



**ST HELENS**  
BOROUGH COUNCIL

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

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

**PLAN ORDER**

**PO0501 – PO0700**

**SEPTEMBER 2020**

# Plan Order Index

Policy	PO numbers	Plan Order Document
<b>Local Plan</b>		
General Comments	PO0001 to PO0241	SD007.1 to SD007.2
Policy Omission Comments	PO0242 to PO0244	SD007.2
Paragraph 1.3.6	PO0245	SD007.2
Paragraph 1.4 – 1.14	PO0246 to PO0249	SD007.2
Paragraph 1.6.1	PO0250	SD007.2
Paragraph 1.7.1	PO0251	SD007.2
Paragraph 1.7.2	PO0252 to PO0593	SD007.2, SD007.3, SD007.4, SD007.5
Table 2.1	PO0594	SD007.5
Chapter 3	PO0595 to PO0596	SD007.5
Spatial Vision	PO0597 to PO0603	SD007.5
Strategic Aims & Objectives	PO0604 to PO0620	SD007.5
Chapter 4	PO0621 to PO0622	SD007.5
Policy LPA01	PO0623 to PO0683	SD007.5
Policy LPA02	PO0684 to PO0912	SD007.5, SD007.6, SD007.7, SD007.8
Policy LPA03	PO0913 to PO0971	SD007.8
Policy LPA04	PO0972 to PO1333	SD007.8, SD007.9, SD007.10, SD007.11
Policy LPA04.1	PO1334 to PO1396	SD007.11
Policy LPA05	PO1397 to PO2403	SD007.11, SD007.12, SD007.13, SD007.14, SD007.15, SD007.16, SD007.17, SD007.18, SD007.19, SD007.20
Policy LPA05 - Table 4.5	PO2404 to PO2426	SD007.20
Policy LPA05 – Reasoned Justification	PO2427 to PO2456 & PO2488	SD007.20
Policy LPA05 – Table 4.6	PO2457 to PO2483	SD007.20
Policy LPA05 – Reasoned Justification	PO2484 to PO2485	SD007.20
Policy LPA05 – Table 4.7	PO2486 to PO2487	SD007.20
Policy LPA05 – Figure 4.3	PO2489	SD007.20
Policy LPA05.1	PO2490 to PO2553	SD007.20, SD007.21
Policy LPA06	PO2554 to PO3301	SD007.21, SD007.22, SD007.23, SD007.24, SD007.25, SD007.26, SD007.27, SD007.28
Policy LPA07	PO3302 to PO3395	SD007.28
Policy LPA07 – Reasoned Justification	PO3396 to PO3398	SD007.28
Policy LPA08	PO3399 to PO3445	SD007.28, SD007.29



Policy LPA08 – Reasoned Justification	PO3446 to PO3458	SD007.29
Policy LPA09	PO3459 to PO3471	SD007.29
Policy LPA09 – Reasoned Justification	PO3472 to PO3473	SD007.29
Policy LPA10	PO3474 to PO3504	SD007.29, SD007.30
Policy LPA10 – Reasoned Justification	PO3505	SD007.30
Policy LPA11	PO3506 to PO3514	SD007.30
Policy LPA11 – Reasoned justification	PO3515 to PO3516	SD007.30
Policy LPB01	PO3517 to PO3519	SD007.30
Policy LPC01	PO3520 to PO3559	SD007.30
Policy LPC02	PO3560 to PO3583	SD007.30
Policy LPC02 – Reasoned Justification	PO3584	SD007.30
Policy LPC02 – Table 6.3	PO3585 to PO3586	SD007.30
Policy LPC04	PO3587 to PO3591	SD007.30
Policy LPC05	PO3592 to PO3599	SD007.30
Policy LPC06	PO3600 to PO3610	SD007.30, SD007.31
Policy LPC06 – Reasoned Justification	PO3611	SD007.31
Policy LPC07	PO3612	SD007.31
Policy LPC07 – Figure 7.2	PO3613	SD007.31
Policy LPC08	PO3614 to PO3618	SD007.31
Policy LPC08 – Reasoned Justification	PO3619	SD007.31
Policy LPC09	PO3620 to PO3625	SD007.31
Policy LPC10	PO3626 to PO3637	SD007.31
Policy LPC11	PO3638 to PO3643	SD007.31
Policy LPC11 – Reasoned Justification	PO3644 to PO3646	SD007.31
Policy LPC12	PO3647 to PO3660	SD007.31
Policy LPC12 – Reasoned Justification	PO3661	SD007.31
Policy LPC13	PO3662 to PO3671	SD007.31
Policy LPC14	PO3672 to PO3675	SD007.31
Policy LPC14 – Reasoned Justification	PO3676	SD007.31
Policy LPD01	PO3677 to PO3688	SD007.31
Policy LPD01 – Reasoned Justification	PO3689	SD007.31
Policy LPD02	PO3690 to PO3697	SD007.31
Policy LPD03	PO3698 to PO3704	SD007.31, SD007.32
Policy LPD03 – Reasoned Justification	PO3705	SD007.32
Policy LPD06	PO3706 to PO3708	SD007.32
Policy LPD07	PO3709 to PO3714	SD007.32
Policy LPD03 – Reasoned Justification	PO3715	SD007.32
Policy LPD09	PO3716 to PO3718	SD007.32
Policy LPD10	PO3719 to PO3724	SD007.32
Policy LPD10 – Reasoned Justification	PO3725 to PO3734	SD007.32
Appendices	PO3735 to PO3754	SD007.32
<b>Economic Viability Assessment</b>		
	PO3755 to PO3772	SD007.32
<b>Green Belt Review 2018</b>		
	PO3773 to PO3883	SD007.32, SD007.33

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

PO0501

①-LPA08 ②-LPA02 ③-Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0164
Type of Submission	Web submission
Full Name	Mr Dylan Riley
Organisation	
Address	35 Kiln Lane WA10 6AD
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

These plans will lead to significant additional traffic congestion on a network that is already at breaking point and continually log-jammed across the town.

This will be made even worse by the need for additional and/or expanded schools.

St Helens Council has a long history of failing to deliver infrastructure.

It will have a detrimental effect on highway safety for both pedestrians, cyclists and drivers.

Schools and nurseries are already over-subscribed and this Plan will only lead to even more pressure.

Social infrastructure will not be able to cope; doctors, dentists and the hospitals.

Increased traffic will exacerbate health problems across the town due to increased pollution and isolated developments increasing car dependency and therefore potentially obesity.

There will be a significant loss of recreational areas for walking and escaping urban areas and additional sports facilities such as a golf course if Green Belt development is allowed.

There is a huge amount of Brownfield land available to develop in St Helens but it seems the easier option is Green Belt.

The council are pandering to demands of landowners and developers seeking to make huge profits at the expense of GB.

Neighbouring areas such as Knowsley also has extensive Brownfield sites and a Duty to Co-operate could find a common strategy – none appears to have been carried out.

①

②

③

There are no exceptional grounds to alter GB boundaries and by doing so would leave the town continuing to be blighted by brownfield and contaminated sites, whilst developers profit and the council take the increased taxes to be wasted.

2

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

No green belt should be released as no exceptional circumstances.

The growth projections should be revised to something more realistic

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

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

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

Response Date	3/12/2019 7:35:43 PM
---------------	----------------------

PO0502

① - LPA04    ② - Statement of Common Ground

#### Representor Details

Web Reference Number	WF0165
Type of Submission	Web submission
Full Name	Mrs Kathryn Foster
Organisation	
Address	67 Liverpool Rd Haydock St Helens WA11 9SD
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA04 Sites 2EA, 5EA, 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

NPPF 134c - purpose of Green Belt 'to assist in safeguarding the countryside from encroachment', but St Helens Council's distributed Q&A sheet p13 states Green Belt "is not about the ecology or habitat value". I consider this misleading and therefore contrary to correct Community Involvement as described in their Guidance Note(2.2ii Legal).

Not justified - I do not believe that the Council has proved that this type and size of development is necessary in this position and their recent passing of plans for low density, highly polluting, low paid employment in this area (site 2EA) which is still currently Green Belt, on the grounds of now clearly untrue 'very special circumstances' demonstrates their lack of rigour.

Using Green Belt fails to encourage 'recycling of derelict and other urban land' NPPF 134e.

Building on this land is likely to increase current flooding problems with Clipsley brook.

Industry of any kind, but particularly the likely [and already passed] 'Logistics', will further overload already congested, dangerous and polluting highways and junctions. The argument that 'if the road system is broken it can not be 'more broke' and therefore the additional traffic is 'insignificant'

[paraphrased] is not justification.

There is no statement of common ground with neighbouring authorities.

①

②

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

Leave the Green Belt designation on this 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 7:34:35 PM
---------------	----------------------



PO0503

① - LPA06 ② - Green Belt Review 2018 ③ - Statement of Common Ground

#### Representor Details

Web Reference Number	WF0167
Type of Submission	Web submission
Full Name	Mr Neil Bailey
Organisation	
Address	13 Peebles Close Garswood Wigan WN4 0SP
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-Site1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Council should be put to strict proof of its population estimates. The population of St Helens has been in steady decline since 1981 and now they think it's suddenly going to improve. Where are all these people going to come from?

The Greenbelt must be protected at all costs and the removal of this Greenbelt for immediate and future housing must be a last resort. The Council has taken the easy option of removing Greenbelt rather than the most environmentally friendly option of using brownfield and derelict land. This option must be utilised first. Once the Greenbelt is sold to developers it will never be replaced. One of the purposes of Greenbelt is to encourage the recycling of derelict land and this must be observed.

Garswood has a large amount of wildlife - bats, wild birds and small animals that will lose their habitat and never return.

The infrastructure in Garswood is not sustainable. The narrow country roads couldn't take the extra traffic, either during building works or once the houses are built. The site access to either Billinge Road or Smock Lane would be inadequate and any necessary highway works must be funded by the developer and not the Council Tax payers.

There is a lack of doctors surgeries - the current one already has long waiting times.

①

The Council have admitted that there isn't a village centre but seem intent on building more houses without infrastructure. Garswood is unsuitable as the commuter area they appear to want. The railway station has NO parking and nowhere to put any and there is no disabled or pram access to the station platforms. Residents are forced to use their cars and if they want to use public transport the bus routes are few and the railway station not fit for purpose.

The local schools wouldn't be able to cope with an influx of children.

Due to the close proximity of the primary and high schools in Bryn and Ashton that already need to be used for children in Garswood, these plans would appear to show that there is no statement of common ground with the neighbouring authorities.

\* The adjacent playing fields are also planned to be removed from the Greenbelt. This mustn't be allowed to happen as it is one of the very few amenities that young people in the area have. If it isn't planned for housing, and the council line is that it isn't, then it MUST stay as Greenbelt. As a professional football coach I know of the benefits to young and old alike of all sports and this land must be protected.

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

Delete this land - and the playing field - from the proposed removal from the Greenbelt.

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

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

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

Response Date

3/12/2019 7:03:25 PM

PO0504

①-LPA06    ②-GEN    ③- Statement of Common Ground

#### Representor Details

Web Reference Number	WF0168
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	-----
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	-----

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

Yes (via e-mail)

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

Policy	LPA06 - 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from. 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. 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.

②

①

The access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate.

Any necessary highways works must be funded by the developer and not the Council Tax payers.

There is no statement of common ground with neighbouring authorities.

①

③

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

Delete this land from the proposed removal from the Greenbelt

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

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

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

Response Date	3/12/2019 7:03:24 PM
---------------	----------------------

PO0505



①-LPA05 ②-GEN ③- Statement of Common Ground

#### Representor Details

Web Reference Number	WF0169
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	---
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	-----

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

Yes (via e-mail)

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

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from. 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. 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.

②

①



The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highways works must be funded by the developer and not the Council Tax payers. There is no statement of common ground with neighbouring authorities.

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

That this land be deleted from proposed removal from the Greenbelt.

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

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

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

Response Date	3/12/2019 6:56:30 PM
---------------	----------------------

PO0506

①-LPA06 ②-Statement of Common Ground

#### Representor Details

Web Reference Number	WF0171
Type of Submission	Web submission
Full Name	Mr Christopher Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS
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 2ES
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

A development of this type is not justified as there is no strict proof of need. As the site is allocated as 'safeguarded' until after 2035 and given the lifespan of this type of warehouse development the site should remain in the greenbelt so after the end of the local plan period the whole question can be re-evaluated.

This is agricultural land used for crop growing and should remain so - as an island race, Brexit etc these fields could become the lifeblood for the nation.

Release of greenbelt will cause significant harm to the purposes of the greenbelt.

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land, by using greenbelt this fails to encourage this and is contrary to NPPF policy/guidelines.

High volumes of predicted traffic will add to the already over capacity on junction 23 of M6.

There is no statement of common ground with neighbouring authorities.

Planning permission in the greenbelt has already been granted by the council in respect of Florida Farm North site 2EA this is extremely close to this development along with applications already received for similar development at site 5EA land to the west of Haydock Land and 8EA Parkside West, NLW

①

②

①

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

Delete this land from the proposed removal from the greenbelt.

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

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

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

Response Date	3/12/2019 6:04:18 PM
---------------	----------------------

PO0507

①- LPA05    ②- Statement of Common Ground

**Representor Details**

Web Reference Number	WF0174
Type of Submission	Web submission
Full Name	Mr Christopher Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I am unsure if the plan is legally sound and would have entered 'don't know' but no box available for that answer.

Due to lack of infrastructure/services etc house building in this area is not sustainable - shortage of doctors/surgeries, dentists lack of school places. Garswood CP has 1 place available and in the past children here have had to be educated in portacabins and in large class sizes of 40+ not for one year but for the Rectory 53, no immediately available Catholic primary school - St Mary's in Billinge has 5 places and would necessitate the need for travel by car as not on a direct and or frequent enough bus route. Our Lady's in Bryn is out of the Borough. Many secondary school children in Garswood already by necessity have to travel outside of the Borough for their education ie to Edmund Arrowsmith, Cansfield or Byrchall schools in Ashton GM, Upholland WLDC.

Without strict proof of population estimates there is no justification - the Borough's population has been in decline for some 30+ years therefore, where will these extra people come from?

By releasing greenbelt this will NOT assist in urban regeneration as the land in question is neither urban, derelict or in need of recycling. Therefore against NPPF. This is an agricultural field for growing crops and should be left as such.

Significant harm will be caused to the purpose of the greenbelt.

①

There is no statement of common ground with neighbouring authorities. \_\_\_\_\_ ②  
Access to the site on either Garswood or Billinge Road would be inadequate. Necessary highways \_\_\_\_\_ ①  
work(s) must be funded by the developer and not by council tax payers ie from the public purse. \_\_\_\_\_

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/12/2019 5:41:32 PM
---------------	----------------------

PO0508



① - LPA06      ② - Statement of Common Ground

#### Representor Details

Web Reference Number	WF0179
Type of Submission	Web submission
Full Name	Mr Christopher Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS
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	LPA06 1HS
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.

Not sure if the plan is legally sound would have put 'don't know' but no box

The population of St Helens has been in decline since the early 1980's, and has an ageing population.

Where are all the extra people coming from?

Release of greenbelt will cause significant harm to the purpose of the greenbelt and alteration of greenbelt boundaries should only be undertaken in very special circumstances - which these are not. As the land is neither urban, in need of recycling or derelict then greenbelt release would not assist in urban regeneration and is against NPPF policies.

The land is used for agriculture and in light of Brexit, etc it should remain solely for that purpose.

There is no statement of common ground with neighbouring LAs.

Due to lack of infrastructure/services etc house building in this area is not sustainable - shortage of doctors/surgeries, dentists lack of school places. Garswood CP has 1 place available, Rectory 53, no immediately available Catholic primary school - St Mary's in Billinge has 5 places and would necessitate the need for travel, Our Lady's in Bryn is out of the Borough. Many secondary school children in Garswood travel outside of the Borough and into GM for their education.

Access to the site would be inadequate any necessary highways works must be funded by the developer and not from the public purse ie council tax payers.

①

②

①

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/12/2019 4:23:21 PM
---------------	----------------------

PO0509

① - LPA04 ② - Statement of Common Ground

#### Representor Details

Web Reference Number	WF0180
Type of Submission	Web submission
Full Name	Mr Christopher Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS WN4 0SS
Agent Details	

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

No

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

Policy	LPA04 2EA, 5EA, 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I do not know if the process is legally sound and I am not able to tick 'don't know'

Predicted high volumes of heavy traffic which have been exacerbated by the granting of permission for Florida Farm North will add to the already over capacity of the roads in the locality.

By releasing greenbelt it is not assisting in urban regeneration as this site is neither in need or recycling or derelict. Using greenbelt fails to encourage principles in the NPPF.

The purpose of the greenbelt will be significantly harmed if further release of greenbelt land in the vicinity takes place.

Greenbelt has already granted planning permission in the greenbelt in respect of site 2EA (Florida Farm North) further releases should not therefore take place.

Strict proof should be obtained that there is a need for this type of development at this location and on this scale. It is not good enough to take the developer's word for it. Therefore this is not justified.

No statement of common ground with neighbouring LAs.

Any development in this location will exacerbate flooding further down Clipsley Brook particularly at the Ship Inn area. Unconvinced that the current proposed mitigation re SUDS on FFN (+20% and 1in

①

②

①

100 rainfall event) will be sufficient to cope - this should be proven for a number of years BEFORE adding further runoff into the equation.

①

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/12/2019 4:04:06 PM
---------------	----------------------

PO0510

# ① - LPA05      ② - Statement of Common Ground

## Representor Details

Web Reference Number	WF0181
Type of Submission	Web submission
Full Name	Mr Christopher Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS
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 SITE 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I am unsure if the plan is legally compliant therefore answer to question 4 Don't Know but no box.

No statement of common ground between neighbouring LAs.

The population of St Helens has fallen consistently over the last 30+ years. Provision should be made to future-proof communities with sheltered accommodation, bungalows etc not just more housing per se.

This does not encourage or assist urban regeneration as no derelict or urban land is being used.

Greenbelt release will cause notable harm to the purpose of the greenbelt.

Due to lack of facilities car use is being actively encouraged, the housing isn't sustainable as there is a lack of school places eg Grange Valley CP is already over subscribed, there are only 33 places left at Legh Vale CP and 42 at English Martyrs - where is it proposed these children will be schooled?

Doctors and dentists are too are almost full (in some cases lists being closed already).

Site access is inadequate, extra traffic pressure would be put onto an already very busy highways system and would lead to rat-running through the proposed development - which would not be safe for the communities there.

The site already experiences flooding any solutions would place even greater amounts of water into Clipsley Brook. The continual push for concreting over the greenbelt with warehousing type

②

①

developments the effects of which have not yet been demonstrated in relation as to whether Clipsey Brook will be able to cope has yet to be established. A contingency for 1 in 100 +50% rainfall event has not been incorporated in any recent developments.

①

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

Delete this land from proposed removal from the greenbelt

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

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

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

Response Date	3/12/2019 3:41:06 PM
---------------	----------------------



PO0511

① - LPA05      ② - GEN      ③ - Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0191
Type of Submission	Web submission
Full Name	Mrs Susan Vaudrey
Organisation	
Address	8 laurel drive eccleston WA10 5JD
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	

#### 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.

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

③

①

includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

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

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

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

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

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

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

Response Date	3/12/2019 10:50:56 AM
---------------	-----------------------

PO0512

① - LPA05    ② - LPA06    ③ - Para 1-7.2 OTC

#### Representor Details

Web Reference Number	WF0192
Type of Submission	Web submission
Full Name	Mr john vaudrey
Organisation	
Address	8 laurel drive eccleston WA10 5JD
Agent Details	john vaudrey

**Would you like to be kept updated of future stages of the St Helens Borough 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	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Green Belt Review (2018) contains dodgy decisions, based on comments from developers rather than the opinion of local people and facts. Land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified. The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need.

②

①



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.

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 Plan is therefore not effective.

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

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

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

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

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

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

Response Date	3/12/2019 10:47:47 AM
---------------	-----------------------

PO0513

**Representor Details**

Web Reference Number	WF0204
Type of Submission	Web submission
Full Name	Mr John Riley
Organisation	
Address	16 Heywood Gardens, St Helens WA10 4JU
Agent Details	

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

No

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

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
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.**

- Oxford Economics have a track record of overstating growth figures and their data has been significantly higher than the reality for a number of years
- The Local Plan is a self-fulfilling prophecy in that the land requirements are based on over-optimistic growth numbers and the growth numbers are based on land being released
- In mathematical terms, this would be a circular reference – you cannot calculate 'A' based on 'B' when the calculation to achieve 'B' relies on 'A' 01
- The Standard Method should be used to calculate housing needs and no exceptional circumstances have been demonstrated to justify otherwise
- The Local Plan produces no evidence to demonstrate all other alternatives have been explored prior to commencing the Green Belt Review
- The Infrastructure Delivery Plan is nothing more than a document outlining the current issues and projects underway to alleviate today's issues 02
- It is not clear any Duty to Cooperate has been carried out, certainly not evidenced in the Plan
- o Knowsley Council comment:
- that it will be extremely challenging to demonstrate adequate grounds for an additional 15 years' worth of housing 03
- that such a significant increase in economic growth will be difficult to pass 'exceptional circumstances'



- ☐ that they are keen to ensure St Helens do not undermine their own ability to deliver housing
- ☐ that allocation of certain sites has potential for an adverse impact to Knowsley residents and businesses
- o Warrington Council comment:
- ☐ That residents of Warrington should not have to suffer impacts of a decision made by a neighbouring authority
- ☐ That they do not believe the scale of expansion can be accommodated by the existing access arrangements and a new access onto the M62
- The above comments question what strategic discussions/decision have been held under the statutory Duty to Co-operate and Statements of Common Ground

03

With all of the above in mind, it is stated that the Plan has not been positively prepared, nor is justified, effective or consistent with National Policy.

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

The correct baseline numbers need to be used to then construct the whole plan. Right now it is based on totally unrealistic projections.

**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 9:07:41 PM
---------------	----------------------

PO0514

**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
---------------	----------------------

PO0515

**Representor Details**

Web Reference Number	WF0214
Type of Submission	Web submission
Full Name	Mr Sean Hollowed
Organisation	
Address	6 The Fairways Ashton-in-Makerfield Wigan Lancs WN4 0YX
Agent Details	

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

No

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

Policy	LPA04 - sites 2EA, 5EA & 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective

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

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale. 01

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. 02

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt. 03

The Department of Communities and Local Government has stated that, "Local Authorities may only alter Greenbelt boundaries in exception circumstances." I do not believe that the Council has proved in its Plan that the circumstances are exceptional. 04

The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North. 05

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. 06

High volumes of predicted traffic will add to the already over capacity on the roads in the vicinity. 07

There is no statement of common ground with neighbouring authorities.

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



Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/11/2019 7:13:49 PM
---------------	----------------------

PO0516



**Representor Details**

Web Reference Number	WF0215
Type of Submission	Web submission
Full Name	Miss Jane Wilcock
Organisation	
Address	6 The Fairways Ashton-in-Makerfield Wigan Lancs WN4 0YX
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA04 - sites 2EA, 5EA & 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale. 01

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. 02

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt. 03

The Department of Communities and Local Government has stated that, "Local Authorities may only alter Greenbelt boundaries in exception circumstances." I do not believe that the Council has proved in its Plan that the circumstances are exceptional. 04

The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North. 05

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. 06

High volumes of predicted traffic will add to the already over capacity on the roads in the vicinity. 07

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/11/2019 7:04:41 PM
---------------	----------------------

PO0517

**Representor Details**

Web Reference Number	WF0222
Type of Submission	Web submission
Full Name	Mrs Gill Holmes
Organisation	
Address	13 Villiers Crescent Eccleston St. Helens WA10 5HP
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective

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

1: St Helens council have stated a principle of brownfield site first and greenfield only in extreme circumstances, however they have not demonstrated diligence in identifying suitable brownfield sites for housing or monies to support decontamination of these sites. Other councils have demonstrated a commitment to regeneration of town centres through housing development - a strategy that is desperately needed in St Helens. There has been little demonstration of imagination in solving this issue and the decision to build on greenfield sites is an easy option which leads to further dereliction and decay of the town centre. Eccleston's inclusion is the green belt which is to be safe guarded for development, this is grade 1 or 2 agricultural land, a very necessary resource at this time, therefore the plan is not justified ore sustainable. 01

2: Employment growth. The figures supplied are based on unreasonable assumptions and will lead to an oversupply of housing. the main source of employment will be warehousing which will not provide the high earning jobs suggested, also it is anticipated that warehousing industry will increasingly make use of robot technology which will reduce the predicted employment figures. These factors will affected the numbers and type of housing development and is not reflected in the plan making it unjustifiable and unsustainable. The employment figures quoted should be replaced by ONS (2018) which uses more current data. 02



3: Infrastructure: the Infrastructure Delivery Plan is weak to the point of non-existence. The areas to be developed already have the problems of oversubscribed schools and major transport problems. The 8HS is beside the A580 a major route between Manchester and Liverpool, already undergoing major work to improve traffic flow. Further disgorgement of thousands more cars onto this road will make this expensive upgrading pointless. Bleakhill Road is already a bottle-neck morning and night without further cars from a new development adding to the problem. There is also the issue of road safety there is the school on this road and access to this will become more difficult together with the danger of air pollution from idling cars - a very pertinent problem currently. It is proposed that Houghton's Lane development will exit directly onto the A580 in an area that is an know black spot - 3 people lost there lives at this point just before Christmas. For Windle and Eccleston 8HS acts as a lone greenspace and a buffer for the road pollution from the A580. It is the only accessible area of greenbelt criss-crossed by footpaths which are regularly used by residents. The Plan is not effective or justified. 03

4: Duty to cooperate: there is little evidence of discussion with other authorities or services e.g NHS. Neighbouring authorities have major development plans for both employment and housing and there is little evidence of discussion between authorities as to how realistic these plans are. It appears that it is a race to develop land and the first to build will win, such a policy will cause over prediction of employment and housing need which could be disastrous for the region. There appears to have been little negotiation with the NHS and the services that can be provided. The area already has a recruitment problem both for GPs and hospital staff, Brexit will make this worse and there has been little discussion as to how this development will affect services already stretched and whether it is possible for the NHS to respond to the extra demand. Therefore the plan is not sustainable. 04

The Plan does not comply with NPPF (2018) and it does not consider the more accurate and true housing and employment information in ONS (2018) figures therefore due to all the factors listed (and more) this could lead to an unsustainable oversupply of housing in the North West together with the loss of valuable agricultural land. 05

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

Suggestion:

The ONS (2018) needs to be adopted, more accurate and realistic housing need statistics should be developed/sourced;

funding to decontaminate brownfield sites should be sourced;

redevelopment of town centre sites to enhance regeneration of this area is a priority;

remove all Green Belt areas from the plan; protect agricultural land.

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

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

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

Response Date	3/11/2019 2:19:27 PM
---------------	----------------------

PO0518

**Representor Details**

Web Reference Number	WF0246
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	---
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	--- ---

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

Yes (via e-mail)

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

Policy	LPA05 - 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them.

The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from.

Cross referencing this with the Council's employment policy of seemingly putting all its eggs in the basket marked 'warehousing', such jobs with its notoriously low pay, will not attract workers to move into the Borough to purchase the new build housing.

01

02

03



One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

Examples of brownfield sites that could be developed for housing and aren't put forward in the Local Plan are:

1 Land off Parr Street in St Helens Town Centre, to the rear of St Helens Central Station. This site was formerly the Council owned abattoir which was demolished many years ago and has been derelict ever since. In close proximity to the station and the Town Centre this site would appear to be ripe for development and would clear up an unsightly mess. OK

2 Land off Bellerophon Way, Haydock, to the rear of the Tesco Haydock. This land is currently being marketed as housing land but again it isn't allocated in the Local Plan.

These are just two examples and there are many other areas of brownfield sites throughout the Borough that could be developed but the Council would appear to favour release of Greenbelt rather than insisting that developers remediate brownfield sites to clean up the many eyesore areas. The Council states that it has a 'brownfield first' policy but this seems to be mere lip service and is not put into practice or made manifestly clear from the Local Plan.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt in that is closing the Green spaces between the settlements of Haydock, Garswood and Blackbrook.

This site, Florida Farm South, is some 23 hectares or approximately 57 acres. On the opposite side of the A580 East Lancashire Road the Council granted planning permission for warehouse development at Florida Farm North, some 36.37 hectares of Greenbelt Land..

