high-quality transition between the urban and rural landscape.

*Overall*

- 2.25 As the site was not taken forward past Stage 1B in the 2018 GBR it **was not given an “overall”** commentary. Taylor Wimpey considers that separating this site from the wider site and incorporating the pipeline as a boundary demonstrates the site no longer fulfils the purposes of the Green Belt.

Gorsey Lane (2018 GBR Ref: 074\_D) – Allocated for Housing as part of Parcel 074

Figure 4 Gorsey Lane - GBR 2018 Reference 074\_D



Source: St Helens Green Belt Review December 2018

- 2.26 The 2016 and 2018 GBRs assessed the same extent of land, however the overall justification in the 2016 GBR was included as part of the wider 074 parcel. In respect of the Green Belt purposes 1 to 3 as assessed in the GBR, Taylor Wimpey would note the following:

*Purpose 1 – To check the unrestricted sprawl of large built-up areas:*

- 2.27 The 2018 GBR assessed the site **as providing a “Low” contribution to this purpose; with** Gorsey Lane to the south, the urban area to the west, tree lined boundary to the north and a strong field line to the west providing strong boundaries. The 2016 GBR assessed the purposes against the wider parcel (Ref: 074) which assessed this purpose as “Low”. Taylor Wimpey would agree with this assessment as the site benefits from clearly defined physical boundaries.

*Purpose 2 – To prevent neighbouring towns merging into one another*

- 2.28 The 2016 GBR assessed **the site as having a “Medium”** contribution to this purpose as it was part of a wide gap when considered as the wider parcel. The 2018 GBR however, assessed this site making a “Low” contribution **as “although it sits on the urban edge of Clock Face (Bold), it provides little or no discernible contribution to the merging of Bold with any other settlement”**. Taylor Wimpey support the 2018 GBR assessment of this parcel.

*Purpose 3 – To assist in safeguarding the countryside from encroachment*

- 2.29 The site **was assessed as “Low” in the 2016** and 2018 GBRs as although it is fairly open, the perception of openness is weak and limited when considering the strong boundaries, visible urban development and the planning permission for properties on the site of the former colliery



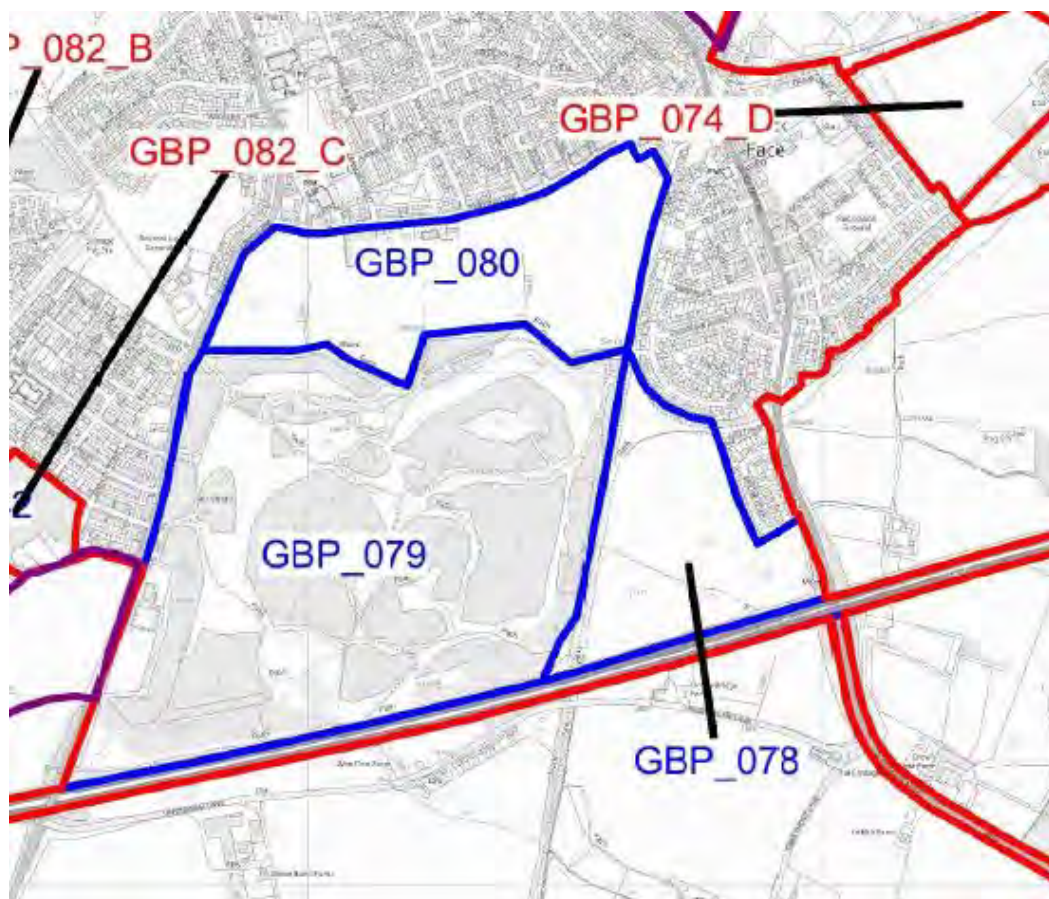
building. Taylor Wimpey agree with this assessment as Gorsey Lane comprises a natural extension to the urban area and would not contravene this purpose.

## Overall

- 2.30 The overall assessment in the 2016 GBR was that the site (as part of the wider parcel of land) **provided a “Low” contribution to the Green Belt purposes**. This was supported in the 2018 GBR which asserts that the site plays a *“limited role in the outward expansion of Bold into the countryside and plays no real part in a strategic gap”*. The 2018 GBR notes that it was **allocated as “safeguarded” in the previous iteration of the Local Plan largely due the wider site** being spread across different land ownerships. However, it is acknowledged that as each of the parcels has been actively promoted, ownership issues are not considered significant. Taylor Wimpey supports the assessment of this site given it no longer fulfils its purpose as Green Belt land and is a suitable and deliverable site for housing.

Gartons Lane (2018 GBR Ref: 080) – Allocated for Residential Development

Figure 5 Gartons Lane - GBR 2018 Reference 080



Source: St Helens Green Belt Review 2018

- 2.31 In respect of the Green Belt purposes 1 to 3 as assessed in the GBR, Taylor Wimpey would note the following:

*Purpose 1 – To check the unrestricted sprawl of large built-up areas:*

- 2.32 The 2016 GBR assessed the site as providing a “Medium” contribution to this purpose as it is well contained with housing to the north and east and woodland to the south. The 2018 GBR assesses the site as having a “Low” contribution to this purpose given it has strong boundaries and should not lead to unrestricted sprawl. Taylor Wimpey agree with the 2018 GBR assessment as the site is substantially contained by built development.

*Purpose 2 – To prevent neighbouring towns merging into one another*

- 2.33 The 2016 GBR assessed this parcel as making a “Medium” contribution to this purpose as settlements have already merged to the north of the parcel. The 2018 GBR amends this to a “Low” contribution given that the two settlements are not considered as “large built up areas” in the context of the GBR and Taylor Wimpey support this clarification in the 2018 methodology.

*Purpose 3 – To assist in safeguarding the countryside from encroachment*

- 2.34 This was assessed as making a “Low” contribution to this purpose in the 2018 GBR (“Medium” in the 2016 GBR). The justification being that the site is fully enclosed with urban features and residential development is clearly visible when viewed from the south, east and west, therefore Taylor Wimpey support this assessment as development of the site will not have a significant impact on the countryside.

*Overall*

- 2.35 The overall assessment in 2016 and 2018 GBRs was that the site makes a “Low” contribution to the Green Belt purposes, is in a sustainable location and would form a natural extension to the existing urban settlement. Taylor Wimpey fully support this assessment as its release would not conflict with the purposes of the Green Belt and its proximity to services and facilities ensures it is entirely suitable for a residential allocation.

**General Comments**

- 2.36 **Notwithstanding the above, as evidenced in Taylor Wimpey’s representations on the SDLP and the supporting Technical Review of the SHMA;** Taylor Wimpey has concerns over the evidence base underpinning the OAN calculation. It is considered that there is a misalignment between the economic growth aspirations and the housing supply to support this objective; as such Taylor Wimpey believes that St Helens should be considering a higher housing requirement figure. This would have a knock-on effect in terms of requiring additional land to be released from the Green Belt.
- 2.37 As detailed above, taking into account Taylor Wimpey’s comments on the methodology and assessment of the wider Vista Road and Common Road sites, it is considered that these two sites serve a limited Green Belt function and should also be released from the Green Belt to meet St Helens future housing need. Finally, Taylor Wimpey considers that the small parcel of land currently occupied by the farm buildings fronting Gartons Lane should be included in the overall Gartons Lane allocation and can see no reason for its exclusion.

## 3.0 Conclusion

- 3.1 Having regard to the Framework, Taylor Wimpey largely supports the methodology as set out in the GBR, however it does have concerns regarding some of the assessment conclusions. Taylor

Wimpey strongly supports the removal of the Gorsey Lane and Gartons Lane sites and their allocation for housing (SDLP Reference: 4HA and 5HA) to meet the needs of St Helens.

- 3.2 Based on the comments above, Taylor Wimpey believes the assessments for the wider Vista Road site and the Common Road site are not justified and that these sites should be allocated to meet housing **need. As noted in Taylor Wimpey's representations on the Local Plan and the** supporting Technical Review of the SHMA, Taylor Wimpey believes that the current evidence base for the OAN is not robust or sound and is likely to need further review.
- 3.3 Taylor Wimpey would strongly support the allocation of its sites at Vista Road and Common Road if further land is required for release from the Green Belt. It is shown above the both sites are available and deliverable and serve a limited contribution to the Green Belt purposes. If an allocation for housing is not considered appropriate at this time, then these sites should be allocated as Safeguarded Land.
- 3.4 Taylor Wimpey would recommend that following a review of the housing figures, the Green Belt Review is updated.



## **Appendix 3 Indicative Masterplans**





- Key**
- Site boundary
  - Existing Public Right of Way
  - Existing Bridleway
  - Other existing pedestrian routes
  - Proposed pedestrian and cycle routes
  - Proposed signalised pedestrian crossing
  - Proposed public open space
  - Retained existing trees
  - Proposed indicative trees
  - Proposed highway access
  - Primary road network (suitable for bus route)
  - Minor vehicle route
  - Indicative building frontages
  - Potential housing areas
  - Parking facilities
  - Potential visitor hub

**Taylor  
Wimpey**

## Gartons Lane, St Helens

Illustrative masterplan

Drwg No: 494B-01A  
Drawn by: NJ/HB  
Rev by: AH  
QM Status: Checked  
Scale: 1: 2500 @ A2

Date: 10.05.18  
Checker: NJ  
Rev checker: NJ  
Product Status:  
Client review







**Key**

-  Site boundary
-  Indicative building frontages
-  Potential housing areas
-  Existing Public Right of Way
-  Proposed pedestrian routes
-  Proposed cycle routes
-  Proposed controlled toucan crossing
-  Proposed pedestrian refuge island
-  Proposed public open space
-  Retained existing trees
-  Proposed indicative trees
-  Proposed highway access
-  Controlled access point (emergency / bus only)
-  Primary road network (suitable for bus route)
-  Minor vehicular route

**Taylor Wimpey**  
**Gorsey Lane, St Helens**

**Illustrative  
Masterplan**

Scale: 1:2000 @ A3







Key:

- Site boundary
- Proposed vegetation
- Existing hedgerow
- Proposed primary road
- Proposed secondary road
- Proposed pedestrian route
- Existing public right of way
- Development area
- Proposed SUDS pond
- Gated agricultural access

**Taylor  
Wimpey**

**Common Road,  
Newton-le-Willows**

Illustrative masterplan

Drwg No: 561C\_01B  
Drawn by: HB  
Rev by: AH  
QM Status: Checked  
Scale: 1: 2000 @ A3

Date: 04.05.18  
Checker: NJ  
Rev checker: CW  
Product Status:  
Client review





Key  North

-  Public Rights of Way (Newton Heritage Trail)
-  Existing water course/pond
-  Lyme and Wood Pits Country Park (partially opened, with permitted landfill site until 2016)
-  Potential highway access
-  Open space
-  Strategic tree planting
-  SuDS pond
-  Sports pitch
-  Housing land use (approx 30dw/ha)
-  Housing land use (approx 35dw/ha)
-  New strategic link road
-  New pedestrian connection
-  New recreational route / cycle route
-  New enhanced / supplementary Heritage Trail route

**Area Measures:**

Residential area: 15.29 ha

Potential to deliver circa 513 dwellings at varied densities 30-35dw/ha

**Taylor Wimpey**

VISTA ROAD,  
NEWTON-LE-WILLOWS

**Development Vision**

Scale: 1:5000 @ A1





**GRASSCROFT**

# Comments on Keppie Massie Economic Viability Assessment of December 2018

St Helens Local Plan

March 2019



**GRASSCROFT**  
DEVELOPMENT  
SOLUTIONS



### **List of Abbreviations:**

Taylor Wimpey UK Ltd (Taylor Wimpey)  
Keppie Massie (KM)  
Grasscroft Development Solutions (GDS)  
St Helens Council (SHC)  
Economic Viability Assessment (EVA)  
Dwellings Per Hectare (DPH)  
Community Infrastructure Levy (CIL)  
Gross Internal Area (GIA)  
Building Cost Information Service (BCIS)  
Gross Development Value (GDV)  
Benchmark Land Value (BLV)  
Existing Use Value (EUV)  
Strategic Market Housing Assessment (SHMA)  
Registered Social Landlord (RSL)

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BCIS Data Extract		

# 1. Introduction.

**This report has been produced by Grasscroft Development Solutions to comment on the consultation document produced by Keppie Massie (KM) on behalf of St Helens Council (SHC). The document is titled “ST HELENS LOCAL PLAN ECONOMIC VIABILITY ASSESSMENT” (EVA). The document has been produced to set out and to invite comments on the approach proposed for the assessment of viability when considering the proposed new Local Plan for the period 2020 to 2035.**

Grasscroft Development Solutions (GDS) have been instructed by Taylor Wimpey UK Ltd (Taylor Wimpey) to comment on the proposed approach to the Study, the viability appraisal methodology and the assumptions proposed.

Keppie Massie have identified within Section 1 of the EVA the purpose of the report. They refer to the NPPF at paragraph 1.02 and specifically to the importance placed on ensuring policies do not undermine the delivery of the plan<sup>1</sup>. It is with this in mind that all viability assumptions that are ultimately adopted should be based on a cautious approach as the commonly accepted residual valuation approach is by its nature sensitive to even small changes in key assumptions. If a local plan is to be successful in avoiding the need for site specific viability assessments on all future development sites and/or not deterring sites from being brought forward completely, then it is critical that the assumptions adopted are realistic and do not test the limits of viability.

KM and SHC have invited comments on the EVA by Wednesday 13<sup>th</sup> March 2019. This note concentrates on providing a response to the main assumptions proposed within the EVA in so far as they relate to the residential development market only, it does not comment on commercial uses.

In preparing the note other documents have also been considered and referred to where appropriate including the Authority's Local Plan Strategy and associated documents, Viability Testing Local Plans and the RICS Guidance Note: Financial Viability in Planning.

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<sup>1</sup> Reference ID: 10-002-20180724



## 2. Grasscroft Development Solutions.

**This report has been undertaken by Michael Coulter, a Director and Richard Heathcote, a Consultant at Grasscroft Development Solutions.**

Grasscroft Development Solutions is the development consultancy arm of the Grasscroft Property Company Ltd, which is a regional based residential and commercial development company.

The Grasscroft group of companies has been active within the North West, and wider area, for the past twelve years and has undertaken and completed a number of successful residential and commercial developments.

Michael Coulter has a First Class Honours Degree in Building, a Master's Degree in Built Environment Research and is a Member of the Chartered Institute of Building. He has 20 years experience at the highest level within the property industry and has held senior and board level positions at a variety of development and building companies.

Michael's career has had a strong residential focus and as such he has been responsible for the development and delivery of a wide variety of private sector and social housing schemes within the North of England. These schemes have ranged from small new build projects to large urban regeneration initiatives, including Macintosh Village in Manchester which incorporated the UK's first 'eco tower'. Posts held by him have included:

- Roland Bardsley Homes Ltd – Director
- Taylor Woodrow Capital Developments – Associate Director
- Morrison Homes Ltd – Area Development Manager

Richard Heathcote has a degree in Urban Land Economics and has 25 years of experience in the property industry having held senior positions with a number of development companies and commercial property practices.

Richard's career has also had a strong residential focus, both for new build traditional housing, high rise apartment development, mixed use developments and major listed building conversions throughout England and Wales. Posts held by him have included:

- GL Hearn - Land and Planning Director
- Crosby Lend Lease - Development Manager
- CALA Finance - Business Development Manager
- PJ Livesey Group - Land and Estates Manager

Current consultancy commissions range from providing advice on viability to full development management of residential and mixed use projects.

Taking into account the above demonstrable experience, the writers of this paper are in a very strong position to comment on the issues set out within the St Helens Local Plan Economic Viability Assessment consultation document.

### 3. General Methodology.

Within this section of the report we will consider and comment upon the general approach adopted by Keppie Massie to assessing viability in the SHC area and highlight some of the key areas of guidance, particularly where KM have adopted a different approach or where from the information provided to date there is a lack of clarity on the basis of inputs.