Its proposals are that a further 28 hectares to the north of that site should also be allocated for warehousing, giving a total of almost 65 hectares or 160 acres to be covered in concrete, tar macadam and huge sheds.

Those sites, together with Florida Farm South will amount to approximately 217 acres of Greenbelt for development, a huge proportion of the Greenbelt in this vicinity.

..  
Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. Building housing developments on the fringes of the Borough encourages the use of motor cars because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe because of the proximity to the newly re-configured junction of Haydock Lane and the A580 which lies to the East of the proposed junction.

This junction was constructed with money received from the Liverpool City Region rather than being provided by the developer in what is said to be a £150 million development. This is now a 4-way junction with Toucan crossing facilities meaning that traffic in the morning and evening peak periods is queuing for longer and the drivers are then moving away from the signals and rapidly accelerating. These vehicles will be confronted by vehicles leaving the proposed housing development. 05

The proposal for a roundabout junction at Liverpool Road & Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

A development of this size at this location is likely to generate over 2000 additional vehicle movements per day. Anyone leaving the development to travel in the direction of Manchester can only do so by leaving at this junction and then accessing the A580 via the A58/A580 junction or by travelling through Haydock via the A599 and accessing the A580 via the Haydock Lane junction referred to above.

The Council has proposals to upgrade the A58/A580 junction but it isn't known whether the works have anticipated the additional traffic that will be generated by the proposal. Other than the construction of the roundabout referred to at the junction of Liverpool Road and Vicarage Road there don't appear to be any additional highways infrastructure proposals. This roundabout is merely to provide access to the development, it doesn't mitigate the problems that will be created by the development.



Air pollution is already a major problem in St Helens with the statistics for deaths from pulmonary disease being higher than average. The recent BBC website article about polluted areas of the UK, list Merseyside and Manchester as two of the worst polluted areas. The A580 links these two areas and already carries a heavy burden of traffic. 05

The developers of the site at Florida Farm North stated in their planning application that the development would generate an estimated 6,700 additional vehicle movements per day through the A580/Haydock Lane junction. The additional air pollution caused by these vehicles was described as negligible in the report to the Planning Committee. There must come a time, however, when all the negligible amounts add up to substantial. 06

There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into Clipsley Brook which floods at the junction of West End Road and Stanley Bank Way (A58). The problem isn't made any easier because the Council for the Florida Farm North development has relaxed its requirements for flood prevention from a one in 100 year storm plus 40% for climate change to one in a 100 year plus 10% for climate change, without giving any adequate reasons why. The Employment Land proposals at LPA04 Sites 5EA and 6EA will do nothing to ease the burden on the amount of water in Clipsley Brook. 05

The loss of approximately 217 acres of farmland in this small area could prove to be crucial to the ability of the Country to grow its own food crops.

The Council doesn't appear to have provided a statement of common ground with neighbouring authorities. 07

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

The site at LPA05 - 2HA should be deleted from the list of land to be deleted from the Greenbelt.

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

Yes, I wish to participate at the oral examination

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

I wish to speak on behalf of residents in the vicinity of this proposed development who have already had their lives blighted by the granting of planning permission for the warehouse development at Florida Farm North.

Response Date	3/10/2019 6:08:16 PM
---------------	----------------------

PO0519

**Representor Details**

Web Reference Number	WF0248
Type of Submission	Web submission
Full Name	Mrs Catherine Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

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

No

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

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

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

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08



- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016).
- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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

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

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

Response Date	3/10/2019 6:03:27 PM
---------------	----------------------

PO0520



**Representor Details**

Web Reference Number	WF0249
Type of Submission	Web submission
Full Name	Mr Brendan Houlihan
Organisation	
Address	68 Ecclesfield Rd Eccleston St Helens WA10 5NB
Agent Details	

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

Yes (via e-mail)

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 0
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

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

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08



- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016).
- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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

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

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

Response Date	3/10/2019 5:58:24 PM
---------------	----------------------

PO0521



**Representor Details**

Web Reference Number	WF0250
Type of Submission	Web submission
Full Name	Mr Richard Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

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

No

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

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

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

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.
- 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. 09
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09
- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

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

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

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

Response Date	3/10/2019 5:51:50 PM
---------------	----------------------

PO0522



①-LPA05 ②-GEN ③-Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0253
Type of Submission	Web submission
Full Name	Mrs Susan Mackenzie
Organisation	
Address	29 Seddon Close, St Helens Merseyside 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	
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:

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.

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

③

①

should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

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

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

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

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

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

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

Response Date	3/10/2019 4:50:40 PM
---------------	----------------------

PO0523



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

PO0524

① - LPA05 ② - GEN ③ Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0263
Type of Submission	Web submission
Full Name	Mrs Clare Blade
Organisation	
Address	9 Villiers Crescent Eccleston St Helens WA10 5HP
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Justified - No, the plan is based on flawed methodology

Effective - No the plan is not deliverable

Consistent with National Policy - No, it does not comply with NPPF 2018

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in

③

①

the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

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

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

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

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

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

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

Response Date	3/10/2019 1:28:27 PM
---------------	----------------------

PO0525



① - LPA05 ② - GEN ③ - Para 1.7.2 OTC

#### Representor Details

Web Reference Number	WF0264
Type of Submission	Web submission
Full Name	Mr Stephen Blade
Organisation	
Address	9 Villiers Crescent Eccleston St Helens WA10 5HP
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Justified - No the plan is based on flawed methodology

Effective - No, the plan is not deliverable

Consistent with national policy - No, it does not comply with NPPF 2018

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in

③

①

the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

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

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

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

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

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

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

Response Date	3/10/2019 1:22:41 PM
---------------	----------------------

PO0526

①-LPA04 ②-LPA05 ③-LPA06  
④-IDP ⑤-Statement of Common Ground

#### Representor Details

Web Reference Number	WF0265
Type of Submission	Web submission
Full Name	Mr Geoffrey Holmes
Organisation	
Address	13,VILLIERS CRESCENT ECCLESTON ST. HELENS WA10 5HP
Agent Details	

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

Yes (via e-mail)

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

Policy	ST HELENS BOROUGH LOCAL PLAN 2020 – 2035
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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.

ST HELENS BOROUGH LOCAL PLAN 2020 – 2035 SUBMISSION DRAFT JANUARY 2019

The forecast employment growth is based on unreasonable and untested assumptions. There is nothing to underpin these aspirational figures. This then results in an oversupply of housing. The whole plan stands or falls on this test for the correct housing need. The figures quoted should be replaced by the ONS (2018) which uses more current data.

St Helens has stated a principle of brownfield first which is entirely correct however it has shown very little imagination and diligence in identifying suitable sites of brownfield and contaminated land which could easily meet housing need. In order to justify the release of greenbelt it has to provide exceptional circumstances it has failed to identify these. For Eccleston the inclusion of Green Belt in the plan which is to be safeguarded is mainly Grade 1 and 2 agricultural land, a very necessary resource at this time. This Plan is not justified or sustainable.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the only greenspace for Windle that also acts as a buffer to pollution caused by the A580. The Plan is not effective.

①  
②  
③  
④  
⑤

The Plan does not comply with NPPF(2018) Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also over predicting employment growth leading to an oversupply of housing which cannot be sustainable in this area of the North West.

**Suggestion**

Adopt the ONS(2018) housing need statistics, source funding for regeneration and decontamination, bring contaminated land especially town centre sites into the housing plan and remove all Green Belt reallocation from the Plan.

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

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

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

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

Response Date	3/10/2019 1:20:56 PM
---------------	----------------------



PO0527

①-LPA06 ②-Statement of Common Ground

**Representor Details**

Web Reference Number	WF0267
Type of Submission	Web submission
Full Name	Mr Adrian Storey
Organisation	
Address	502 Garswood Road. Garswood. WN40XH
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	
Policies Map	site 1HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not justified. The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the use of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purpose of Greenbelt.

Housing in this area isn't sustainable due to the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on Billinge Road, Leyland Green Road or Garswood Road would be inadequate.

Any necessary highways works must be funded by the developer and not the Council Tax payer.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/10/2019 12:52:57 PM
---------------	-----------------------

PO0528

①-LPA05 ②-GEN ③-Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0268
Type of Submission	Web submission
Full Name	Mrs Patricia Anne Fidler
Organisation	
Address	11 Marylebone Avenue St Helens WA9 5SZ
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

③

①



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. There are excellent examples of this now. 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 forever.

**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 12:45:58 PM
---------------	-----------------------

PO0529

① - LPA05 ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0269
Type of Submission	Web submission
Full Name	Mr Adrian Storey
Organisation	
Address	502 Garswood Road Garswood. WN40XH
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 05
Paragraph / diagram / table	
Policies Map	Site 1HA
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not justified - The Council should be put to strict proof of its population estimates. The population of St. Helens has been in decline since 1981. Where are the extra people coming from?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using greenbelt fails to encourage this.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highways works must be funded by the developer and not council tax payers.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/10/2019 12:35:14 PM
---------------	-----------------------

PO0530



①-LPA05 ②-GGN ③Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0273
Type of Submission	Web submission
Full Name	Mr Stephen Pownall
Organisation	
Address	14 Villiers Crescent Eccleston St Helens Wa10 5HN
Agent Details	

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

Yes (via e-mail)

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective

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

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

③

①

should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

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

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

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

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

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

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

Response Date	3/10/2019 9:57:39 AM
---------------	----------------------

PO0531

① - LPA06    ② - Statement of Common Ground

#### Representor Details

Web Reference Number	WF0274
Type of Submission	Web submission
Full Name	Mr John Cunningham
Organisation	
Address	19 Sherwood Close Rainhill Prescot Merseyside L35 4RA
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	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	
Other documents	

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

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

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

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 road network surrounding 3HS is already at capacity now and would be made unsustainable by the proposed housing development. There is only one A road serving the Rainhill area (Warrington Road), together with a B road (Rainhill Road) and a C road (Two Butt Lane). These roads at times are currently unable to support present traffic demands, particularly during rush hours, and developing further houses in the vicinity will only add to the problem for all residents who own vehicles and make it more dangerous for pedestrians and cyclists. Because of existing traffic jams around the junction of Rainhill Road and Warrington Road (skew bridge), traffic already uses residential estates around Longton Lane as a cut through and this will only be exacerbated. The junction at skew bridge would require significant widening and improvement to support this housing development. Furthermore, housing development would be unsustainable in this locality due to a lack of infrastructure and services such as doctors surgeries, dental practices, schools, hospitals and A&E facilities. These services are already under strain without the proposed housing development. In addition, the water table of 3HS is already a confirmed zone 2 and 3 flood zone and further housing development on this land would put houses bordering the brook [REDACTED] at increased risk of flooding. Furthermore, the land at and around 3HS supports a variety of wildlife and plants, including 13 protected species. Development at this site would be detrimental to these species, as

①

well as having a negative effect on people's wellbeing by removing some of the only green belt land in this locality. Housing development would lead to increased risk of air pollution and would result in increased risk of premature death from respiratory diseases, which are already higher in St Helens compared to regional and national averages (e.g. between 2013 and 2015 there was an average of 51.9 deaths per thousand in St Helens, compared to 33.1 deaths per thousand in England as a whole). Finally, there has been no statement of common ground with neighbouring authorities such as Knowsley Borough Council, where new housing developments are already under way, negating the need for further housing development on 3HS.

①

②

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

The Council should not consider removing 3HS from classification as green belt land, therefore abiding with the National Planning Policy Framework (2019).

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

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

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

Response Date	3/10/2019 9:52:26 AM
---------------	----------------------



PO0532

①-LPA04    ②-LPA05    ③-LPA05, 8HA  
 ④-GEN    ⑤-Statement of Common Ground

#### Representor Details

Web Reference Number	WF0276
Type of Submission	Web submission
Full Name	Mrs Kathryn Spencer
Organisation	
Address	4 Queens Way Rainford St Helens Merseyside WA11 8EU
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	The whole plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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.

Generally and in relation to the overall figures and projections contained in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
  - the economic analysis is flawed and based on over-optimistic assumptions ①
  - the level of land needed is therefore not as high as set out in the Local Plan ②
  - 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 ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope.

There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- 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 Local Plan 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.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of 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	3/9/2019 10:21:59 PM
---------------	----------------------

PO0533

- ①-LPA04    ②-LPA05    ③-LPA05, 8HA  
 ④-GEN    ⑤-Statement of Common Ground

#### Representor Details

Web Reference Number	WF0278
Type of Submission	Web submission
Full Name	Miss Christina Cook
Organisation	
Address	119 Higher Lane Rainford St Helens Merseyside WA11 8BQ
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	All of the plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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.

Generally and in relation to the overall figures and projections contained in the Plan: \_\_\_\_\_

• there are no exceptional circumstances to justify not using the standard method to calculate housing need \_\_\_\_\_ ②

• the economic analysis is flawed and based on over-optimistic assumptions \_\_\_\_\_ ①

• 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 \_\_\_\_\_ ②

• 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 \_\_\_\_\_ ⑤

The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. \_\_\_\_\_ ②



The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope.

There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- 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 Local Plan 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.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of 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	3/9/2019 7:30:13 PM
---------------	---------------------

PO0534

- ①-LPA04 ②-LPA05 ③-LPA05, 8HA  
④-GEN ⑤- Statement of Common Ground

#### Representor Details

Web Reference Number	WF0279
Type of Submission	Web submission
Full Name	Miss Rebecca Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens Merseyside WA11 8BQ
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	Everything in the plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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.

Generally and in relation to the overall figures and projections contained 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

The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound.

②

①

②

⑤

②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope.

There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- 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 Local Plan 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.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of 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	3/9/2019 7:25:22 PM
---------------	---------------------

PO0535



- ①-LPA04    ②-LPA05    ③-LPA05, 8HA  
 ④-GEN    ⑤-Statement of Common Ground

**Representor Details**

Web Reference Number	WF0280
Type of Submission	Web submission
Full Name	Miss Hollie Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens Merseyside WA11 8BQ
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	The whole plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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.**

Generally and in relation to the overall figures and projections contained in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
  - the economic analysis is flawed and based on over-optimistic assumptions ①
  - the level of land needed is therefore not as high as set out in the Local Plan ②
  - 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 ②
  - 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 ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope.

There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- 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 Local Plan 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.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of 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	3/9/2019 7:17:37 PM
---------------	---------------------

PO0536

- ① - LPA04    ② - LPA05    ③ - LPA05, 8HA  
 ④ - GEN    ⑤ - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0281
Type of Submission	Web submission
Full Name	Mrs Jean Lamb
Organisation	
Address	13 Rookery Lane Rainford St Helens Merseyside WA11 8EE
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	Everything in the plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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.**

Generally and in relation to the overall figures and projections contained in the Plan:

• there are no exceptional circumstances to justify not using the standard method to calculate housing need ②

• the economic analysis is flawed and based on over-optimistic assumptions ①

• 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 ②

• 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 ⑤

The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope. There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- 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 Local Plan 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.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of previously developed land.
- 6) To prohibit any development on Green Belt or previously undeveloped land until all existing Brownfield land has been utilised.
- 7) To adopt a policy of ensuring all vacant or unused existing property within the Borough is fully utilised before allowing development of similar use/type.
- 8) To create a greater diversity of employment opportunities.
- 9) To provide for and encourage development that creates more sustainable types of employment than currently proposed.



**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 7:10:32 PM
---------------	---------------------

PO0537

① - LPA04    ② - LPA05    ③ - LPA05, 8HA  
 ④ - GEN    ⑤ - Statement of Common Ground

#### Representor Details

Web Reference Number	WF0282
Type of Submission	Web submission
Full Name	Mrs Jacqueline Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens Merseyside WA11 8BQ
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	The whole plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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.

Generally and in relation to the overall figures and projections contained in the Plan:

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
  - the economic analysis is flawed and based on over-optimistic assumptions ①
  - the level of land needed is therefore not as high as set out in the Local Plan ②
  - 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 ②
  - 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 ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future.

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope.

There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- 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 Local Plan 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.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of previously developed land.
- 6) To prohibit any development on Green Belt or previously undeveloped land until all existing Brownfield land has been utilised.
- 7) To adopt a policy of ensuring all vacant or unused existing property within the Borough is fully utilised before allowing development of similar use/type.
- 8) To create a greater diversity of employment opportunities.
- 9) To provide for and encourage development that creates more sustainable types of employment than currently proposed.

**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 7:01:53 PM
---------------	---------------------



PO0538

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

#### Representor Details

Web Reference Number	WF0283
Type of Submission	Web submission
Full Name	Mr Zach Cunningham
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)**

Yes (via e-mail)

#### 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

③

①

- data that does not justify the aspirational targets included in the plan. 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 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 6:18:12 PM
---------------	---------------------

PO0539

①-LPA04 ②-LPA05 ③-GEN  
④-IDP ⑤-Para 17.2 OTC

#### Representor Details

Web Reference Number	WF0284
Type of Submission	Web submission
Full Name	Mr Evan Cunningham
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. (2)
- 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 6:13:25 PM
---------------	---------------------



PO0540

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

PO0541

①-LPA04 ②-LPA05 ③-GEN  
④-IDP ⑤-Para 17.2 OTC

#### Representor Details

Web Reference Number	WF0286
Type of Submission	Web submission
Full Name	Ms Clare Cunningham
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)**

Yes (via e-mail)

#### 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 6:03:36 PM
---------------	---------------------



PO0542

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

#### Representor Details

Web Reference Number	WF0287
Type of Submission	Web submission
Full Name	Ms Sarah-Jane Howitt
Organisation	
Address	17 Brooklands Road Eccleston St Helens WA10 5HE
Agent Details	

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

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 that 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.

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. ②
- 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. 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 5:44:22 PM
---------------	---------------------

PO0543

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

#### Representor Details

Web Reference Number	WF0289
Type of Submission	Web submission
Full Name	Ms Claire Tyrrell
Organisation	
Address	17 Brooklands Road Eccleston St Helens WA10 5HE
Agent Details	

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

Yes (via e-mail)

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

Policy	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

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 5:36:51 PM
---------------	---------------------



PO0544

① - LPA04    ② - LPA05    ③ - LPA05, 8HA  
 ④ - GEN    ⑤ - Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0293
Type of Submission	Web submission
Full Name	Mr Ian Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens WA11 8BQ
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	The entire Plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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.

Generally and in relation to the overall figures and projections contained in the Plan:

• there are no exceptional circumstances to justify not using the standard method to calculate housing need \_\_\_\_\_ ②

• the economic analysis is flawed and based on over-optimistic assumptions \_\_\_\_\_ ①

• 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 \_\_\_\_\_ ②

• 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 \_\_\_\_\_ ⑤

The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. \_\_\_\_\_ ②

The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future. \_\_\_\_\_ ④

The inflated and unjustified predictions of population and need would create increased and concentrated traffic on roads and junctions that are clearly unsuitable and unable to cope. There is no mention or consideration of how critical amenities, such as Schools, Doctors, and other community amenities needed to support the additional population in areas identified for development would be provided.

The implications and consequences of the proposed use of undeveloped land that currently allows and aids the absorption and dispersal of rainwater, have not been properly considered or taken in to account. This will inevitably lead to water courses being overburdened at times of peak flow and so cause flooding to downstream areas. This is a problem that is already acknowledged and known about in relation to Black Brook. The Plan ignores this and similar issues and can only make the situation worse and will make the currently planned remedial measures pointless.

Specifically in relation to site 8HA - Rookery Lane Rainford :

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- 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 Local Plan 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.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

- 1) To be based on accurate, sensible and justifiable predictions of population growth/decline and relevant other factors when determining need for any future development.
- 2) Reduce the housing and employment targets in line with the above.
- 3) To retain all of the existing Green Belt.
- 4) To adopt a Brownfield site first policy that positively promotes remediation and sustainable redevelopment of such sites in preference to all other alternatives.
- 5) To allocate and make use of previously developed land.
- 6) To prohibit any development on Green Belt or previously undeveloped land until all existing Brownfield land has been utilised.
- 7) To adopt a policy of ensuring all vacant or unused existing property within the Borough is fully utilised before allowing development of similar use/type.
- 8) To create a greater diversity of employment opportunities.
- 9) To provide for and encourage development that creates more sustainable types of employment than currently proposed.

#### **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 3:58:25 PM
---------------	---------------------

PO0545

**Representor Details**

Web Reference Number	WF0306
Type of Submission	Web submission
Full Name	Mr Peter Richards
Organisation	West Lancashire Borough Council
Address	52 Derby Street Ormskirk L39 2DF
Agent Details	

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

Yes (via e-mail)

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

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

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

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	Yes

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

West Lancashire Borough Council has no objections to the content of the St. Helens Borough Local Plan 2020-2035 Submission Draft document, and is content that the Plan has been prepared in compliance with all legal requirements and is "sound". In particular, West Lancashire Borough Council can confirm that St Helens Council have engaged on strategic, cross boundary matters in accordance with the requirements of the Duty to Co-operate both as part of the Liverpool City Region (including West Lancashire) working groups and evidence studies, and directly with West Lancashire Borough Council in relation to specific cross-boundary matters which affect St Helens and West Lancashire. ①

In particular, this Council supports the St Helens Local Plan's proposals to allocate a significant area of land for employment purposes (policy LPA04.1) on the M6 Corridor, including for large-scale Logistics space, which will, alongside proposals in West Lancashire's own Local Plan Review for the M58 Corridor, help to meet the wider demand for such large-scale Logistics space arising in the Liverpool City Region (including West Lancashire) as identified by the LCR SHELMA study. ③

This Council also welcomes the Local Plan's support for the Skelmersdale Rail Link proposals (policy LPA07 and on the Key Diagram), which, if delivery can be secured, will be of great benefit to West

②



Lancashire in general (in particular the town of Skelmersdale), as well as Rainford in St Helens borough and Kirkby in Knowsley borough.

**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	3/7/2019 5:18:34 PM
---------------	---------------------

PO0546

**Representor Details**

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

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

This version of the plan does not satisfy:

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

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

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



are using an older forecast (2014) of 486.

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

08

05

09

10

11

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

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

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

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

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

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

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

PO0547



**Representor Details**

Web Reference Number	WF0346
Type of Submission	Web submission
Full Name	Mrs Elizabeth Graner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA10 4EY
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- 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.

01

02

03

04

05

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

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



- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

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

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

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

Response Date

3/5/2019 6:20:22 PM

PO0548



**Representor Details**

Web Reference Number	WF0347
Type of Submission	Web submission
Full Name	Mr Alan Garner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA104EY
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- 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.

01

02

03

04

05

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

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



- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

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

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

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

Response Date	3/5/2019 6:18:13 PM
---------------	---------------------

PO0549



① - LPA04    ② - LPA05    ③ - GGN  
 ④ - IDP    ⑤ - Para 17.2 DTC

#### Representor Details

Web Reference Number	WF0351
Type of Submission	Web submission
Full Name	Mr Trevor Gregory
Organisation	
Address	16A Brooklands Road Eccleston St Helens WA10 5HF
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Greenbelt Review (2018)

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

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

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

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 believe that this version does not satisfy:

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

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

- 1) Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan
- 2) Adequate regional and cross border collaboration has not been undertaken
- 3) The Housing Need assessment does not use Standard Methodology and no case for exceptional circumstances has been made
- 4) 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

⑤

②

- 5) The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not yet available or included on the Brownfield Register
- 6) The St Helens Council statement of Contaminated Land sites (2015) indicates that 3170 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 3170 ha available, if it were to be remediated
- 7) The council in conjunction with Liverpool City Region Combined Authority 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
- 8) 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
- 9) 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)
- 10) The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquility and general health. It does not promote less vehicle dependency with it's proposals for edge of town developments
- 11) 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	3/5/2019 4:00:56 PM
---------------	---------------------

PO0550

① - LPA06      ② - Statement of Common Ground

#### Representor Details

Web Reference Number	WF0352
Type of Submission	Web submission
Full Name	Mrs Wendy Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS
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 SITE 1HS
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.

\*Lack of sustainability - shortage of local services in relation to school places (many children are schooled in GMR), lack of provision for health care dentists/doctors, making it necessary to travel by car.

\*Gb release will cause significant and lasting harm to purpose of gb.

\*By using gb as opposed to other brownfield sites it is not encouraging recycling of land.

\*Falling population of borough year on year over at least 30 years, proof of population estimates should be provided.

\* No common ground statements with neighbouring authorities seen.

\*Inadequate highways infrastructure would leave residents footing the bill when this should be down to developer.

\*Currently available for food stuff/crop growing and should remain so.

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

Delete this land from proposed removal from gb

**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 3:52:12 PM
---------------	---------------------



PO0551

① - LPA05 ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0353
Type of Submission	Web submission
Full Name	Mrs Wendy Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS WN4 0SS
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 Site 1HA
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.**

- \*lack of statement of common ground with neighbouring authorities.
- \*Proof of population estimates required as over las 3 census returns the population has decreased.
- \*Lack of services (doctors, dentist, schools, transport links incl busses) is not sustainable and this development would encourage a dependency on the car.
- \*Site access inadequate and necessary highway works must not be funded by council tax payer - it must be the developer's responsibility.
- \* The development will not help urban regeneration as it is not recycling derelict land by using green belt this fails to encourage this.
- \*The field should be kept for agriculture and foodstuff growing - especially after Brexit and its uncertainty.
- \* The release of green belt will cause significant harm to the purpose of green belt.

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

Delete this land from the proposed removable from the green belt.

**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 3:16:36 PM
---------------	---------------------

PO0552

① - LPA04      ② LPA05  
 ③ - LPA05, 8HA      ④ - Para 1.7.2 DTC

**Representor Details**

Web Reference Number	WF0355
Type of Submission	Web submission
Full Name	MS MARY BILLINGTON
Organisation	LOCAL RESIDENT
Address	17 HIGHCROSS ALFRED STREET RAININFORD WA11 8GF
Agent Details	

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

Yes (via e-mail)

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

Policy	LSPD
Paragraph / diagram / table	
Policies Map	HA8
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	shlaa 2016 16m&142

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

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

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

Positively prepared, Justified, Effective

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

The council have failed to co-operate with other councils and have not published other statements of common ground. \_\_\_\_\_ ④

With regard to the overall figures on the plan, there are no exceptional circumstances to justify using the standard method to calculate the housing need. \_\_\_\_\_ ②

the economic reasoning is flawed and based on over-optimistic assumptions. \_\_\_\_\_ ①

The level of land needed for development is therefore not as high as set out in the local plan. \_\_\_\_\_ ②

There are no exceptional circumstances to change the greenbelt boundaries. \_\_\_\_\_ ②

The site is grade 1 agricultural land providing employment, this plan is supposed to promote employment, the planned proposals do the opposite.. \_\_\_\_\_ ③

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

Only 4 sites score 4 negatives on the sustainability appraisal, the other 3 have been dropped. St Helens own assessment concludes that HA8 is the least appropriate Green belt site for housing. this site is next to an industrial area with all the associated risks.. \_\_\_\_\_ ③

There has been no consultation with NATURAL ENGLAND over the loss of this highly productive farming land. \_\_\_\_\_

Other reasonable alternatives should be explored, i.e using previously developed land, this will have less impact on the environment and would mean less need for new infrastructure. \_\_\_\_\_ ②



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

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

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

Response Date	3/5/2019 9:06:24 AM
---------------	---------------------

PO0553

①-LPA05 ②-LPA06, 8HS ③-IDP ④-Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0362
Type of Submission	Web submission
Full Name	Mr Christopher Farmer
Organisation	
Address	46 Ecclesfield Rd Eccleston St Helens Merseyside WA105NB
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

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

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

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

Positively prepared, Justified

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

Positively prepared.

Although within the plan it states that there is cross border communication and collaboration, this has not been shared or how bordering boroughs plans have informed St Helens plan or visa versa.

Justified

The Housing Needs assessment has not used standard methodology and has been informed by out of date statistics (ONS 2016 predicts 383 houses, Local plan has been prepared using previous figure (2014)of 486 houses per year).

This leads to an over estimation of houses required.

St Helens is a working class town, with many brownfield sites which are under-utilised. Brownfield register does not take into account contaminated sites, which should be further explored before taking any action on green belt sites.

St Helens has recently become a pilot site for regenerating contaminated brown field land. This was post the local plan being drafted. This surely negate the so called requirement to safeguard any green belt land.

The land identified as 8HS has attracted a large developer and their need for this prime land appears to have influenced the decision making of the council. In that, within the council Green Belt Review,

④

①

②

within the comment section the rational used to protect other green belt site have not been applied to 8HS despite the same findings. In fact the findings are used to justify releasing 8HS from green belt status.

②

With the many brownfield sites across the borough it is highly likely that other site are made available to the council within the time period of this plan. Thus negating the need to release this green belt land.

①

The plan makes no reference to the current funding and plans of Torus Housing Association who have recently won substantial funding through Homes England. They have published their intent to build 800 new homes across St Helens. Furthermore, from their website they state they are aspiring to build 1800 affordable homes over the next four years within St Helens.

Effective

How local infrastructure will support the plan has not been explored or defined.

③

The large development would not be sustainable and no further information has been made available how transport, access to health care and education would be met.

This area would promote car dependence in an area which reports frequent road traffic accidents and which has a high volume of traffic. Current public transport is infrequent, any increase will impact further on road congestion. There is no rail links within this area of St Helens.

②

As a result, it as to be expected that there will be an increase both air, noise and environmental pollution, which will impact on people's health and well being.

The land is high quality agricultural land, which offers economic growth in the form of produce and the plan does not take into account the impact of losses in employment and farming industry.

8HS offers significant protection and food for wildlife.

Consistent with National policy

It does not comply with NPPF 2018 specifically point 11 and 13 ( failure to demonstrate "exceptional circumstance")

Green belt is precious to us. St Helens is a historic working class town which bares the scars that many industries have left behind. These areas are crying out to be developed, as open spaces, housing and recreational activities. However, this plan chooses to ignore this heritage and need, choosing to demote green belt land to safeguarded land to enable greedy developers the opportunity to destroy part of our town.

①

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

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating 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	3/4/2019 6:05:02 PM
---------------	---------------------

PO0554



① - LPA05    ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0364
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
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	Development of Housing Florida Farm South 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?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse 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.

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.

There is no statement of common ground with neighbouring authorities.

The access to this site is inadequate, a left in/ left out from the East Lancs Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat running. There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into the Clipsley brook.

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/4/2019 3:54:08 PM
---------------	---------------------

PO0555

①-LPA05      ②-Statement of Common Ground

**Representor Details**

Web Reference Number	WF0365
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
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	Development of Housing To the South of Billinge Road and West of Smock Lane Policy LPA05 Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse 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.

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.

There is no statement of common ground with neighbouring authorities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highway works must be funded by the developer and NOT council tax payers

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

Delete this land from the proposed removal from the greenbelt

①

②

①

**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	3/4/2019 3:51:58 PM
---------------	---------------------

PO0556



① LPA06 ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0366
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
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	Safeguarded land to the north of Billinge Road Policy LPA08 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse 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.

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.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/4/2019 3:50:14 PM
---------------	---------------------

PO0557

① - LPA05 ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0367
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
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	Development of Housing To the South of Billinge Road and West of Smock Lane Policy LPA05 Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse 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.

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.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/4/2019 3:48:39 PM
---------------	---------------------

PO0558



① - LPA05 ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0368
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
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	Development of Housing Florida Farm South Policy LPA05 Site 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the reuse 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.

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.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/4/2019 3:46:48 PM
---------------	---------------------

PO0559

①-LPA04 ②-LPA05 ③-GEN ④-Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0373
Type of Submission	Web submission
Full Name	Mr. Robert Stock
Organisation	
Address	16 Lynton Way, Windle, St. Helens, Merseyside, 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)**

Yes (via e-mail)

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

Policy	Objective of the Local Plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Local Plan has been devised with the intention of achieving as much Council Tax income as is possible from house building. This has been stated in public arenas by St. Helens Council. The predetermined employment growth is calculated based on unreasonable assumptions with little evidence to support them. And it is these aspirational figures and the use of "out of date" data, which brings about a greater housing requirement than is actually needed. A better and more realistic Local Plan would have been achieved, had the figures used been based on the ONS(2018), which uses more current information. Hence, the Local Plan is not positively prepared. St. Helens Borough has sufficient Brownfield and Contaminated land which could quite easily meet housing requirements. While St. Helens Council may not currently have funding to de-contaminate some of the contaminated sites, this will not always be the case, especially when taken over a 15-30-year time frame. The removal of land from the Green Belt therefore cannot be justified. Hence, The Local Plan is not justified.

The Local Plan is weak on infrastructure planning and does not adequately address major transport problems which are already apparent, and which will worsen still further as the Liverpool City Region

①

②

③

Development comes more into being. Also, there is little on how school and medical facility \_\_\_\_\_ (3)  
shortages, are to be addressed. Hence, the Local Plan is not effective.  
The Local Plan cannot be said to be current, since it does not use the most current data or current \_\_\_\_\_ (182)  
national planning framework. I would have more confidence in the Local Plan if (1) it complied with  
NPPF(2018), and (2) it used the more accurate and up-to-date housing and employment statistics in  
ONS(2018). Other Authorities round and about St. Helens Borough are also producing Local Plans \_\_\_\_\_ (4)  
which are over stating housing requirements, demonstrating a failure to cooperate. Hence, the  
Local Plan is not consistent with current national policy.

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

Make the Local Plan more representative of current knowledge and data by adopting the ONS(2018)  
report on employment and housing statistics, Thereby eliminating the need in this Local Plan to  
reallocate land from the Green Belt.

**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	3/4/2019 4:10:51 AM
---------------	---------------------

PO0560



①-LPA04 ②-LPA05 ③-GEN ④-Para 17.2 OTC

#### Representor Details

Web Reference Number	WF0381
Type of Submission	Web submission
Full Name	Mr Alastair Rooke
Organisation	
Address	10 Ansdell drive Eccleston St Helens WA10 5NB
Agent Details	

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

No

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green belt review 2018

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

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

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

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.

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

The housing need assessment does not use standard methodology, and no case for exceptional circumstances has been made.

The plan makes no mention of brownfield and previously developed land that is not available or included on the brownfield register.

Adequate regional and cross border collaboration has not been undertaken.

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 increase in traffic proposed in the plan will have a significant impact on air-quality, noise, tranquillity and general health.

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

Retaining all Green belt areas for the future of our children must be put above greed and money.

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.

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

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

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

Response Date	3/3/2019 4:29:37 PM
---------------	---------------------

PO0561

① - LPAOS ② - GEN ③ - Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0383
Type of Submission	Web submission
Full Name	Mrs Audrey Rooke
Organisation	
Address	18 Ecclesfield Rd Eccleston St Helens WA10 5NB
Agent Details	

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

No

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green belt review 2018

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

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

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

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.

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.

**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 3:53:17 PM
---------------	---------------------

PO0562



① - LPA04 ② - LPA05 ③ - Statement of Common Ground

#### Representor Details

Web Reference Number	WF0386
Type of Submission	Web submission
Full Name	Mrs Jacqueline Scott-Harley
Organisation	n/a
Address	4 Green Lane Rainford St Helens WA11 8EJ
Agent Details	n/a

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

Yes (via e-mail)

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

Policy	St Helens Borough Local Plan 2020-2035
Paragraph / diagram / table	8HA 9EA
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

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.

②

①

②

③

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

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

2

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

Please see above

**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 10:36:37 AM
---------------	----------------------

PO0563

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

⑤

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.
- 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.

②

③

④

③

④

**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
---------------	----------------------

PO0564



①-LPA05 ②-Statement of Common Ground

**Representor Details**

Web Reference Number	WF0389
Type of Submission	Web submission
Full Name	Mr Stephen Harrison
Organisation	
Address	177 Liverpool Road Haydock St Helens WA119RX
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not Justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt daily to encourage this.

The release Greenbelt will cause significant harm to the purposes of the Greenbelt.

Increased 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. Further to this, more people means more cars, means more vehicles on the road leading to the roads themselves. The current state of the local roads are inadequate with pot holes and uneven surfaces, which in turn is causing damage and unnecessary wear and tear to vehicles. So how would the infrastructure be able to cope with the added influx of people.

The access to the site is inadequate, a left in / left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road & Vicarage Road would put additional traffic on an already overstretched highways systems. There would be problems of rat-running though the proposed development.

Although a little mercenary, the proposed development of housing would greatly affect the house pricing for residents on Liverpool Road, Vicarage Drive, Brookside View and surrounding areas that

back onto the proposed. Is this really fair on these residents who have been loyal and resided in their homes for many years, some all their lives and stayed with the Haydock community fro their housing to be de-valued greatly?

There are existing flooding problems at the site and remedies to prevents this would place even greater amounts of water into the Clipsley Brook.

There is no statement of common ground with neighbouring authorities.

①

②

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

Delete this land from the proposed removal from the Greenbelt

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

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

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

Response Date	3/2/2019 7:45:55 PM
---------------	---------------------

PO0565

① - LPA04      ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0390
Type of Submission	Web submission
Full Name	Mr Stephen Harrison
Organisation	
Address	177, Liverpool Road Haydock, St Helens Wa119RX
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not Justified - The Council should be put to strict proof of need for this type of development, in this position and on this scale.

One purpose of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt in respect of site 2EA -Florida Farm North.

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location.

High volumes if predicted traffic will add to the already over capacity on the highways in the vicinity. Further to this, the more HGVs the more 'wear and tear' on the roads, thus more and more pot holes and uneven surfaces. This will intern affect personal vehicles suspension and tyre use.

The warehouses that are being built at the moment originally stated that they would be single storey in height. This is the case, however, these warehouse are still visible for residents on Liverpool Road whom back onto the Florida Farm land.

How would YOU honestly feel if this was YOU?

There is no statement of common ground with neighbouring authorities.

①

②

They say that this new infrastructure will bring X amount of new jobs... Very good, but for WHO? The residents of Haydock? NO in fact this would draw more people into the area, stretching the already crippled infrastructure. Thus the new development will not help with jobs for the people of Haydock. Furthermore, if the machinery in the warehouses is going to be automated, where does this help the work force?

Haydock was once a quant and peaceful village. Yes, it had to go with the times and have some industrialisation, but where does this stop? The Greenbelt is there for the residents of Haydock to enjoy. Why ruin it?

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

Delete this land from the proposal removal from the Greenbelt

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

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

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

Response Date	3/2/2019 7:27:31 PM
---------------	---------------------

PO0566



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

PO0567

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:

**6. Please give details of why 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
- 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

PO0568



① - LPA05    ② - GEN    ③ - Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0396
Type of Submission	Web submission
Full Name	Mr Peter Williams
Organisation	
Address	26 Prestbury Drive Eccleston St Helens WA10 5RA
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05
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 not positively prepared as:

1. St Helens Council has used the ONS(2014) statistics and not the more recent and more accurate, statistics ONS(2016) which are available. The later statistics suggest that there is a reduction in housing needs. The Council must be aware of the reduced needs but still choose to use the older figures, resulting in unnecessarily high housing targets. Changing the plan to use the latest figures would reduce the requirement for building on Green Belt.

2. There has been inadequate regional & cross border collaboration with adjacent authorities, in particular with regard to on-going development of a number of enormous distribution warehousing sites along the length of the Merseyside stretch of the A580 East Lancs Road. These developments all dependent on road freight. When combined with the additional local traffic directly from a large residential development, as proposed by The Plan, this already busy & hazardous trunk road would undoubtedly have an undesirable impact along with an increased risk of accidents.

3. The Plan is not consistent with achieving sustainable development. Sustainable development is defined as "development that meets the needs of the present, without compromising the ability of future generations to meet their own needs" (Sustainable Development Commission <http://www.sd-commission.org.uk/pages/what-is-sustainable-development.html>). The local plan neither meets the

①

③

②

①

needs of the current or forecasted population and compromises the ability of future generations to meet their own needs by the destruction of agricultural land that can then never be reclaimed.

The plan is not justified as:

The Plan neglects to consider reasonable alternatives, such as the available brownfield sites in the borough. The St Helens Council statement of "Contaminated Land sites" (2015) indicates that 3170 hectares of the lowest priority contaminated land exists in St Helens. If only 7% of this land was considered for remediation there would be no need to consider use of green belt land.

The plan is not effective as:

The local plan does not offer evidence that effective joint working on regional or cross boundary strategic matters have been dealt with. Also, no plan can be effective if it is incomplete - The Plan does not address the lack of infrastructure and the poor education on offer in St Helens and concentrates, instead, on house building and low skilled employment. Allocating Green Belt for housing without addressing the additional infrastructure needs will only make the situation worse. In addition, the type of houses built will, in all likelihood, not meet the housing needs of in St Helens.

The plan is not consistent with national policy as:

In its present form it does not enable the delivery of sustainable development in accordance with the policies in the NPPF. Para 109 of the NPPF (2018) suggests that development should be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety. Surely, the addition of 1800 cars attempting to access the A580 East Lancs Road, a route already bearing excess road freight, would have a huge impact on highway safety.

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

1. The plan should be based on the more recent and more accurate, statistics ONS(2016) which are available.
2. The plan should be able to deliver the forecasted housing needs, as safely as possible, by focusing on the existing brownfield sites, without jeopardising our future food source. If financial reasons for avoiding the residential development of brownfield sites are being cited, then this should form part of the negotiations with Central Government and the developers who will make extensive financial gains.
3. All infrastructure needs should be addressed comprehensively by the plan.

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

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

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

Response Date	3/1/2019 6:15:39 PM
---------------	---------------------

PO0569

①-LPA05 ②-GEN ③-IDP ④-Para 1.7.2 OTC

#### Representor Details

Web Reference Number	WF0400
Type of Submission	Web submission
Full Name	Mrs Alison Williams
Organisation	
Address	26 Prestbury Drive WA10 5RA
Agent Details	

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

Yes (via e-mail)

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

Policy	LpA05
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 not positively prepared as:

1. it fails to meet the area's objectively assessed needs as the council has used ONS figures from 2014 when more current forecasts have been published (ONS, 2016) ①

2. it has not been informed by agreements with other authorities as there has been inadequate regional & cross border collaboration eg the recent & on-going development of a number of enormous distribution warehousing sites along the length of the Merseyside stretch of the A580 East Lancs Road, all dependent on road freight, then proposing the addition of local traffic directly from a large residential development to this already busy & hazardous trunk road which would surely increase risk of accidents in terms of both likelihood & impact. ②

3. it is not consistent with achieving sustainable development. Sustainable development is defined as "development that meets the needs of the present, without compromising the ability of future generations to meet their own needs" (Sustainable Development Commission <http://www.sd-commission.org.uk/pages/what-is-sustainable-development.html>). The local plan neither meets the needs of the current or forecasted population and compromises the ability of future generations to meet their own needs by the destruction of agricultural land that can then never be reclaimed. ③

The plan is not justified as:

The Plan is not an appropriate strategy, as it neglects reasonable alternatives, such as the available brownfield sites in the borough. The St Helens Council statement of "Contaminated Land sites" (2015) indicates that 3170 hectares of the lowest priority contaminated land exists in St Helens. If ④

only 7% of this land was considered for remediation there would be no need to consider use of green belt land. ①

The plan is not effective as:

The local plan doesn't appear to provide evidence of effective joint working on regional or cross boundary strategic matters that have been dealt with rather than deferred or any statement of common ground. Furthermore, no plan can be effective if it is incomplete. The infrastructure delivery plan fails to provide an adequate explanation of the impact on Health & Social Care, Education or other community statutory services, let alone making provision for managing these requirements. ④ ③

The plan is not consistent with national policy as:

In its present form it does not enable the delivery of sustainable development in accordance with the policies in the NPPF. Para 109 of the NPPF (2018) suggests that development should be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety. Surely, the addition of 1800 cars attempting to access the A580 East Lancs Road, a route already bearing excess road freight, would have a huge impact on highway safety. ①

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

The plan should be able to deliver the forecasted housing needs, as safely as possible, by focusing on the existing brownfield sites, without jeopardising our future food source. If financial reasons for avoiding the residential development of brownfield sites are being cited, then this should form part of the negotiations with the developers who are set to make extensive financial gains.

**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	2/28/2019 8:50:37 PM
---------------	----------------------

PO0570



**Representor Details**

Web Reference Number	WF0445
Type of Submission	Web submission
Full Name	Mr Paul McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

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

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

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

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

01

02

03

04

05

06

07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- 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 3:12:06 PM
---------------	----------------------

PO0571



**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
---------------	----------------------

PO0572



**Representor Details**

Web Reference Number	WF0449
Type of Submission	Web submission
Full Name	Mrs Carmel Farmer
Organisation	
Address	46 Ecclesfield Rd, Eccleston, St Helens, Merseyside WA105NB
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Positively prepared.

Although within the plan it states that there is cross border communication and collaboration, this has not been shared or how bordering boroughs plans have informed St Helens plan or visa versa.

Justified

The Housing Needs assessment has not used standard methodology and has been informed by out of date statistics (ONS 2016 predicts 383 houses, Local plan has been prepared using previous figure (2014) of 486 houses per year).

This leads to an over estimation of houses required.

St Helens is a working class town, with many brownfield sites which are under-utilised. Brownfield register does not take into account contaminated sites, which should be further explored before taking any action on green belt sites.

The land identified as 8HS has attracted a large developer and their need for this prime land appears to have influenced the decision making of the council. In that, within the council Green Belt Review, within the comment section the rational used to protect other green belt site have not been applied to 8HS despite the same findings. In fact the findings are used to justify releasing 8HS from green belt status.

With the many brownfield sites across the borough it is highly likely that other site are made available to the council within the time period of this plan. Thus negating the need to release this green belt land.

The plan makes no reference to the current funding and plans of Torus Housing Association who have recently won substantial funding through Homes England. They have published their intent to build 800 new homes across St Helens. Furthermore, from their website they state they are aspiring to build 1800 affordable homes over the next four years within St Helens.

04

#### Effective

How local infrastructure will support the plan has not been explored or defined.

The large development would not be sustainable and no further information has been made available how transport, access to health care and education would be met.

05

This area would promote car dependence in an area which reports frequent road traffic accidents and which has a high volume of traffic. Current public transport is infrequent, any increase will impact further on road congestion. There is no rail links within this area of St Helens.

As a result, it is to be expected that there will be an increase both air, noise and environmental pollution, which will impact on people's health and well being.

06

The land is high quality agricultural land, which offers economic growth in the form of produce and the plan does not take into account the impact of losses in employment and farming industry.

07

8HS offers significant protection and food for wildlife.

03

#### Consistent with National policy

It does not comply with NPPF 2018 specifically point 11 and 13 (failure to demonstrate "exceptional circumstance")

Green belt is precious to us. St Helens is a historic working class town which bears the scars that many industries have left behind. These areas are crying out to be developed, as open spaces, housing and recreational activities. However, this plan chooses to ignore this heritage and need, choosing to demote green belt land to safeguarded land to enable greedy developers the opportunity to destroy part of our town.

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

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

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

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

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

Response Date	2/23/2019 6:36:43 PM
---------------	----------------------

PO0573

**Representor Details**

Web Reference Number	WF0450
Type of Submission	Web submission
Full Name	Mrs Alice Donnellan
Organisation	
Address	23 Oak Tree Road Eccleston St. Helens Merseyside WA10 5LJ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared. 01

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective. 02



The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

---

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 for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites. NB I submitted this form on 22nd Feb, but did not receive an automated reply so have re-submitted, in case the first one was not received.

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

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

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

Response Date	2/23/2019 9:59:21 AM
---------------	----------------------



PO0574

①-LPA05 ②-LPA06, 8HS ③-GEN ④-Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0451
Type of Submission	Web submission
Full Name	Miss Mary Donnellan
Organisation	
Address	23 Oak Tree Road Eccleston St Helens Merseyside WA10 5LJ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

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 for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.  
NB: I submitted the above form on 22nd Feb 2019, but I did not receive an acknowledgement, so I have re-submitted today, in case the one from 22nd was not received.

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

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

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

Response Date	2/23/2019 9:52:37 AM
---------------	----------------------

PO0575



① - LPA05    ② - LPA06, 8HS    ③ - GEN    ④ - Para 1.7.2 OTC

#### Representor Details

Web Reference Number	WF0452
Type of Submission	Web submission
Full Name	Mrs William Clarey
Organisation	
Address	12 Sandfield Road Eccleston St. Helens Merseyside WA10 5LS
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③



The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

②

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

①

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

③

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.

④

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.

①

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.

③

The Plan is not effective.

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

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

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

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

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

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

Response Date	2/23/2019 9:46:41 AM
---------------	----------------------

PO0576

① - LPA05 ② - LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0453
Type of Submission	Web submission
Full Name	Mrs Helen Clarey
Organisation	
Address	12 Sandfield Road Eccleston St. Helens Merseyside WA10 5LS
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

②

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

①

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

③

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.

④

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

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.

③

## **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	2/23/2019 9:41:44 AM
---------------	----------------------



PO0577

① - LPA04 ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0454
Type of Submission	Web submission
Full Name	Mrs June Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA04 - Sites 2EA, 5EA and 6EA.
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale.

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.

The Council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North.

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location.

High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/22/2019 2:19:13 PM
---------------	----------------------

PO0578

① - LPA06 ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0455
Type of Submission	Web submission
Full Name	Mrs June Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
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 - Site 1HB
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of 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.

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.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

PO0579



① - LPA05    ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0456
Type of Submission	Web submission
Full Name	Mrs June Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 - Site 1HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of 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.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highways works must be funded by the developer and not the Council Tax payers.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/22/2019 2:03:24 PM
---------------	----------------------

PO0580

①-LPA05

②-Statement of Common Ground

**Representor Details**

Web Reference Number	WF0457
Type of Submission	Web submission
Full Name	Mrs June Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 - Site 2HA.
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of 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.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of Rat-running.

There are existing flooding problems at this site and remedies to prevent this would place even greater amounts of water into the Clipsley Brook.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

①

②

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

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

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

Response Date	2/22/2019 1:56:23 PM
---------------	----------------------

PO0581



① - LPA05      ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0458
Type of Submission	Web submission
Full Name	Mr Michael John Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 - Site 2HA.
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of 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.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of Rat-running.

There are existing flooding problems at this site and remedies to prevent this would place even greater amounts of water into the Clipseley Brook.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

①

②

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

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

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

Response Date	2/22/2019 1:51:47 PM
---------------	----------------------

PO0582

① - LPA04      ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0459
Type of Submission	Web submission
Full Name	Mr Michael John Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 04 - Sites 2EA, 5EA and 6EA.
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale.

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.

\The Council has already granted planning permission in the \greenbelt in respect of site 2EA - Florida Farm North.

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location.

High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/22/2019 11:40:27 AM
---------------	-----------------------

PO0583



① - LPA06    ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0460
Type of Submission	Web submission
Full Name	Mr Micheal John Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
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 - 1HB.
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

Not Justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of 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.

Housing in this area isn't sustainable because of lack of schools, doctors surgeries, bus routes and other services. the use of cars is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

PO0584

① - LPA05    ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0461
Type of Submission	Web submission
Full Name	Mr Michael John Buckle
Organisation	Resident
Address	58 Hamilton Road Garswood WN4 0SU
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 - Site 1HA.
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from?

One of the purposes of 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.

Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

The access to the site on either Billinge Road or Garswood Road would be inadequate. Any necessary highways works must be funded by the developer and not the Council Tax payers. There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/22/2019 10:59:22 AM
---------------	-----------------------

PO0585

① - LPA05 ② LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0462
Type of Submission	Web submission
Full Name	Mrs Alice Donnellan
Organisation	
Address	23 Oak Tree Road Eccleston St. Helens Merseyside WA10 5LJ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③



The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

②

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

①

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

③

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.

④

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

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.

③

The Plan is not effective.

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

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

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

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

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

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

Response Date	2/22/2019 9:08:16 AM
---------------	----------------------

PO0586

① - LPA05    ② - LPA06, 8HS    ③ - GEN    ④ - Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0463
Type of Submission	Web submission
Full Name	Miss Mary Donnellan
Organisation	
Address	23 Oak Tree Road Eccleston ST. HELENS Merseyside WA10 5LJ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt review 2018

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③

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. ④

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. 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. ③

The Plan is not effective.

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

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

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

#### **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

2/22/2019 8:48:05 AM

PO0587



① - LPA05 ② - GEN

③ - Para 172 etc

**Representor Details**

Web Reference Number	WF0467
Type of Submission	Web submission
Full Name	Mrs Carol Howard
Organisation	
Address	3 Melrose Avenue Eccleston St Helens WA10 5PQ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 05
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 does not satisfy the requirement for Sustainable development or the criteria for Sustainable transport. Nor does it satisfy sustainable housing, targets proposed are based on inflated employment growth predictions. Effective land use is not being considered as town centre development would benefit the area more than building on Green Space. Agricultural Land Quality is being ignored so food security is not satisfied. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact of farming and distribution jobs has not been considered. Adequate regional and cross border collaboration has not been undertaken. Our local infrastructure is already struggling to cope with traffic. Air quality, noise and tranquillity and general health will be impacted by increased traffic. Commuting to Manchester from Eccleston takes upwards of 90 minutes in rush hour traffic already, whether by the A580 or M6/M62. Windle Island cannot cope with more traffic. Houghtons Lane has been ripped up by vehicles using the road as a cut through and our council is already struggling to repair potholes in a timely manner. Healthcare and Education will also struggle to cope with a higher population.

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

A brownfield first approach must be fully adopted. No Green Belt land should even be considered until every available brownfield site has been identified and built upon. Contaminated land should

be cleaned up, regenerating, revitalising and improving the local environment within our town. 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. Lots of shops in our town centre are now empty. Could they be redeveloped for housing rather than being left to deteriorate?

**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	2/21/2019 10:02:52 AM
---------------	-----------------------

PO0588

①-LPA05 ②-GEN ③-Para 17.2 DTC

### Representor Details

Web Reference Number	WF0468
Type of Submission	Web submission
Full Name	Mr. Ray Howard
Organisation	
Address	3 Melrose Avenue Eccleston St Helens WA10 5PQ
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 05
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 does not satisfy the requirement for Sustainable development or the criteria for Sustainable transport. Nor does it satisfy sustainable housing, targets proposed are based on inflated employment growth predictions. Effective land use is not being considered as town centre development would benefit the area more than building on Green Space. Agricultural Land Quality is being ignored so food security is not satisfied. The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact of farming and distribution jobs has not been considered. Adequate regional and cross border collaboration has not been undertaken. Our local infrastructure is already struggling to cope with traffic. Air quality, noise and tranquillity and general health will be impacted by increased traffic. Commuting to Manchester from Eccleston takes upwards of 90 minutes in rush hour traffic already, whether by the A580 or M6/M62. Windle Island cannot cope with more traffic. Houghtons Lane has been ripped up by vehicles using the road as a cut through and our council is already struggling to repair potholes in a timely manner. Healthcare and Education will also struggle to cope with a higher population.

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

A brownfield first approach must be fully adopted. No Green Belt land should even be considered until every available brownfield site has been identified and built upon. Contaminated land should

①  
②  
①  
②  
③  
②

be cleaned up, regenerating, revitalising and improving the local environment within our town. 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. Lots of shops in our town centre are now empty. Could they be redeveloped for housing rather than being left to deteriorate?

**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	2/21/2019 10:00:09 AM
---------------	-----------------------

PO0589



① - LPA04 ② - Statement of Common Ground

#### Representor Details

Web Reference Number	WF0470
Type of Submission	Web submission
Full Name	Mrs Valerie Wilson
Organisation	
Address	2 Hollins Close Garswood Wigan WN4 0RR
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA04 Sites 2EA,5EA,6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

Not justified - the Council should be put to strict proof of the need for this type of development in this position & 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.

The Council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North.

The risk of flooding further down the Clipsey Brook will be exacerbated by future development at this location.

High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity and add to air pollution.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/20/2019 3:58:11 PM
---------------	----------------------

PO0590

① - LPA06      ② - Statement of Common Ground

**Representor Details**

Web Reference Number	WF0471
Type of Submission	Web submission
Full Name	Mrs Valerie Wilson
Organisation	
Address	2 Hollins Close Garswood Wigan WN40RR
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 Site 1HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

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.

One of the purposes of the Greenbelt is to assist urban regeneration by encouraging the recycling of derelict land and other urban land. Using Greenbelt fails to encourage this.