#### **Evidence Base and Presentation of Viability Results.**

There is currently a lack of detail on how a number of the KM appraisal inputs have been evidenced and calculated, particularly in regard to critical assumptions such as build cost. It is clear however that this is currently set at too low a level overall, which we will refer to further below.

At present the EVA does not include copies of the viability appraisal summaries. For consultees to be able to assess fully the KM assumptions and the results tables that have been produced copies should be provided within the appendices for the main typologies and the key strategic sites that the Local Plan will rely upon. KM have provided similar appraisal summaries for other local authority areas, including the recently concluded Cheshire East CIL Examination Hearings. This is key evidence which is readily available and should be provide as soon as possible to give all consultees the opportunity to review and make representations as appropriate. Our ability to comment fully on overall viability matters is currently limited by the omission of appraisal summaries from the EVA.

#### **Testing Viability at the Plan Making Stage.**

We note the quotes taken from the various sources relating to Viability and Local Plans. Emphasis is increasingly being placed on ensuring that the types of sites and developments planned are deliverable wherever possible without the need for further viability assessment at the decision making stage. This is evident when referring to the updated Planning Practice Guidance.<sup>2</sup>

Whilst this seems a sensible approach, all too often this is not currently possible. Each site is unique and therefore its overall development cost is also unique. Any area wide approach to viability therefore needs to ensure that the vast majority of development will remain viable even when fully policy compliant. To achieve this, the overall cumulative impact of all the Council's plan polices needs to be carefully assessed and set at a level that allows sufficient headroom to ensure this is the case throughout the plan period.

This is typically done by completing a series of financial appraisals and assessing what if any level of surplus is available to make contributions to affordable housing and other local plan policy objectives. To ensure the long term deliverability of the plan it is good practice not to test the margins of viability and therefore it is widely accepted and that "headroom" needs to be built into appraisals, both within the levels of individual cost and revenue assumptions but

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<sup>2</sup> Reference ID: 10-002-20180724 and Reference ID: 10-008-20180724

also when considering what proportion of any final surplus should be considered available for contributions to local plan polices. In many cases headroom of between 30% and 50% is allowed. This was the case in the recent Cheshire East CIL examination hearings we took part in where 50% was adopted. The remaining 50% is the sum available for the funding of plan polices and CIL (if it were to be considered).

Clearly over the proposed plan period economic and market conditions will change considerably on a number of occasions and therefore it is also important to retain a degree of flexibility so that should market conditions deteriorate a good proportion of development can remain viable and developments continue to come forward to meet the overall plan requirements. In periods of economic slowdown (which are bound to occur during the plan period), it is imperative that development is still possible to retain the economic and social benefits that derive from it.

### **Guidance on Key Appraisal Assumptions.**

With this in mind it is important that the key appraisal inputs are conservatively assessed. Given the nature of a residual valuation approach, these assumptions have a significant potential impact on the outcome and any surplus that may be available is normally only a small percentage of the total gross development value. We will make more detailed comments on the individual appraisal assumptions in other areas of our consultation response.

Whilst the price paid for land is not deemed to be a relevant justification for failing to accord with policies in the plan it is critical that the “base input” land cost is set at a level that provides a real incentive for landowners to either bring their sites to the market or to invest directly themselves in promoting the sites through the planning system. Whichever route is taken there is a considerable financial risk given the uncertainties around obtaining planning consents and the subsequent ability to achieve a successful sale. Long periods of time can be required to successfully promote sites during which both market conditions and individual circumstances can change. There has to be a significant potential return to the landowner to motivate them to either promote the site themselves or enter into an agreement with a third party to do so.

It is also critical that the cost of all plan polices are fully and realistically costed and detailed item by item. All too often appraisals fail to incorporate these costs fully and make no allowance for the cost of these polices increasing year on year whilst the review of the impacts is only periodic.

The Planning Practice Guidance on Viability states that ....***“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.”...<sup>3</sup>*** If this aim is to be achieved then the appraisals produced will need to include for an objective assessment of likely abnormal costs that developments will

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<sup>3</sup> Paragraph 002 Reference ID10-002-20180724



also incur otherwise there will continue to need to be detailed site specific assessments. At present abnormal costs have been specifically excluded from KM's total cost assessments.

Similarly for many larger strategic sites there are significant opening up costs which often go un-assessed or significantly under assessed when part of an area wide assessment of this type. This cost item is dealt with within the detailed guidance contained in ***Viability Testing Local Plans, Advice for planning practitioners (the Harman Report)***. Opening up costs are identified in Appendix B item 2 as ....***“strategic infrastructure costs which are typically in the order of £17,000 - £23,000 per plot for larger scale schemes”***.<sup>4</sup>

KM have made allowances for opening up costs in table 5.4 at paragraph 5.44 of the EVA which increase from zero from small sites of up to 14 dwellings up to £8,300 for sites of 200 units and over which is approximately 40% of the cost advocated by Harman. This allowance therefore appears low but does need to be considered as part of the total development cost allowance.

Larger sites will also have additional costs associated with their promotion through planning. This has been widely accepted and adopted elsewhere and should be reflected in the fee percentage adopted. Again the Harman Report makes detailed reference to these costs in item 4 of Appendix B:

***“.....Many viability studies incorporate an assessment of fees based solely upon a percentage of house-building costs. While this may be appropriate in relation to smaller scale sites, such an approach may underestimate the costs associated with the promotion and implementation of larger, more complex schemes.***

***Such costs may include:***

- ***Outline application costs***
- ***Local Plan promotion***
- ***CIL Examination in Public representation***
- ***Environmental statements***
- ***Design and access statements***
- ***Masterplan and design codes***
- ***Public consultation costs***
- ***The discharge of planning conditions and approval of reserved matters***
- ***Planning application fees***
- ***Project management costs***
- ***Building regulation fees***
- ***Statutory undertakers' fees, including bonding costs.***

***Figures for fees relating to design, planning and other professional fees can range from 8 -10% for straightforward sites to 20% for the most complex, multi-phase sites. In circumstances where the Local Plan is reliant upon large scale sites in order to accommodate its assessed housing requirement, consideration should also be given***

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<sup>4</sup> Viability Testing Local Plans, Advice for planning practitioners, Appendix B, Item 2, Page 44

***to the additional planning promotion and land assembly costs necessarily incurred in the manner described in Step 2 (Threshold and Benchmark Land Value).’’<sup>5</sup>***

Whilst the above list is by no means definitive it is clear that the costs associated with the initial assessment and subsequent promotion of large residential and mixed use sites are significant. These costs need to be fully reflected within the appraisals proposed, with appropriate levels of fees and opening up costs included.

If SHC wish to minimise the need for future site specific viability assessments then the general assumptions used in the proposed viability appraisals need to be cautious in their overall approach, incorporate the appropriate level of construction costs and allow for significant headroom. By adopting this approach modest changes in economic conditions should not render all sites unviable and only those sites with significant abnormal costs will in normal market conditions incur viability issues and therefore need some relaxation of local plan policy requirements. If this approach is not adopted, then there will continue to be the need for site specific viability appraisals, which will impact on overall housing delivery and on affordable housing provision in particular.

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<sup>5</sup> Viability Testing Local Plans, Advice for planning practitioners, Appendix B, Item 4, page 44-45

## 4. Evidence, Analysis & Appraisal Assumptions.

At present there is insufficient information provided within the KM report to make a full assessment of the various viability assumptions proposed. As stated above it would greatly assist all consultees if copies of the viability appraisal summaries were provided. Notwithstanding the above, our current observations are as detailed below:

### **Development Mix And Density.**

The development dwelling mix and resultant density is a critical assumption and needs careful consideration. Development densities are often referred to in terms of the number of dwelling per hectare (DPH) however this is only part of the picture and whilst it is reasonable for SHC to have a target density of typically 30 dwellings per net hectare or higher in more urban locations, densities will vary from site to site dependent upon the site location, and characteristics of the surrounding area, topography, social and economic factors and market conditions. In some cases a lower density may be more appropriate, for example sites in edge of settlement locations which were formally open countryside or Greenbelt. It is often the case that on larger sites, to achieve varying character areas, densities will be variable. In addition it is important to identify the SHC are seeking to promote larger homes as part of their housing strategy and accordingly, a lower density will be necessary.

Just as important is the actual mix of house types and the sizes of each type of dwelling. It is the combination of the number of dwellings per hectare, the mix of house types and the individual house type unit size which drives the actual development density and therefore the resultant overall gross development value.

Whilst we accept it is common to see a range of development densities the planning constraints placed on development layouts are generally common and have a significant impact on the quantum of development that can be achieved. The majority of councils will look to have broadly similar “standards” they seek to achieve relating to privacy distances and overlooking issues, the size of private amenity space, parking standards and road layouts, etc. These constraints to a great extent dictate the density of development that can be achieved.

Whilst greater density can be achieved (in terms of m<sup>2</sup> per hectare or square feet per acre) by for example utilising a larger proportion of terraced house types or three storey dwellings, these will generally also achieve a lower sales value compared to detached housing at lower density. Developments that are of a higher density will have a different appearance and will generally also tend to achieve lower sales values, though the impact can be ameliorated to some extent through the use of higher quality design, materials and finish, though this will impact on the development cost.

We support the general approach of testing a range of sites typologies as set out in table 3.4 on page 25 of the EVA however, what is not clear is what if any adjustment to the housing mix has been made when completing the appraisals for the 30DPH, 35DPH and 40DPH



scenarios. Without this detail we are unable to comment fully on the suitability or robustness of the assumptions.

From the limited information provided in the EVA we would make the following initial comments on the individual assumptions proposed.

### **Dwelling Sizes.**

KM discusses at some length from page 25 to 29 of the EVA development densities, mix and unit sizes.

They refer to analysis they have completed on dwelling mix and sizes from recent planning permissions and refer to these in tables 3.8 and 3.10 and compare them to the assumptions made in previous viability work from 2016 and from the housing mix recommended within the councils SHMA.

It is not clear how recent applications have been analysed, however the KM analysis closely accords with the previous assumptions from the 2016 viability work and the councils SHMA and therefore they have decided to maintain the previously applied assumptions on mix and dwelling sizes.

This being the case the mix maintains a 1 bedroom house type at 56m<sup>2</sup> however there is no corresponding evidence for such a house type within the planning application analysis. This is not surprising as we are unaware of any developer seeking to develop such a property, we would therefore recommend either its removal from the dwelling mix or its replacement with a 1 bedroom bungalow type which would at least be a theoretically feasible (if unlikely) option.

The sizes proposed by KM are set out in Table 1 below:

Dwelling Type	1 Bed House	2 Bed House	3 Bed House	4 Bed House	5 Bed House	1 Bed Flat	2 Bed Flat
Dwelling Size Proposed Sq m	56	70	84	109	139	56	70
Dwelling Size Proposed sq ft	603	753	904	1173	1496	603	703

**Table 1: Average Dwelling Sizes adopted in the EVA.**

GDS believe that the methodology adopted is too simplistic and is not sufficiently representative of the range of sizes for a particular house type that will be delivered across the borough, dependent on the market location. It also fails to differentiate between terraced, semi detached or detached house types. There is also no reference to 3 storey house types or Bungalows that we understand are also proposed within the housing mix.

Whilst there is less margin for error with the smaller house types i.e. the 1, 2 and 3 bed dwellings due to a smaller range in sizes, the inappropriateness of the adopted methodology is illustrated when considering the larger properties. For instance KM has assumed all 5 bed

houses at 139m<sup>2</sup> irrespective of the market location. The size of a 5 bedroom house can vary widely dependent upon both the location, size of the development site and the developer profile, from as little as around 120m<sup>2</sup> up to around 250m<sup>2</sup>.

To adopt a single average size for the house types is too broad-brush and consideration should be given to a range of sizes which better reflect the specific market locations. It is however also important to recognise that when adopting a larger house type size there will inevitably also be an impact on the DPH. You cannot simply apply the same mix and unit size to a 40 DPH scheme as you would at 30 DPH. For a 40 DPH dwelling mix we would expect no 5 bedroom detached houses would be included for example.

Included within the KM table 3.11 are 1 and 2 bedroom flats. However, it is not clear how these are relevant as it is not specified how, if at all they are included in the proposed dwelling mix as outlined in the table 2.3 on page 12 of the EVA. The mix proposed gives no breakdown for the proportions of 4 and 5 bedroom houses and for all dwelling types provides a range of percentages. From the information provided, therefore, it is impossible to calculate what actual development density is being proposed in terms of the total square feet per acre (metres per hectare). We are therefore unable to comment fully on its appropriateness.

Our overall comment is that as an “average” the unit sizes proposed are reasonably representative of 2 storey detached for the 4 and 5 bedroom units.

For the 3 bedroom units it is not representative of a semi detached or terraced unit which would be smaller at between 770 sq ft and 870 sq ft.

Similarly for 2 bedroom terraced or semis detached we would expect them to be in the region of 675 sq ft to 720 sq ft in this area.

When considering bungalows then as they will have less circulation space 600 sq ft would be appropriate for a 1 bedroom unit and 675 sq ft for a 2 bedroom bungalow.

The apartment sizes adopted are also larger than we would expect in SHC area with a more typical 1 bedroom apartment averaging 525 sq ft and a 2 bedroom apartment 650 sq ft.

### **Gross to Net Site Ratios.**

The gross to net areas proposed in Table 3.6 on page 26 of the EVA have been applied to the generic assessments of a range of sites from 5 to 200 dwellings.

We would point out that not all small sites will have a 100% developable area and it may therefore be prudent to adopt say a 95% gross to net ratio for the smallest sites.

KM state that for the larger site specific assessments of sites allocated for new development they have based their assumptions on the site areas, densities and capacities as set out in table 2.2 on page 9 of the EVA.

Whilst this is a reasonable approach, in itself this will not impact significantly on viability though sites with larger areas of undeveloped land will tend to require an increased budget for external works, open space set up and management, etc. It is the assumptions surrounding the density of development in terms of the square feet per acre (square metres per hectare) as outlined above which are of far more significance in reaching a suitably realistic and cautious view on viability. Without access to actual copies of the development appraisals it is not possible for us to reach a firm conclusion on the appropriateness of the densities appraised.

### **Densities/Acre (Hectare).**

As referred to above, there is currently insufficient detail within the EVA to make a detailed assessment of the assumptions proposed. We are therefore unable to calculate the actual density proposed as it is unclear, if, for example, flats are included within the mix or what is the proposed split between 4 and 5 bedroom houses, as they are currently grouped together as providing 15-20% of dwellings.

From previous analysis we have carried out elsewhere densities of between 11,500 to 13,000 sq feet per acre (2,640 to 2,985m<sup>2</sup> per hectare) would represent a suitably conservative range of assumptions for development density for a typical 2 storey housing only development. This would increase if 3 storey houses were included, or a proportion of apartments but would decrease if bungalows were included.

As referred to above, if densities in excess of 30 dwellings per hectare are to be tested then there needs to be an adjustment to the development mix assumptions so that the actual density of accommodation in terms of metres squared per hectare (sq ft per acre) remains realistic as a cautious assumption for an area wide assessment of this kind. Densities of 40 DPH will necessitate the inclusion of a much higher proportion of smaller terraced or semi detached properties, and either elements of 3 storey housing or some apartments. It cannot be simply assumed that the same 2 storey housing mix can be carried forward.

### **Use of Appropriate Build Cost Data.**

We are concerned that no reference is made to the BCIS data costs which are normally relied upon as a key source of construction cost data for area wide assessments of this kind. Instead KM refers to their internal database, knowledge and experience.

Within the Keppie Massie Report on Construction Costs, at paragraph 2.9, they point out that the BCIS is referenced as an appropriate data source within the latest guidance. It is in fact the only data source so referenced. Whilst alternatives could be considered if they were made available and were based on actual completed projects build cost data. From our recent experience during an examination hearing for another local authority area it has become clear that the database referred to by KM is in fact not based on actual development costs and in fact is based upon viability appraisals from throughout the country. This seriously undermines the utility of the schedule, and means that it should be unfavourably compared to information provided by BCIS data which is based upon actual construction costs not prospective ones.



Whilst some information regarding the background of the KM Database and what it contains, plus a copy of part of the report, was ultimately provided after the examination hearing closed we have still not been provided with any real background as to the inputs and whether this is appropriate evidence to assess likely development costs.

It is our conclusion from an assessment of the limited information obtained on the KM database that it is insufficient, confused and cannot be properly interrogated, nor has a proper explanation of the inputs been provided.

If KM are to persist with relying on this flawed database rather than BCIS costs then it should be produced in full at an early stage so that all parties have the opportunity to review and make detailed representations on its suitability and shortcomings.

It is important to reiterate that the information published elsewhere in respect of the KM database is insufficient and missing critical information that is necessary to understand the information. For any reasonable participant to determine whether the database forms an appropriate evidence base upon which to determine viability. Noting that this is prospective information based on viability assessments and not retrospective information based upon actual build costs (as is the case with the BCIS database) then to even begin to determine whether the costs database is “appropriate” evidence, as a minimum it is considered that the following information is required:

- Type of Developer/organisation that submitted the viability evidence (i.e. national housebuilder, registered provider, land promoter or small developer etc.);
- Site size or density of development;
- Type of dwellings & mix of uses (if any) provided. For example, some schemes may have been for or included apartments;
- Site background. Information regarding the stage that the site was at when the viability appraisal was submitted or what works had been carried out prior to the site being purchased. This type of information is critical to understanding the submitted costs.
- An explanation as to how average figures have been reached.