Housing in this area isn't sustainable because of the lack of school places, doctor's and dentist's surgeries, bus routes and other services. The use of cars on already overcrowded roads is being encouraged because of the lack of facilities.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/20/2019 3:48:21 PM
---------------	----------------------

PO0591



① - LPA04    ② - LPA05    ③ - Para 1.7.2 DTC

#### Representor Details

Web Reference Number	WF0473
Type of Submission	Web submission
Full Name	Mr Paul Trelford
Organisation	
Address	30 Howards Lane, Eccleston WA10 5HY
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	Yes
Habitats Regulation Assessment	
Other documents	

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

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

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

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

There are no exceptional circumstances to justify not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the level of land needed is therefore not as high as set out in the Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

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

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

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

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

Identify and regenerate the numerous brownfield sites around already developed infrastructures

#### 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 8:33:56 PM
---------------	----------------------

PO0592

① - LPA06      ② - Para 1.7.2 DTC

**Representor Details**

Web Reference Number	WF0475
Type of Submission	Web submission
Full Name	Dr Hannah Denno
Organisation	
Agent Details	

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

Yes (via e-mail)

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

Policy	Green belt land in Windle
Paragraph / diagram / table	Site 8HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified

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

I believe the estimated housing need is too high, and that the figures are based on incorrect assumptions, there are therefore no exceptional circumstances to justify use of Green Belt Land. Other local options have not been sufficiently explored such as the use of previously developed land nearer the town centre. This land needs to be reclaimed and used for housing this would enhance the appearance of the town centre in a more sustainable way that did not need new infrastructure. This is an area with ecologically diverse habitats which is used for recreation and leisure. The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

**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:**

PO0593

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

#### Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is not positively prepared.

St Helens has adequate Brownfield and Contaminated land which could easily meet housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.

①

②

④

③



The Plan does not comply with NPPF(2018) as it was written prior to it's publication. Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also planning to over supply housing which cannot be sustainable in this area of the North West.

182

5

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

Adopt the ONS(2018) housing need statistics and remove all Green Belt reallocation from the Plan.

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

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

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

Response Date	2/16/2019 2:35:45 PM
---------------	----------------------

PO0594



CPRE Lancashire response  
jackie.copley  
to:  
planningpolicy  
13/03/2019 09:20



# 1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

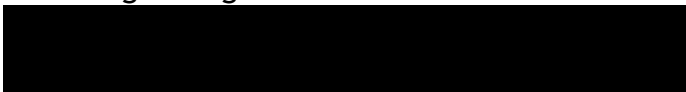
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

**Jackie Copley MRTPI MA BA(Hons) PgCert**  
Planning Manager



## Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

CPRE Lancashire is a Company Limited By Guarantee registered in England, No. 5291461

Registered Charity Number: 1107376

*This email and any files transmitted with it are confidential and intended for the addressee(s) only. If you are not the intended recipient any disclosure, distribution, copying or printing is strictly prohibited. If you have received this email in error please notify the sender. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of CPRE Lancashire. Finally, this email and its attachments have been checked for viruses before submission, however the recipient should also check for the presence of viruses. CPRE Lancashire accepts no responsibility for any damage caused by any virus transmitted by this email.*



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

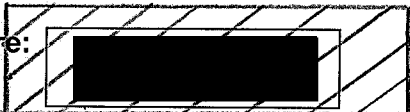
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
--	--

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

**Would you like to be kept updated of future stages of the St Helens Borough 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 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 type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

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

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

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

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

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

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;



employment property and have an adverse effect on the property market. It would lead to widespread vacancy. We think the data in Tables 4.2, 4.3 and 4.4 is inaccurate.

Our view is supported by the expert opinion of economist Dr. Glenn Athey, who was commissioned by St Helens Green Belt Association (an umbrella residents group opposed to Green Belt loss). In his report, Dr Athey concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts has 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 a number of other assumptions underpinning employment land policies, including forecasts of port freight. In light of Dr Athey's expert opinion, CPRE Lancashire calls for the Council to 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. CPRE Lancashire calls for the economic data, analysis to be corrected.

This is particularly the case when considering the fact that all surrounding geography in Liverpool City Region, Greater Manchester, Cheshire and West Lancashire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland for development, which is important for future food security, and is currently protected by Green Belt designation on the basis of economic analysis that is flawed and consequently not fully justified. Some of the land so allocated is among the most versatile in the country. 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. CPRE Lancashire is 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.

In any case, what is the local benefit of B8 Warehousing formats with new technology replacing human resources resulting in very low density employment formats, causing great harm to Green Belt purpose? We think there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, and question the need for such an excessive amount in the countryside. The duty to cooperate has not been complied with on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities, resulting in 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. CPRE Lancashire believes local planning of large warehousing formats should be in accordance with promises by Government to protect Green Belt.

#### **Policy LPA04.1: Strategic Employment Sites**

CPRE Lancashire is opposed to needless release of Green Belt land for employment uses. Previously we raised concern over 2EA, 4EA, 7EA, and 8EA (LPA10), but we reserve the right to comment on other employment sites included in LPA04.1 at the examination.

It is supported that planning applications for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

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

In recent years, CPRE has undertaken considerable research to show that housing assessments

PO0595



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

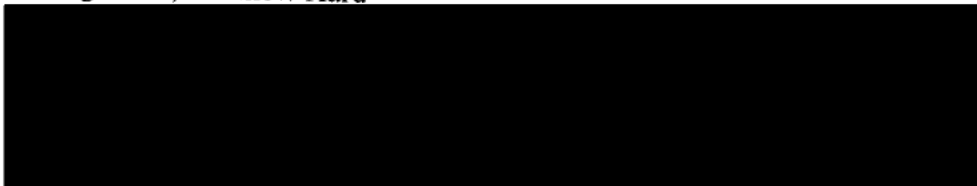
to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:02

Cc:

Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner



**indigo.**



RTPI Planning Consultancy of the Year 2017

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



This e-mail (including any attachments) is intended only for the recipient(s) named above.  
It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person.  
If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	Address: St James' Tower 7 Charlotte Street Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	
Signature	Date: 13/03/2019

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

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

Yes ☒ (Via Email)

No ☐

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

## **RETURN DETAILS**

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

post to:

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

**or** by hand delivery to:

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

**or** by e-mail to:

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

## **PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?							
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment			

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

Please tick as appropriate

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

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

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary



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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

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

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

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

☒

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

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

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

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

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

# St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

**indigo.**

### 3. St Helens Borough Local Plan 2020-2035 Submission Draft

- 3.1. Chapter 3 contains specific representations to the proposed policies. However, we comment below on the strategic, overarching aspects of the current draft.

#### Employment land

- 3.2. The Employment Land Needs Study (ELNS) recognises that St Helens has experienced low rates of delivery of employment land, especially compared to some of its neighbours, because of an inadequate supply of market attractive sites. Nonetheless, the ELNS calculates the OAN predominantly from previous delivery rates.
- 3.3. By using this method, the future supply will continue to be hamstrung. By way of comparison, had previously there been a better supply of market attractive sites, the delivery of land would have increased and as such the OAN would rise. 01
- 3.4. Therefore, the Local Plan needs to revise the strategy to ensure the previous inadequate supply is rectified, in addition to meeting future needs.
- 3.5. Increasing the amount of employment land will have a consequential impact on the housing requirement, which has also been characterised by sluggish delivery.

#### Housing requirement

- 3.6. It will be necessary to review and update the housing targets as a consequence of reverting to an employment land target that is commensurate to the Council's own spatial vision and that strives to boost employment opportunities after years of dampened supply.
- 3.7. Furthermore, we have significant concerns that the new local plan will not resolve the shortfall in housing delivery against the Core Strategy.
- 3.8. Page 26 of the 2017 Strategic Housing Land Availability Assessment shows progress of housing delivery against the Core Strategy. Figure 5.1 confirms that 1,324 homes have failed to be delivered between 2003 and 2017. We acknowledge that the Council has only narrowly missed hitting 100% of its Housing Delivery Test, but this pertains to the previous three years and not to the historic Core Strategy period. 02
- 3.9. By starting afresh with calculating the housing requirement, the Council are failing to accommodate the historic shortfall against the Core Strategy. Given the Core Strategy has an end-date of 2027, it is necessary to add 1,324 to the requirement for 9,234 homes between 2016 and 2035 in order for the plan to be positively prepared and thus sound.

#### Housing supply

- 3.10. The housing supply compared with requirement of 9,234 homes is set out in Table 4.6 of the local plan.
- 3.11. There are several flaws with this table, partly stemming from using a 2017 base-date, and partly from errors in the counting. 03

#### Expected completions by April 2020

- 3.12. Adding the actual completions in 2016/17 to the expected number of completions in 2017 to 2020 gives a total of 1,962, not 1,989 as stated in Table 4.6. Although not accounted for in

PO0596



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

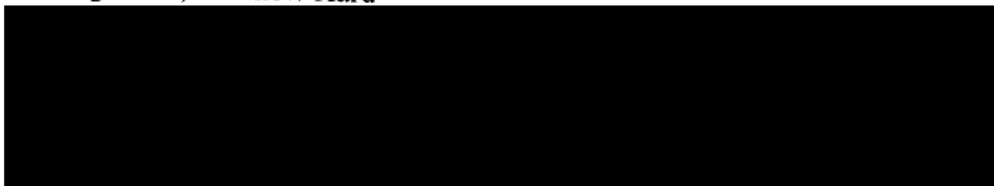
to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:02

Cc:

Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner



**indigo.**



RTPI Planning Consultancy of the Year 2017

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



This e-mail (including any attachments) is intended only for the recipient(s) named above.  
It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person.  
If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	Address: St James' Tower 7 Charlotte Street Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	
Signature	Date: 13/03/2019

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

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

Yes ☒ (Via Email)

No ☐



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

## **RETURN DETAILS**

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

post to:

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

**or** by hand delivery to:

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

**or** by e-mail to:

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

## **PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?							
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment			

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

Please tick as appropriate

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

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

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

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

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

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

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

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

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

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

# St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

**indigo.**

### 3. St Helens Borough Local Plan 2020-2035 Submission Draft

- 3.1. Chapter 3 contains specific representations to the proposed policies. However, we comment below on the strategic, overarching aspects of the current draft.

#### Employment land

- 3.2. The Employment Land Needs Study (ELNS) recognises that St Helens has experienced low rates of delivery of employment land, especially compared to some of its neighbours, because of an inadequate supply of market attractive sites. Nonetheless, the ELNS calculates the OAN predominantly from previous delivery rates.
- 3.3. By using this method, the future supply will continue to be hamstrung. By way of comparison, had previously there been a better supply of market attractive sites, the delivery of land would have increased and as such the OAN would rise. 01
- 3.4. Therefore, the Local Plan needs to revise the strategy to ensure the previous inadequate supply is rectified, in addition to meeting future needs.
- 3.5. Increasing the amount of employment land will have a consequential impact on the housing requirement, which has also been characterised by sluggish delivery.

#### Housing requirement

- 3.6. It will be necessary to review and update the housing targets as a consequence of reverting to an employment land target that is commensurate to the Council's own spatial vision and that strives to boost employment opportunities after years of dampened supply.
- 3.7. Furthermore, we have significant concerns that the new local plan will not resolve the shortfall in housing delivery against the Core Strategy.
- 3.8. Page 26 of the 2017 Strategic Housing Land Availability Assessment shows progress of housing delivery against the Core Strategy. Figure 5.1 confirms that 1,324 homes have failed to be delivered between 2003 and 2017. We acknowledge that the Council has only narrowly missed hitting 100% of its Housing Delivery Test, but this pertains to the previous three years and not to the historic Core Strategy period. 02
- 3.9. By starting afresh with calculating the housing requirement, the Council are failing to accommodate the historic shortfall against the Core Strategy. Given the Core Strategy has an end-date of 2027, it is necessary to add 1,324 to the requirement for 9,234 homes between 2016 and 2035 in order for the plan to be positively prepared and thus sound.

#### Housing supply

- 3.10. The housing supply compared with requirement of 9,234 homes is set out in Table 4.6 of the local plan.
- 3.11. There are several flaws with this table, partly stemming from using a 2017 base-date, and partly from errors in the counting. 03

#### Expected completions by April 2020

- 3.12. Adding the actual completions in 2016/17 to the expected number of completions in 2017 to 2020 gives a total of 1,962, not 1,989 as stated in Table 4.6. Although not accounted for in

PO0597



EL0009



St.Helens Borough Local Plan 2020-2035 Submission Draft  
Andrew Windress  
to:  
planningpolicy  
28/02/2019 13:55

① - SPANAL UNIO

② - CPA02

③ - LPA05

④ - GBR (2018)



2 Attachments



St Helens Local Plan 2020-35 Reps.pdf 150827 TS Site A Rev 2 - Reduced.pdf

Please find attached representations on the Local Plan Submission Draft.

Regards

Andrew

**Andrew Windress MA MRTPI**  
Director



a: 9 York Place, Leeds, LS1 2DS  
w: [www.idplanning.co.uk](http://www.idplanning.co.uk)



This message, including any attachments, has been sent by ID Planning and is intended solely for the use of the person(s) to whom it is addressed. Its contents are confidential and if you are not the intended recipient, please could you delete this email from your system, without copying or disclosing its contents, and inform the sender by return e-mail that you have received this message.

Email communications cannot be guaranteed to be secure, or free from computer viruses, therefore ID Planning does not accept legal responsibility for this message or its contents. The recipient is responsible for checking this message for viruses and verifying its authenticity before acting on the contents. Any views or opinions presented are solely those of the author and do not necessarily represent those of ID Planning.

ID Planning is the trading name of ID Town Planning Consultancy Limited (Company registration number : 05271142)

February 2019



**Representations on the St. Helens Borough Local Plan 2020-2035  
Submission Draft and the Draft Green Belt Review 2018 with  
particular reference to land at Haydock Park Racecourse (Previous  
Local Plan site reference 2015\_003).**

On behalf of  
Jockey Club Racecourses

Prepared by  
I D Planning  
9 York Place  
Leeds  
LS1 2DS

---

## 4.0 Representations to the St. Helens Borough Local Plan 2020-2035 Submission Draft

- 4.1 The comments below are provided in respect of the individual policies quoted.

### Spatial Vision

- 4.2 We wish to support the Council's commitment to the effective use of the Borough's stock of brownfield land to help meet housing needs, as well as its commitment to the location of housing development where it is well connected to employment areas. ] ①

### Policy LPA02

- 4.3 We agree with part 1 of Policy LPA02 which identifies the Key Settlements where sustainable regeneration and growth will be focussed, which includes Haydock. ] ②
- 4.4 Part 4 is also supported in principle. However, it is considered the housing allocations in the proposed Green Belt areas are not appropriate and should include the HPR site. ]
- 4.5 The HPR site is a brownfield site in a sustainable location, adjoining the boundary of one of the Key Settlements listed in part 1 of this policy. It is currently proposed to be removed from the Green Belt and would greatly benefit from a housing allocation in order to encourage the delivery of housing on the site. Furthermore, the scale of development as indicated in previous submissions would be reflective of the surrounding housing development and would preserve the existing trees on the site. Development of this site would also preserve more sensitive and undeveloped sites within the Green Belt. ✓
- 4.6 Paragraph 4.6.7 stresses the Borough's "substantial need for new housing development that is linked to demographic needs and the need to provide sufficient housing to support employment growth." The HPR site is located immediately to the north of a large area of land (Ref: 2ES) which is proposed to be removed from the Green Belt and safeguarded for employment use. As identified in the Draft Local Plan, there is a substantial need to provide new housing to support employment growth and accordingly, the HPR site is well positioned to support employment growth on site 2ES in the future. ✓
- 4.7 Paragraph 4.6.8 establishes the aim for land for new development to be identified "in sustainable locations, generally within, or on the edge of, or close to Key Settlements." As discussed, the HPR site is located on the edge of Haydock, which is identified as a Key Settlement. The Transport Assessment previously submitted to the Council and provided again at Appendix 1 confirms that the site is in a highly accessible and sustainable location with good access to local shops and services including public transport services. ✓

PO0598



ELOOS 6



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
 Dan Ingram  
 to:  
 planningpolicy@sthelens.gov.uk  
 11/03/2019 13:18

1 Attachment



26800.A3.DI.DM - St Helens LP Submission Draft Reps - Travers Farm, Bold 190311 with Appendices.pdf

To whom it may concern,

Please find attached a copy of representations, including Vision Statement, prepared by Barton Willmore on behalf of our Client, Andrew Cotton and Family, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan Ingram  
 Senior Planner

Consider the Environment, Do you really need to print this email?

The information contained in this e-mail (and any attachments) is confidential and may be privileged. It may be read, copied and used only by the addressee, Barton Willmore accepts no liability for any subsequent alterations or additions incorporated by the addressee or a third party to the body text of this e-mail or any attachments. Barton Willmore accepts no responsibility for staff non-compliance with our IT Acceptable Use Policy.

① - GEN

② - Spatial Vision

③ - Objective 4

④ - key Diagram

⑤ - LPA01

⑥ - LPA02

⑦ - LPA03

⑧ - LPA04

⑨ - LPA04.1

⑩ - LPA05

⑪ - LPA05.1

⑫ - LPA06

⑬ - LPA08

⑭ - LPA09

⑮ - LPC01

⑯ - LPC02

⑰ - LPC07

⑱ - LPC09

⑲ - Appendix 5



St. Helens  
Council

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

EF0176

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: ANDREW	First name: DAN
Last Name: COTTON	Last Name: INGRAM
Organisation/company:	Organisation/company: BARTON WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

Signature: [Redacted]	Date: 13/03/19
-----------------------	----------------

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

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

Yes ☒ (Via Email)

No ☐



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

## PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

PLEASE REFER TO SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

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

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

---

# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on Behalf of Andrew Cotton and Family

March 2019



## 2.0 PLAN PERIOD, VISION, OBJECTIVES AND KEY DIAGRAM

### Plan Period

- 2.1 It is noted that the Plan Period for the New Local Plan is 2020 – 2035. Despite this much of the evidence which underpins the Plan covers differing Plan Periods. Examples of this are detailed within the table below:

Description	Plan Period
New Local Plan	2020 – 2035
Housing Requirement (LPA05)	2016 – 2035
Employment Allocations (LPA04)	2018 – 2035
St Helens Borough Estimated Employment Land Needs	2012 – 2037
OAN for new Employment Land	2012 – 2035
Residual Employment Land Requirement	2018 – 2035

- 2.2 Whilst it is unclear why these differences exist, it is clear however that the Plan periods are not aligned which introduces unnecessary complexity to the Plan, providing opportunity for misunderstanding and misinterpretation.

### Vision

- 2.3 Our Client is generally supportive of the proposed Vision for St Helens in 2035. The Vision is consistent with the approach of national planning policy and is sufficiently aspirational. Achievement of the Vision will bring about positive economic and social change for St Helens including the urban renewal of existing urban areas, the creation of new urban areas, diversification of the local economy and a wider and improved choice of housing catering for a diversity of needs.
- 2.4 Notwithstanding this our Client is concerned that the Vision does not make reference to the Bold Forest Garden Suburb. Given that this is a key aspect of the New Local Plan, and the single-most exciting opportunity for the Borough in decades, our Client considers that specific reference should be made to it within the Vision, as its delivery is a clear aspiration of the Council and one which should be outlined as a priority from the outset.

## 5.0 CONCLUSIONS

5.1 These representations have been prepared and submitted by ~~Barton Willmore on behalf~~ of our Client, ~~Andrew Cotton and Family.~~

5.2 Reflecting on the comments made in these representations, our Client is supportive of the approach applied by the Council to the following:

- The Vision and Plan objectives, in our Client's view broadly reflect national planning policy, and provide for a commitment to the fulfilment of deliverable yet aspirational social and economic goals, our Client does however consider that the delivery of Bold Forest Garden Suburb should be included both within the Vision and as a Strategic Aim in its own right; ① ② ③
- The Key Diagram, subject to the Bold Forest Garden Suburb being identified in its own right; ④
- Policy LPA03, establishing the broad development principles for the Borough; ⑦
- The decision by the Council to pursue the delivery of a minimum of 215 hectares of employment land during the Plan Period; ⑧
- The decision by the Council to include our Client's land interest in the key housing allocation within the Plan; ⑩
- The decision by the Council to identify land for release from the Green Belt for housing and employment and additional safeguarded land to meet future needs; and ⑪
- The provision of flexibility within housing policies to allow for lower provision than policy requirements if necessary on account of viability. ⑫

5.3 Despite these observations, our Client cannot at this stage provide their full endorsement of the New Local Plan as providing a sound planning document. There are a number of areas, as outlined below, which remain a cause of concern for our Client:

- Our Client considers that policy LPA01 should be removed from the Plan in its entirety as it only replicates National Planning Policy; ⑬

PO0599





St Helens Local Plan Submission Draft Representations - Torus 62 Limited  
Ian Gilbert  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

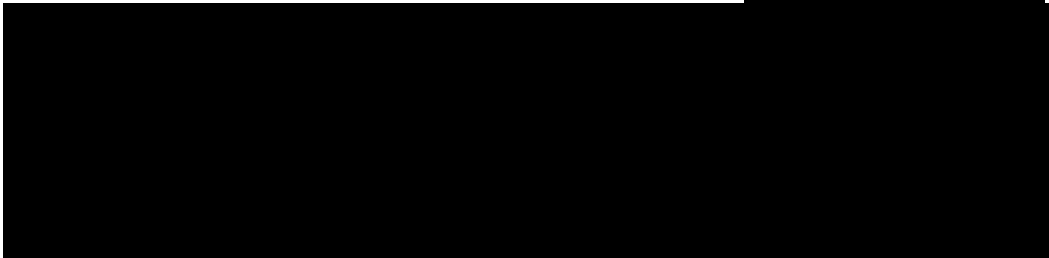
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**  
Planning Associate



**Representor Details**

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

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

Yes (via e-mail)

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

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

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

# St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

## 2. PLAN PERIOD, SPATIAL VISION AND OBJECTIVES

### Plan Period

- 2.1 The Submission Draft document identifies that the plan period for the emerging Local Plan is 2020 – 2035, a 15 year time period. This approach is supported by Paragraph 157 of the NPPF which encourages Local Plans to:

**“be drawn up over an appropriate timescale, preferable a 15 year time horizon, taking account of longer term requirements, and be kept up-to-date”.**

- 2.2 Whilst the above approach appears to meet the minimum requirement for identifying an appropriate plan period, the Local Plan is somewhat confusing in this regard as the Plan itself appears to plan for a period between 2016 to 2035. Indeed, the evidence that the Council appears to rely on, including the timeframe for identifying the Objectively Assessed Needs of the Borough, appears to commence at 2016. 01
- 2.3 As we set out in further detail later in these representations (in particular in relation to housing requirement and supply) the differences between the plan period and the evidence base risk adding complexity to the emerging Plan and may result in the potential for misunderstanding and misinterpretation and unnecessary complexity. For example, the housing requirement evidence base covers a period of 19 years between 2016 and 2035, housing supply is addressed within the SHLAA 2017 but the plan period covers the period of 2020 – 2035. This mismatch of evidence with the plan period has the potential to cause unnecessary confusion. We would suggest that the time period for the Local Plan is amended to 2016 – 2035 to reflect the evidence base period.

### Vision

- 2.4 Our Client is generally supportive of the proposed Spatial Vision for St Helens. The Spatial Vision is consistent with national policy and will help to bring forward positive economic and social change. Our Client, for the reasons set out within these representations, has some concerns in relation to whether that vision can be realised and whether the Local Plan will plan fully to meet the aspirations of the Council. 02  
03

PO0600





St Helens Local Plan Submission Draft Representations - Torus 62 Limited  
Ian Gilbert  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

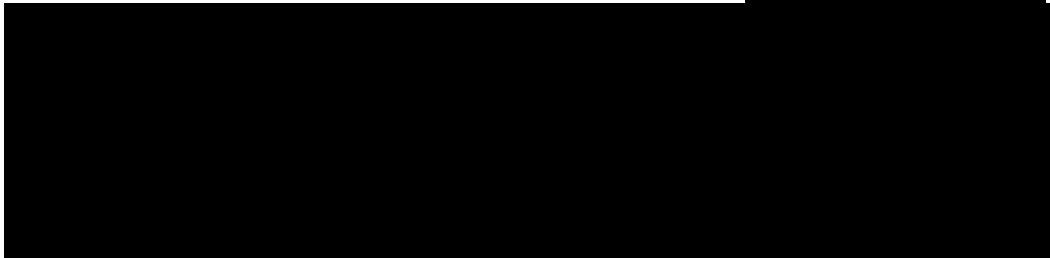
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**  
Planning Associate



**Representor Details**

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

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

Yes (via e-mail)

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

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

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

# St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

## 2. PLAN PERIOD, SPATIAL VISION AND OBJECTIVES

### Plan Period

- 2.1 The Submission Draft document identifies that the plan period for the emerging Local Plan is 2020 – 2035, a 15 year time period. This approach is supported by Paragraph 157 of the NPPF which encourages Local Plans to:

**"be drawn up over an appropriate timescale, preferable a 15 year time horizon, taking account of longer term requirements, and be kept up-to-date".**

- 2.2 Whilst the above approach appears to meet the minimum requirement for identifying an appropriate plan period, the Local Plan is somewhat confusing in this regard as the Plan itself appears to plan for a period between 2016 to 2035. Indeed, the evidence that the Council appears to rely on, including the timeframe for identifying the Objectively Assessed Needs of the Borough, appears to commence at 2016. 01
- 2.3 As we set out in further detail later in these representations (in particular in relation to housing requirement and supply) the differences between the plan period and the evidence base risk adding complexity to the emerging Plan and may result in the potential for misunderstanding and misinterpretation and unnecessary complexity. For example, the housing requirement evidence base covers a period of 19 years between 2016 and 2035, housing supply is addressed within the SHLAA 2017 but the plan period covers the period of 2020 – 2035. This mismatch of evidence with the plan period has the potential to cause unnecessary confusion. We would suggest that the time period for the Local Plan is amended to 2016 – 2035 to reflect the evidence base period.

### Vision

- 2.4 Our Client is generally supportive of the proposed Spatial Vision for St Helens. The Spatial Vision is consistent with national policy and will help to bring forward positive economic and social change. Our Client, for the reasons set out within these representations, has some concerns in relation to whether that vision can be realised and whether the Local Plan will plan fully to meet the aspirations of the Council. 02  
03

PO0601





St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
Dan Ingram  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 14:20



2 Attachments



27020.A3.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

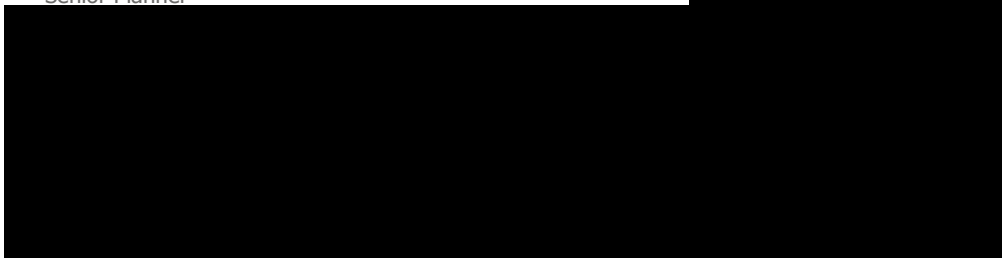
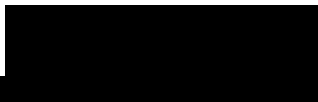
To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.  
**Dan Ingram**  
Senior Planner





St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMORIS
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

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

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

Yes ☒ (Via Email)

No ☐



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

## **RETURN DETAILS**

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

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

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

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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



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

### **PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
---	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO  
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER  
SITES.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019

## 2.0 HOUSING AND ECONOMIC GROWTH IN ST HELENS

2.1 The New Local Plan makes provision for a minimum of 9,234 net additional dwellings between April 2016 and March 2035 (Policy LPA05) by identifying 215.4 hectares of land for development between April 2018 and March 2035 (Policy LPA04).

2.2 It is noted that the Plan period for the New Local Plan is 2020 – 2035. Despite this, much of the evidence which underpins the Plan would appear to cover differing periods. Examples of this are detailed within the table below:

Description	Period
New Local Plan	2020 – 2035
Housing Requirement (LPA05)	2016 – 2035
Employment Allocations (LPA04)	2018 – 2035
St Helens Borough Estimated Employment Land Needs	2012 – 2037
OAN for new Employment Land	2012 – 2035
Residual Employment Land Requirement	2018 – 2035

2.3 It is somewhat unclear as to why so many differences exist; the failure to align these periods has the potential to introduce unnecessary complexity to the Plan, providing the potential for misunderstanding and misinterpretation. Clarification on this matter would be welcomed.