If the site is for a mixed use details of how they have been treated should be provided, particularly those which have substantial residential elements. It would appear from the information provided to date elsewhere that such schemes have been excluded from the data set.

From our previous analysis of the KM database, it is also not possible to determine the status of each development site when the viability appraisal data is entered into the database. As such we do not know what stage of development or pre-development the sites are at. Some sites within the data set may already have a planning consent and therefore the level of professional fees required by them to bring the site forward will be significantly reduced. Other sites could have had significant elements of enabling works already completed by land owners or site promoters, for example the construction of shared spine roads, service infrastructure and site clearance and remediation which would effectively reduce the construction cost but may have been reflected in the price paid for the site. There appears to have been no attempt to rationalise or normalise these “outliers” from the data to prevent unrealistic skewing of the data.

For a scheme to be brought forward in SHC, all the construction costs would need to be accounted for. It is clear from our previous examination of the KM database that significant costs associated with the schemes within the Database could, and we expect are, missing thereby deflating the average figures and giving a misrepresentative picture in terms of construction and professional costs. This clearly raises issues as to whether it is, therefore, a reliable or robust source of actual development costs.

If KM are to persist with the use of their internal database then it also needs to be made available in a format that is capable of being readily interrogated and commented upon.

KM have claimed their database has been benchmarked against BCIS data. However, we have previously 'sense-checked' it against the actual construction costs in the BCIS database and it is demonstrably at odds with it.

We have also previously looked at the make-up of the data set in terms of the scale of developments. Whilst we only have details of scheme size by bands, it is clear that it is not representative of the scale of development for which it is being used as a basis for assessing costs in the SHC area. Of the 131 sites within the data set previously provided to us 77 have less than 50 dwellings (58.8%). Only 5 of the sites (3.8%) have over 250 dwellings. A breakdown of the site categories is provided in Table 2 for ease of reference. Given the scale of some of the sites in SHC this is a further anomaly in this use of a data set that is not representative of the sites that are being appraised.

Dwelling Range	Number of Schemes	% of Schemes
0-50	77	58.80%
50 - 150	38	29.00%
150 - 250	11	8.40%
250+	5	3.80%
<b>Total</b>	<b>131</b>	<b>100.00%</b>

**Table 2 - Estimated Breakdown of Scheme Sizes**

From our previous limited review of the entries within the table it is clear that it contains errors. As an example, if one looks at the column for fee percentage this should be a calculation of the fee cost as a percentage of all the other development costs (excluding contingency). For the second site in the table (Allerdale May 2012) the fee percentage is quoted as 6.48%. Development costs inclusive of fees are £8,994,147. Fees are £698,116. There is no inclusion for a contingency on this project. The total cost excluding fees is therefore £8,296,031. Fees as a percentage of development cost are actually 8.42%.

As the table had not been provided to us in a useable form we cannot resolve how this error has occurred nor are we able to correct it. We have carried out a similar calculation for a site in the High Peak area dated May 2014. For this site the fee percentage is stated as 8.29%. When calculated correctly after the deduction of the fee cost itself and the contingency cost from the total cost the correct percentage is 9.68%. We have therefore concluded that if the error applies to all sites. Therefore the fee percentage is consistently being understated within the data set. Likewise, we are simply unable to corroborate how the average professional fee figure has been calculated.

In addition, we would highlight that there appears to be other errors within the database. As an example, the St Helens entry dated 10/2013 is for a scheme of between 0-25 dwellings however the floorspace banding is set at 6,500-7,000m<sup>2</sup>. Even using the higher number of dwellings and lower floorspace banding, an average of 260m<sup>2</sup> per dwelling seems to be so unrealistic that we expect the band categorisation is incorrect. Other anomalies such as this may exist, although without having the data in a usable form it is difficult to confirm this. Thus, the form of the database means that proper scrutiny is not possible, and the details produced so far suggest that its content is unreliable. It does not comprise appropriate evidence on the basis of what has been disclosed to date.

We remain of the view given the significant limitations of the evidence provided to support the use of the KM database as highlighted above that it cannot be relied upon. We see no justification for departing from the use of BCIS data as is prevalent in the vast majority of other area wide viability assessments that have been carried out throughout the country by other consultants, particularly when KM propose to use the BCIS data as the basis for the commercial elements on mixed use sites.

It is also unclear how the KM database has actually informed the build costs applied within their viability appraisals as copies of the appraisal summaries are not include within the EVA. If build costs have been based on an analysis and application of the KM database then we are unsure of the relevance of much of the detail contained within Report on Construction Costs which appears to suggest that the build costs have actually been derived from a cost plan based on a range of assumptions as set out in that report.

### **Keppie Massie Report on Construction Costs.**

Appendix B of the KM report on construction costs includes a number of tables which identify the various site typologies appraised at the various densities for Greenfield and Brownfield sites.

Within the tables the total construction cost is identified and also then expressed as an average cost per square metre. No breakdown of how the cost has been arrived at is provided and we are unable to determine the basis of the KM "Total Cost" with any certainty from the information in the report however our interpretation of their approach to total costs is set out below:

From the information provided we believe the total cost referred to in these tables includes:

- All plot build costs for both sub and superstructures
- All preliminary costs
- All external works

It is clear from paragraph 2.23 that the cost of constructing garages for larger house types is included as part of the KM external works costs but no detail is provided on the actual cost included for this item.



There is a list of excluded items which are common to all scenarios set out on each table. The excluded items are:

- White goods/ appliances
- Incentives
- Floor Finishes
- Remediation of contaminated land in Brownfield sites
- Vat excluded from all costs
- Contractors profit excluded
- No allowance for code for sustainable homes compliance
- No abnormal costs on Greenfield sites

We disagree with the exclusion of the cost of white goods / appliances as these are included within standard specifications for most developers. Similarly tile finishes to bathrooms are commonly included. The cost of incentives should be reflected in the net sales values adopted as we refer to below.

We believe certain other items have been excluded from these costs as within the Viability Testing results section of the report the impact of these items is separately identified. These are:

- S106 Costs
- M4(2) and M4 (3) costs
- Education contributions

It is however unclear if the costs are also inclusive of other items but our interpretation of paragraph 6.03 of the EVA is that the build costs referred to in the various tables in Appendix B of the report on construction costs also include allowances for:

- Surface water attenuation
- Provision of open space for developments greater than 40 dwellings
- Sustainable Drainage Systems
- Ducting for cable and broadband.

It is also unclear if the cost of other opening up costs is included within the total cost. Paragraph 2.24 states open space costs have been costed separately but no details are provided. For opening up costs the table at paragraph 2.36 indicates a range of costs from Zero for sites of up to 14 dwellings to £8,300 per dwelling for sites of over 200 units. We would point out that this figure is significantly below the range of cost allowance advocated in the Harman report<sup>6</sup> of £17,000 to £23,000 for large strategic sites.

The KM Cost report also confirms that they have made separate cost allowances for professional fees of between 7.5% for small sites decreasing to just 5% for larger sites. This approach is completely contrary to the advice in the Harman report as referred to in detail in section 3 of this report. It is also at odds with the approach adopted by all other council advisors we have encountered. Larger sites will tend to have a wider range of more complex issues to resolve which will increase the need for specialist consultants and consultants of

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<sup>6</sup> Viability Testing Local Plans, Advice for planning practitioners, Appendix B, Item 2, Page 44

greater experience. It is our experience that the fee costs tend to increase with the scale of projects not decrease.

We have recently reviewed the allowance made in over 30 other local authority areas and in all other cases (with the exception of those where KM have been involved) the fee percentage adopted has been in the range of 8% to 12%. For those authorities where a range of fees were adopted the fee percentage increased as the scale of the development increased.

We would therefore recommend that an allowance of 7% is adopted as a minimum assumption for smaller sites and that this should increase for large sites to between 10% and 12% depending on scale and complexity

Finally KM have made a contingency allowance of 5% on all development costs, including professional fees which is a standard allowance for area wide assessments of this kind.

Given the KM cost tables refer to “total costs” we can only assume that these items are also included in the costs quoted.

### **Contractor Profit.**

KM also state that they will also adjust the build cost rate that they derive from their own database to exclude construction profit. However, it is unclear how they will calculate this. We do not agree with this approach and question how they determine which sites were built out by a main contractor and which were developed by in house teams and subcontractors.

Whilst we accept that some sites will be built utilising a main contractor whilst others will be procured by an in house team utilising subcontractors, the overall costs will be broadly similar as regardless all contractors include a profit margin within their cost. In addition a developer who procures their own subcontractors will have to directly employ additional staff to manage the construction which adds to the overall development cost.

The approach proposed by KM If adopted would lead to an under assessment of costs which many developers would not be able to achieve.

### **Comparison of KM Costs Against Recognised Alternative Data.**

To reach any conclusions on the costs adopted by KM is very difficult without sight of the detailed appraisal summaries. However, if our interpretation of the costs is correct then for a typical 200 unit Greenfield scheme providing 30% affordable housing at a density of 35DPH the KM total cost equates to £1,147/m<sup>2</sup> (£106.56/ft).

To try and put this “Total Cost” into some perspective we have considered the BCIS cost data for the St Helens area. A copy is attached at Appendix A.

In many of the area wide assessments we have reviewed in recent years a figure close to the BCIS median cost data has been utilised. For the St Helens area in Q4 2018 the median cost for Estate Housing Generally was reported at £1189/m<sup>2</sup> (£110.46). To enable a meaningful

comparison with the proposed KM cost a number of adjustments need to be made to the base cost.

The BCIS data does not include for the cost of any external works and therefore a widely accepted and utilised approach is to allow for these works by adding around 12% to 15% to the reported base build costs depending upon the scale and layout of the individual site. For an area wide assessment of the kind this represents a suitably cautious assumption.

For larger sites there is, as highlighted above, the need to reflect opening up costs, the cost of which are detailed in the Hardman Guidance and again widely adopted in other area wide assessments of this kind. These costs are in addition to the normal external works allowance.

It should also be noted that the BCIS costs do not include for the cost of construction of private garages. When completing the detailed appraisals this cost needs to be separately identified for those properties where either single or double will be provided. An appropriate cost for a single garage is around £6000 whilst for a double garage we would allow around £11,000.

Based on BCIS median and lower quartile costs the total cost for a typical 200 dwelling site is summarised in the table below. It should be noted that these costs do not include any allowance for opening up costs or site specific abnormalities, garages for 3, 4 and 5 bedroom houses or the costs of the proposed SHC policies in relation construction standards, education and other S106 items.

<b>Cost Item</b>	<b>£/ft</b>	<b>Cost Item</b>	<b>£/ft</b>
BCIS Median Base Build Cost	110.46	BCIS Lower Quartile Base Build Cost	97.45
External Works 15%	16.57	External Works 15%	14.62
Professional Fees 8%	10.16	Professional Fees 8%	8.97
Contingency 5%	6.86	Contingency 5%	6.05
<b>Total Cost</b>	<b>144.05</b>	<b>Total Cost</b>	<b>127.08</b>

**Table 3: Greenfield Development Costs Based on BCIS Standard Assumptions.**

By reference to the widely supported and referenced BCIS data with typical allowances for external works, professional fees and a contingency we would expect total costs to fall somewhere in the range of £127.08/ft to £144.05/ft subject to individual site factors subject to appropriate additions for the provision of garages, additional opening up costs on larger sites and abnormal costs.

It should also be noted from the BCIS data at Appendix A that the build costs for small developers are significantly higher. We would recommend that figures that closely accord with the BCIS median cost for “One Off” housing detached (3 units or less) are utilised for the appraisal of the 5 unit schemes (£1777/m2 or £165.08/ft) and that for the 10 to 20 dwelling schemes an appropriate base cost would be somewhere around the mid-point between this cost and the Estate Housing Generally cost of £1119/m2 (£110.46/ft) with the appropriate additions for external works, professional fees and contingency to reflect the bespoke nature of smaller developments.

In contrast the KM Cost report proposes a range of “Total Costs” from £104.42 for the largest 200 dwelling sites up to £130.71 for sites of just 5 dwellings or fewer.



### Apartment Block Costs.

In Appendix C of the EVA Keppie Massie have adopted a different approach to costs for apartment blocks. Here they have provided a series of cost summaries which set out the individual cost build up for substructures, super structures, external work, preliminaries, professional fees and an overall contingency allowance. From the total of these cost elements there is a 6.5% reduction applied for contractors profit and overhead. It is not clear why this reduction has been made as whilst we are aware Keppie Massie have applied a similar reduction when assessing costs based on BCIS costs, as is highlighted by the comparative costs in Table 4 below this “cost plan” is clearly not based on BCIS costs.

<b>KM "Cost Plan"</b>	<b>£/ft</b>	<b>BCIS Cost Base</b>	<b>£/ft</b>
Base Cost	99.42	BCIS Median	128.76
External Works 14.22%	14.14	External Works 14%	18.03
Professional Fees 7%	7.95	Professional Fees 8%	11.74
Contingency 5%	6.08	Contingency 5%	7.93
minus 6.5% Contractor	-8.29	Zero Contractor Deduction	0.0
<b>Total Cost</b>	<b>119.29</b>	<b>Total Cost</b>	<b>166.46</b>

**Table 4: Greenfield Apartment Cost Comparison KM Cost Plan against BCIS Costs.**

To enable comparison with the BCIS base cost the KM base cost is made up of their costs for sub structures, superstructures and preliminaries.

As can be seen from the table the Keppie Massie base cost is almost £30/ft (circa 23%) less than the comparable the BCIS median cost and would also be £13/ft (circa 11.5%) less than the lower quartile BCIS cost using the same assumptions.

### Proposed Planning Policies and the Impact on Development Costs.

KM have considered the impact of the proposed local plan policies and identified those which will have an impact on development costs. They have then made an assessment of the likely cost of each item. We support this approach and comment further on each item below.

### Building Regulations Optional Standards.

We note that an allowance of £1,100 per house is proposed to meet the requirements of Building Regulations Optional Standards M4(2) relating to accessible and adaptable dwellings and £5,500 per house to achieve M4(3A). A build up has been provided for each of these additional cost items. Whilst these costs are generally appropriate it is not clear what assumptions have been made on the impact on the net sales values of the adapted properties as the appraisal summaries have not been included within the EVA.

### **Electric Vehicle Charging Points.**

KM have considered the costs associated with electric vehicle charging points and state an allowance of £220 per dwelling has been made. The allowance is low and we would expect a cost of £300 to £350 to be more typical. Whilst in itself the impact on viability is minor for the cost of the works on individual dwellings there is the potential for a significant increase in the overall electricity supply requirement for a site. Our client's recent experience on a large strategic Green Belt release in Chester where charging points have been required on all plots deriving from policy, this has resulted in the need for substantial additional reinforcement of infrastructure and additional substation requirements to meet the additional loading requirements. These costs are currently not reflected within the KM allowance.

### **Site Specific S106 costs.**

There is an allowance of £1,000 per dwelling currently proposed to cover the cost of all site specific S106 requirements. Whilst this may be sufficient on some small scale developments where S106 contributions are very limited for the majority of larger sites this would be inadequate. Any site that is required to make contributions to any off site facilities or services will incur a far higher level of cost. We would recommend that a schedule of likely residual S106 contributions is included within any subsequent consultation with each item costed in detail so as to ensure the sum included within appraisals is robust rather than an arbitrary nominal allowance. We would expect the true cost to be significantly higher.

Items that remain subject to S106/S278 contributions may include:

- Open Space
- Public Transport
- Highway Improvements
- Infrastructure or Services
- Footpaths and Cycleways
- Community Facilities
- Health Care
- Leisure Services
- Ecology

### **Conclusions on Reliance on KM Cost Database.**

We have significant concerns regarding the use of the KM database. Instead the base development cost should be taken from the relevant BCIS data adopting the appropriate values for the St Helens area, with appropriate allowances then made for external works, professional fees (at varying percentages to reflect the scale and complexity of developments) and an overall contingency. In addition larger sites should include an allowance for opening up costs.

The BCIS costs are specifically referenced as an appropriate source with the latest NPPF guidance note and are utilised in the vast majority of other assessments of this type. The BCIS costs are based on actual costs whereas the KM data base is not.

The data received by KM is from a range of third parties cost estimates with a wide range of different unknown assumptions within it. It is clear from the limited information we have seen elsewhere that it is unreliable and not correctly analysed. It remains unclear how the KM database has informed the “Total Cost” adopted in the KM cost report and we would welcome further explanation alongside the provision of the detailed appraisal summaries.

### **Residential Net Sales Values.**

With regard to the residential net sales values proposed, we have carried out our own analysis of sites currently available and these broadly support the net sales values adopted.

There is however a need for caution when analysing headline asking prices. The vast majority of developers will offer significant incentive packages (free carpets, fitted furniture, upgraded appliances, stamp duty payments, etc.) in addition to the help to buy initiative which is prevalent on most sites, makes the calculation of a true net sale price difficult. Assessing a true net sales value becomes far more difficult when developers also offer part exchange deals on buyers old homes.

Depending on general market conditions, the levels of completion from other sites, the marketing approach of the individual developer and the specific characteristics of the site itself the level of incentives can vary significantly, but would typically be around 5% in strong market conditions but can rise to 10% when the market deteriorates or if a particular site is not performing well.

### **Affordable Housing.**

In terms of affordable housing provision, we would recommend a range of tenure assumptions are appraised as for more challenging sites a different tenure mix may enable some affordable housing to remain viable.

The EVA sets out that the bid prices adopted for testing are as follows:

- Affordable Rent 45% of market value
- Low Cost Home Ownership 70% of market value

The rent caps on affordable units announced by the government during 2015 have effectively put Registered Providers on hold and meant that rental offers are being reduced for social rent properties. Many developers that GDS are working with are facing difficulties in receiving any offers at all from Registered Providers to take on social rent housing, and where offers are made they are typically reduced to approximately 35% of market value. An appropriate discount reflective of the market is:

- Affordable Rent 40% of market value
- Intermediate 65% of market value



## **Benchmark Land Values.**

We have reviewed the approach currently proposed by KM within the EVA and are broadly supportive of their interpretation of the relevant guidance.

It is important that landowners remain sufficiently incentivised to bring forward their sites so that the council's wider housing delivery needs are met. If benchmark land values are set too low then there is no incentive and landowners, who sometimes have held sites for generations, will take a longer term view and chose to hold the site or look at other alternative development forms.

With regard to the Benchmark Land Values proposed we do not believe the differentiation between Brownfield values and Greenfield values is correct. The £150,000 and £250,000 proposed for Greenfield Sites is significantly below achieved sales values. If a full analysis of current market values was carried out we believe that this would support a much closer correlation between Greenfield and Brownfield values which should be reflected in the Benchmark Land Values adopted.

At present the EVA is assessing some Greenfield sites against benchmark land values of the equivalent of or less than alternative commercial uses, for example Industrial Land Values of £150,000 and Office Land Values of £200,000 have been adopted elsewhere in the EVA, both of which are very conservative assessments of these alternative use values. Our recent experience in other parts of the Northwest would indicate that industrial land is achieving values significantly higher than the £150,000 adopted by KM. The BLV for Residential land needs to be a reflection of the EUV plus a premium. Based on the current BLV's there is no incentive to the landowner to achieve a residential consent for their site.

It also needs to be kept in mind when carrying out area wide assessments of this kind there remains the possibility that additional abnormal costs will still affect a specific site. These may only come to light during a detailed planning application when more intrusive site investigation is undertaken. If there is no buffer provided now then these additional costs can only be paid for by the land owner accepting a reduced value for their site. If the benchmark land value is set too low then this leaves no scope to absorb any additional abnormal costs and the site will not come forward. Therefore either the both the commercial and residential Benchmark Land Values need to be increased or appropriate allowances made for the likely impact of abnormal costs for both Brownfield and Greenfield sites. An increase to the various benchmark land values of around £100,000 to £150,000 would be appropriate and would allow for some level of abnormal costs to be absorbed by landowners whilst still offering them a return on their site.

## **Acquisition costs.**

The 1.8% land acquisition cost is based on 1% of purchase price for agent's fees and legal fees at 0.8%.

GDS agrees that the allowances made are within the range of costs seen in the market but are at the lower end of the range and therefore are not a conservative assumption. The

cumulative impact all the individual assumptions have on a residual appraisal needs to be considered. Even small adjustments can have a significant impact when taken together.

Agents fees can vary from just under 1% to as high as 2.5% therefore we would recommend the fee level is increased to 1.5%.

In addition for the assessment of the smaller generic sites both the agent fee and legal fee should be subject to a minimum cost of £10,000 each as a percentage allowance becomes irrelevant when site values fall to very low levels.

## **Finance.**

The 7% rate suggested is realistic for the majority of developers. However for smaller developers funding remains both difficult to obtain and the costs are significantly more than 7%. In addition to the interest rate applied to the loan facility funders often require valuation fees, arrangement fees, management fees, and exit fees which are usually based on a percentage of the peak facility requirement.

In addition, many funders only provide facilities for limited periods and so developers often find they incur additional costs to extend or renew facilities particularly on sites when predicted development programmes are not met. These additional costs often effectively double the cost of finance to the developer.

For this reason we would recommend that the cost of finance for sites of 30 units or fewer are increased to at least 10%.

## **Developer Profit.**

Similar to our concerns on finance costs, whilst we support the 20% of GDV profit margin adopted on larger schemes, though this should be seen as a minimum requirement, with many developers requiring in excess of this amount.

We do not agree that this should be reduced to 17.5% for schemes of 10 units or less. Small developers often rely on funding developments from specialist funders or in some cases high net worth individuals. It is our own experience over many years that in order for them to provide funding profit margins of in excess of 20% are required as a smaller or less experienced developer is often seen as carrying a greater risk. In the current market a small developer would not be able to access funding with a profit margin of only 17.5%. The minimum level that should be adopted is 20% to align with the larger sites.

## 5. Conclusions.

In Summary whilst we support the general approach to viability testing and the general methodology utilised within the Keppie Massie Economic Viability Assessment we have identified a number of areas for further consideration:

1. For a full assessment of the KM EVA to be possible copies of the various appraisal summaries need to be published for analysis and comment in a similar format to those provided by them in other local authority areas.
2. In relation to the Total Costs referred to in the KM Report of Construction Costs tables it is unclear how this cost is built up. Provision of the appraisal summaries would go a long way to clarifying the position.
4. We are unable to determine the exact level of base build costs proposed for residential housing schemes, however given the level of “Total Costs” of development set out within Appendix B of the KM Report of Construction Costs it would appear they are significantly below comparable BCIS costs both at median and lower quartile cost levels. We are therefore unable to support their use at this time.
5. The base build costs proposed for apartment schemes as set out in Appendix C of the EVA appear to be based on a simplified cost plan with no supporting evidence for the costs proposed. The overall costs are significantly below comparable BCIS costs both at median and lower quartile cost levels. We are therefore unable to support their use.
6. We are unable to support the use of the KM “build cost” database given the inadequacies we have previously identified. Instead BCIS costs should be adopted at the appropriate level for the St Helens area.
7. The KM development costs currently exclude any assessment of abnormal development costs which limits their value at the plan making stage. This being the case, site specific viability assessments will continue to be required on sites where abnormal development costs or significant infrastructure and opening up costs are encountered.
8. The Net Sales Values adopted should reflect an allowance for appropriate levels of sales incentives.
9. Discounts from market value for affordable housing require minor adjustment to reflect a conservative assumption on the current bid values achievable from RSL’s.
10. The Benchmark Land values adopted for both residential and commercial uses are low, particularly for Greenfield Residential sites in the medium and higher value areas. In the former the level proposed is below that adopted for commercial office developments and only the same as potential industrial uses, both of which are also set at very low level. At these Benchmark land values there is no incentive to land owners to promote their sites for residential development given they could be depressed further by abnormal costs.



11. Finance costs for small developers should be increased to represent the higher costs of funding they incur.
12. Developer Profit Margins of 20% should be adopted for all developments. Small developers are unable to obtain funding at returns below this level.

We trust that the Council and their advisors will find our comments useful and that the necessary amendments are made now to ensure the results of subsequent detailed viability testing are robust and ensure that the Council's wider housing delivery objectives can be met throughout the plan period.

## Appendix 1.

BCIS Data Extract.

## £/m2 study

**Description:** Rate per m2 gross internal floor area for the building Cost including prelims.

**Last updated:** 02-Mar-2019 00:39

> Rebased to 4Q 2018 (321) and St Helens ( 99; sample 31 )

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
810. Housing, mixed developments (15)	1,246	630	1,079	1,214	1,375	2,839	1222
810.1 Estate housing							
Generally (15)	1,228	595	1,049	1,189	1,349	4,207	1740
Single storey (15)	1,379	774	1,179	1,323	1,543	4,207	286
2-storey (15)	1,193	595	1,039	1,162	1,305	2,393	1321
3-storey (15)	1,219	776	989	1,178	1,377	2,521	129
4-storey or above (15)	2,393	1,280	-	2,200	-	3,893	4
810.11 Estate housing detached (15)	1,563	940	1,195	1,372	1,609	4,207	20
810.12 Estate housing semi detached							
Generally (15)	1,222	711	1,053	1,190	1,338	2,261	410
Single storey (15)	1,391	859	1,189	1,362	1,553	2,261	75
2-storey (15)	1,189	711	1,047	1,162	1,297	2,101	315
3-storey (15)	1,110	834	925	1,050	1,202	1,806	20
810.13 Estate housing terraced							
Generally (15)	1,254	771	1,051	1,202	1,382	3,893	359
Single storey (15)	1,384	939	1,148	1,304	1,602	2,025	43
2-storey (15)	1,225	771	1,044	1,187	1,360	2,393	260
3-storey (15)	1,243	776	966	1,178	1,371	2,521	55
816. Flats (apartments)							
Generally (15)	1,450	706	1,210	1,386	1,634	4,881	964
1-2 storey (15)	1,384	867	1,175	1,326	1,524	2,578	233
3-5 storey (15)	1,428	706	1,204	1,374	1,629	2,865	642
6+ storey (15)	1,797	1,048	1,457	1,691	1,907	4,881	86
820.1 'One-off' housing detached (3 units or less)							
Generally (15)	2,079	839	1,457	1,777	2,577	5,987	138
Single storey (15)	1,601	839	1,337	1,455	1,801	2,902	39
2-storey (15)	2,064	902	1,511	1,861	2,523	4,020	67
3-storey (15)	2,442	1,170	1,703	2,375	2,771	4,539	24
4-storey or above (15)	3,878	1,735	2,480	4,009	5,169	5,987	6



## Chapter 5 General Development Policies

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**5.11** It would be inappropriate to safeguard Protected Land outside settlement boundaries, as this could imply that the land is considered suitable for development at some point in the future, and would effectively give it the same status as other former 'Open Land on the Urban Fringe' now deemed worthy of inclusion within settlements, which would thereby undermine the setting of settlement boundaries.

**5.12** Therefore, Policy GN1 is less restrictive than national Green Belt policy in relation to 'Protected Land', but generally seeks to restrict development on former non-Green Belt land outside settlements to small scale and low intensity uses, or to uses which are appropriate in rural areas, for example horticulture. The uses permitted by Policy GN1 for Protected Land are consistent with Policy DS4 of the previous Local Plan (WLRLP 2006), and represent a continuity in approach.

**5.13** Outside settlement boundaries, Policy SP1 allows for countryside uses that retain or enhance the rural character of the area and Policy RS1 allows for affordable housing outside settlements only if there are no suitable sites within the settlement. These policies are consistent with what is allowed by Policy GN1 for non-Green Belt land outside settlements.



### 5.2 Policy GN2: Safeguarded Land

#### Context

**5.14** The Local Plan is required to demonstrate flexibility to respond to changing circumstances. In addition, when amending Green Belt boundaries, the National Planning Policy Framework directs Local Plans to have "regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period" (paragraph 83, p20). Therefore, there is a need to remove some land from the Green Belt and safeguard it for a "Plan B" (to allow flexibility within the Local Plan) and for development needs beyond the plan period (beyond 2027).

### Policy GN2

#### Safeguarded Land

The land identified on the Policies Map as safeguarded land is within the settlement boundaries but will be protected from development and planning permission will be refused for development proposals which would prejudice the development of this land in the future. This safeguarding is necessary for one of the following two reasons:

- It is allocated for the “Plan B” – such land will be safeguarded from development for the needs of the “Plan B” should it be required. If the “Plan B” is not required then this land will be safeguarded from development until 2027 for development needs beyond 2027.
- It is safeguarded from development for needs beyond 2027 – these sites will only be considered for development after 2027 if there is not a sufficient supply of other suitable sites within the settlement boundaries to meet any identified development needs at that time.

The following sites will be safeguarded from development (potential capacity for housing and / or employment land in brackets):

#### a) “Plan B” sites

- i. Land at Parr’s Lane, Aughton (400 dwellings)
- ii. Land at Ruff Lane, Ormskirk (10 dwellings)
- iii. Land at Red Cat Lane, Burscough (60 dwellings)
- iv. Land at Mill Lane, Up Holland (120 dwellings)
- v. Land at Moss Road (west), Halsall (240 dwellings)

#### b) Safeguarded until 2027

- i. Land at Yew Tree Farm, Burscough (500 dwellings and 10 ha of employment land)
- ii. Land at Moss Road (east), Halsall (210 dwellings)

The safeguarded land at Yew Tree Farm is not marked on the Policies Map as it is part of the wider Policy SP3 allocation for a strategic development site and a subsequent masterplan for this allocation will define the precise boundary of the land to be safeguarded until 2027 within this site.

### Justification

**5.15** Ultimately, given the requirement to amend Green Belt boundaries in the Borough to ensure the delivery of the residential and employment development needs and the requirement to demonstrate flexibility in that delivery of development needs if circumstances change, it is necessary to identify safeguarded land within the Local Plan. This land will be protected from development until it is absolutely required to meet development needs beyond this plan period or, if it is assigned as a “Plan B” site, to meet development needs in this plan period if allocated sites fail to deliver the required amount of development.

**5.16** In considering how much land is to be safeguarded, regard has been had as to how much land is required for the “Plan B” and what would be a reasonable amount to safeguard from development for potential development needs beyond 2027. In considering which sites should be safeguarded, a full site appraisal of a number of potential sites was undertaken. A summary of the site appraisal process that has led to the above list of sites is provided in the separate technical paper on Strategic Options and Green Belt Release. This is especially relevant for those sites safeguarded from development for the “Plan B”.

**5.17** The land safeguarded until 2027 has been identified as such because it is part of a wider parcel of land removed from the Green Belt or removed from the policy designation under Policy DS4 in the Replacement Local Plan (2006) but which is not required for development in the Plan period or under the Plan B. An example of this would be Yew Tree Farm in Burscough, where only a portion of the wider Yew Tree Farm allocation is required for the Strategic Development Site (see Policy SP3) but the Green Belt amendments must encompass the entire site to ensure that the new boundary of the Green Belt is robust.

### Other Local Planning Policy and supporting documents

- West Lancashire Local Plan 2012-2027 – Technical Paper 1: Strategic Options and Green Belt Release (2012)
- The Green Belt Study (2011)

## 5.3 Policy GN3: Criteria for Sustainable Development

### Context

**5.18** The aim of achieving sustainable development is a key objective of the planning process and the Council is committed to ensuring that all development in the Borough is of a high quality which contributes positively to its distinctive character. All development within the Borough, including changes of use, is therefore expected to be sustainable, having full regard to the local context within which it sits.

**5.19** Design features can also address wider sustainability issues such as crime, carbon reduction, reducing flood risk and other environmental concerns such as air quality and lighting, creation of wildlife-friendly habitats, and making buildings accessible to all user groups. Therefore, a policy is required to guide development proposals to ensure that they are sustainable.



RO1155



St. Helens  
Council

263

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

Ref: LPSD

01 MAR 2019

(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

### 1. Your Details

(we will correspond via your agent)

Title: MRS  
First Name: AUDREY  
Last Name: M<sup>C</sup>CLEAN  
Organisation/company: \_\_\_\_\_  
Address: 106 STATION RD  
GARSWOOD  
Postcode: WN4 0SD  
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: 22/2/2019

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

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

☐ Yes (via email)

☐ No

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

## RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

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

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

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

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

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

Telephone: **01744 676190**

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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



## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy <b>LPA05</b> <b>1HA</b>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input 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 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><b>EXTREMELY CONCERNED REGARDING TRAFFIC + THE POLLUTION. WILL NEED MASSIVE INFRASTRUCTURE NO SNR SCHOOL. TRAFFIC CONGESTION WHEN TRYING TO LEAVE VILLAGE IS BAD ENOUGH NOW WHY ARE BROWNFIELD SITES BEING USED AS THEY MEET ESTIMATED DEMAND. NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES NO PARKING FACILITIES AT RAILWAY STATION</b></p>

Please continue on a separate sheet if necessary

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

PLEASE 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
---	--	--

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.**

RO1156





{In Archive} St Helens Borough Local Plan 2020-2035 Submission Draft

to:

planningpolicy

21/02/2019 13:48

Dear Sirs,

I wish to object to the Local Plan on the following grounds.

The area where I live should not be retained within the Green Belt. The areas I refer to are the residential areas of Moss Lane (Windle Ashes Farm to no 44), Rainford Rd (123-189), St Helens Rd (no 1 Hillside -186), Inglewood Drive, Inglewood Rd, Longwood Close and Hill Top Rd, the Bottle and Glass PH and the Plumbers Merchants MLR.

This is a substantial suburban housing area of c 170 houses and two businesses. It is not a village in the countryside. Most of the houses front two increasingly busy and noisy dual carriageways the A570 and the A580. There is more tarmac than open field.

The reasons for objection to maintaining the land within the Green Belt are-

1 None of the five reasons for including land in Green Belt are met here. You have declined to argue differently in representations made to you more than a year ago.

2 You have declined also to state that the review of the Green Belt included any specific review of this area.

3 The area has been included in the Green Belt for some time and yet your Council has granted planning permission for several houses materially larger than the original dwellings, large extensions, granny flats and recently a swimming pool because your Development Control Team have been reluctant to enforce Green Belt Policy in this area given that development within the built up area does not adversely affect the openness of the surrounding Green Belt.

4 Normal Planning Policy would be sufficient in this area.

5 There are infill sites within this built up area, for example the land opposite the Bottle and Glass PH which could be used for much needed housing and to contribute to the Council's other policies promoting self build, retirement homes and affordable housing.

6 It is perverse to allocate large areas of open farmland and previously a golf course which only caters for the volume house builders and has raised very strong objections, at the same time as retaining a built up area like this within the Green Belt. It serves no useful purpose and it is unnecessarily restrictive.