2.4 Notwithstanding this, our Client is supportive of the proposed Vision for St Helens in 2035. The Vision is consistent with the approach of national planning policy and is considered to be sufficiently aspirational. Achievement of the Vision will bring about positive economic and social change for St Helens including the regeneration/renewal of existing urban areas, the creation of new urban areas, diversification of the local economy, and a wider and improved choice of new housing catering for a range of local and Borough-wide needs.

2.5 Our Client is generally supportive of the objectives of the New Local Plan by which to achieve the Vision. Objectives seeking population growth, together with the allocation of sufficient land to meet local employment needs and to support the implementation of sub-regional growth strategies, are both welcomed by our Client. They also support the objectives aimed at the creation of sustainable communities and the delivery of a range

PO0602



15/02/19







St Helens Local plan - Pre-Submission Draft - Response by Revelan  
John Pearce  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:53







- ① - LPA02
- ② - LPA04
- ③ - SPATIAL Vision
- ④ - LPC 05
- ⑤ - LPA03
- ⑥ - STRATEGIC Aims  
+ OBJECTIVE



10 Attachments

   
Ltr to St. Helen's Council JP 13.03.19.pdf Site Location Plan.pdf

   
lpsd-representation-form Strategic Aims and Objectives.pdf lpsd-representation-form Policy LPA03.pdf

   
lpsd-representation-form Proposals Map .pdf lpsd-representation-form Policy LPA04.pdf

   
lpsd-representation-form Spatial Vision.pdf lpsd-representation-form Omission Site.pdf

   
lpsd-representation-form Policy LPA02.pdf Proposals Map Extract Newton-le-Willows.pdf

Dear Sir or Madam

Please find attached a response to the Local Plan – Pre-submission Draft Submitted on behalf of Revelan.

Kind regards

**John Pearce** BSc (Hons) MTPL MRTPI  
Senior Planner



**harris lamb**  
PROPERTY CONSULTANCY

Harris Lamb Ltd | 75–76 Francis Road | Birmingham | B16 8SP





**CLEAR THINKING**  
COMMERCIAL PROPERTY ADVICE  
**WWW.HARRISLAMB.COM**

Regulated by RICS. Harris Lamb accept no legal responsibility for the contents of this message. Any opinions expressed in this email are those of the individual and not necessarily of the firm, unless expressly stated to be so. If you receive this in error, please contact the sender and delete it from your system. This email and any attachments are intended for the addressee only and may contain information which is confidential or legally privileged. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this communication and any attachments is strictly prohibited. This email does not form the basis of a contract.



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: John
Last Name:	Last Name: Pearce
Organisation/company: Revelan Developments Ltd.	Organisation/company: Harris Lamb Planning Consultancy
Address: c/o Agent	Address: Grosvenor House 75 – 76 Francis Road Edgbaston Birmingham
Postcode:	Postcode: B16 8SP
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No:
Email:	Email: [REDACTED]

Signature:

[REDACTED]

Date:

13<sup>th</sup> March 2019

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	Spatial Vision	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/> ✓	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/> ✓	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/> ✓	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or <u>fails to comply with the duty to cooperate</u> . <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
Please see attached.	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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.**

Our Ref: P1635/JP  
Date: 13<sup>th</sup> March 2019

Grosvenor House  
75-76 Francis Road  
Edgbaston  
Birmingham B16 8SP

[REDACTED]  
Head of Local Plans  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP

BY EMAIL ONLY  
planningpolicy@sthelens.gov.uk

Dear [REDACTED]

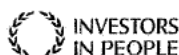
**St Helens Pre-Submission Draft Local Plan  
Response by Revelan Developments Ltd.**

We are instructed by Revelan Developments Ltd. to submit representations to the St Helens Pre-Submission Draft Local Plan. Revelan have let and sold a number of industrial premises on the Sankey Valley Industrial Estate, Newton-le-Willows. These units have been successfully let and the location has proved very attractive to occupiers, which affords convenient access to the strategic motorway network and major conurbations of Liverpool and Manchester. The area has proved very attractive to potential occupiers and a number of enquiries have been received by Revelan's agent from a wide variety of B Class users looking to locate in the Borough.

The representations submitted below relate principally to an area of unused land within Revelan's ownership at Junction Lane, Newton-le-Willows. Please see site location attached. The area of land is currently identified as open space in the Pre-Submission Draft Local Plan, although it has not performed this function for more than 10 years and is not publicly accessible. Revelan have never been approached by another other user seeking to purchase the site for sports or recreation use. Revelan are, therefore, seeking the removal of the open space designation and for the site to be allocated for employment use instead. Our detailed comments are set out below.

**Spatial Vision**

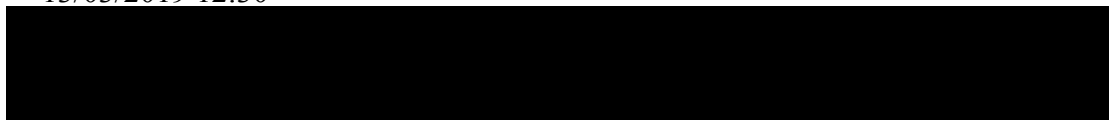
We support the vision of creating a range of high quality employment development within the Borough, which makes use of the excellent transport links that benefit the Borough. Similarly, we agree that established employment areas will continue to provide affordable accommodation for a wide range of employers, thereby helping to facilitate local employment and job growth, whilst attracting inward investment.



PO0603



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)

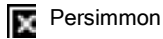


30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH





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....](#)

---

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. If you are not the intended recipient please contact the sender and delete the message.

Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

**St. Helens Borough Local Plan  
2020-2035 Submission Draft**

---

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

PO0604



St Helens Local Plan Submission Draft Representations - Torus 62 Limited  
Ian Gilbert  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

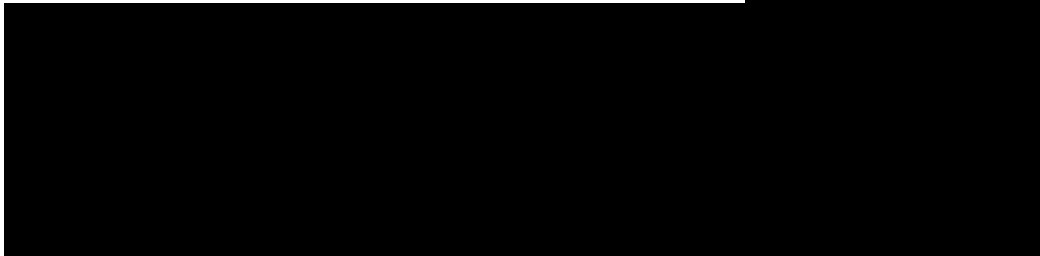
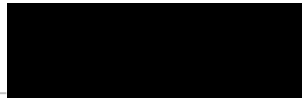
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**  
Planning Associate





**Representor Details**

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Please see accompanying representations

**7. Please set out modification(s) you consider are necessary**

Please see accompanying representations

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Please see accompanying representations

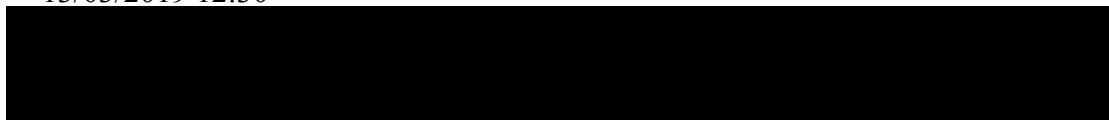
### Strategic Aims and Objectives

- 2.5 Our Client is generally supportive of the proposed Strategic Aims and Objectives to ensure that the Vision is achieved. We support the inclusion of objective 1.3 to ensure that effective use is made of previously developed land. 04 05
- 2.6 We also consider that Strategic Aim 4 (Objective 4.1) should be amended, to include reference to market *and* affordable homes. Whilst we recognise that the Council seeks to deliver sufficient range of new homes, we consider that it is fundamental for the soundness of the Local Plan that the Council plans sufficiently to meet the need for affordable housing across the borough. 06
- 2.7 The introductory chapter of the Local Plan is clear in the difficulties facing the borough with regard to deprivation and the affordability of housing; the Local Plan notes that both of those trends are worsening and something that the Council needs to tackle. The provisions of sufficient affordable homes for those suffering most from that deprivation and worsening affordability will be a key to reversing those trends. Paragraph 2.5.3 of the Local Plan notes addressed affordability of market housing in the borough and notes that lower quartile house prices are over 4 times greater than lower quartile household income.
- 2.8 As set out later in these representations, the Government's Standardised Methodology for calculating Objectively Assessed Needs (SMOAN) for housing does make adjustments for trends in affordability. However, the SMOAN does not seek to establish what the need for affordable housing within the borough is and, therefore, a housing requirement that meets the objectively assessed need for housing overall may underdeliver against a specific need for affordable housing. 01
- 2.9 Lastly, our Client has some concerns in relation to the Local Plan's aspirations for contributing to the growth of the Liverpool City Region (LCR) as a whole. Whilst paragraph 1.7.1 of the Local Plan notes the extent to which St Helens has a close working relationship with the wider LCR on strategic planning matters (including noting the preparation of the Spatial Development Strategy (SDS)). As part of the evidence base for the LCR SDS the Liverpool City Region Combined Authority (LCRCA) prepared a Strategic Housing and Employment Land Availability Assessment 2017 (SHELAA) which sought to assess the likely needs for housing and employment land across the LCR as a whole. 08

PO0605



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

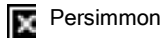
**Sean McBride**  
 Persimmon Homes (North West)



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....](#)

---

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. If you are not the intended recipient please contact the sender and delete the message.

Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

**St. Helens Borough Local Plan  
2020-2035 Submission Draft**

---

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

01

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

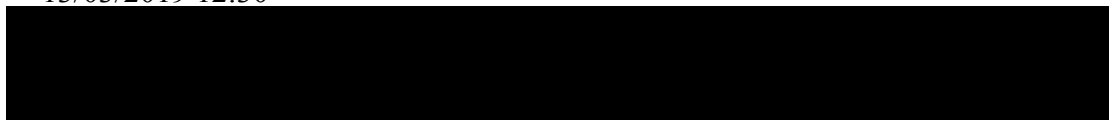
07

PO0606





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

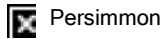
**Sean McBride**  
Persimmon Homes (North West)



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....](#)

---

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. If you are not the intended recipient please contact the sender and delete the message.

Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

**St. Helens Borough Local Plan  
2020-2035 Submission Draft**

---

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

PO0607



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
Dan Ingram  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 14:20



2 Attachments



27020.A3.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

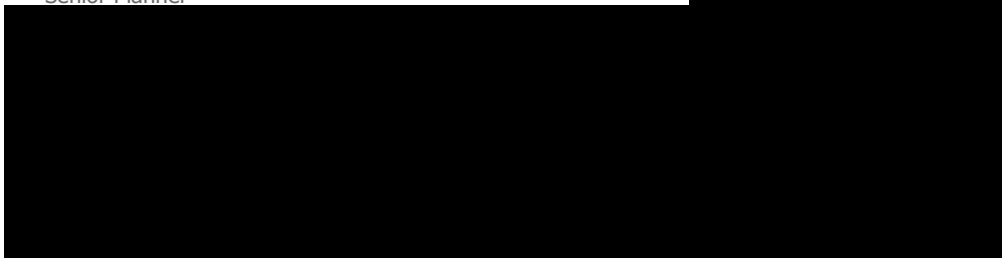
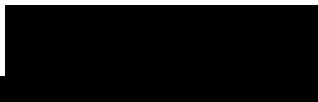
To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.  
**Dan Ingram**  
Senior Planner







St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMORIS
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ **No**, I do not wish to participate at the oral examination

☒ **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO  
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER  
SITES.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019

## 2.0 HOUSING AND ECONOMIC GROWTH IN ST HELENS

2.1 The New Local Plan makes provision for a minimum of 9,234 net additional dwellings between April 2016 and March 2035 (Policy LPA05) by identifying 215.4 hectares of land for development between April 2018 and March 2035 (Policy LPA04).

2.2 It is noted that the Plan period for the New Local Plan is 2020 – 2035. Despite this, much of the evidence which underpins the Plan would appear to cover differing periods. Examples of this are detailed within the table below:

Description	Period
New Local Plan	2020 – 2035
Housing Requirement (LPA05)	2016 – 2035
Employment Allocations (LPA04)	2018 – 2035
St Helens Borough Estimated Employment Land Needs	2012 – 2037
OAN for new Employment Land	2012 – 2035
Residual Employment Land Requirement	2018 – 2035

2.3 It is somewhat unclear as to why so many differences exist; the failure to align these periods has the potential to introduce unnecessary complexity to the Plan, providing the potential for misunderstanding and misinterpretation. Clarification on this matter would be welcomed.

2.4 Notwithstanding this, our Client is supportive of the proposed Vision for St Helens in 2035. The Vision is consistent with the approach of national planning policy and is considered to be sufficiently aspirational. Achievement of the Vision will bring about positive economic and social change for St Helens including the regeneration/renewal of existing urban areas, the creation of new urban areas, diversification of the local economy, and a wider and improved choice of new housing catering for a range of local and Borough-wide needs.

2.5 Our Client is generally supportive of the objectives of the New Local Plan by which to achieve the Vision. Objectives seeking population growth, together with the allocation of sufficient land to meet local employment needs and to support the implementation of sub-regional growth strategies, are both welcomed by our Client. They also support the objectives aimed at the creation of sustainable communities and the delivery of a range



ELO192

of new dwellings, both market and affordable. That said, our Client does consider that reference should be made within Objective 4 to aspirational housing given that the Plan recognises at paragraph 2.5.1 that the provision of detached houses in the Borough is significantly lower than the regional and national averages. The delivery of aspirational, detached family homes would address a clear deficit in the Borough and equally align with the Vision to provide for good quality housing stock in the Borough.

03

04



PO0608

15/02/19



St Helens Local plan - Pre-Submission Draft - Response by Revelan  
John Pearce  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:53



- ① - LPA02
- ② - LPA04
- ③ - SPATIAL Vision
- ④ - LPC 05
- ⑤ - LPA03
- ⑥ - STRATEGIC Aims  
+ OBJECTIVE

10 Attachments



Ltr to St. Helen's Council JP 13.03.19.pdf Site Location Plan.pdf



lpsd-representation-form Strategic Aims and Objectives.pdf lpsd-representation-form Policy LPA03.pdf



lpsd-representation-form Proposals Map .pdf lpsd-representation-form Policy LPA04.pdf



lpsd-representation-form Spatial Vision.pdf lpsd-representation-form Omission Site.pdf



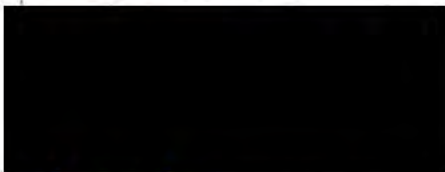
lpsd-representation-form Policy LPA02.pdf Proposals Map Extract Newton-le-Willows.pdf

Dear Sir or Madam

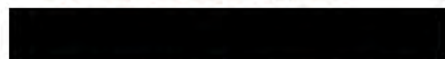
Please find attached a response to the Local Plan – Pre-submission Draft Submitted on behalf of Revelan.

Kind regards

**John Pearce** BSc (Hons) MTPL MRTPI  
Senior Planner



**harris lamb**  
PROPERTY CONSULTANCY



Harris Lamb Ltd | 75-76 Francis Road | Birmingham | B16 8SP





PROPERTY CONSULTANCY

**CLEAR THINKING**  
COMMERCIAL PROPERTY ADVICE

**WWW.HARRISLAMB.COM**

Regulated by RICS. Harris Lamb accept no legal responsibility for the contents of this message. Any opinions expressed in this email are those of the individual and not necessarily of the firm, unless expressly stated to be so. If you receive this in error, please contact the sender and delete it from your system. This email and any attachments are intended for the addressee only and may contain information which is confidential or legally privileged. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this communication and any attachments is strictly prohibited. This email does not form the basis of a contract.



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: John
Last Name:	Last Name: Pearce
Organisation/company: Revelan Developments Ltd.	Organisation/company: Harris Lamb Planning Consultancy
Address: c/o Agent	Address: Grosvenor House 75 – 76 Francis Road Edgbaston Birmingham
Postcode:	Postcode: B16 8SP
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No:
Email:	Email: [REDACTED]

Signature:

[REDACTED]

Date:

13<sup>th</sup> March 2019

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	Strategic Aims and Objectives	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"/> <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/> <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/> <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see attached.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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.**

Our Ref: P1635/JP  
Date: 13<sup>th</sup> March 2019

Grosvenor House  
75-76 Francis Road  
Edgbaston  
Birmingham B16 8SP

[REDACTED]  
Head of Local Plans  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP

BY EMAIL ONLY  
planningpolicy@sthelens.gov.uk

Dear [REDACTED]

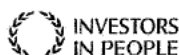
**St Helens Pre-Submission Draft Local Plan  
Response by Revelan Developments Ltd.**

We are instructed by Revelan Developments Ltd. to submit representations to the St Helens Pre-Submission Draft Local Plan. Revelan have let and sold a number of industrial premises on the Sankey Valley Industrial Estate, Newton-le-Willows. These units have been successfully let and the location has proved very attractive to occupiers, which affords convenient access to the strategic motorway network and major conurbations of Liverpool and Manchester. The area has proved very attractive to potential occupiers and a number of enquiries have been received by Revelan's agent from a wide variety of B Class users looking to locate in the Borough.

The representations submitted below relate principally to an area of unused land within Revelan's ownership at Junction Lane, Newton-le-Willows. Please see site location attached. The area of land is currently identified as open space in the Pre-Submission Draft Local Plan, although it has not performed this function for more than 10 years and is not publicly accessible. Revelan have never been approached by another other user seeking to purchase the site for sports or recreation use. Revelan are, therefore, seeking the removal of the open space designation and for the site to be allocated for employment use instead. Our detailed comments are set out below.

**Spatial Vision**

We support the vision of creating a range of high quality employment development within the Borough, which makes use of the excellent transport links that benefit the Borough. Similarly, we agree that established employment areas will continue to provide affordable accommodation for a wide range of employers, thereby helping to facilitate local employment and job growth, whilst attracting inward investment.



### **Strategic Aims and Objectives**

✓ In light of the Council's vision, we specifically support the strategic aims and objectives that relate to ensuring a strong and sustainable economy.

### **Policy LPA02: Spatial Strategy**

✓ We support the Council's spatial strategy of directing sustainable regeneration and growth of St Helens to the main settlements, which includes Newton-le-Willows. Similarly, we support the intention to retain existing employment areas where they are suitable and viable to maintain a diverse portfolio of accessible employment opportunities across the Borough. The Sankey Valley Industrial Estate is one such employment area that successfully attracts a range of both local and national occupiers. In light of the success of the estate to attract occupiers, we consider it wholly appropriate to direct further development to it, particularly where there is market demand for new accommodation in this location. This aspect of the spatial strategy will assist with delivering economic growth objectives and job creation in the Borough.

✓ The spatial strategy also seeks to take steps to maintain and enhance the Borough's network of ecological, open space and recreation sites in accordance with Policy LPA09. Whilst we do not object to this in principle, we return to this point below in the context of Revelan's land at Junction Lane, Newton-le-Willows.

✓ The policy is, therefore, considered sound as it positively prepared and consistent with national policy.

### **Policy LPA03: Development Principles**

✓ We generally support the development principles set out in the Policy, specifically, those that relate to improving the economic well-being of the Borough. The objective of creating and retaining a range of employment and training opportunities that are readily accessible by non-car modes is seen as particularly important and, therefore, supported.

The policy is, therefore, considered sound as it positively prepared and consistent with national policy.

### **Policy LPA04: A Strong and Sustainable Economy**

✓ We support the Council's aim to deliver a minimum of 215.4 hectares of land for development over the Plan Period. We have no specific comments on any of the sites that are identified as draft allocations for employment development. Whilst the policy focuses on the protection and retention of sites in employment use, it could usefully include a reference to supporting new employment development on sites that are not currently, or have previously been, used for employment purposes, which subject to adherence with other policies of the Plan, will contribute to the pool of employment land and premises in the Borough.

✓ As drafted, the policy is not positively prepared. To make the policy sound, we suggest that a further criteria is added, that states that new employment development will be supported on sites that are not currently employment sites, where the proposal would not conflict with other policies of the Plan.

PO0609



St Helens Local Plan Submission Draft Representations - Torus 62 Limited  
Ian Gilbert  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

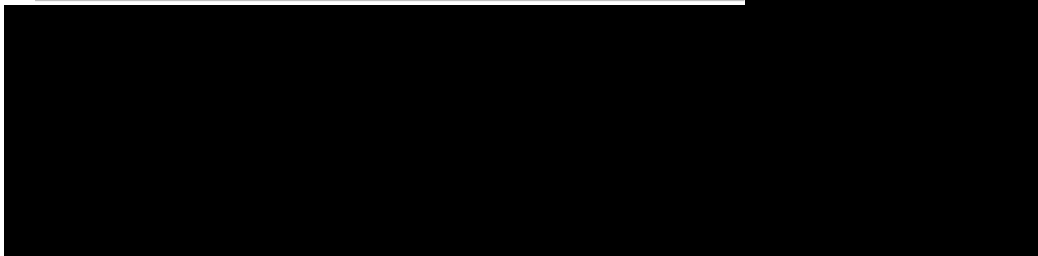
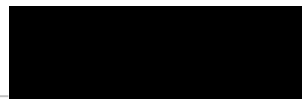
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**  
Planning Associate



**Representor Details**

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Please see accompanying representations

**7. Please set out modification(s) you consider are necessary**

Please see accompanying representations

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Please see accompanying representations



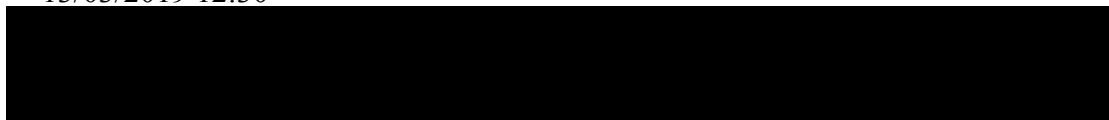
### Strategic Aims and Objectives

- 2.5 Our Client is generally supportive of the proposed Strategic Aims and Objectives to ensure that the Vision is achieved. We support the inclusion of objective 1.3 to ensure that effective use is made of previously developed land. 04 05
- 2.6 We also consider that Strategic Aim 4 (Objective 4.1) should be amended, to include reference to market *and* affordable homes. Whilst we recognise that the Council seeks to deliver sufficient range of new homes, we consider that it is fundamental for the soundness of the Local Plan that the Council plans sufficiently to meet the need for affordable housing across the borough. 06
- 2.7 The introductory chapter of the Local Plan is clear in the difficulties facing the borough with regard to deprivation and the affordability of housing; the Local Plan notes that both of those trends are worsening and something that the Council needs to tackle. The provisions of sufficient affordable homes for those suffering most from that deprivation and worsening affordability will be a key to reversing those trends. Paragraph 2.5.3 of the Local Plan notes addressed affordability of market housing in the borough and notes that lower quartile house prices are over 4 times greater than lower quartile household income.
- 2.8 As set out later in these representations, the Government's Standardised Methodology for calculating Objectively Assessed Needs (SMOAN) for housing does make adjustments for trends in affordability. However, the SMOAN does not seek to establish what the need for affordable housing within the borough is and, therefore, a housing requirement that meets the objectively assessed need for housing overall may underdeliver against a specific need for affordable housing. 01
- 2.9 Lastly, our Client has some concerns in relation to the Local Plan's aspirations for contributing to the growth of the Liverpool City Region (LCR) as a whole. Whilst paragraph 1.7.1 of the Local Plan notes the extent to which St Helens has a close working relationship with the wider LCR on strategic planning matters (including noting the preparation of the Spatial Development Strategy (SDS)). As part of the evidence base for the LCR SDS the Liverpool City Region Combined Authority (LCRCA) prepared a Strategic Housing and Employment Land Availability Assessment 2017 (SHELAA) which sought to assess the likely needs for housing and employment land across the LCR as a whole. 08

PO0610



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.

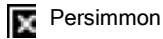
Kind regards  
 Sean

**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....](#)

---

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. If you are not the intended recipient please contact the sender and delete the message.

Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

**St. Helens Borough Local Plan  
2020-2035 Submission Draft**

---

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

PO0611



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
Dan Ingram  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 14:20



2 Attachments



27020.A3.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

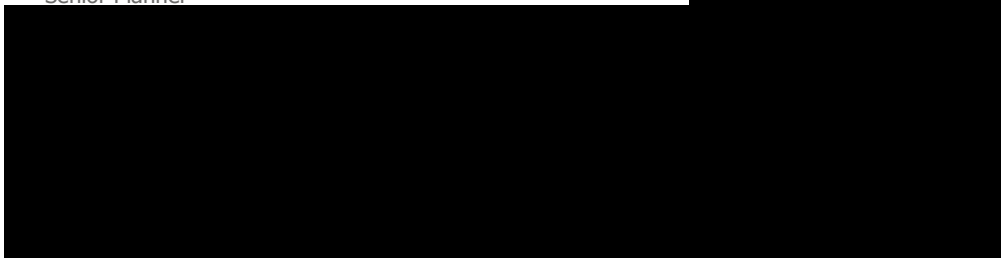
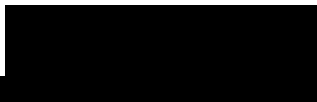
To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.  
**Dan Ingram**  
Senior Planner







St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMORIS
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
---	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO  
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER  
SITES.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019

## 2.0 HOUSING AND ECONOMIC GROWTH IN ST HELENS

2.1 The New Local Plan makes provision for a minimum of 9,234 net additional dwellings between April 2016 and March 2035 (Policy LPA05) by identifying 215.4 hectares of land for development between April 2018 and March 2035 (Policy LPA04).

2.2 It is noted that the Plan period for the New Local Plan is 2020 – 2035. Despite this, much of the evidence which underpins the Plan would appear to cover differing periods. Examples of this are detailed within the table below:

Description	Period
New Local Plan	2020 – 2035
Housing Requirement (LPA05)	2016 – 2035
Employment Allocations (LPA04)	2018 – 2035
St Helens Borough Estimated Employment Land Needs	2012 – 2037
OAN for new Employment Land	2012 – 2035
Residual Employment Land Requirement	2018 – 2035

2.3 It is somewhat unclear as to why so many differences exist; the failure to align these periods has the potential to introduce unnecessary complexity to the Plan, providing the potential for misunderstanding and misinterpretation. Clarification on this matter would be welcomed.

2.4 Notwithstanding this, our Client is supportive of the proposed Vision for St Helens in 2035. The Vision is consistent with the approach of national planning policy and is considered to be sufficiently aspirational. Achievement of the Vision will bring about positive economic and social change for St Helens including the regeneration/renewal of existing urban areas, the creation of new urban areas, diversification of the local economy, and a wider and improved choice of new housing catering for a range of local and Borough-wide needs.

2.5 Our Client is generally supportive of the objectives of the New Local Plan by which to achieve the Vision. Objectives seeking population growth, together with the allocation of sufficient land to meet local employment needs and to support the implementation of sub-regional growth strategies, are both welcomed by our Client. They also support the objectives aimed at the creation of sustainable communities and the delivery of a range



ELO192

of new dwellings, both market and affordable. That said, our Client does consider that reference should be made within Objective 4 to aspirational housing given that the Plan recognises at paragraph 2.5.1 that the provision of detached houses in the Borough is significantly lower than the regional and national averages. The delivery of aspirational, detached family homes would address a clear deficit in the Borough and equally align with the Vision to provide for good quality housing stock in the Borough.

03

04

PO0612



ELOOS6



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
 Dan Ingram  
 to:  
 planningpolicy@sthelens.gov.uk  
 11/03/2019 13:18

1 Attachment



26800.A3.DI.DM - St Helens LP Submission Draft Reps - Travers Farm, Bold 190311 with Appendices.pdf

To whom it may concern,

Please find attached a copy of representations, including Vision Statement, prepared by Barton Willmore on behalf of our Client, Andrew Cotton and Family, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan Ingram  
 Senior Planner

Consider the Environment, Do you really need to print this email?

The information contained in this e-mail (and any attachments) is confidential and may be privileged. It may be read, copied and used only by the addressee, Barton Willmore accepts no liability for any subsequent alterations or additions incorporated by the addressee or a third party to the body text of this e-mail or any attachments. Barton Willmore accepts no responsibility for staff non-compliance with our IT Acceptable Use Policy.

① - GEN

② - Spatial Vision

③ - Objective 4

④ - key Diagram

⑤ - LPA01

⑥ - LPA02

⑦ - LPA03

⑧ - LPA04

⑨ - LPA04.1

⑩ - LPA05

⑪ - LPA05.1

⑫ - LPA06

⑬ - LPA08

⑭ - LPA09

⑮ - LPC01

⑯ - LPC02

⑰ - LPC07

⑱ - LPC09

⑲ - Appendix 5



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

EF0176

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: ANDREW	First name: DAN
Last Name: COTTON	Last Name: INGRAM
Organisation/company:	Organisation/company: BARTON WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

Signature: [Redacted]	Date: 13/03/19
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐



# Please use a separate copy of Part B for each separate comment/representation.

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

---

# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on Behalf of Andrew Cotton and Family

March 2019



### Strategic Aims and Objectives

- 2.5 Our Client is generally supportive of the objectives of the New Local Plan. Objectives seeking the population growth, together with the provision of sufficient land to meet local employment needs and support the implementation of sub-regional growth strategies are both welcomed by our Client. As too are the objectives aimed at the delivery of sustainable communities and the delivery of a range of new dwellings, both market and affordable. In this respect however our Client considers that reference should be made within Objective 4 to aspirational housing given that the plan recognises at paragraph 2.5.1 that the provision of detached houses in the Borough is significantly lower than the regional and national averages. The delivery of aspirational, detached family dwellings would address a clear deficit in the Borough and should be coupled with the Vision of creating good quality housing stock. (3)
- 2.6 In addition to the above, our Client considers that the delivery of Bold Forest Garden Suburb should be added in as a strategic aim in its own right, given that its delivery underpins the New Local Plan. The New Local Plan should identify from the outset the significance of the allocation, highlighting the opportunity it offers to deliver the overall vision of the Plan. In the absence of this, our Client considers that presently the Plan is unsound in this regard, as it fails to address this key ambition of the Borough.
- 2.7 In the event that the Council do not consider that the delivery of the Bold Forest Garden Suburb warrants being a strategic aim in its own right then our Client considers that at the very least it should be identified as a new strategic objective at 4.2.

### Key Diagram

- 2.8 Our Client recognises the importance of the Key Diagram (Figure 4.2) in illustrating areas of growth and areas where land is to be protected from development. Furthermore, our Client welcomes the inclusion of their land interest at Travers Farm on the Key Diagram.
- 2.9 Notwithstanding this our Client considers that the Key Diagram should provide greater clarity through clearer labelling with key site allocations, including our Client's land interest being clearly labelled. Greater detail on the Key Diagram would also assist in reducing misinterpretation when locating land parcels. The current Key Diagram is vague in terms of boundaries (for example settlement boundaries and Green Belt). Key Sites, as outlined within the Plan should be highlighted differently to other new housing sites on the diagram, reflecting their status and prioritisation within the Plan. (4)



## 5.0 CONCLUSIONS

5.1 These representations have been prepared and submitted by ~~Barton Willmore on behalf of our Client, Andrew Cotton and Family.~~

5.2 Reflecting on the comments made in these representations, our Client is supportive of the approach applied by the Council to the following:

- The Vision and Plan objectives, in our Client's view broadly reflect national planning policy, and provide for a commitment to the fulfilment of deliverable yet aspirational social and economic goals, our Client does however consider that the delivery of Bold Forest Garden Suburb should be included both within the Vision and as a Strategic Aim in its own right; ①
- The Key Diagram, subject to the Bold Forest Garden Suburb being identified in its own right; ②
- Policy LPA03, establishing the broad development principles for the Borough; ③
- The decision by the Council to pursue the delivery of a minimum of 215 hectares of employment land during the Plan Period; ④
- The decision by the Council to include our Client's land interest in the key housing allocation within the Plan; ⑤
- The decision by the Council to identify land for release from the Green Belt for housing and employment and additional safeguarded land to meet future needs; and ⑥
- The provision of flexibility within housing policies to allow for lower provision than policy requirements if necessary on account of viability. ⑦

5.3 Despite these observations, our Client cannot at this stage provide their full endorsement of the New Local Plan as providing a sound planning document. There are a number of areas, as outlined below, which remain a cause of concern for our Client:

- Our Client considers that policy LPA01 should be removed from the Plan in its entirety as it only replicates National Planning Policy; ⑧

PO0613

ELO112



HBF response to St Helens Local Plan Submission  
 Joanne Harding  
 to:  
 planningpolicy@sthelens.gov.uk  
 12/03/2019 17:26



2 Attachments



19-03-13 St Helens Local Plan Submission.docx HBF lpsd-representation-form-signed.pdf

Dear Sir / Madam,

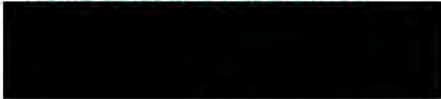
Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI  
 Local Plans Manager - North  
 HOME BUILDERS FEDERATION



This e-mail is confidential, and may be legally privileged. If you are not the intended recipient, do not copy, use or disclose its content, but contact the sender immediately.

Whilst we run anti-virus software on all Internet emails we are not liable for any loss or damage sustained as a result of software viruses. The recipient is advised to run their own anti-virus software.

Registered in England and Wales | Registered office: 27 Broadwall, London, SE1 9PL  
 Company Reg No. 276 4757 | Vat No. 882 6294 86

① - STRATEGICAL Aims & OBJECTIVES

② - LPA05

③ - LPA05 - PARA. 3

④ - LPA05 - PARA 4

⑤ - LPA07 - PART 3C

⑥ - LPA07 - PART 9

⑦ - LPC01 - PART 1

⑧ - LPC01 - PART 2

⑨ - LPC01 - PART 3

⑩ - LPC01 - PART 4

⑪ - LPC02

⑫ - LPC10

⑬ - LPC13

⑭ - LPD07



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House 27 Broadwall London	Address:
Postcode: SE1 9PL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 13/03/2019
-----------------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

## FURTHER INFORMATION

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**



## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)				Please see separately attached letter.			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Please see separately attached letter.		

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/> Please see separately attached letter.
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see separately attached letter.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see separately attached letter.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	-------------------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.



Local Plan  
St Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP

SENT BY EMAIL  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
13/12/2018

Dear Sir / Madam,

## ST HELENS LOCAL PLAN SUBMISSION DRAFT

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members. ✓

### Vision and Objectives

*The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:*

The HBF support the part of the vision which states that 'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as set out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply. ①

The HBF considers that the policy should be modified as follows:

- 4.1 To enable the delivery of sustainable communities by identifying land to increase the supply ~~for a sufficient number~~ and range of new dwellings.

#### **Policy LPA05: Meeting Housing Needs**

The HBF does not consider that Policy LPA05 is sound, as it is not positively prepared, justified, or consistent with national policy for the following reasons:

##### Part 1: Housing Requirement

This policy states that over the period 2016 to 2035 a minimum of 9,234 net additional dwellings should be provided, at an average of at least 486 dwellings each year. However, this is a decrease from the previous consultation version of the document which sought a housing requirement of 10,830 over the period 2014 to 2033, at an average rate of 570 dwellings each year, which does lead to queries as to why the sudden change in housing requirement. ✓

The 2017 draft SHELMA identified a range of OANs for St Helens from 397 (economic baseline) to 855 (economic growth) dwellings each year, with a demographic based need of 416 dwellings each year. The Economic Growth reflects the jobs growth which could result from development projects and policies which are expected to be implemented over the study period. ✓

The 2019 SHMA Update calculates the OAN using the standard methodology for the period 2018-2028 utilising the 2014-based household projections it identifies a figure of 482 dpa for the period. It is noted this has decreased from the 504 indicative housing need identified by the standard methodology for the period 2016-2026. ✓

The 2019 SHMA Update also considers a number of economic scenarios aligned with planned economic growth in the Borough, as set out in the St Helens ELNA. The ELNA identified a number of growth scenarios two of which – Scenario 2 and Scenario 3 – were considered most likely to come forward and are therefore considered in the SHMA. Economic Scenario 2 results in a need for 514 dpa, whilst Economic Scenario 3 results in a need for 479 dpa (for the period 2016 to 2033). ✓

The HBF consider that given the evidence contained within the draft SHELMA and the St Helens ELNA, and the Liverpool City Region Growth Deal<sup>1</sup> that the Council should consider an uplift in the housing figure above that provided by the Standard Methodology. ] ②

It is noted that in February 2019 MHCLG published updates to national planning policy and guidance including the standard method for assessing housing need. The standard method proposes to continue to use the 2014-based data, adjusted to take account of affordability to calculate a minimum annual housing need figure. The Government has continued to reiterate its aspiration to significantly boost the supply of homes and to support a housing market that delivers 300,000 homes. The HBF would therefore recommend the Council to take an approach that continues to

<sup>1</sup> The HBF also notes evidence collated by AMION on behalf of one of our members also identifies higher levels of jobs growth than that set out in the Council's evidence.

PO0614





St Helens Local Plan Submission Draft Representations - Torus 62 Limited  
Ian Gilbert  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

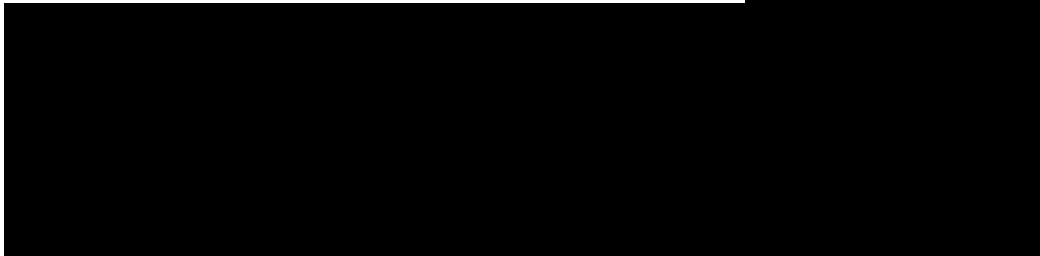
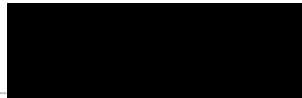
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**  
Planning Associate



**Representor Details**

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Please see accompanying representations

**7. Please set out modification(s) you consider are necessary**

Please see accompanying representations

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Please see accompanying representations

### Strategic Aims and Objectives

- 2.5 Our Client is generally supportive of the proposed Strategic Aims and Objectives to ensure that the Vision is achieved. We support the inclusion of objective 1.3 to ensure that effective use is made of previously developed land. 04 05
- 2.6 We also consider that Strategic Aim 4 (Objective 4.1) should be amended, to include reference to market *and* affordable homes. Whilst we recognise that the Council seeks to deliver sufficient range of new homes, we consider that it is fundamental for the soundness of the Local Plan that the Council plans sufficiently to meet the need for affordable housing across the borough. 06
- 2.7 The introductory chapter of the Local Plan is clear in the difficulties facing the borough with regard to deprivation and the affordability of housing; the Local Plan notes that both of those trends are worsening and something that the Council needs to tackle. The provisions of sufficient affordable homes for those suffering most from that deprivation and worsening affordability will be a key to reversing those trends. Paragraph 2.5.3 of the Local Plan notes addressed affordability of market housing in the borough and notes that lower quartile house prices are over 4 times greater than lower quartile household income.
- 2.8 As set out later in these representations, the Government's Standardised Methodology for calculating Objectively Assessed Needs (SMOAN) for housing does make adjustments for trends in affordability. However, the SMOAN does not seek to establish what the need for affordable housing within the borough is and, therefore, a housing requirement that meets the objectively assessed need for housing overall may underdeliver against a specific need for affordable housing. 01
- 2.9 Lastly, our Client has some concerns in relation to the Local Plan's aspirations for contributing to the growth of the Liverpool City Region (LCR) as a whole. Whilst paragraph 1.7.1 of the Local Plan notes the extent to which St Helens has a close working relationship with the wider LCR on strategic planning matters (including noting the preparation of the Spatial Development Strategy (SDS)). As part of the evidence base for the LCR SDS the Liverpool City Region Combined Authority (LCRCA) prepared a Strategic Housing and Employment Land Availability Assessment 2017 (SHELAA) which sought to assess the likely needs for housing and employment land across the LCR as a whole. 08

PO0615



ELO258



Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P  
Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston  
Park, St Helens  
Graham Lamb

SITE GBP-092-A

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:01



## 4 Attachments



L004- Land at St Helens Road - Reps to Submission Local Plan.pdf Appendix 3- Agricultural Land Report.pdf



Appendix 4- Comprehensive Reps to Submission Local Plan.pdf



Appendix 4a- Interim Housing Needs Assessment.pdf

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

- |                  |                  |
|------------------|------------------|
| ① LPA05          | ⑥ S.O.5.1        |
| ② LPA02          | ⑦ LPA02 - PARA 3 |
| ③ GBR            | ⑧ LPA02 - PARA 4 |
| ④ S.A.           | ⑨ LPA03          |
| ⑤ S.O.4.1        | ⑩ LPA04          |
| ⑪ LPA05 - PARA 3 | ⑬ APPENDIX 4     |
| ⑫ LPA05 - PARA 4 | ⑭ TABLE 4.6      |
| ⑮ LPA05.1        | ⑯ LPA07, PARA 9  |
| ⑰ LPC02          | ⑲ LPC10 - PARA 6 |
| ⑱ LPC04          | ⑳ LPC13 - PARA 4 |
| ㉑ LPA06          | ㉒ LPD07          |
| ㉓ LPC01          | ㉔ LPD02          |
| ㉕ LPD03          |                  |

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.  
This email and any associated files, is intended for the exclusive use of the addressee only.  
If you are not the intended recipient you should not use the contents nor disclose them to any other person.  
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

<https://i.imgur.com/ZuAcceY.jpg>

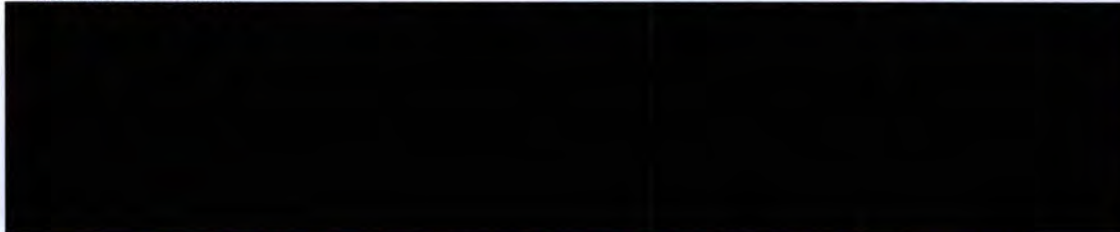
<https://i.imgur.com/iHE788g.jpg>



 <https://i.imgur.com/05aES4f.jpg>



RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o  
P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston  
Park, St Helens (EMAIL 2)  
Graham Lamb  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:03



1 Attachment



Appendix 1- Delivery Statement.pdf

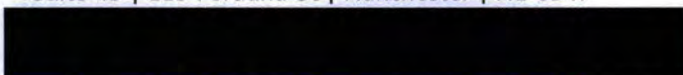
## Email 2

**Graham Lamb**  
Associate Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland St | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd [07277000] registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

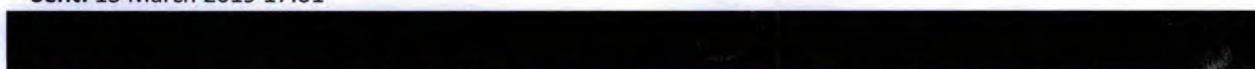
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please click here to view it.



 Please consider the environment before printing this email message.

**From:** Graham Lamb

**Sent:** 13 March 2019 17:01



**Subject:** Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/05aES4f.jpg>

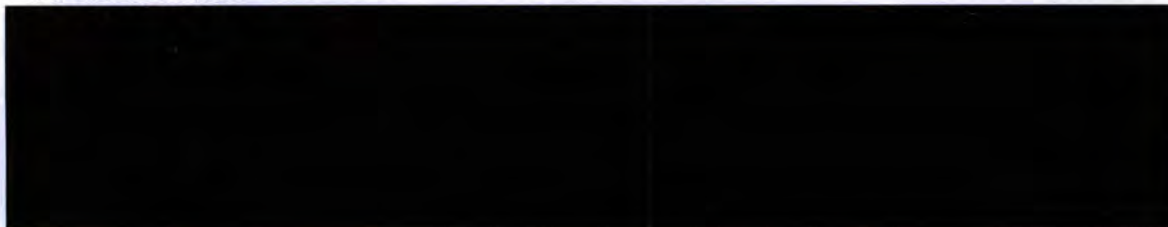
 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHET88g.jpg>





RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o  
P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston  
Park, St Helens (EMAIL 2)  
Graham Lamb  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:04



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

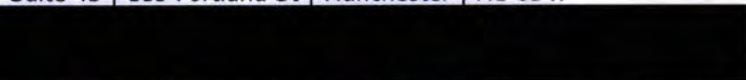
### Email 3

**Graham Lamb**  
Associate Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland St | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)


Pegasus Group is the trading name of Pegasus Planning Group Ltd [07277000] registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please click here to view it.



 Please consider the environment before printing this email message.

**From:** Graham Lamb

**Sent:** 13 March 2019 17:01

**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Subject:** Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](https://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy

Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/05aES4f.jpg>

 [https://i.  
imgur.c  
om/ZuA  
cceY.jp  
g](https://i.imgur.com/ZuAcceY.jpg)

 [https://i.  
imgur.c  
om/iHE  
T88g.jp  
g](https://i.imgur.com/iHEt88g.jpg)



KW/GL/P17-0098/L004



13 March 2019

Planning Policy Team  
Development Plans Section  
St Helens Council  
Place Services  
Town Hall Annexe  
Victoria Square  
St Helens  
Merseyside  
WA10 1HP

**Sent via email to:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Dear Sir/Madam,

**Land North of St Helens Road, Eccleston Park, St Helens  
St Helens Local Plan Submission Draft (January-March 2019 Consultation)**

We are instructed on behalf of the client, I Birchall & D Birchall (c/o P Wilson & Company LLP Chartered Surveyors), to submit representations to the Local Plan Submission Consultation of the emerging St Helens Local Plan. The client are the landowners of a parcel of land referred to as land north of St Helens Road, Eccleston Park.

A Delivery Statement has been prepared for the site, which is contained at **Appendix 1**. As demonstrated in the document, the site has capacity to deliver up to 625 homes in a highly sustainable location. This document demonstrates how the site is entirely suitable, deliverable and viable for housing development, as well as being an entirely appropriate Green Belt release site.

Further technical studies have also been prepared to further demonstrate the suitability of St Helens Road site for housing development, as set out below and attached:

- Accessibility Statement (**Appendix 2**)
- Agricultural Land Report (**Appendix 3**)

**The need to allocate additional sites**

Pegasus Group has prepared comprehensive representations and an Interim Housing Report to the St Helens Local Plan on behalf of another client, Redrow, who have separate land interests within Eccleston (both reports are contained at **Appendix 4**).

So whilst not directly related to this site, these reports (particularly sections 4-9 of the main representation) outline a compelling case as to why the Council need to allocate more sites in order for the plan to be found sound and to meet emerging housing requirements, as summarised below:

**PLANNING | DESIGN | ENVIRONMENT | ECONOMICS**

Suite 4b, 113 Portland Street, Manchester, M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales  
Registered Office: Pegasus house, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

- There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned.
- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites.
- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan.

To conclude, we politely suggest that the Council need to allocate more sites in order for the plan to be found sound. As demonstrated in the appended documents, the St Helens Road, Eccleston site is available and suitable for development and should therefore be considered for housing allocation.

I trust the enclosed is clear, however should you have any queries on these representations please do not hesitate to contact me on the details provided below.

Yours sincerely,

Graham Lamb  
**Associate Planner**

Encs.





**ST HELENS BOROUGH LOCAL PLAN 2020-2035:  
SUBMISSION DRAFT**

**REPRESENTATION BY  
REDROW HOMES NORTH WEST**

Date: 13<sup>th</sup> March 2019

Pegasus Reference: GL/KW/P17-0098/R005v4

**Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

**PLANNING** | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

#### **4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)**

- 4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

##### **Spatial Vision & Strategic Objectives**

- 4.2 Redrow support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*. ✓
- 4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a 'sufficient' number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be 'positively prepared' with the objective of 'significantly boosting the supply of housing'. As such, the Council should be seeking to surpass their needs so we recommend that the wording be updated to reflect this. (5)
- 4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to need to meet local employment needs; however, boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to acknowledge this. (6)

##### **Policy LPA02 (Part 3) - Previously Developed Land**

- 4.5 We agree that previously developed land will make a significant contribution to supply and support the Council in seeking to encourage brownfield re-development through the lowering of developer contributions. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide the range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another. (7)
- 4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment.

##### **Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

- 4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is ✓

PO0616





Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

Email 1 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:05

① - LPA05

② - LPA02

③ - GBR

④ - S.A.

⑤ - S.O. 4.1

⑥ - S.O. 5.1

⑦ - LPA02 - PARA 3

⑧ - LPA02 - PARA 4

⑨ - LPA03

⑩ - LPA04

4 Attachments



Appendix 1-Site Location Plan-Redrow.pdf Appendix 2 Part 1-Delivery Statement-Redrow.pdf



Representation Form-Redrow-May 19.pdf R005v6 - Repts to Submission Local Plan-Redrow.pdf

Dear Sir/Madam,

We are instructed on behalf of our client, Redrow Homes North West, to submit the attached form and representation (R005) to the Local Plan Submission Draft Consultation. Redrow have land interests in relation to the Burrows Lane, Eccleston site, which is discussed in detail in the attached representation.

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Site Location Plan (attached to this email)
- Appendix 2 - Delivery Statement (Part 1 attached to this email)
- Appendix 3 - Accessibility Statement
- Appendix 4 - Phase 1 Ecology Survey
- Appendix 5 - Agricultural Land Assessment
- Appendix 6 - Detailed Site Pro Forms
- Appendix 7 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 8 - Council's Housing Trajectory
- Appendix 9 - Pegasus Housing Trajectory
- Appendix 10 - Spatial Distribution of Sites

⑪ - LPA05 - PARA 3

⑫ - LPA05 - PARA 4

⑬ - APPENDIX 4

⑭ - TABLE 4.6

⑮ - LPA05.1

⑯ - LPA06

We will follow up this submission by sending a CD in the post which contains the entirety of Redrow's submission to the Local Plan consultation.

⑰ - LPC01

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

⑱ - LPC02

Many thanks and kind regards,

⑲ - LPC04

**Rebecca Dennis**

Principal Planner

**Pegasus Group**PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

⑳ - LPC13 - PARA 4

㉑ - LPD07

㉒ - LPD02

㉓ - LPD03

㉔ - LPA07 - PARA 3d

㉕ - LPA07 - PARA 9

㉖ - LPC10

  [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.  
This email and any associated files, is intended for the exclusive use of the addressee only.  
If you are not the intended recipient you should not use the contents nor disclose them to any other person.  
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/05aES4f.jpg>

 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

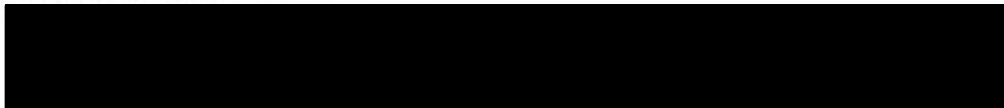
Email 2 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:06



3 Attachments



Appendix 2 Part 2-Delivery Statement-Redrow.pdf



Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

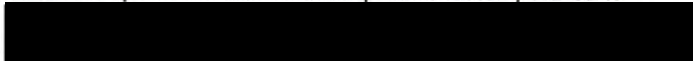
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



[https://](https://www.pegasusgroup.co.uk)

[www.pegasusgroup.co.uk](https://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



<https://i.imgur.com/ZuAcceY.jpg>

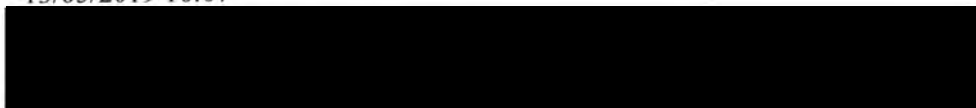


<https://i.imgur.com/iHE T88g.jpg>





Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 3 of 4  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:07



## 7 Attachments



Appendix 5-Agricultural Land Classification-Redrow.pdf Appendix 6-Detailed Site Pro Forma-Redrow.pdf



Appendix 8-Council's Housing Trajectory-Redrow.pdf



Appendix 9a-Pegasus Trajectory Best Case Scenario-Redrow.pdf



Appendix 9b-Pegasus Trajectory Worst Case Scenario 9b-Redrow.pdf



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



Appendix 7-Review of Employment-Led Local Plan Housing Requirement-Redrow.pdf

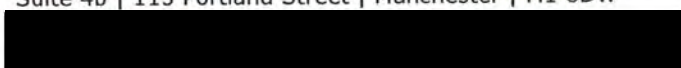
Email 3 of 4 of Redrow representations.

### Rebecca Dennis

Principal Planner

### Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



<http://www.pegasusgroup.co.uk>

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.  
This email and any associated files, is intended for the exclusive use of the addressee only.  
If you are not the intended recipient you should not use the contents nor disclose them to any other person.  
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHEt88g.jpg>



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 4 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:07



1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



https://

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>





## **ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT**

### **REPRESENTATION BY REDROW HOMES NORTH WEST**

Date: 13<sup>th</sup> May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

### **Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

**PLANNING** | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

#### 4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)

- 4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

##### **Spatial Vision & Strategic Objectives**

- 4.2 Redrow support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*.
- 4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a *'sufficient'* number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be *'positively prepared'* with the objective of *'significantly boosting the supply of housing'*. As such, the Council should be seeking to surpass their needs so we recommend that the wording be updated to reflect this. (5)
- 4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to need to meet local employment needs; however, boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to acknowledge this. (6)

##### **Policy LPA02 (Part 3) - Previously Developed Land**

- 4.5 We agree that previously developed land will make a significant contribution to supply and support the Council in seeking to encourage brownfield re-development through the lowering of developer contributions. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide the range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another. (7)
- 4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment.

##### **Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

- 4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is

PO0617



Sinc: Formex LPA0 HS23 ELO290

ELO290B.1.pdf



Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8  
Rebecca Dennis

to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:13

① LPA05

② LPA02

③ GBR

④ SA

⑤ S.O.4.1

⑥ S.O.5.1

⑦ LPA02-PARA 3

### 3 Attachments



Representation Form-Wallace-May 19.pdf R001v7- Reps to Submission Local Plan-Wallace.pdf



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑧ LPA02-PARA 4

⑨ LPA03

⑩ LPA04

⑪ LPA05-PARA 3

Dear Sir/Madam,

We are instructed on behalf of our client, Wallace Land Investments, to submit the attached form and representation (R001) to the Local Plan Submission Draft Consultation. Wallace have land interests in relation to the Mill Lane, Rainhill site, which is discussed in detail in the attached representation.

⑫ LPA05-PARA 4

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Illustrative Masterplan (attached to this email)
- Appendix 2 - Previously Submitted Documents and Technical Information
- Appendix 3 - Additional Technical Documents (May 2019)
- Appendix 4 - Detailed Site Pro Formas
- Appendix 5 - Council's Stage 3 Green Belt Assessment of Mill Lane Site
- Appendix 6 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 7 - Council's Housing Trajectory
- Appendix 8 - Pegasus Housing Trajectory
- Appendix 9 - Spatial Distribution of Sites

⑬ APPENDIX 4

⑭ LPA05-TABLE 4.6

⑮ LPA05.1

⑯ LPA06

⑰ LPC01

We will follow up this submission by sending a CD in the post which contains the entirety of Wallace's submission to the Local Plan consultation.