Regards

Keith McCormack  
31 St Helens Rd  
Rainford  
St Helens

WA11 7QR

RO1157





St. Helens  
Council

579

12 MAR 2019

Ref: LPSD

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

(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: MISS	Title:
First Name: LISA	First name:
Last Name: MCCORMACK	Last Name:
Organisation/company:	Organisation/company:
Address: 7 DERRINGSTONE CLOSE ST. HELENS	Address:
Postcode: WA10 3QR	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
	Email:

Signature: [Redacted]

Date:

4/3/2019

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	LPAOS Site 2HA	Paragraph / diagram / table <u>1</u>	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"/> <u>Don't Know</u>	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 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. THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. ST. HELENS POPULATION HAS BEEN IN DECLINE SINCE 1981.

GREENBELT IS DESIGNED TO ASSIST IN URBAN RE-GENERATION BY ENCOURAGING USE OF DERELICT / OTHER URBAN LAND. BY USING GREENBELT IT FAILS TO ENCOURAGE THIS.

HOUSING IS NOT SUSTAINABLE IN THIS AREA DUE TO LACK OF DOCTORS, SCHOOLS ETC. USE OF CARS IS BEING ENCOURAGED.

INADEQUATE ROAD ACCESS. UNSAFE ACCESS POINTS.

THIS SITE CURRENTLY FLOODS + IS HIGH WATER TABLE. BUILDING HERE WILL CAUSE HIGH RISK OF FLOODING IN HAYDOCK

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.

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

3. If your representative 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 trial 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 <u>LPA04</u> <u>SITES</u> <u>2EA</u> <u>SEA</u> <u>SEA</u>	Paragraph / diagram / table <u>3</u>	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"/>	<u>Don't Know</u>	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 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

- COUNCIL ALREADY GRANTED PERMISSION IN GREENBELT FOR FLORIDA FARM NORTH - SITE 2EA.
- NOT JUSTIFIED - NO NEED FOR ANOTHER LARGE SCALE DEVELOPMENT ON THIS SITE / AREA.
- SIGNIFICANT LOSS OF GREENBELT CURRENTLY PROTECTING URBAN SPRAWL.
- ROAD NETWORK ALREADY CONGESTED.
- HIGH RISK OF FLOODING CLIPSLEY BROOK AND FURTHER DOWNSTREAM.

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

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

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

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (The hearing is in public)	
<input checked="checked" type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination

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

**Please 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.

RO1158



St.Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>HARRY</i>	First name:
Last Name: <i>MCCORMICK</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>11 PETUNIA CLOSE NEW BOLD ST HELENS</i>	Address:
Postcode: <i>WA9 4ZU</i>	Postcode:
Tel No: <span style="background-color: black; color: black;">[REDACTED]</span>	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: <span style="border: 1px solid black; display: inline-block; width: 250px; height: 20px;"></span>	Date: <span style="border: 1px solid black; display: inline-block; width: 150px; height: 20px;"></span>
--	---

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

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

Yes ☐ (Via Email)

No ☐

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



RO1159

①-LPA02 ②-LPA04 ③-LPA07 ④-LPA06  
⑤-LPA08 ⑥-LPC12 ⑦-LPD07

WF0183 pdf

### Representor Details

Web Reference Number	WF0183
Type of Submission	Web submission
Full Name	Mrs Clare McDermott
Organisation	N/A
Address	8 Mallard Gardens St Helens WA9 5BL
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	7HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	x
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The population has been declining and without knowing the impact of Brexit it is unclear why there is a requirement for additional housing on this land. 01

St Helens Council suggests availability for 84 units.

Declining business including industry has declined since the middle of the 1980s and the area proposed relies on employment outside of the area to be able to afford the houses. 02

This obviously has an impact on the traffic throughout the area and the current infrastructure is insufficient to cope with that and the additional pollution.

There have been houses built on the old Sutton site, further down the road nearer to Sutton on Elton Head Road plus the new Waterside development with additional housing suggested there. Elton Head Road is heavily used at present including a through route for the ambulance service which means the traffic noise is already high and the number of cars, vans, buses and wagons also contribute to the pollution. 03

The area of Rainhill only has one A road which services this area in addition to the by pass so it is heavily used and Elton Head Road is used as a cut through.

Add another 160 cars plus would add to congestion, pollution and noise levels.

This will also impact pedestrian safety to have increased traffic and again pollution levels.

I have breathing problems and over the past few years I have reviewed the pollution levels and surrounding areas and between 2013 and 2015 there were on average 51.9 deaths per 100,000 from

respiratory diseases in the under 75s compared to 44.3 for the North West and 33.1 for the rest of England with Thatto Heath rated as the second highest effected in the Borough. 03

Therefore this area of Elton Head Road would be affected by the increase not only of cars but the additional pollution linked to homes and gardens.

The area designated in 7HS is a natural green band of land which acts as a buffer between the industrial buildings built on the link way and the new housing estate further down Elton Head Road. There are foxes and rabbits, bats, squirrels and the occasional heron who inhabit the area and there are numerous wild birds in the area.

If this area were to disappear and removed from the green belt area and place into safe guarding and then subsequently development it would be one large housing estate from Rainhill through to St Helens forming a huge urban development and lack of green space. OK

If areas of natural land are removed from the green belt areas then this would cause significant harm to the purpose of having the green belt.

Additional housing would add to the problems of school places and availability of seeing the doctor in the local surgeries. It could also impact hospital and A&E facilities, doctors and dentists. If the new houses were occupied and they could not gain access to local facilities then they would have to travel and again this adds to the amount of cars on the road. 05

If you add approximately 160 cars (some families will have more than 2 cars) and the number of journeys per day then we would find it hard to exit our close which is hard at the moment between the hours of 7 and 9 and then 3 and 5 and 6 and 8 due to the rush hour and school times. 03

There is also flooding every year on the road and the three closes opposite the proposed site were built on 3 ponds and this is obvious in times of bad weather.

At moment at least the water is near the farm land and does not always spread across the road.

If there was significant building then the utilities and facilities would need to be thoroughly excavated and proper drainage and management implemented. 06

The area has confirmed flood zones and a high water table to lose the space available to help with the drainage could put our houses at risk of flooding.

We also have shortages every now and then and broadband can drop in and out and if you add further volumes then this could impact these services again if volumes increased. 07

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

The council should not consider removing this land from green belt or open spaces to place in safe guarding.

I have been advised that this could be reviewed every five years so although it states it is safeguarded until 2035 I am registering my representation for my future safety and wellbeing.

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

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

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

Response Date	3/12/2019 3:02:20 PM
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**Representor Details**

Web Reference Number	WF0489
Type of Submission	Web submission
Full Name	Mrs Clare McDermott
Organisation	
Address	8 Mallard Gardens, St Helens, Merseyside WA9 5BL
Agent Details	

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

Yes (via e-mail)

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

Policy	LPC01, LPC02, LPC05, LPD03
Paragraph / diagram / table	7HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective

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

The area is subject to flooding and the underground drains only just cope with the heavy rain due to previous low lying land and 3 x ponds that were previously in situ around Broadlands and the three closes including Mallard.

There are too many houses being built in the area and insufficient roads to be able to cope with the additional traffic. This will cause heavier use of the roads. At present it can take 20 minutes to get out of our close at present and this is before the end of Elton Head Road is opened up to all the new houses there.

The road and drainage will not be able to sustain more houses plus the infrastructure as there were multiple power cuts when the Broadlands were being built and also the Larches and Retirement village on Elton Head Road.

The field is also one of the last pieces of open land in the area now that Riverside and the Sutton sites are being built and the industrial units on the link way will make the area look more city than country. Building more houses on open land is unnecessary and there are many existing sites that can be redeveloped rather than destroying more green belt land.

The council needs to gain more funds because of cuts but to destroy the areas for short term gain and put additional strain on the infrastructure and make the area more like one huge housing estate is ludicrous and unjustifiable.

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

Review the actual turnover of homes and what is being sold before deciding to build even more homes without the supporting schools, hospitals, utilities and roads and look at rebuilding areas that already have had buildings and get the builders to use those sites rather than destroy virgin green land.

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

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

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

Response Date	1/21/2019 8:52:56 PM
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RO1160



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

Ref: LPSD

11 MAR 2019

(For official use only)

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

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>COUNCILLOR</u>	Title: _____
First Name: <u>DENNIS</u>	First name: _____
Last Name: <u>MCDONNELL</u>	Last Name: _____
Organisation/company: <u>ST HELENS MBC</u>	Organisation/company: _____
Address: <u>DEMOCRATIC SERVICES</u>	Address: _____
<u>TOWN HALL</u>	_____
<u>VICTORIA SQUARE</u>	_____
Postcode: <u>SC HELENS WA10 1HR</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	_____

Signature: _____	Date: <u>08-03-19</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.

## PART B - YOUR REPRESENTATION CLLR D MCDONNELL

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)				LOCAL PLAN 2020-2035 GREENBELT REVIEW DEC-2018: MINOR ADJUSTMENTS TABLE 6.1 AC06 PAGE 153					

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 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>AC06 1) NOT COMPLIANT WITH NPPF "GREEN BELT BOUNDARIES IN EXCEPTIONAL CIRCUMSTANCES SHOULD ONLY BE ALTERED" (NO EXCEPTIONAL CIRCUMSTANCE GIVEN) 2) IMPACT ON REMAINING GREENBELT IS LIKELY TO RUIN THE OPEN RURAL ASPECT OF THE LAND 3) THE PROPOSAL IS UNSOUND AS REASONABLE ALTERNATIVES ARE NOT CONSIDERED 4) PROPOSAL IS AGAINST ST HELENS COUNCIL POLICY TO MINIMISE THE REMOVAL OF GREENBELT LAND</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.

A 'REASONABLE ALTERNATIVE' IS OFFERED AS A MODIFICATION TO MAKE THE LOCAL PLAN LEGALLY COMPLIANT AND SOUND:-

REPLACE THE TEXT OF AC06 PAGE 153 WITH:-

"THAT THE GREENBELT BOUNDARY BE REALIGNED ALONG THE REAR GARDEN FENCES OF THE PROPERTIES STANDING ON CARR MILL ROAD AND THAT THE CLUSTER OF CONVERTED FARM BUILDINGS REMAIN IN THE GREENBELT"

PLEASE SEE ATTACHED FURTHER DETAILS

Please continue on a separate sheet if necessary

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

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

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

No, I do not wish to participate at the oral examination	<b>YES</b>	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 IS NORMAL PROCEDURE FOR WARD COUNCILLORS TO MAKE VERBAL REPRESENTATION ON BEHALF OF LOCAL RESIDENTS

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

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

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





## **St. Helens Council**

---

**Democratic Services  
Town Hall  
Victoria Square  
St Helens WA10 1HP**

**Planning Inspector  
St Helens Local Plan**

**Please reply to :-  
Cllr D Mc Donnell**

**8th March 2019**

### **The St Helens Borough Local Plan 2020-2035 Submission Draft**

#### **Representation to the Government Planning Inspector concerning the Greenbelt Review AC06 Barrows Farm, Carr Mill Road, Billinge**

**Dear Inspector,**

The Greenbelt Review proposes that Barrows Farm is taken out of the Greenbelt for the following reasons:-

AC06 The current Greenbelt Boundary includes a number of dwellings and business outlets in this location and follows no visible boundary on the ground. As the site is already significantly developed it is recommended that the Greenbelt Boundary is realigned to follow the rear of the existing outbuildings.

There is an anomaly at No.83 and No.83a Carr Mill Road as the Greenbelt Boundary runs along the street in front of these properties. The reason for this is because No.83 was the original Farm house and No. 83a is a new build permitted as infilling along the street. Both properties are in the Greenbelt and should be removed. The Greenbelt Boundary should run along their rear garden fences as it does for the rest of the street. This would give a clear visible boundary on the ground.

The proposal to remove the cluster of Converted Farm Buildings to correct the Greenbelt Boundary at the farm is unnecessary and goes against Council Policy to retain as much Greenbelt land as is reasonably possible.

The statement that "The site is already significantly developed" (so should be removed from the Greenbelt) is misleading.

There are no new developments at this site only a 'change of use' of the original Farm Buildings (which occurred 30 years ago)

The Converted Farm Buildings occupy the same footprint as they have for the past 100 years. The open rural aspect of the site has not changed the Farm Buildings belong in the Greenbelt.

The Ward Councillors have met with Planning Officers and have proposed the following alternative for AC06 Barrows Farm:-

"That the Greenbelt Boundary be realigned along the rear garden fences of the properties standing on Carr Mill Road and that the cluster of Converted Farm Buildings remain in the Greenbelt"

The Planning Officers have not expressed disagreement with this alternative but cannot amend the Submission Draft at this final stage. Therefore the recommendation to adopt the alternative proposal for the Greenbelt Boundary is brought to your attention.

The Ward Councillors of Billinge & Seneley Green would be happy to attend any Hearing that you deem necessary to give verbal representation on this matter.

**Yours Sincerely,**

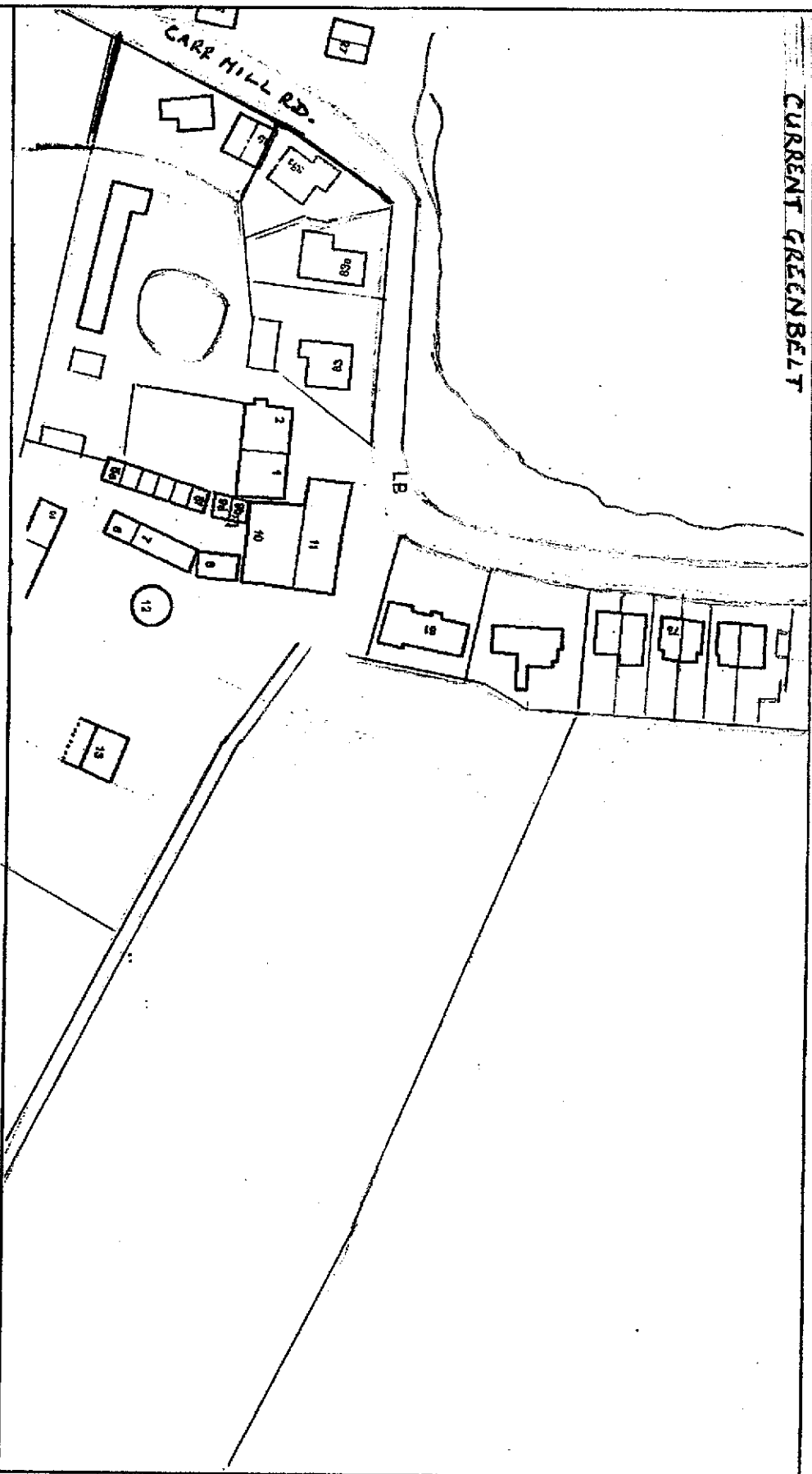
**Cllr D Mc Donnell**

**Cllr S E Murphy**

**Cllr J Pearson**

**Billinge & Seneley Green Ward  
St Helens MBC**

**CURRENT GREENBELT**



**Barrows Farm, Carr Mill Road, Billinge, WNS 7TX**

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**Development Control Section  
Chief Executives Department  
St Helens Council**