⑱ LPC02

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

⑲ LPC04

⑳ LPC03-PARA 4

㉑ LPA07-PARA 3c

㉒ LPA07

㉓ LPA07-PARA 9

㉔ LPA02

㉕ LPC10

㉖ LPA03

Many thanks and kind regards,

**Rebecca Dennis**  
Principal Planner

**Pegasus Group**

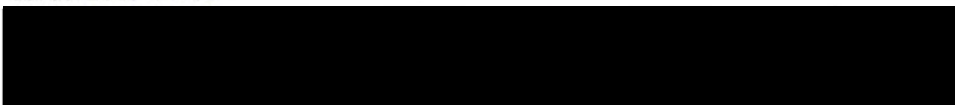
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough





Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:13



4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



Website

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>





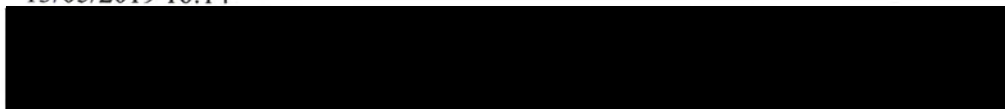
Representations to Local Plan Submission Draft Consultation-Wallace-Email 3 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:14



1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

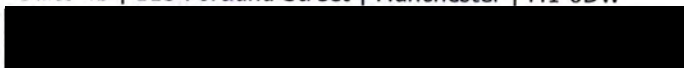
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



[https://](https://www.pegasusgroup.co.uk)

[www.pegasusgroup.co.uk](https://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



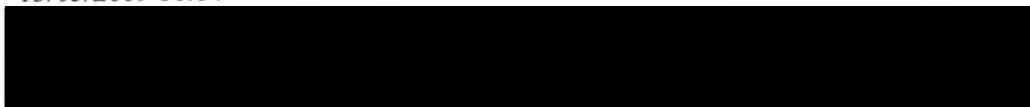
<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>



Representations to Local Plan Submission Draft Consultation-Wallace-Email 4 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:14



2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

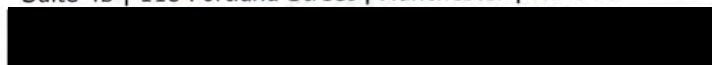
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



mailto:rebecca.dennis@pegasusgroup.co.uk

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>



<https://i.imgur.com/05aES4f.jpg>



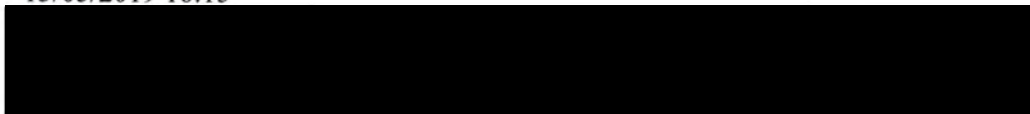
Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:15



1 Attachment



Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

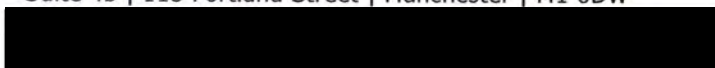
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



<mailto:planningpolicy@sthelens.gov.uk>

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (072777000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



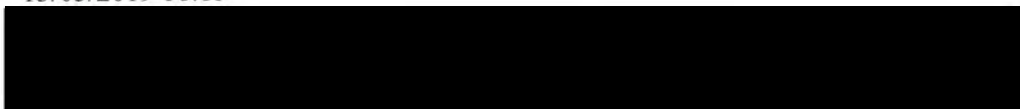
<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>



Representations to Local Plan Submission Draft Consultation-Wallace-Email 6 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:15



1 Attachment



Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

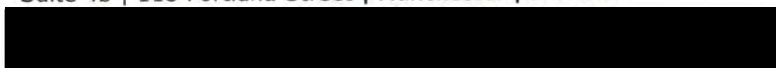
Email 6 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.  
This email and any associated files, is intended for the exclusive use of the addressee only.  
If you are not the intended recipient you should not use the contents nor disclose them to any other person.  
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHET88g.jpg>

 <https://i.imgur.com/05aES4f.jpg>





## Representations to Local Plan Submission Draft Consultation-Wallace-Email 7 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:16



### 7 Attachments



Appendix 4-Detailed Site Pro Formas-Wallace.pdf Appendix 5-Council's Stage 3 Green Belt Assessment-Wallace.pdf



Appendix 7-Council's Housing Trajectory-Wallace.pdf



Appendix 8b-Pegasus Trajectory Worst Case Scenario-Wallace.pdf



Appendix 8c-Summary Supply Trajectory-Wallace.pdf



Appendix 8a-Pegasus trajectory Best Case Scenario-Wallace.pdf



Appendix 6-Review of Employment-Led Local Plan Housing Requirement-Wallace.pdf

Email 7 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.


This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/05aES4f.jpg>

 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHET88g.jpg>





Representations to Local Plan Submission Draft Consultation-Wallace-Email 8 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:16



1 Attachment



Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



Internet

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHEt88g.jpg>



## **ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT**

### **REPRESENTATION BY WALLACE LAND INVESTMENTS**

Date: 13<sup>th</sup> May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

#### **Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

**PLANNING** | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

**Live: 45457800 v 3**

#### 4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)

- 4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

##### **Spatial Vision & Strategic Objectives**

- 4.2 Wallace support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*.
- 4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a *'sufficient'* number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be *'positively prepared'* with the objective of *'significantly boosting the supply of housing'*. As such, the Council should be seeking to surpass their needs, so we recommend that the wording be updated to reflect this. (5)
- 4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to meet local employment needs; however boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to make reference to this. (6)

##### **Policy LPA02 (Part 3) - Previously Developed Land**

- 4.5 We agree that previously developed land can make a significant contribution to supply. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide a range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another. (7)
- 4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment. Developer contributions should be assessed and set taking into account site specifics. A one size fits all generic approach should be avoided.

##### **Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

- 4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is

PO0618



ELO258



Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P  
Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston  
Park, St Helens  
Graham Lamb

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:01

SITE GBP-092A

## 4 Attachments

L004- Land at St Helens Road - Reps to Submission Local Plan.pdf Appendix 3- Agricultural Land Report.pdf

Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

Appendix 4a- Interim Housing Needs Assessment.pdf

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**  
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.  
This email and any associated files, is intended for the exclusive use of the addressee only.  
If you are not the intended recipient you should not use the contents nor disclose them to any other person.  
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

<https://i.imgur.com/ZuAcceY.jpg>

<https://i.imgur.com/iHE788g.jpg>

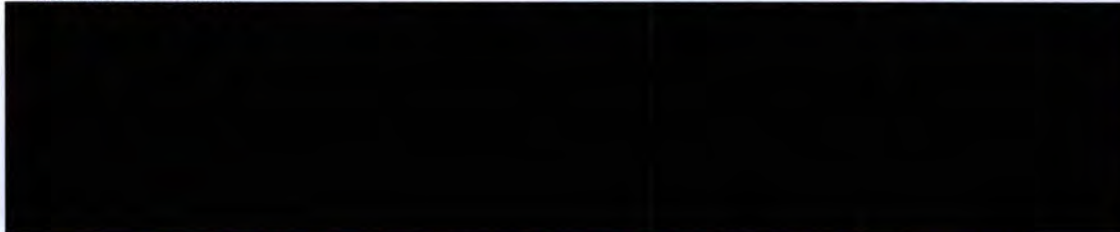
- |                  |                  |
|------------------|------------------|
| ① LPA05          | ⑥ S.O.5.1        |
| ② LPA02          | ⑦ LPA02 - PARA 3 |
| ③ GBR            | ⑧ LPA02 - PARA 4 |
| ④ S.A.           | ⑨ LPA03          |
| ⑤ S.O.4.1        | ⑩ LPA04          |
| ⑪ LPA05 - PARA 3 | ⑬ APPENDIX 4     |
| ⑫ LPA05 - PARA 4 | ⑭ TABLE 4.6      |
| ⑮ LPA05.1        | ⑯ LPA07, PARA 9  |
| ⑰ LPC02          | ⑲ LPC10 - PARA 6 |
| ⑱ LPC04          | ⑳ LPC13 - PARA 4 |
| ㉑ LPA06          | ㉒ LPD07          |
| ㉓ LPC01          | ㉔ LPD02          |
| ㉕ LPD03          |                  |



 <https://i.imgur.com/05aES4f.jpg>



RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o  
P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston  
Park, St Helens (EMAIL 2)  
Graham Lamb  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:03



1 Attachment



Appendix 1- Delivery Statement.pdf

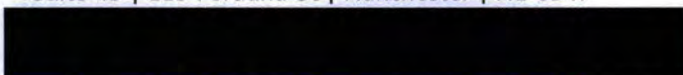
## Email 2

**Graham Lamb**  
Associate Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland St | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd [07277000] registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

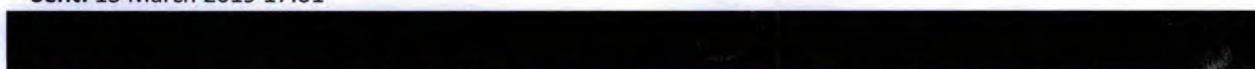
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please click here to view it.



 Please consider the environment before printing this email message.

**From:** Graham Lamb

**Sent:** 13 March 2019 17:01



**Subject:** Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/05aES4f.jpg>

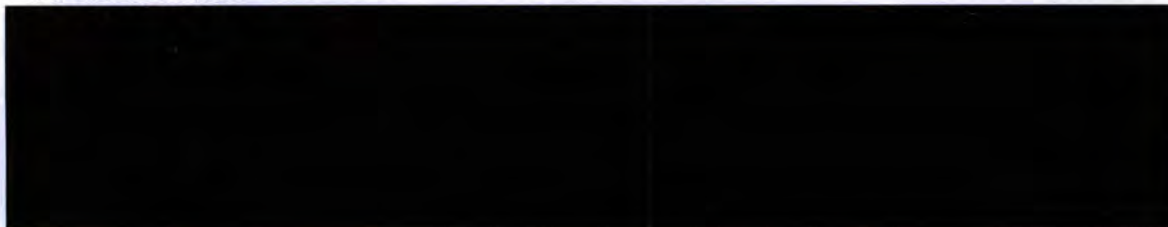
 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHET88g.jpg>





RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o  
P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston  
Park, St Helens (EMAIL 2)  
Graham Lamb  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 17:04



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

### Email 3

**Graham Lamb**  
Associate Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland St | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)


Pegasus Group is the trading name of Pegasus Planning Group Ltd [07277000] registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please click here to view it.



 Please consider the environment before printing this email message.

**From:** Graham Lamb

**Sent:** 13 March 2019 17:01

**To:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Subject:** Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](https://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy

Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/05aES4f.jpg>

 [https://i.  
imgur.c  
om/ZuA  
cceY.jp  
g](https://i.imgur.com/ZuAcceY.jpg)

 [https://i.  
imgur.c  
om/iHE  
T88g.jp  
g](https://i.imgur.com/iHEt88g.jpg)



13 March 2019

Planning Policy Team  
Development Plans Section  
St Helens Council  
Place Services  
Town Hall Annexe  
Victoria Square  
St Helens  
Merseyside  
WA10 1HP

**Sent via email to:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Dear Sir/Madam,

**Land North of St Helens Road, Eccleston Park, St Helens  
St Helens Local Plan Submission Draft (January-March 2019 Consultation)**

We are instructed on behalf of the client, I Birchall & D Birchall (c/o P Wilson & Company LLP Chartered Surveyors), to submit representations to the Local Plan Submission Consultation of the emerging St Helens Local Plan. The client are the landowners of a parcel of land referred to as land north of St Helens Road, Eccleston Park.

A Delivery Statement has been prepared for the site, which is contained at **Appendix 1**. As demonstrated in the document, the site has capacity to deliver up to 625 homes in a highly sustainable location. This document demonstrates how the site is entirely suitable, deliverable and viable for housing development, as well as being an entirely appropriate Green Belt release site.

Further technical studies have also been prepared to further demonstrate the suitability of St Helens Road site for housing development, as set out below and attached:

- Accessibility Statement (**Appendix 2**)
- Agricultural Land Report (**Appendix 3**)

**The need to allocate additional sites**

Pegasus Group has prepared comprehensive representations and an Interim Housing Report to the St Helens Local Plan on behalf of another client, Redrow, who have separate land interests within Eccleston (both reports are contained at **Appendix 4**).

So whilst not directly related to this site, these reports (particularly sections 4-9 of the main representation) outline a compelling case as to why the Council need to allocate more sites in order for the plan to be found sound and to meet emerging housing requirements, as summarised below:

**PLANNING | DESIGN | ENVIRONMENT | ECONOMICS**

Suite 4b, 113 Portland Street, Manchester, M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales  
Registered Office: Pegasus house, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

- There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned.
- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites.
- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan.

To conclude, we politely suggest that the Council need to allocate more sites in order for the plan to be found sound. As demonstrated in the appended documents, the St Helens Road, Eccleston site is available and suitable for development and should therefore be considered for housing allocation.

I trust the enclosed is clear, however should you have any queries on these representations please do not hesitate to contact me on the details provided below.

Yours sincerely,

Graham Lamb  
**Associate Planner**

Encs.





**ST HELENS BOROUGH LOCAL PLAN 2020-2035:  
SUBMISSION DRAFT**

**REPRESENTATION BY  
REDROW HOMES NORTH WEST**

Date: 13<sup>th</sup> March 2019

Pegasus Reference: GL/KW/P17-0098/R005v4

**Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

**PLANNING** | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

#### **4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)**

- 4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

##### **Spatial Vision & Strategic Objectives**

- 4.2 Redrow support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*. ✓
- 4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a 'sufficient' number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be 'positively prepared' with the objective of 'significantly boosting the supply of housing'. As such, the Council should be seeking to surpass their needs so we recommend that the wording be updated to reflect this. (5)
- 4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to need to meet local employment needs; however, boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to acknowledge this. (6)

##### **Policy LPA02 (Part 3) - Previously Developed Land**

- 4.5 We agree that previously developed land will make a significant contribution to supply and support the Council in seeking to encourage brownfield re-development through the lowering of developer contributions. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide the range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another. (7)
- 4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment.

##### **Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

- 4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is ✓

PO0619





Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

Email 1 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:05

① - LPA05

② - LPA02

③ - GBR

④ - S.A.

⑤ - S.O. 4.1

⑥ - S.O. 5.1

⑦ - LPA02 - PARA 3

⑧ - LPA02 - PARA 4

⑨ - LPA03

⑩ - LPA04

4 Attachments



Appendix 1-Site Location Plan-Redrow.pdf Appendix 2 Part 1-Delivery Statement-Redrow.pdf



Representation Form-Redrow-May 19.pdf R005v6 - Repts to Submission Local Plan-Redrow.pdf

Dear Sir/Madam,

We are instructed on behalf of our client, Redrow Homes North West, to submit the attached form and representation (R005) to the Local Plan Submission Draft Consultation. Redrow have land interests in relation to the Burrows Lane, Eccleston site, which is discussed in detail in the attached representation.

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Site Location Plan (attached to this email)
- Appendix 2 - Delivery Statement (Part 1 attached to this email)
- Appendix 3 - Accessibility Statement
- Appendix 4 - Phase 1 Ecology Survey
- Appendix 5 - Agricultural Land Assessment
- Appendix 6 - Detailed Site Pro Forms
- Appendix 7 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 8 - Council's Housing Trajectory
- Appendix 9 - Pegasus Housing Trajectory
- Appendix 10 - Spatial Distribution of Sites

⑪ - LPA05 - PARA 3

⑫ - LPA05 - PARA 4

⑬ - APPENDIX 4

⑭ - TABLE 4.6

⑮ - LPA05.1

⑯ - LPA06

We will follow up this submission by sending a CD in the post which contains the entirety of Redrow's submission to the Local Plan consultation.

⑰ - LPC01

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

⑱ - LPC02

Many thanks and kind regards,

⑲ - LPC03 - PARA 4

⑳ - LPD07

㉑ - LPD02

㉒ - LPD03

㉓ - LPC04

㉔ - LPA07 - PARA 3d

㉕ - LPA07 - PARA 9

㉖ - LPC10

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.  
This email and any associated files, is intended for the exclusive use of the addressee only.  
If you are not the intended recipient you should not use the contents nor disclose them to any other person.  
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>

 <https://i.imgur.com/05aES4f.jpg>



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

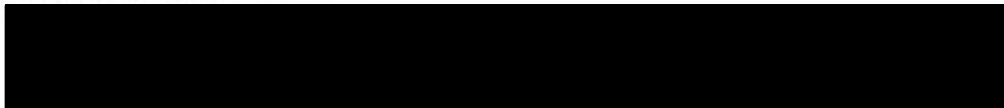
Email 2 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:06



3 Attachments



Appendix 2 Part 2-Delivery Statement-Redrow.pdf



Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



[https://](https://www.pegasusgroup.co.uk)

[www.pegasusgroup.co.uk](https://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHE T88g.jpg>





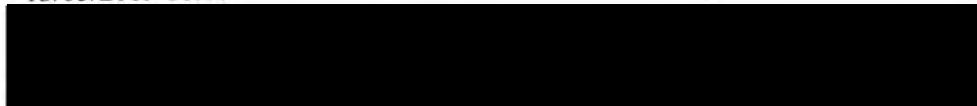
Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 3 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:07



## 7 Attachments



Appendix 5-Agricultural Land Classification-Redrow.pdf Appendix 6-Detailed Site Pro Forma-Redrow.pdf



Appendix 8-Council's Housing Trajectory-Redrow.pdf



Appendix 9a-Pegasus Trajectory Best Case Scenario-Redrow.pdf



Appendix 9b-Pegasus Trajectory Worst Case Scenario 9b-Redrow.pdf



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



Appendix 7-Review of Employment-Led Local Plan Housing Requirement-Redrow.pdf

Email 3 of 4 of Redrow representations.

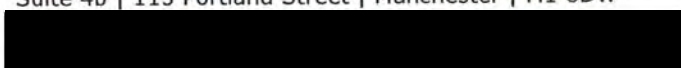
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



<http://www.pegasusgroup.co.uk>

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy

Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHEt88g.jpg>



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 4 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:07



1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



https://

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>





## **ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT**

### **REPRESENTATION BY REDROW HOMES NORTH WEST**

Date: 13<sup>th</sup> May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

#### **Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

**PLANNING** | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

#### **4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)**

- 4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

##### **Spatial Vision & Strategic Objectives**

- 4.2 Redrow support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*.
- 4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a *'sufficient'* number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be *'positively prepared'* with the objective of *'significantly boosting the supply of housing'*. As such, the Council should be seeking to surpass their needs so we recommend that the wording be updated to reflect this. (5)
- 4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to need to meet local employment needs; however, boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to acknowledge this. (6)

##### **Policy LPA02 (Part 3) - Previously Developed Land**

- 4.5 We agree that previously developed land will make a significant contribution to supply and support the Council in seeking to encourage brownfield re-development through the lowering of developer contributions. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide the range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another. (7)
- 4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment.

##### **Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

- 4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is

PO0620



Sinc: Formex LPA0 HS23 ELO290

ELO290B.1.pdf



Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8  
Rebecca Dennis

to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:13

① LPA05

② LPA02

③ GBR

④ SA

⑤ S.O.4.1

⑥ S.O.5.1

⑦ LPA02-PARA 3

### 3 Attachments



Representation Form-Wallace-May 19.pdf R001v7- Reps to Submission Local Plan-Wallace.pdf



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑧ LPA02-PARA 4

⑨ LPA03

⑩ LPA04

⑪ LPA05-PARA 3

Dear Sir/Madam,

We are instructed on behalf of our client, Wallace Land Investments, to submit the attached form and representation (R001) to the Local Plan Submission Draft Consultation. Wallace have land interests in relation to the Mill Lane, Rainhill site, which is discussed in detail in the attached representation.

⑫ LPA05-PARA 4

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Illustrative Masterplan (attached to this email)
- Appendix 2 - Previously Submitted Documents and Technical Information
- Appendix 3 - Additional Technical Documents (May 2019)
- Appendix 4 - Detailed Site Pro Formas
- Appendix 5 - Council's Stage 3 Green Belt Assessment of Mill Lane Site
- Appendix 6 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 7 - Council's Housing Trajectory
- Appendix 8 - Pegasus Housing Trajectory
- Appendix 9 - Spatial Distribution of Sites

⑬ APPENDIX 4

⑭ LPA05-TABUE 4.6

⑮ LPA05.1

⑯ LPA06

⑰ LPC01

We will follow up this submission by sending a CD in the post which contains the entirety of Wallace's submission to the Local Plan consultation.

⑱ LPC02

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

⑲ LPC04

⑳ LPC13-PARA 4

㉑ LPA07-PARA 3c

㉒ LPA07

㉓ LPA07-PARA 9

㉔ LPA02

㉕ LPC10

㉖ LPA03

Many thanks and kind regards,

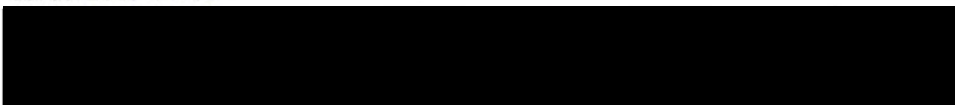
**Rebecca Dennis**  
Principal Planner

**Pegasus Group**  
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW





Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:13



4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)


Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHET88g.jpg>

 <https://i.imgur.com/05aES4f.jpg>





Representations to Local Plan Submission Draft Consultation-Wallace-Email 3 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:14

1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.


This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

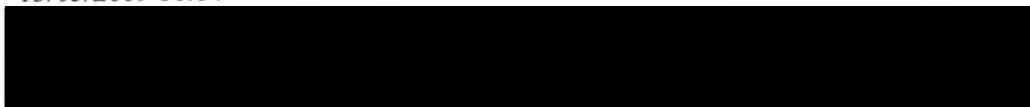
 <https://i.imgur.com/05aES4f.jpg>

 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>



Representations to Local Plan Submission Draft Consultation-Wallace-Email 4 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:14



2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

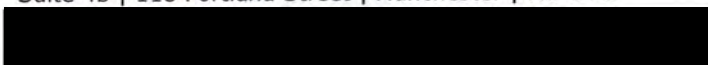
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



mailto:rebecca.dennis@pegasusgroup.co.uk

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>



<https://i.imgur.com/05aES4f.jpg>



Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:15

1 Attachment



Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



<mailto:planningpolicy@sthelens.gov.uk>

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



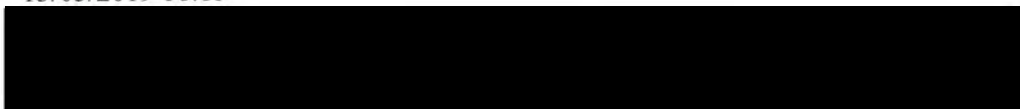
<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>



Representations to Local Plan Submission Draft Consultation-Wallace-Email 6 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:15



1 Attachment



Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

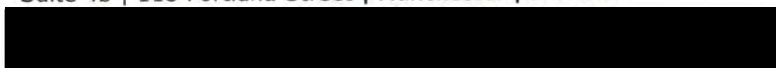
Email 6 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.  
This email and any associated files, is intended for the exclusive use of the addressee only.  
If you are not the intended recipient you should not use the contents nor disclose them to any other person.  
If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>

 <https://i.imgur.com/05aES4f.jpg>





## Representations to Local Plan Submission Draft Consultation-Wallace-Email 7 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:16



### 7 Attachments



Appendix 4-Detailed Site Pro Formas-Wallace.pdf Appendix 5-Council's Stage 3 Green Belt Assessment-Wallace.pdf



Appendix 7-Council's Housing Trajectory-Wallace.pdf



Appendix 8b-Pegasus Trajectory Worst Case Scenario-Wallace.pdf



Appendix 8c-Summary Supply Trajectory-Wallace.pdf



Appendix 8a-Pegasus trajectory Best Case Scenario-Wallace.pdf



Appendix 6-Review of Employment-Led Local Plan Housing Requirement-Wallace.pdf

Email 7 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

  [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.


This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

 <https://i.imgur.com/05aES4f.jpg>

 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHET88g.jpg>





Representations to Local Plan Submission Draft Consultation-Wallace-Email 8 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:16



1 Attachment



Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS  
Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



Internet

[www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.

This email and any associated files, is intended for the exclusive use of the addressee only.

If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.



<https://i.imgur.com/05aES4f.jpg>



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHEt88g.jpg>



## **ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT**

### **REPRESENTATION BY WALLACE LAND INVESTMENTS**

Date: 13<sup>th</sup> May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

#### **Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

**Live: 45457800 v 3**

#### 4. SPATIAL VISION & OVERALL STRATEGY (CHAPTERS 3 & 4)

- 4.1 Below we provide some general comments on the Spatial Vision and Strategic Objectives in Chapter 3 and the Spatial Strategy set out in Policy LPA02 and its supporting text.

##### **Spatial Vision & Strategic Objectives**

- 4.2 Wallace support the overall vision, particularly where it states that: *'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'*.
- 4.3 We are also in general support of the strategic objectives, although we do have some specific comments on the wording. Firstly, Strategic Objective 4.1 refers to providing land for a *'sufficient'* number and range of new dwellings, which suggests only just meeting needs. However, the 2019 NPPF requires plans to be *'positively prepared'* with the objective of *'significantly boosting the supply of housing'*. As such, the Council should be seeking to surpass their needs, so we recommend that the wording be updated to reflect this. (5)
- 4.4 Secondly, Strategic Objective 5.1 highlights the need for an adequate supply of employment land to meet local employment needs; however boosting the supply of housing land is equally important for local employment as increasing the range and quality of housing stock is a key to attracting and retaining employees whilst minimising the need to commute, and we would suggest the wording is updated to make reference to this. (6)

##### **Policy LPA02 (Part 3) - Previously Developed Land**

- 4.5 We agree that previously developed land can make a significant contribution to supply. That said it is clear that the Council will need a variety of brownfield and greenfield sites to provide a range of housing and to ensure consistent delivery through the plan period, and as such it is our view that they should not be prioritising or incentivising one land type over another. (7)
- 4.6 Lowering developer contributions for brownfield sites is justified on the basis that such sites generating higher costs and lower sales values; however, in our view this is an over-simplistic assumption as greenfield sites can often carry significant abnormal or opening up costs, particularly large strategic sites of which there are several in this plan, and Keppie Massie do acknowledge this within the methodology of their Viability Assessment. Developer contributions should be assessed and set taking into account site specifics. A one size fits all generic approach should be avoided.

##### **Policy LPA02 (Part 4) - Green Belt and Safeguarded Land**

- 4.7 This policy seeks to release land from the Green Belt both for development within the emerging plan period (2020-2035) and beyond, through safeguarded land. The need for Green Belt release is justified in the supporting text (paragraph 4.6.9), where the Council confirm that there is

PO0621



Objection to plans to build on Ecclestone/Windle Greenbelt land.

Gerard Banks

to:

planningpolicy@sthelens.gov.uk

11/03/2019 09:35



1 Attachment



Planning Objection.pdf

Dear Sir/Madam

Please find attached my objection to your plans to build on Ecclestone/Windle Greenbelt land.

Kind regards

Gerard Banks

54 Ecclesfield Road

Ecclestone





Mr & Mrs G Banks  
54 Ecclesfield Road  
Eccleston  
St Helens  
WA10 6BN  
[REDACTED]

11 March 2019

Local Plan  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens, Merseyside  
WA10 1HP

Dear Sir or Madam

On behalf of my wife and I, I wish to object to the St Helens Council Local Plan(2018). In particular, we are objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

[REDACTED]

Now, to discover that you intend to illegally build and take away the view we have enjoyed for over [REDACTED] years is heartbreaking. I actually do not have the words to describe quite how distressed we are even at the prospect. Not only will our view be destroyed, but all the wildlife that we have enjoyed for so long will disappear, including rabbits, hares, mice, voles, etc., the thought of them being slaughtered is equally distressing. This is Greenbelt land and always have been. It should never be built on.

01

From a technical standpoint, St Helens Council are using a projected annual house building target of 486, the ONS suggestion for 2014 is 468 and the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. We do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances".

02  
03

The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development; it is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land.

04

According to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050 whilst agricultural land lost to land degradation is estimated at 12M hectares p.a. (23 hectares/minute, 1 hectare = 2.47 acres); enough to produce up to 20M tonnes of grain. Furthermore, the overall trend of steadily declining agricultural yields will be subject to widely fluctuating yields in the UK and worldwide due to the growing incidence of extreme weather events, such as storms, floods and heatwaves. For example, total UK cereal production had significant dips in 2001, 2007, 2012 and 2013 linked to adverse weather conditions in those years (source: Defra, 2015).