**Scale 1/1250**

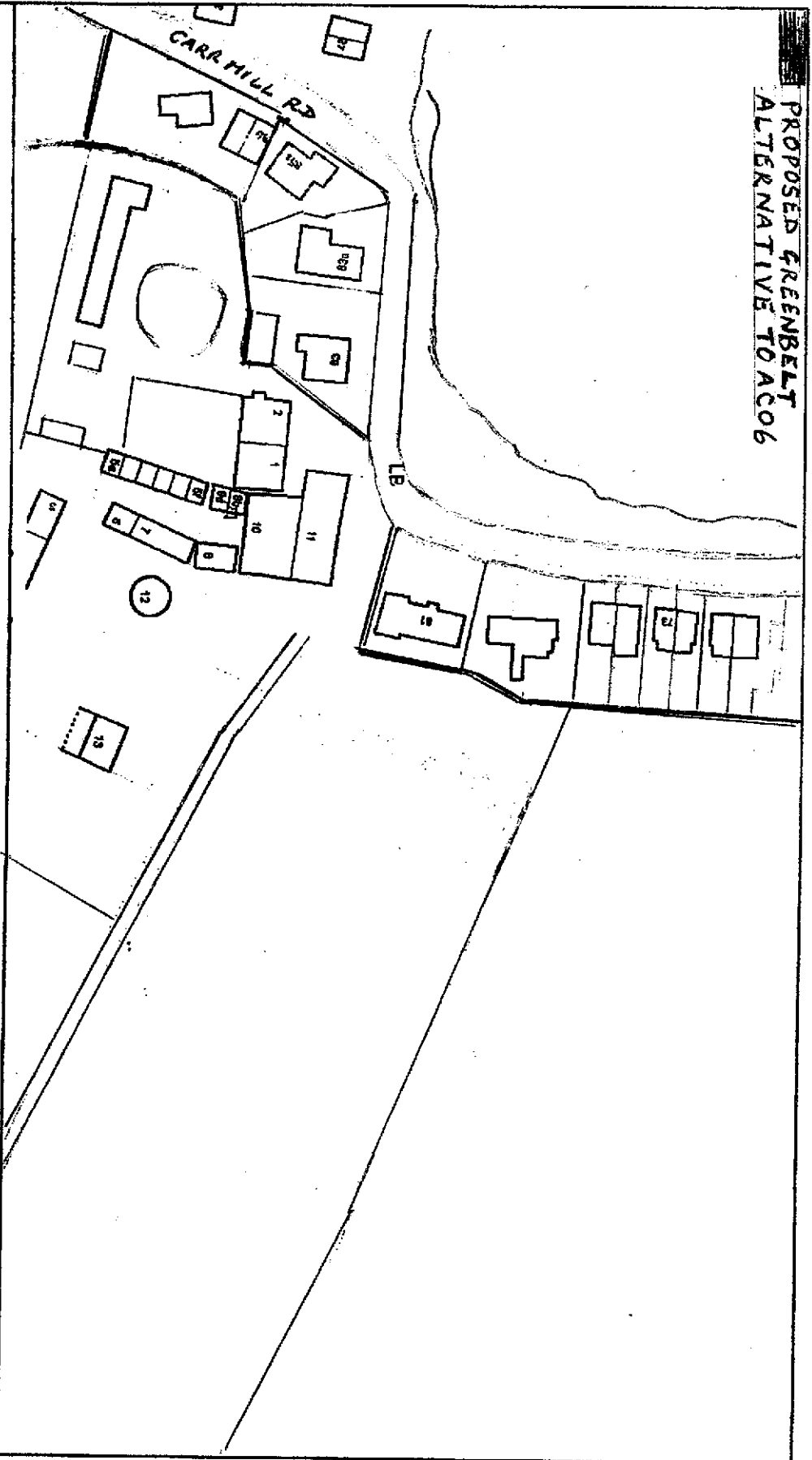
**Date 11/5/2017**

**Centre = 353047 E 399363 N**

**St Helens Council  
Corporate GIS Unit**



**PROPOSED GREENBELT  
ALTERNATIVE TO AC06**



**Barrows Farm, Carr Mill Road, Billinge, WN5 7TX**

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**Development Control Section  
Chief Executives Department  
St Helens Council**

**Scale 1/1250**

**Date 11/5/2017**

**Centre = 353047 E 399363 N**

**St. Helens Council  
Corporate GIS Unit**

RO1161



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: JESSICA	First name:
Last Name: MCELROY	Last Name:
Organisation/company:	Organisation/company:
Address: 234 CLOCKFACE ROAD CLOCKFACE ST. HELENS MERSEYSIDE	Address:
Postcode: WA9 4LY	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 4-4-19
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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 ☒ (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.



RO1162



St.Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

1127

13 MAY 2019

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: JOHN	First name:
Last Name: MCELROY	Last Name:
Organisation/company:	Organisation/company:
Address: 234 CLOCKFACE CLOCKFACE ST. HELENS MERSEYSIDE	Address:
Postcode: WA9 4LX.	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 4-4-19
-----------------------	--------------

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.

RO1163



**Representor Details**

Web Reference Number	WF0021
Type of Submission	Web submission
Full Name	Mrs Michelle Mcelroy
Organisation	
Address	234 clockface road clockface st helens merseyside wa94lx Wa94lx
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	All
Other documents	

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

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

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

**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**

I oppose to any building on greenbelt land

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

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

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

Response Date	3/23/2019 8:47:57 PM
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RO1165

①-LPA02

②-Para 17.2 DTC

EL0161.pdf



RAG Submission

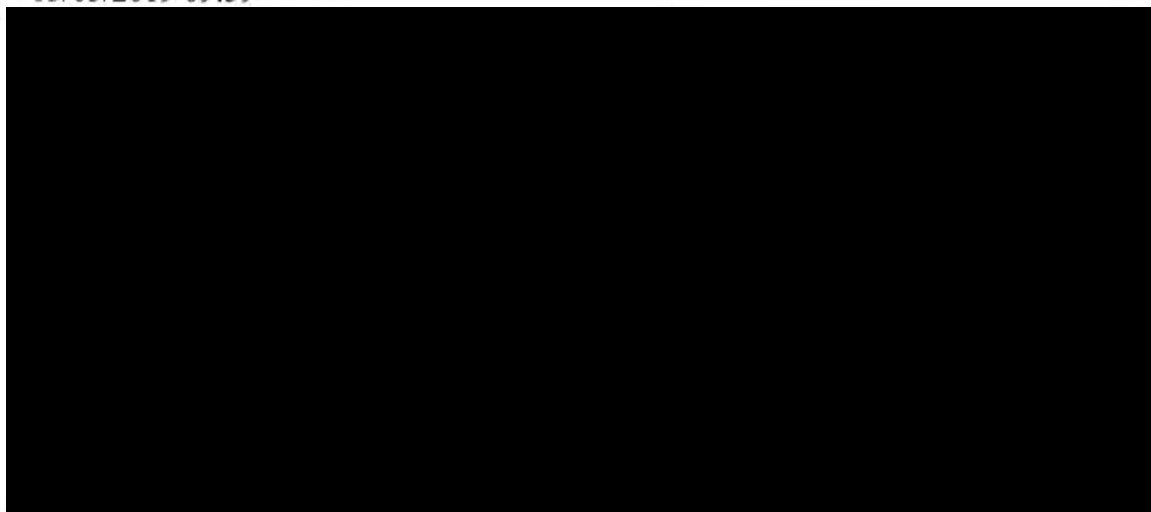
③-LPA07

④-LPA05

to:

planningpolicy

13/03/2019 09:59



1 Attachment



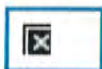
RAG Submission Final.docx

Dear Sirs,

Please find attached the representation from Rainford Action Group re the St Helens Plan 2020-2035 proposed Submission Draft

Kind Regards,

**Ian McFegan**



Virus-free. [www.avast.com](http://www.avast.com)



① - LPA02      ② - Para 1.7.2 DTC  
③ - LPA07      ④ - LPA05

## **Rainford Action Group (RAG) Representation; St. Helens Local Plan 2020-2035 Proposed Submission Draft**

**March 2018**

1. Purpose
2. Introduction
3. Overall Plan
4. Comments on site 8HA (Land South of Higher Lane and East of Rookery Lane, Rainford)
5. Appendix 1

Key	
Abbreviation	Full Title
SHLP	St. Helens Local Plan 2020 -2035 Proposed Submission Draft
SHBC	St Helens Borough Council ("The Council")
RAG	Rainford Action Group

## **1. Purpose**

- 1.1 This submission is made on behalf of Rainford Action Group (RAG) in consultation with the concerns raised by the local residents and complements the SHGBA submission by Kirkwells.

## **2. Introduction**

- 2.1 RAG was formed in Dec 2016, initially to help Rainford residents to understand what was being proposed by St. Helens Council in the SHLPP, and to help them through the somewhat complicated submission process.
- 2.2 Many residents were deeply concerned by the scale of development in Rainford proposed by that document. A committee was formed to represent the views of the community and encourage participation in the process.
- 2.3 Public meetings were held with over 400 attendees, and a Facebook Group was set up which currently has 1,500 members, as well as a Twitter account with over 1,000 followers.
- 2.4 RAG welcomes the reduction in the number of sites and housing numbers proposed for Rainford in the St.Helens Local Plan 2020-2035 Proposed Submission Draft.
- 2.5 RAG is not against development *per se*, and accepts the need for new housing in the right amount and location and where there is a proven need.
- 2.6 We would also like to see the early adoption of a local Plan. However, we do not believe that this Proposed Submission Draft passes the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF ) and there are number of issues we feel need to be addressed which are set out below.



### 3. Overall Plan

In summary our issues with the overall plan are;

- 
- 3.1 There are no exceptional circumstances to justify not using the standard method to calculate housing need
  - 3.2 The economic analysis is flawed and based on over-optimistic assumptions
  - 3.3 The level of land needed for housing and employment is therefore not as high as set out in the Plan 01
  - 3.4 There are therefore no exceptional circumstances to change Green belt boundaries
  - 3.5 Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated
- 

- 3.6 The Council have failed to co-operate with other councils and have not published any statement(s) of common ground. 02
- 

- 3.7 Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth. 03
- 

*[Note: Points 3.1 to 3.6 are covered in detail in the Kirkwell's submission on behalf of St Helens Green Belt Association, and by Dr Athey's submission.]*

### 4. Comments on Site 8HA

(Land South of Higher Lane and East of Rookery Lane, Rainford)

- 
- 4.1 Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1. It is therefore logical that this should be the first site Green Belt site released from development if the housing need is reduced. We are arguing (3.1 above) that the Council should use the Standard method of 468 rather than the uplifted 486, which over 19 years equates to 342 fewer houses. This comfortably exceeds the 259 houses planned for site 8HA 04
-



- 4.2 This site is next to an Industrial Area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142. (See Appendix 1 for further details)
- 4.3 The site is Grade 1 Agricultural Land and is some of the most fertile land in the Country. Just 2.7% of the surface area of England is as Grade 1 Agricultural Land. It is actively farmed, providing 2 crops per year and employment in the agricultural sector. These jobs are threatened by the proposed removal of this site from the Green Belt. Housing in close proximity to the Industrial Area will limit future activity and expansion of this site, due to health, safety and amenity concerns. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect. 04
- 4.4 Site 8HA is close to two accident blackspots in Rainford at either end of Mill Lane and traffic from this site will inevitably pass through one or other of these junctions on the way to/from St Helens
- 4.5 The site is reasonably well served by bus, with hourly bus services to St Helens and Ormskirk, but poorly served by rail with the nearest train station located in Rainford Junction over 2 miles away with minimal parking facilities.
- 4.6 The site promotes biodiversity and sustains wildlife. Building will destroy habitat and reduce biodiversity. Mitigation is not properly addressed in the Plan.
-

## APPENDIX 1

### Supporting details for point 4.2

The requirements scheduled for this development in the site profile in Appendix 5 are;

- *Safe highway access should be provided from both Rookery Lane and Higher Lane (with any necessary off-site improvements).*
- *Appropriate noise attenuation measures, should be incorporated to protect new residents from unacceptable noise levels from the adjoining industrial area.*
- *A flood attenuation feature and habitat creation (similar to existing woodland to the south-east of the site) would be required along the south -western boundary with Rainford Linear Park (minimum 25m).*
- *Existing protected trees within the site should be given due consideration in line with Policy LPC10.*
- *The design and layout should provide for a range of house types in accordance with Policy LPC01 and LPC02.*

There is no indication that either safety or pollution issues have been adequately considered. Smoke and pollution have been observed on a number of occasions extending onto the proposed site.

See images taken on the following dates

- a) 25 January 2019 @ 13.33 (Photos 1 & 2)



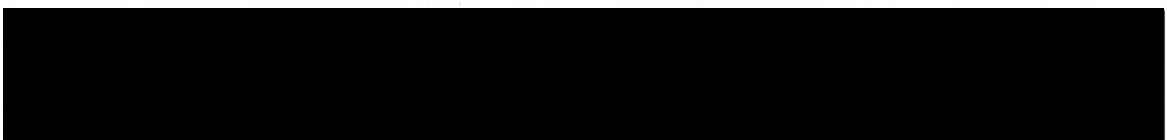




b) 07 January 2019 @ 08.31 (Photo 3)



c) Monday 11 Feb. 2019 @ 08.31am (Photo 4)





## NEWS REPORT ON EXPLOSION

On 28<sup>th</sup> May 2018 there was a “huge explosion” at one of the units adjacent to this site, which is an example of the dangers of siting housing so close to industrial activity. See report and photo below from the Liverpool Echo

<https://www.liverpoolecho.co.uk/news/liverpool-news/reports-massive-explosion-before-fire-14711206>

A “massive explosion” was heard shortly before a fire broke out at a Merseyside industrial estate this evening. Fire crews were called to **Rainford** Industrial estate, in **St Helens**, at around 7.40pm to reports of thick black smoke coming from the building on Sandwash Close. People in the area at the time said the bang was so loud it “shook the windows”.

One woman, who lives on Mill Lane, told the ECHO: “We we’re having a barbecue out the back and heard a massive explosion. It startled us all a bit and my husband said it shook the windows in the kitchen. “When we came out to look we could see the black smoke coming out. It looked like it was travelling for miles.”



Another local resident said she was walking her dog on the “dirt track” next the industrial estate when she heard between six and eight bangs and saw thick smoke and big flames shoot into the air.

Crews are still battling the large fire at the site but the smoke has subsided significantly and it appears to be under control.

A road closure is currently in place on Sandwash Close and people are asked to avoid the area.

A Merseyside Police spokesperson said on Twitter: “Please be aware that we have received reports of a large fire at Mill Lane - Rainford Industrial Estate.

RO1166





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)

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**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: IAN <del>McFESAN</del>	First name:
Last Name: McFESAN	Last Name:
Organisation/company:	Organisation/company:
Address: 83 HEYES AVENUE RAINFORD	Address:
Postcode: WAL 8AP	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

09/03/2019

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

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

Yes ☒ (Via Email)

No ☐

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



## RETURN DETAILS

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

post to:

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

**or by hand delivery to:**

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

**or** by e-mail to:

**planningpolicy@sthelens.gov.uk**

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

### FURTHER INFORMATION

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

**Email:**

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

**Telephone:**

01744 676190

## NEXT STEPS

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

## DATA PROTECTION

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

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**



## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulation Assessment	<input checked="" type="checkbox"/>
Other documents (please name document and relevant part/section)				GREEN BELT REVIEW					

### 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

1. There are no exceptional circumstances to justify not using the standard method of housing need.
2. The economic analysis is flawed and based on over-optimistic assumptions
3. The amount of land needed is <sup>therefore</sup> as high as set out in the Local Plan.
4. Therefore there are no exceptional circumstances as required to change Green Belt boundaries
5. Other reasonable alternatives have not been fully explored, such as lower target figures and using more previously developed land.
6. The Council have failed to co-operate with other councils in any meaningful way, and have not published statements of common ground. For these reasons it should fail both the legal tests and the test of soundness. Please continue on a separate sheet if necessary

①

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.

SHBC should amend the Plan by retaining the Green Belt, reducing the housing and employment targets and allocating more previously developed land.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

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.



RO1167



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)

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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: LUCY	First name:
Last Name: MCFEGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 83 HEYES AVENUE RAINFORD	Address:
Postcode: WA11 8AP	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

10/03/19

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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 ☒

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or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Other documents (please name document and relevant part/section)				GREEN BELT REVIEW					

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"/>

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Please continue on a separate sheet if necessary



SHBC should amend the plan by retaining the green belt, reducing the housing and employment targets and allocating more previously developed land.

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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)		Yes, I wish to participate at the oral
--	--	--

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**Please keep a copy for future reference.**

RO1168





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Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
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Ref: LPSD

13 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: PENNY	First name:
Last Name: McFEGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 83, HEYES AVE RAINFORD	Address:
Postcode: WA11 8AP	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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No ☒

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**Please use a separate copy of Part B for each separate comment/representation.**



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3. To which part of the Local Plan does this representation relate?									
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Other documents (please name document and relevant part/section)				GREEN BELT REVIEW					

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"/>
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. There are no exceptional circumstances to justify not using the standard Method of housing needs.
  2. Economic analysis is flawed and based on over optimistic assumptions
  3. The amount of land needed is therefore not as high as set out in the local plan.
  4. Therefore there are no exceptional circumstances as required to change greenbelt boundaries
  5. Other reasonable alternatives have not been fully explored, such as lower target figures and using more previously developed land.
  6. The Council have failed to co-operate with other councils in any meaningful way and have not published statements of common ground. For these reasons it should fail both the legal tests and the test of soundness.
- 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.

SHBC should amend the plan by retaining the green belt, reducing the housing and employment targets and allocating more previously developed land.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

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.

RO1169



St. Helens  
Council

613

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](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS .	Title:
First Name: ELIZABETH	First name:
Last Name: MCGOWAN	Last Name:
Organisation/company:	Organisation/company:
Address: 64 CORONATION ROAD - WINDLE	Address:
Postcode: WA10 6BG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

8.3.19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☒

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us by no later than 5pm on Wednesday 13<sup>th</sup> March 2019 by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or by e-mail to:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Please note we are unable to accept faxed copies of this form.

### FURTHER INFORMATION

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**



## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	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: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes	No
Sound?	Yes	No <b>X</b>
Complies with the Duty to Cooperate	Yes	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?	<b>X</b>
Justified?	<b>X</b>
Effective?	<b>X</b>
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

Adequate regional and cross border collaboration has not been undertaken. <sup>2</sup> 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 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.

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



**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

<b>X</b>	<b>No, I do not wish to participate at the oral examination</b>		<b>Yes, I wish to participate at the oral examination</b>
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10

**Thank you for taking the time to complete and return this response form.**  
**Please keep a copy for future reference.**

RO1170

**Representor Details**

Web Reference Number	WF0212
Type of Submission	Web submission
Full Name	Mr Christopher McGowan
Organisation	
Address	64 Coronation Road Windle St Helens WA10 6BG
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 2018

**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

**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.**

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 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.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/11/2019 7:45:47 PM
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RO1171

E10233



Objection to planning development in Rainford, as part of St Helens Borough Local Plan 2020-35, in particular related to HA Rookery Lane

McKenna, Simon

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:17

Hide Details

Sine 811

① - L.P.A.

② - D.C.

③ - S.A.

Hello,

I would like to raise my objection to the planned work in Rainford. My name is Simon McKenna and I live at 39 Lakeside Gardens, Rainford, St Helens, WA11 8HH.

The points I would like to make on the plan overall are;

- There are no exceptional circumstances to justify not using the standard method to calculate the housing need.
- The economic analysis is flawed and based on over-optimistic assumptions.
- The level of land needed if 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 statements of common ground.

Rainford Specific points (8HA Rookery Lane).

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is the least appropriate Green Belt site allocated for housing in Phase 1.
- The site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to the being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector, which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

In addition, all the previous objections I raised in my earlier email related to previous plan remain relevant to this.

Kind Regards

Simon McKenna



RO1172

U10234



FW: Objection to planning development in Rainford, as part of St Helens Borough Local Plan 2020-35, in particular related to HA Rookery Lane  
McKenna, Simon

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:18

Hide Details

Sims 8HA

① - LPA05

② - DEC 1-1-2

③ - S.A.

Hello,

I have been asked to raise this on behalf of my son, Jack McKenna, who lives at 39 Lakeside Gardens, Rainford, St Helens, WA11 8HH

The points I would like to make on the plan overall are;

- There are no exceptional circumstances to justify not using the standard method to calculate the housing need.
- The economic analysis is flawed and based on over-optimistic assumptions.
- The level of land needed if 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 statements of common ground.

①

②

Rainford Specific points (8HA Rookery Lane).

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is the least appropriate Green Belt site allocated for housing in Phase 1.
- The site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to the being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector, which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

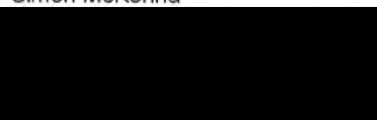
③

④

In addition, all the previous objections I raised in my earlier email related to previous plan remain relevant to this.

Kind Regards

Simon McKenna



RO1173



660235



FW: Objection to planning development in Rainford, as part of St Helens Borough Local Plan 2020-35, in particular related to HA Rookery Lane

McKenna, Simon

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:19

Hide Details

8116 8111

①-LP05

②-DEC

③-S.A.

Hello,

I have been asked to raise this on behalf of my daughter, Rose McKenna, who lives at 39 Lakeside Gardens, Rainford, St Helens, WA11 8HH. She is 15 years old.

The points I would like to make on the plan overall are;

- There are no exceptional circumstances to justify not using the standard method to calculate the housing need.
- The economic analysis is flawed and based on over-optimistic assumptions.
- The level of land needed if 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 statements of common ground.

①

②

Rainford Specific points (8HA Rookery Lane).

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is the least appropriate Green Belt site allocated for housing in Phase 1.
- The site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to the being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector, which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

③

④

In addition, all the previous objections I raised in my earlier email related to previous plan remain relevant to this.

Kind Regards

Simon McKenna

RO1174



Mckenna, Nicola  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:07

ELO259

- ① - LPA 05
- ② - Para 1.7.2
- ③ - S.A

Hello,

I would like to raise my objection to the planned work in Rainford. My name is Nicola McKenna and I live at 39 Lakeside Gardens, Rainford, St Helens, WA11 8HH.

The points I would like to make on the plan overall are;

- There are no exceptional circumstances to justify not using the standard method to calculate the housing need.
- The economic analysis is flawed and based on over-optimistic assumptions.
- The level of land needed if 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 statements of common ground.

①

②

Rainford Specific points (8HA Rookery Lane).

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is the least appropriate Green Belt site allocated for housing in Phase 1.
- The site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to the being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector, which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

③

①

Nicola McKenna

If you are not the intended recipient or have received this message in error, please notify the sender and permanently delete this message and any attachments. Gartner UK Limited is a company registered in England and Wales with the registration number 2266016. The Registered Office is Tamesis, The Glanty, Egham, Surrey, TW20 9AH.



RO1175

**Representor Details**

Web Reference Number	WF0348
Type of Submission	Web submission
Full Name	Mrs Kathleen McKeon
Organisation	
Address	37 Sandfield Road Eccleston St Helens Merseyside WA105LR
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of “Contaminated Land (CL) sites” (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing ‘unsuitable’ sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/5/2019 6:15:42 PM
---------------	---------------------



RO1176

**Representor Details**

Web Reference Number	WF0349
Type of Submission	Web submission
Full Name	Miss Alice McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Local Plan
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of “Contaminated Land (CL) sites” (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing ‘unsuitable’ sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/5/2019 6:11:32 PM
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RO1177

① - LPA04    ② - LPA05    ③ - GEN  
 ④ - IDP    ⑤ - Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0388
Type of Submission	Web submission
Full Name	Mr John McKeon
Organisation	Mr
Address	3 Windlebrook Crescent Windle WA10 6DY
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.

The plan is: based on flawed methodology; not deliverable and does not comply with NPPF 2018.

Also, the plan does not satisfy :

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

③

①

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②

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
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④

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**7. Please set out modification(s) you consider are necessary**

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/3/2019 10:06:47 AM
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RO1178

**Representor Details**

Web Reference Number	WF0445
Type of Submission	Web submission
Full Name	Mr Paul McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	Areas 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

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- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
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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	2/24/2019 3:12:06 PM
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RO1179

**Representor Details**

Web Reference Number	WF0446
Type of Submission	Web submission
Full Name	Mrs Helen McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	Area s 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	yes
Habitats Regulation Assessment	yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/24/2019 3:06:37 PM
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RO1180

**Representor Details**

Web Reference Number	WF0043
Type of Submission	Web submission
Full Name	Mrs Heather McKeown
Organisation	
Address	22 Jackson Close Prescot Rainhill L35 6DA
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	x
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

It is my believe that the road infrastructure around 3HS (2 B Roads; Rainhill Road and Portico Lane and 1 C Road; Two Butt lane) will be unable to support any more traffic, as at certain times of the day it currently experiences great difficulties. Any increase in traffic will impact on other B and C roads including Mill Lane on which my house presently joins and Warrington Road onto which Mill Lane joins. This already has large tail backs of traffic which I experience every day especially during peak times (including school starting and finishing times.)

It is my belief that increased traffic will have a detrimental affect on pedestrian safety as well as air pollution. St Helens already has a higher rate of death due to respiratory problems than other areas of the North West and the rest of England with Thatto Heath having the second highest rate in the borough.

As a resident in St Helens it is my firm belief that if 3HS is removed from Greenbelt and placed into Safeguarding and given the opportunity to built a huge amount of dwellings on there would be no natural green buffer area to separate the areas of Whiston, Portico, Eccleston Park, Nutgrove, Thatto Heath and Rainhill and therefore create a continuous area of urban dwellings and green space for our future generations will be lost forever. St Helens Council brownfield register does however suggest there is availability for 5058 houses to be built on therefore 3HS can remain under Greenbelt thus protecting many species of flora and fauna, including more than 13 of which are

protected. It is my opinion that this is the preferred option for St Helens Council to follow and keep 3HS as Greenbelt and should not place 3HS in safeguarded.

**7. Please set out modification(s) you consider are necessary**

It is my opinion that 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 most definitely not consider removing this land from Greenbelt and place it in safeguarded.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/13/2019 4:05:13 PM
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RO1181

**Representor Details**

Web Reference Number	WF0146
Type of Submission	Web submission
Full Name	Mr Thomas Mckeown
Organisation	N/A
Address	22 Jackson Close, Rainhill, Prescot, Merseyside. L35 6DA L35 6DA
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Declining Population in the local Area

Brown fields sites to be used first

Number of houses required calculation flawed

Road infrastructure around 3HS unsuitable

Increase in traffic noise and environmental pollution unacceptable

Increase Traffic around not manageable

Major Roads to congested already without increased numbers

Green belt should be preserved for our health and future generations once gone not replaceable within the same boundaries

Parcel 3HS is of particular beauty and supports a variety of fauna and flora

**7. Please set out modification(s) you consider are necessary**

Parcel 3HS of Policy LPA06 should be removed from the proposal of removing its status or land name as GreenBelt

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 8:14:54 PM
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RO1182



St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

## Part A - Personal Details

## Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>Anthony Thomas</u>	First name: _____
Last Name: <u>McLauchlan</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>41 Fairclough Crescent</u> <u>Hagdock St Helens</u>	Address: _____
Postcode: <u>WA1 0EZ</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: [REDACTED]	Date: <u>28/2/19</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](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LpA04 2CA 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?	<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 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.

Not justified The Council should be put to strict proof of the need for this type of development in this position and its scale.  
Flooding / Traffic /  
look for Brownfield Sites 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.

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	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:


---

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

## Part A - Personal Details

## Part B - Your Representation(s)

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

#### 1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Anthony Thomas

Last Name: McChesney

Organisation/company: \_\_\_\_\_

Address: 41 Fairchase Close  
Hagdock S7 Helens

Postcode: W11 0E2

#### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: 28/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

#### Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

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If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **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?									
Policy LPA 05 site ZHA		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 <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"/>

<p><b>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></b></p> <p><b>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.</b></p> <p><i>Housing in this area isn't sustainable because of the lack of school places/ doctors surgeries/ bus routes and other services</i></p> <p><i>Flooding problems will cause major issues at Blackbrook.</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 this land from the proposal 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	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.**



RO1183



St. Helens  
Council

# 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](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS Angela M. McLaughlin</u>	Title: _____
First Name: <u>Angela</u>	First name: _____
Last Name: <u>McLaughlin</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>41, Fairclough Crescent</u> <u>Haydock</u>	Address: _____
Postcode: <u>WA11 0EZ</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: [REDACTED]	Date: <u>28/2/19</u>
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. ✓

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

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Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## NEXT STEPS

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**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 LP A04 SITES ZEA SEA DEA		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 <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 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>1) Not justified the council should be put to strict proof of the need for this type of development, in this position and on the scale.</p> <p>2) Council already granted planning permission in the greenbelt. (Site ZEA - Flindas Farm North</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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St. Helens  
Council

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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: Angela

Last Name: McLaughlin

Organisation/company: \_\_\_\_\_

Address: 41 Fairclough Cres

Postcode: W11 0E2

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: 28/2/19

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Policy LPA 05 SITE ZHA		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 tick as appropriate

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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 <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 access to the site is inadequate, a left in/left out from the East Lancs road is not safe and the proposal for a junction at Liverpool road and Vicarage Road would put additional traffic on an already overstretched highway system.</p> <p>2/ And existing flooding problems at this site, creating greater amounts of water into Clipsley Brook</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

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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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RO1184

①-LPA01 ②-LPA02 ③-LPA04 ④-LPA02

WF0394.pdf

⑤-Green Belt Review 2018 ⑥-LPA04 ⑦-Para 1.7.2 DTC

⑧-LPA05 ⑨-LPA08 ⑩-LPA07 ⑪-LPA08

### Representor Details

Web Reference Number	WF0394
Type of Submission	Web submission
Full Name	Mr Michael McLoughlin
Organisation	
Address	3b Sadlers Lane Rainford St. Helens WA11 7HT
Agent Details	Mr Michael McLoughlin

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

### 5. If you consider the Local Plan is unsound, it because it is not:

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

this version does not satisfy:

- the requirement for Sustainable development 01
  - the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
  - sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
  - effective land use by concentrating on Green Space development over town centre development with higher densities. 04
  - food security by ignoring Agricultural Land Quality. 05
- In addition, the following fundamental elements of the Plan remain questionable -
- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
  - Adequate regional and cross border collaboration has not been undertaken. 07
  - The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
  - The latest estimate produced by the ONS (2016) predicts that 383 houses

per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

---

- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

---

- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

---

- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

---

- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

---

#### 7. Please set out modification(s) you consider are necessary

#### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

#### 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/2/2019 1:35:59 PM
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①-LPA04 ②-LPA05 ③-GEN  
④-IDP ⑤-Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0395
Type of Submission	Web submission
Full Name	Mr Michael McLoughlin
Organisation	
Address	3b Sadlers Lane Rainford St. Helens WA11 7HT
Agent Details	Mrs Patricia McLoughlin 3b Sadlers Lane Rainford St. Helens, WA11 7HT

**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
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:

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this version does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

③

①

⑤

• The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

• The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

• The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

• The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

• The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

• The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

• The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26.

The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

• The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

• The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

## 7. Please set out modification(s) you consider are necessary

## 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

## 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

3/2/2019 1:22:19 PM

RO1185





**Site rookery lane /Higher Lane Rainford . 8HA**

**Joanne McMahon** to: planningpolicy

13/03/2019 15:51

Dear sir/madam

The issues I have with the above site 8HA Rookery lane /higher lane being taken out the green belt are as follows.

I feel there are

"No exceptional circumstances."

There's has not been enough effort to find alternative "brownfield sites"

Population figures are dated and therefore a need for as many houses stated by SHCC are unrealistic. From the censuses 1981,1991,2001,2011 population figures have been on the decline.

The site is next to a busy industrial estate and therefore subject to the risks associated with industrial services such as pollution, explosions both have recently been reported. And heavy traffic.

Traffic and congestion are already a major issue for Rainford residents.

And with Florida Farm and the Superport already being approved in the local plan development of this site will only add to the problem of air pollution and congestion.

The site in question is grade 1 agricultural land and I feel taking this farming field away would be a crime. Only 2.7 % of the surface of the country is grade 1 agricultural land. This site is farmed regularly with 2 crops a year and serves employment locally. As Brexit is nearing and the uncertainty of a "deal" being agreed I don't think we should be losing this site to development.

The site promotes wildlife and building will destroy the habitat and reduce the biodiversity of the village.

I feel a thorough review of "brownfield" sites should be explored and these to be developed regardless of the cost implications before any green belt sites.

The site in question does have a decent bus route but a very limited train service which is over 2 miles away with very limited parking. This would need to be improved before any development of this site as more houses equals more potential commuters.

Yours faithfully

Joanne McMahon

139, Ormskirk Road

Rainford

St Helens

Merseyside

Wall18jb

Sent from my iPhone

Joanne McMahon.

RO1186



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: <i>Mr</i>	Title:
First Name: <i>Harry</i>	First name:
Last Name: <i>Mr Mawds</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>317A Garswood Road</i>	Address:
Postcode: <i>WN4 1TV</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <i>12.05.2019</i>
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**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes ☐ (Via Email)

No ☒



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on ~~Monday 13<sup>th</sup>~~ ~~Monday~~ MAY 2019** by:

post to:

**Local Plan  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:

Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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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
LP <del>10</del> 5		(1)		IHA			
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 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"/>

<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>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, there will need to be a school built on the new estate as the school run on the existing estate is very chaotic, with cars parked around the school causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is</p>
---



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 Garswood Road// BILLINGE 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. In addition there were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the nearly all the fields in Garswood. This will need to be factored in to the cost of building the estate. N.B. The number of children with asthma is increasing due to pollution and there are a significant number of children in Garswood with asthma. A child has died due to pollution and that is one child too many.



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, where two more could be built. There is also two on Leyland Green Road. There is a plot on Leyland where a large house was pulled down, there is room for four houses there. 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? In addition enable people who are homeless would it better to build social housing? This government stated that they would combat homelessness. Instead they are enabling developers to become rich.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

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3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table	②	Policies Map	1HS	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

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Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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Please tick as appropriate

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Positively Prepared?	<input 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

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Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	<b>No, I do not wish to participate at the oral examination</b>
--	---

	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:

This image shows a blank white page with some minor scanning artifacts or dust specks visible upon close inspection. There is no text or other graphical content.

**Thank you for taking the time to complete and return this response form.**  
**Please keep a copy for future reference.**



RO1187



St Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:  
[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

### 1. Your Details

(we will correspond via your agent)

Title: MR

First Name: JOHN

Last Name: FIVEIGH

Organisation/company: HOUSE HOLDER

Address: 36 HAMILTON RD

LIARSWOOD

NR WIGAN

Postcode: WN4 0SU

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: 20/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. ✓

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St Helens  
WA10 1HP**

or by hand delivery to:

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Telephone: **01744 676190**

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3. To which part of the Local Plan does this representation relate?									
Policy <i>LPA05</i> <i>1HA</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 type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No <i>Don't Know</i>
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><i>Housing in this area isnt sustainable because of lack schools places, doctors, bus services and car parking near the railway station even building 200/300 houses would mean approx 200+ cars minimum most people have 2 cars. Traffic through the village is bad enough now car parking near station is not safe</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 <sup>land</sup> this from Proposal ~~remove~~  
from Green belt

Please continue on a separate sheet if necessary

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<i>NO</i>	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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148

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**Part B - Your Representation(s)**

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>JOHN</u>	First name: _____
Last Name: <u>MCVEIGH</u>	Last Name: _____
Organisation/company: <u>House Holder</u>	Organisation/company: _____
Address: <u>36 HAMILTON RD</u> <u>GARSWOOD</u> <u>NEW IRAN</u>	Address: _____
Postcode: <u>WN4 0SU</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>20/2/19</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

**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.**

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3. To which part of the Local Plan does this representation relate?									
Policy <i>LPA06</i> <i>IHS</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 type="checkbox"/> No <i>Don 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 not legally compliant or is unsound or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>The release of Greenbelt will cause significant harm to purposes of the Greenbelt</i></p> <p><i>Housing in this area isn't sustainable because of lack of school places, doctors, bus routes</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 This <sup>land</sup> from proposal removal  
from Green belt

Please continue on a separate sheet if necessary

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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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RO1188

①-LPA04 ②-LPA05 ③-GEN  
④-IDP ⑤-Para 17.2 DTC

**Representor Details**

Web Reference Number	WF0285
Type of Submission	Web submission
Full Name	Ms Fiona Meli
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
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	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
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 is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

**7. Please set out modification(s) you consider are necessary**

I do not believe this version satisfies:

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

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.

③

①

- Adequate regional and cross border collaboration has not been undertaken. (5)
- 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. (2)
- 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. (3)
- 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) (4)
- 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. (3)
- 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. (4)

**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	3/9/2019 6:08:57 PM
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RO1189



Representation on the Local Plan Submission Draft  
Lindsay Mellors

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:15

Hide Details

From: Lindsay Mellors

To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Smc 8HA

① LPA05

② PARA 1.7.2

③ S.A.

Dear Sir

I am writing with my comments on the above matter.

In general I am wholly against the development of any land currently designated as Green Belt. This land must be protected for future generations to enjoy and farm. Based on the factual evidence below, there is no justification for the development of any Green Belt land in St. Helens. ✓

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. St. Helens Borough Council 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 St. Helens Borough Council's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142.
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite

③

①

effect.

- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

10

Yours faithfully

Mrs Lindsay Mellors  
1 Springvale Reeds Brow  
Rainford  
St. Helens  
WA11 8PB

Kind Regards

**Lindsay Mellors**





RO1190

Sir 8HA

ELO154



Representation on the Local Plan Submission Draft

Andrew Shaun Mellors

to:

planningpolicy@sthelens.gov.uk

13/03/2019 08:31

Hide Details

From: Andrew Shaun Mellors [REDACTED]

To: "planningpolicy@sthelens.gov.uk" &lt;planningpolicy@sthelens.gov.uk&gt;

① LPA05

② para 1-7.2

③ S.A.

Dear Sir

I am writing with my comments on the above matter.

In general I am wholly against the development of any land currently designated as Green Belt. This land must be protected for future generations to enjoy and farm. Based on the factual evidence below, there is no justification for the development of any Green Belt land in St. Helens. ✓

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
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- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness. St. Helens Borough Council 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)

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- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Yours faithfully

Mrs Andrew Mellors  
1 Springvale Reeds Brow  
Rainford  
St. Helens  
WA11 8PB

Kind Regards

**Andrew Mellors**





RO1191

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:  
[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1194  
13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>JULIA</u>	First name: _____
Last Name: <u>MELVIN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>17 ABBOTS HALL</u> <u>AVENUE CLOCK FACE</u>	Address: _____
Postcode: <u>WA9 4UX</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>12.05.19</u>
------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



RO1192

①-LPA05

②-LPA06

③-GEN

**Representor Details**

Web Reference Number	WF0474
Type of Submission	Web submission
Full Name	The Hon Edward Mercer
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	
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:**

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.**

Monday 18 February 2019

Local Plan Preferred Options Consultation

St.Helens Council,

Town Hall,

Victoria Square,

ST HELENS

WA10 1HP

Dear St Helens Council.

Re: Local Plan Preferred Options Consultation

Whiston Hospital is bursting at the seams. Just a couple of weeks ago they made an appeal for people to stay away from A&E unless they have a dire emergency. Meanwhile GP's surgeries are struggling to cope and the pharmacies where we were urged to go for medical advice are under threat of closure.

Dental practices are not a whole lot better with many reluctant to take on new NHS patients.

As many parents know places in local schools are increasingly difficult to obtain forcing pupils to travel. Given the congestion on our roads travelling even a few miles can be a long commute.

③

So here we are with your plans to build thousands of homes on our beautiful green belt land and n'er a word about infrastructure. While plans announced so far are specific on the number of houses they are rather vague on the details of schools and healthcare facilities.

Joined up thinking it isn't.

I'm no expert but would it not be a good idea to start with a plan of the infrastructure before they start throwing up hundreds of new houses or is that too logical? Are we going to wait until the roads are gridlocked and schools are using Portakabins for classrooms?

We already have the sick sleeping in hospital corridors and ambulances unable to offload patients for lack of beds. St Helens Council have had a vendetta about Eccleston for many years and seem to be hell-bent on closing every facility they can get away with. So what's going on?

How can they plan cut-backs and closures at the same time they are planning thousands of additional houses? It makes no sense whatsoever.

The only logic to be deduced from this is that projects generating profit will be acted upon with great alacrity while those requiring expenditure will be ignored, avoided and denied until the chaos becomes overwhelming. It's a self-perpetuated crisis.

We are not fools. That proportion of the East Lancashire Road close to Windle Island has nose to tail traffic from about 4pm every evening. New residents will love the petrol fumes and all access roads being blocked.

I don't know what image these developments are supposed to project but I'm guessing it isn't overcrowded schools, gridlocked roads and an overnight stay in a hospital corridor.

The recent turn out by Eccleston and Windle residents just goes to show the strength of feeling here. People are angry as the bigger developments will have an even more detrimental effect on our village. The consultation is very clear on the plans for very large numbers of new homes but very sketchy on what kind of infrastructure would be needed to support them. It is blatantly obvious our infrastructure simply cannot cope with these plans. We have no idea for example of how our roads will cope, no idea about how our health services will cope and we don't know how our schools can handle hundreds of extra pupils. If we lose our Greenbelt, it will change our village forever and I am not about to sit back and let that happen without a fight

Eccleston has always been a highly sought after semi rural village due to its attractiveness and village feel but if all the homes you intend to build here go ahead then it would totally change the village and it would become a massive and unattractive urban sprawl. What makes you think so many

houses need to be build? The figures you have arrived at are pure fantasy based on completely

inaccurate projections and nothing more. What makes you think so many people will be rushing to

move to all these new houses when your town centre has totally failed in its objectives. New home

buyers want to live close to towns with a great choice of wonderful shops and amenities like in

Warrington or Wigan. There have been so many new developments in Eccleston over the last 25

years including Longmeadow, The Cloisters, Eccleston Woods, Pikes Bridge Fold, Millers Fold,

Percival Way, St Thomas Close, The Spires, Eccleston Grange, need I go on? We have had far too

much development causing roads to be congested, amenities put under great strain already. Our

only surgery being in a port-a-cabin in the church hall car park, a chemist under a threat of closure

and the promised new one hasn't even been built yet at Eccleston Grange, we have two village

schools who would not cope with many more hundred extra pupils, we have one tiny village hall

with an unusable church hall. There is so much more brownfield sites across the borough which you

have never bothered to look into the possibility of building here.

Can you really see thousands of vehicles going to and from home to work or school once, twice or

many more times a day through residential estates, past schools and along our country lanes? I do

not. You will not be able to make it safer as how are you going to widen roads when so many houses

are in the way? Obviously you have not seen the traffic jams along Gillars Lane and it's junction with

Burrows Lane, the huge volume of traffic along Rainford Road towards Windle Island, down Bleak

Hill Road to its junction with Rainford Road at peak times and this is now before any more



developments are made. Open your eyes and just see how our infrastructure here is and imagine how much worse it would be with the development you propose.

To hear that developers want to destroy the green belt land here is almost beyond belief. There is so much other open land in the borough that isn't green belt, so you should be building on that first and not using the greenbelt just because it's easier or better for you or because they will generate you more profit as they will be in some of the most desirable locations in the borough and you won't need to do anything to detoxify the land.

I totally accept we do need to build more homes in England, but this can be done in a way that preserves our green belts for future generations and prevents urban sprawl. There are alternative ways to build more homes, such as prioritising brownfield development. You have not done this. You have also totally failed to take into account any of the infrastructure issues.

Yours sincerely,

Edward Mercer

**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

2/18/2019 7:12:26 PM

RO1193

ELO136

Site SHa



Rainford HA8 objection  
Jo Meredith  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 22:10

① - LPAOS

② - PARA 1.7.2

③ - S.A.

My full name and address:-

Joanne Michelle Meredith  
19 Mossborough Road  
Rainford  
WA11 8QN

My son's full name and address:-

Joseph Samuel Meredith  
19 Mossborough Road  
Rainford  
WA11 8QN

Dear St Helens Council,

We are writing to object to your plans to build on grade one agricultural land.

Here are our reasons concerning the overall 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

Here are some Rainford Specific points (HA8 Rookery Lane) regarding our objection:-

- 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

③



for housing in Phase 1

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Morally, you are wrong to proceed with your plans when there are alternatives available which would avoid building on Grade 1 Agricultural Land.

We look forward to hearing from you with your revised plans.

Yours faithfully,

Joanne and Joseph Meredith  
19 Mossborough Road, WA11 8QN

Get [Outlook for iOS](#)

RO1194

ELO136

Site SHa



Rainford HA8 objection  
Jo Meredith  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 22:10

① - LPAOS

② - PARA 1.7.2

③ - S.A.

My full name and address:-

Joanne Michelle Meredith  
19 Mossborough Road  
Rainford  
WA11 8QN

My son's full name and address:-

Joseph Samuel Meredith  
19 Mossborough Road  
Rainford  
WA11 8QN

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- The economic analysis is flawed and based on over-optimistic assumptions
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- 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

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- 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

③



for housing in Phase 1

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①

Morally, you are wrong to proceed with your plans when there are alternatives available which would avoid building on Grade 1 Agricultural Land.

We look forward to hearing from you with your revised plans.

Yours faithfully,

Joanne and Joseph Meredith  
19 Mossborough Road, WA11 8QN

Get [Outlook for iOS](#)

RO1195

**Representor Details**

Web Reference Number	WF0240
Type of Submission	Web submission
Full Name	Mrs Jennifer Merrills
Organisation	
Address	6 Windle Grove St Helens Merseyside WA10 6HW
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?	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

**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.**

Incorrect and out of date statistics have been used re forecasted housing need. ONS 2016 figures of 383 should be used not the 2014 figures used.

Plan makes no mention of Brownfield and Previously developed land that is not (yet) available or included on brownfield register.

Re 8HS formerly HA16 specifically -

Plan does not confirm how additional school places needed will be facilitated in this already oversubscribed area.

Plan does not confirm how additional gp / healthcare requirements will be facilitated. I am at eccleston medical centre where there is already lengthy waiting times for non emergency appointments.

Plan does not detail what traffic control measurements / road improvements / road safety considerations will be necessary and how these will be facilitated on already busy roads, particularly East Lincs / Windle Island.

Plan does not address lack of public transport infrastructure in this area of St Helens (no local train stations and only limited bus routes).

**7. Please set out modification(s) you consider are necessary**



8HS should remain as Greenbelt land.

Redevelop brownfield sites first, particularly those in closer proximity to town centre / better public transport links.

**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 7:02:41 PM
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RO1196

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:  
[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

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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

980

### 1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: BRENDA

Last Name: MERTENS

Organisation/company: \_\_\_\_\_

Address: 22 GORSEY LANE

CLOCK FACE

Postcode: WA9 4XB

### 2. Your Agent's Details (if applicable)

Title: ~~MR MERTENS~~

First name: ~~FRANK~~

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: ~~22 GORSEY LANE~~

Postcode: ~~WA9 4XB~~

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](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

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Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

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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 type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p><b>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></b></p> <p><b>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.</b></p> <p>GORSEY LANE WILL NOT BE SAFE TO CROSS THANKS TO YOU THE LABOUR COUNCIL you have not informed any of clock face people how on earth can traffic and GORSEY LANE manage MY VIEWS ARE WITH THE BOY &amp; CLOCK FACE ACTION GROUP</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.

Not To Bully

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.**



RO1197



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Mr</i>	Title:
First Name: <i>FRANK</i>	First name:
Last Name: <i>Mertens</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>22 Gorseley Lane</i>	Address:
Postcode: <i>WA9 4XB</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <i>16 - 4 - 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 Monday 13<sup>th</sup> May 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**



RO1198



St. Helens  
Council

261

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.


This form has two parts;


**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>MARGARET</u>	First name:
Last Name: <u>METCALF</u>	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date:

20/3/19

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 ☒ (~~Yes~~ email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address. ✓



Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

planningpolicy@sthelens.gov.uk

### FURTHER INFORMATION

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	2 EA LPA 04	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 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: 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. 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>

Not justified - the Council should be put to strict proof of the need for this type of development, in this position & on this scale.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict & other urban land. Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

The Council has already granted planning permission in the greenbelt in respect of Site 2EA - Flounda Farm.

The risk of flooding further down the Chisley Brook will be exacerbated by future development at this location.

High volumes of predicted traffic will add to the already over capacity on the high ways in the vicinity.

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 renewal  
from the Greenbelt,

Please continue on a separate sheet if necessary

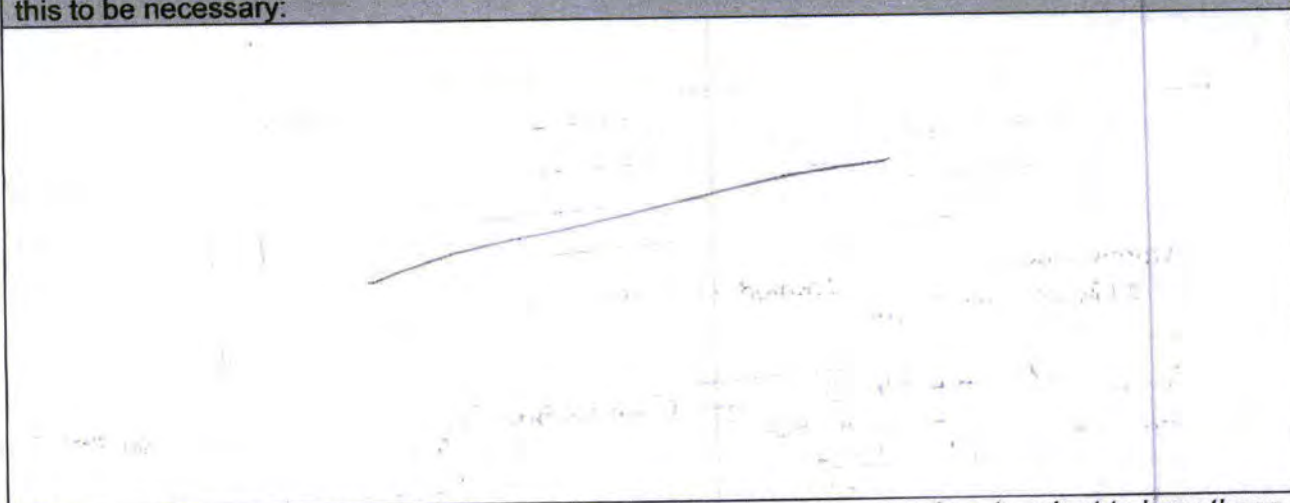
**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original 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)

<b>No, I do not wish to participate at the oral examination</b> NO	<b>Yes, I wish to participate at the oral examination</b>
---	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:


--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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 LPA 05	SITE 1MA	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"/> Don't Know	<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.

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.

Brownfield and derelict sites should always be used before any Greenbelt is released. Urban regeneration should always be encouraged.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes etc. Cars are needed.

The access to this site on either Billinge Road or Garswood Road would be inadequate.

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.

**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.**



## 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 06	SITE 1HS	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"/> Don't Know	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<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 - the Council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981. Brownfield and derelict land should be recycled by the developers before any Greenfield is released.

St Helens Council is releasing Greenfield to developers as a "quick fix" because of the Council's financial problems. There is a lack of school places, doctors surgeries, bus routes & other services. The access to this site from Billinge Road, Heyland Green Road or Garswood Road would be inadequate.

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="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.**



## 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 <b>LPA</b> <b>05.</b>	<b>SITE</b> <b>244</b>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<i>Don't know</i> <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.

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. The recycling of derelict land and other land should be encouraged before any Greenbelt is released for development. Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other facilities, because of this cars have to be used on already overcrowded roads.

Flooding of this area is a regular feature and the Clisley Brook would not cope.

The site entrance from the East Lancashire Road isn't safe and the proposed junction at Vicarage Road would put even more traffic on overstretched highway.

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.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1199





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

13 MAY 2019

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: Middleton	Last Name:
Organisation/company:	Organisation/company:
Address: 15 ORCHID WAY New Bold St Helens	Address:
Postcode: WA9 4ZN	Postcode:
	No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 14/4/2019
-----------------------	-----------------

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.

RO1200



St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1240  
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: PHILLIP	First name:
Last Name: MIDDLETON	Last Name:
Organisation/company:	Organisation/company:
Address: 15, ORCHID WAY NEW BOLD	Address:
Postcode: WA9 4 2N	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

14.4.2019

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.