Food security is an economic, social and environmental issue. It is about consumers having access at all times to sufficient, safe and nutritious food for an active and healthy life at affordable prices. To achieve this, our food supply must be reliable and resilient to shocks and crises. Food must also be produced in a way that is environmentally sustainable or we will be storing up problems for the medium to long term. 04

Protecting food security has to run in parallel with other priorities such as tackling climate change (2015 was the warmest year on record since record keeping began in 1880, NASA 2016) and securing a healthy natural environment. These collectively are likely to be the most pressing economic and social factors affecting the UK in the 21st Century. The question is not IF food security will become a serious issue but WHEN.

The loss of any greenbelt should not be taken lightly. I can only comment on one area of greenbelt mentioned in the local plan as this is the only one that I use. The land referred to is 8HS and is south of the A580 adjacent to Windle Island. The land concerned is grade 1 and 2 agricultural land and has been farmed since the 1850's. It is also land that is enjoyed regularly by the residents who use the numerous footpaths.

If this valuable framing land is removed from Green Belt, the nearest green space would then be north of the A580 and people would be trying to cross this road to access open countryside. This is already a very busy road and as part of the Borough's strategy will get even busier.

As the figures taken from the Mott MacDonald business case for the Windle Island Improvement plan show:- 05

"Following consultation with a transport modeler, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB: (Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more:

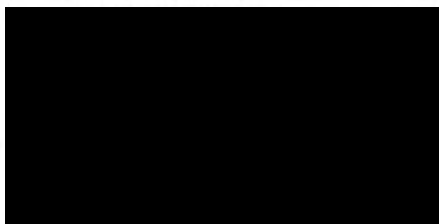
- Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more;
- Daily average speed will change by 10km/hr or more; and
- Peak hour speed will change by 20km/hr or more."

Contaminated brown field sites have not been considered for development; St Helens Council have identified 3,170 hectares of the lowest priority contaminated land but have not proposed a strategy for implementing this. It has been proposed by some Councillors that developers could be made responsible for this and offered this land as an alternative to Green Belt. This has not been seriously considered and, again, shows that there are no "exceptional circumstances" for Green Belt release. 06

Careful reading of the local plan suggests that the release of greenbelt is so that development costs would be reduced thus enabling the affordable housing target to be achieved. Hardly meeting the "exceptional circumstances" justification for releasing greenbelt. 07

For these reasons I would suggest that the Local Plan (2018) is unsound and needs to be modified. Initially the housing target figures should be reduced, secondly the Plan should only consider the fifteen-year target, eliminating any requirement for "safeguarded" sites and finally, the test of "exceptional circumstances" should be carefully and realistically applied to ensure that the precious local Green Belt continues to serve its purpose.

Yours faithfully

A large black rectangular box redacting the signature of Gerard Banks.

Gerard Banks

PO0622





Local plan  
Harry Platt  
to:  
planningpolicy  
13/03/2019 12:43



I have some points to make about the St. Helens local 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.

01

Rainford Specific points (8HA Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

02

Regards  
Harry Platt

111 Bushey Lane,  
Rainford,  
St helens,  
WA11 7TE



PO0623



CPRE Lancashire response  
jackie.copley  
to:  
planningpolicy  
13/03/2019 09:20



# 1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

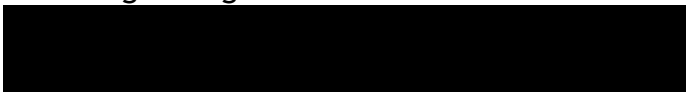
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

**Jackie Copley MRTPI MA BA(Hons) PgCert**  
Planning Manager



## Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

CPRE Lancashire is a Company Limited By Guarantee registered in England, No. 5291461

Registered Charity Number: 1107376

*This email and any files transmitted with it are confidential and intended for the addressee(s) only. If you are not the intended recipient any disclosure, distribution, copying or printing is strictly prohibited. If you have received this email in error please notify the sender. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of CPRE Lancashire. Finally, this email and its attachments have been checked for viruses before submission, however the recipient should also check for the presence of viruses. CPRE Lancashire accepts no responsibility for any damage caused by any virus transmitted by this email.*



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

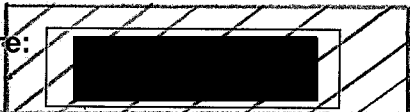
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
--	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough 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 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 type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;



- 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; and
- d) Consistent with national policy – there are some policies in conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

See specific policy reference below.

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.

### LPA01 Presumption in Favour of Sustainable Development

We strongly support Policy LPA01 Presumption in Favour of Sustainable Development, as this is what CPRE campaigns to achieve, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to our beloved rural land. There is so much benefit from our countryside for everyone, that we should not sacrifice it so easily.

CPRE is not a NIMBY (Not in My Back-Yard) organisation. We 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. However, we previously recommended a definition of sustainable development be included in LPA01. We continue to urge for a definition to be included to make sense of what actually is 'sustainable development'. We recommend the Brundtland Report 1987 definition: *"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs"*. It contains two key concepts:

- the concept of "needs", in particular the essential needs of the world's poor, to which overriding priority should be given; and
- the idea of limitations imposed by the state of technology and social organization on the environment's ability to meet present and future needs."

We also recommend the deletion of the wording of *"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible"* as this form of wording will limit the development management function of the Council in the future. This is because 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, CPRE Lancashire is concerned that the planning team will not have the capacity to do this sufficiently and as a result 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. Yet, we are 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. We explain the planning reasons more fully under appropriate policy headings.

PO0624



CPRE Lancashire response  
jackie.copley  
to:  
planningpolicy  
13/03/2019 09:20



# 1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

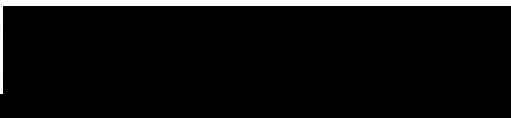
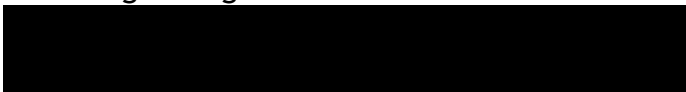
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

**Jackie Copley MRTPI MA BA(Hons) PgCert**  
Planning Manager



## Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

CPRE Lancashire is a Company Limited By Guarantee registered in England, No. 5291461

Registered Charity Number: 1107376

*This email and any files transmitted with it are confidential and intended for the addressee(s) only. If you are not the intended recipient any disclosure, distribution, copying or printing is strictly prohibited. If you have received this email in error please notify the sender. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of CPRE Lancashire. Finally, this email and its attachments have been checked for viruses before submission, however the recipient should also check for the presence of viruses. CPRE Lancashire accepts no responsibility for any damage caused by any virus transmitted by this email.*



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

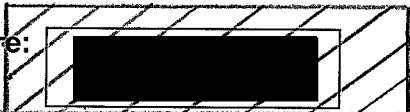
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
--	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough 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 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 type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

- 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; and
- d) Consistent with national policy – there are some policies in conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

See specific policy reference below.

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.

### LPA01 Presumption in Favour of Sustainable Development

We strongly support Policy LPA01 Presumption in Favour of Sustainable Development, as this is what CPRE campaigns to achieve, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to our beloved rural land. There is so much benefit from our countryside for everyone, that we should not sacrifice it so easily.

CPRE is not a NIMBY (Not in My Back-Yard) organisation. We 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. However, we previously recommended a definition of sustainable development be included in LPA01. We continue to urge for a definition to be included to make sense of what actually is 'sustainable development'. We recommend the Brundtland Report 1987 definition: "*Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs*". It contains two key concepts:

- the concept of "needs", in particular the essential needs of the world's poor, to which overriding priority should be given; and
- the idea of limitations imposed by the state of technology and social organization on the environment's ability to meet present and future needs."

We also recommend the deletion of the wording of "*The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible*" as this form of wording will limit the development management function of the Council in the future. This is because 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, CPRE Lancashire is concerned that the planning team will not have the capacity to do this sufficiently and as a result 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. Yet, we are 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. We explain the planning reasons more fully under appropriate policy headings.

PO0625



St Helens Local Plan Submission Draft Representations - Torus 62 Limited  
Ian Gilbert  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

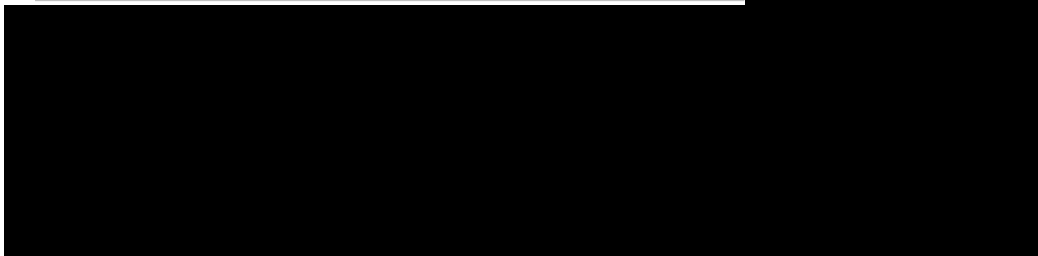
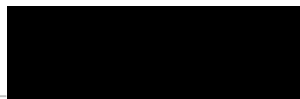
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**  
Planning Associate



**Representor Details**

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Please see accompanying representations

**7. Please set out modification(s) you consider are necessary**

Please see accompanying representations

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Please see accompanying representations



---

### 3. STRATEGIC POLICIES

---

- 3.1 The Council has outlined a number of strategic policies within the Submission Draft Local Plan. Our Client supports the need for significant housing and employment growth, and the pragmatic approach by the Council to bring forward development which at a minimum meets the future residential and employment needs within St Helens and identifies additional land provision to provide flexibility and supply. Moreover, and as mentioned previously, we consider that the Local Plan should aim to provide sufficient growth to support the wider aspirations of the LCR to help drive forward economic growth and seek to reverse current trends of decline in deprivation and affordability within the borough. 9
- 

- 3.2 With regard to the above, we have a number of concerns with the Policies as drafted and set out these comments below: 10
- 

#### **Policy LPA01 – Presumption in favour of sustainable development**

---

- 3.3 Our Client supports the inclusion of Policy LPA01 and the approach taken by the Council in relation to the presumption in favour of sustainable development which is generally reflective of the approach set out within the 2018 NPPF. We consider it is essential for this policy to be included within the emerging Local Plan, and its inclusion demonstrates compliance with Paragraph 11 of the NPPF. 11
- 

- 3.4 Notwithstanding the above, Policy LPA01 seeks only to address the presumption in favour of sustainable development insofar as it relates to decision making, rather than Plan-making. We consider that the Local Plan would benefit from clarification that it has been prepared with the intention of being compatible with the presumption where it relates to plan making; this will be particularly important as the plan evolves through future reviews. Indeed, key to the Local Plan remaining sound will be its commitment to being sufficiently flexible to adapt to rapid change as set out within the opening paragraphs of paragraph 11 of the NPPF. 12
- 

#### **Policy LPA02 – Spatial Strategy**

---

- 3.5 Our Client supports the Council's approach in identifying a number of Key Settlements, which includes Newton-le-Willows. We support the need for development to be 13
-

PO0626



St Helens Local Plan Submission Draft Representations - Torus 62 Limited  
Ian Gilbert  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

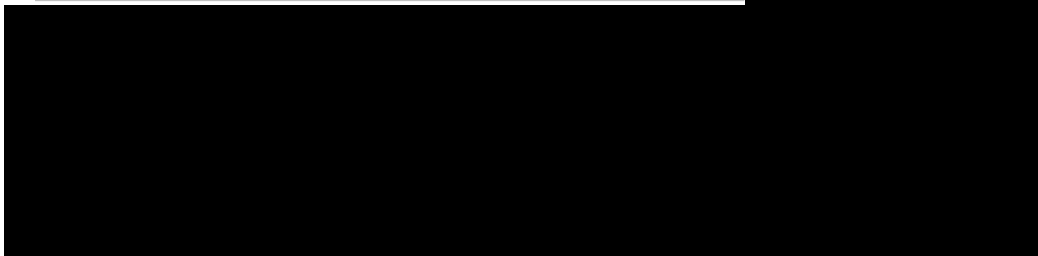
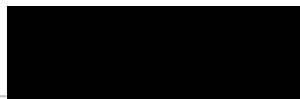
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**  
Planning Associate



**Representor Details**

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Please see accompanying representations

**7. Please set out modification(s) you consider are necessary**

Please see accompanying representations

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Please see accompanying representations



---

### 3. STRATEGIC POLICIES

---

- 3.1 The Council has outlined a number of strategic policies within the Submission Draft Local Plan. Our Client supports the need for significant housing and employment growth, and the pragmatic approach by the Council to bring forward development which at a minimum meets the future residential and employment needs within St Helens and identifies additional land provision to provide flexibility and supply. Moreover, and as mentioned previously, we consider that the Local Plan should aim to provide sufficient growth to support the wider aspirations of the LCR to help drive forward economic growth and seek to reverse current trends of decline in deprivation and affordability within the borough. 9 10
- 

- 3.2 With regard to the above, we have a number of concerns with the Policies as drafted and set out these comments below:

#### **Policy LPA01 – Presumption in favour of sustainable development**

---

- 3.3 Our Client supports the inclusion of Policy LPA01 and the approach taken by the Council in relation to the presumption in favour of sustainable development which is generally reflective of the approach set out within the 2018 NPPF. We consider it is essential for this policy to be included within the emerging Local Plan, and its inclusion demonstrates compliance with Paragraph 11 of the NPPF. 11
- 

- 3.4 Notwithstanding the above, Policy LPA01 seeks only to address the presumption in favour of sustainable development insofar as it relates to decision making, rather than Plan-making. We consider that the Local Plan would benefit from clarification that it has been prepared with the intention of being compatible with the presumption where it relates to plan making; this will be particularly important as the plan evolves through future reviews. Indeed, key to the Local Plan remaining sound will be its commitment to being sufficiently flexible to adapt to rapid change as set out within the opening paragraphs of paragraph 11 of the NPPF. 12
- 

#### **Policy LPA02 – Spatial Strategy**

---

- 3.5 Our Client supports the Council's approach in identifying a number of Key Settlements, which includes Newton-le-Willows. We support the need for development to be 13



PO0627



St Helens Local Plan - Presubmission consultation  
John Fleming  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 10:13



2 Attachments



St Helens Local Plan - consultation form.pdf St Helens - Local Plan presubmission - GDL representations.pdf

**St Helens Local Plan - Presubmission consultation**

Please find attached the response of Gladman Developments to the above consultation.

I would be grateful if you could confirm receipt of this email and its contents.

Yours faithfully,

John Fleming



St Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John	First name:
Last Name: Fleming	Last Name:
Organisation/company: Gladman Developments	Organisation/company:
Address: Gladman House, Alexandria Way, Congleton	Address:
Postcode: CW12 1LB	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

13<sup>th</sup> March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough 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	X	Paragraph / diagram / table	X	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/> x
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> x
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> x

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/> x
Justified?	<input type="checkbox"/> x
Effective?	<input type="checkbox"/> x
Consistent with National Policy?	<input type="checkbox"/> x

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments**

Please see attached representations.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Please see attached representations**

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	<b>No</b> , I do not wish to participate at the oral examination	<b>x</b>	<b>Yes</b> , I wish to participate at the oral examination
--	--	----------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please see attached representations**

***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

St Helen's Local Plan  
Pre- Submission Version  
Gladman Representations



March 2019



## 4 LOCAL PLAN POLICIES

### 4.1 Policy LPA01: Presumption in favour of sustainable development

4.1.1 In principle, Gladman are fully supportive of the direction taken in Policy LPA01, which sets out that decisions will be made in accordance with the presumption in favour of sustainable development and should affirm the Council's commitment to making local planning decisions based on the delivery of sustainable development. The inclusion of such a policy provides assurance of a local approach to planning that will actively seek to improve the social, environmental and the economic wellbeing of the area by ensuring that development demonstrably contributes to the delivery of sustainable development within the borough.

4.1.2 Notwithstanding this, Gladman believe that the above policy could go further in its approach to ensuring the delivery of sustainable development that is consistent with a localised approach to assessing development proposals in line with the ethos of achieving the delivery of sustainable development required by the NPPF2019 which is key to assessing planning proposals and should be reflected in the policy wording linked to the vision and objectives of the plan.

4.1.3 In this regard, Gladman reference the Sustainable Development Statement contained in the draft Durham Local Plan. This is an effective example of a local approach of how development proposals will be considered against the presumption in favour of sustainable development outlined in national policy. It is recommended that similar criteria that are relevant to St Helens be included in the policy wording to demonstrate how a localised approach will be taken through the development management process.

### 4.2 Policy LPA02: Spatial Strategy

#### Plan Period

4.2.1 The emerging Local Plan covers the period 2016 – 2035. Paragraph 22 of the NPPF2019 states:

**"strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements**

PO0628





St Helens Local Plan - Presubmission consultation  
John Fleming  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 10:13



2 Attachments



St Helens Local Plan - consultation form.pdf St Helens - Local Plan presubmission - GDL representations.pdf

**St Helens Local Plan - Presubmission consultation**

Please find attached the response of Gladman Developments to the above consultation.

I would be grateful if you could confirm receipt of this email and its contents.

Yours faithfully,

John Fleming



St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John	First name:
Last Name: Fleming	Last Name:
Organisation/company: Gladman Developments	Organisation/company:
Address: Gladman House, Alexandria Way, Congleton	Address:
Postcode: CW12 1LB	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]

Date:

13<sup>th</sup> March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough 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	X	Paragraph / diagram / table	X	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/> x
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> x
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> x

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/> x
Justified?	<input type="checkbox"/> x
Effective?	<input type="checkbox"/> x
Consistent with National Policy?	<input type="checkbox"/> x

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments**

Please see attached representations.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Please see attached representations**

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	<b>No</b> , I do not wish to participate at the oral examination	<b>x</b>	<b>Yes</b> , I wish to participate at the oral examination
--	--	----------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:



**Please see attached representations**

***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

St Helen's Local Plan  
Pre- Submission Version  
Gladman Representations



March 2019

## 4 LOCAL PLAN POLICIES

### 4.1 Policy LPA01: Presumption in favour of sustainable development

4.1.1 In principle, Gladman are fully supportive of the direction taken in Policy LPA01, which sets out that decisions will be made in accordance with the presumption in favour of sustainable development and should affirm the Council's commitment to making local planning decisions based on the delivery of sustainable development. The inclusion of such a policy provides assurance of a local approach to planning that will actively seek to improve the social, environmental and the economic wellbeing of the area by ensuring that development demonstrably contributes to the delivery of sustainable development within the borough.

4.1.2 Notwithstanding this, Gladman believe that the above policy could go further in its approach to ensuring the delivery of sustainable development that is consistent with a localised approach to assessing development proposals in line with the ethos of achieving the delivery of sustainable development required by the NPPF2019 which is key to assessing planning proposals and should be reflected in the policy wording linked to the vision and objectives of the plan.

4.1.3 In this regard, Gladman reference the Sustainable Development Statement contained in the draft Durham Local Plan. This is an effective example of a local approach of how development proposals will be considered against the presumption in favour of sustainable development outlined in national policy. It is recommended that similar criteria that are relevant to St Helens be included in the policy wording to demonstrate how a localised approach will be taken through the development management process.

### 4.2 Policy LPA02: Spatial Strategy

#### Plan Period

4.2.1 The emerging Local Plan covers the period 2016 – 2035. Paragraph 22 of the NPPF2019 states:

**"strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements**

PO0629



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
Dan Ingram  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 14:20



2 Attachments



27020.A3.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

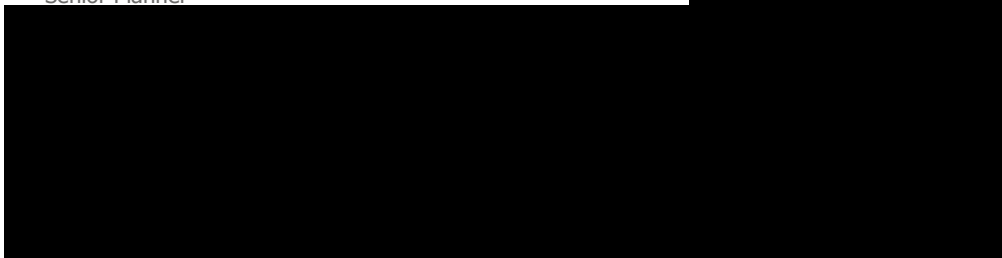
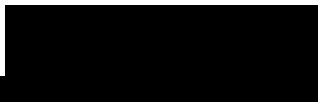
To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.  
**Dan Ingram**  
Senior Planner







St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMORIS
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ **No**, I do not wish to participate at the oral examination

☒ **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO  
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER  
SITES.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019

## 9.0 OTHER POLICY CONSIDERATIONS

- 9.1 This Section will provide our Client's comments on other policies contained within the New Local Plan.

### **Policy LPA01: Presumption in Favour of Sustainable Development**

- 9.2 Policy LPA01 of the New Local Plan sets out the Council's approach to sustainable development during the Plan period. The Plan outlines at paragraph 4.3.2 that the operation of this Policy will be guided by paragraph 11 of the NPPF.

- 9.3 Whilst the Policy follows the broad thrust of the NPPF it introduces additional wording and tests which are not present within paragraph 11 of the NPPF. For example, point 2 of the Policy outlines that planning applications which accord with the Local Plan will be approved without delay unless material considerations indicate otherwise. The material considerations test is no longer included within paragraph 11 of the NPPF and in this regard the policy is inconsistent with the NPPF. 17

- 9.4 Furthermore, the Policy does not allow for a balance to be struck between benefits and harm; this is outlined within paragraph 11 of the NPPF and again Policy LPA01 is inconsistent with national planning policy in this regard. 18

- 9.5 Our Client is concerned that the principles of sustainability advocated by Policy LPA01 do not accord with those outlined within the NPPF, and therefore object to this Policy on these grounds. Our Client considers that the Policy should be compliant with the provisions for sustainable development as outlined within the NPPF but considers that should this be the case, the Policy would not need to be included within the Plan as it would simply be repeating the contents of the NPPF. On this basis, it is recommended that Policy LPA01 be removed from the Plan altogether.

### **Policy LPA02: Spatial Strategy**

- 9.6 This Policy sets the Council's overall strategy for new development in St Helens over the New Local Plan period. Key aims of the Plan are: to support the continued regeneration of St Helens and other key settlements; ensure that the scale, nature and location of development is appropriate and sustainable; encourages the use of brownfield land; identifies land for release from the Green Belt (and safeguarded) to ensure that identified development needs (and future development needs) can be delivered in full; focus strategic employment in accessible locations; support the function and role of St Helens

PO0630



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
Dan Ingram  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 14:20



2 Attachments



27020.A3.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

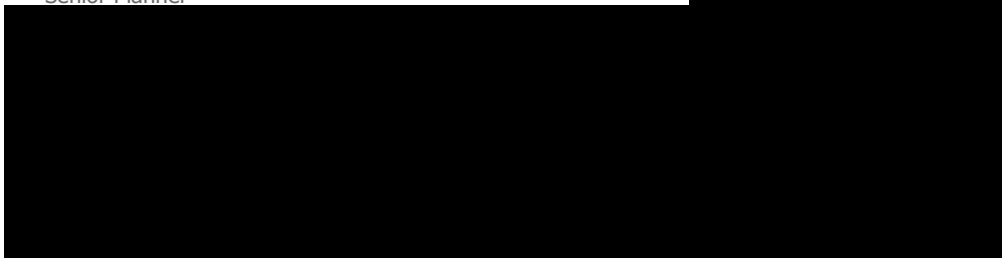
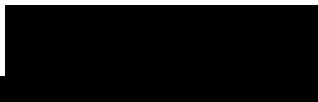
To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.  
**Dan Ingram**  
Senior Planner







St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMORIS
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

#### 3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT					

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

#### 5. If you consider the Local Plan is unsound, is it because it is not:

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

#### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ **No**, I do not wish to participate at the oral examination

☒ **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO  
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER  
SITES.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019



## 9.0 OTHER POLICY CONSIDERATIONS

- 9.1 This Section will provide our Client's comments on other policies contained within the New Local Plan.

### **Policy LPA01: Presumption in Favour of Sustainable Development**

- 9.2 Policy LPA01 of the New Local Plan sets out the Council's approach to sustainable development during the Plan period. The Plan outlines at paragraph 4.3.2 that the operation of this Policy will be guided by paragraph 11 of the NPPF.

- 9.3 Whilst the Policy follows the broad thrust of the NPPF it introduces additional wording and tests which are not present within paragraph 11 of the NPPF. For example, point 2 of the Policy outlines that planning applications which accord with the Local Plan will be approved without delay unless material considerations indicate otherwise. The material considerations test is no longer included within paragraph 11 of the NPPF and in this regard the policy is inconsistent with the NPPF. 17

- 9.4 Furthermore, the Policy does not allow for a balance to be struck between benefits and harm; this is outlined within paragraph 11 of the NPPF and again Policy LPA01 is inconsistent with national planning policy in this regard. 18

- 9.5 Our Client is concerned that the principles of sustainability advocated by Policy LPA01 do not accord with those outlined within the NPPF, and therefore object to this Policy on these grounds. Our Client considers that the Policy should be compliant with the provisions for sustainable development as outlined within the NPPF but considers that should this be the case, the Policy would not need to be included within the Plan as it would simply be repeating the contents of the NPPF. On this basis, it is recommended that Policy LPA01 be removed from the Plan altogether.

### **Policy LPA02: Spatial Strategy**

- 9.6 This Policy sets the Council's overall strategy for new development in St Helens over the New Local Plan period. Key aims of the Plan are: to support the continued regeneration of St Helens and other key settlements; ensure that the scale, nature and location of development is appropriate and sustainable; encourages the use of brownfield land; identifies land for release from the Green Belt (and safeguarded) to ensure that identified development needs (and future development needs) can be delivered in full; focus strategic employment in accessible locations; support the function and role of St Helens

PO0631



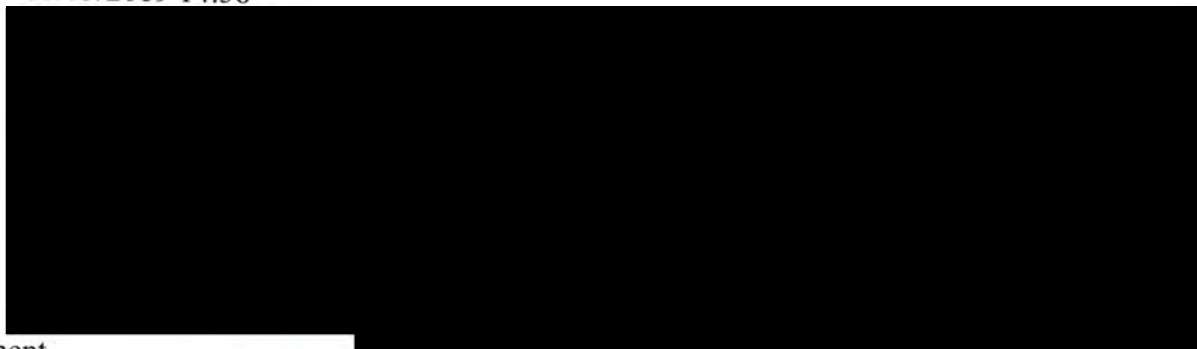
Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 1 of 4 (main representations)

Kennedy, Amy (UK - Manchester)

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:58



1 Attachment



CCfE\_reps to St Helens Local Plan\_without appendices\_March 2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 1 of 4 and the main representations are attached. The technical appendices will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



 Please consider the environment before printing.







#### IMPORTANT NOTICE

This communication is from Deloitte LLP, a limited liability partnership registered in England and Wales with registered number OC303675. Its registered office is 1 New Street Square, London EC4A 3HQ, United Kingdom. Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see [www.deloitte.co.uk/about](http://www.deloitte.co.uk/about) to learn more about our global network of member firms. For details of our professional regulation please see [Regulators](#).

This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please notify [it.security.uk@deloitte.co.uk](mailto:it.security.uk@deloitte.co.uk) and destroy this message immediately. Email communications cannot be guaranteed to be secure or free from error or viruses. All emails sent to or from a @deloitte.co.uk email account are securely archived and stored by an external supplier within the European Union.

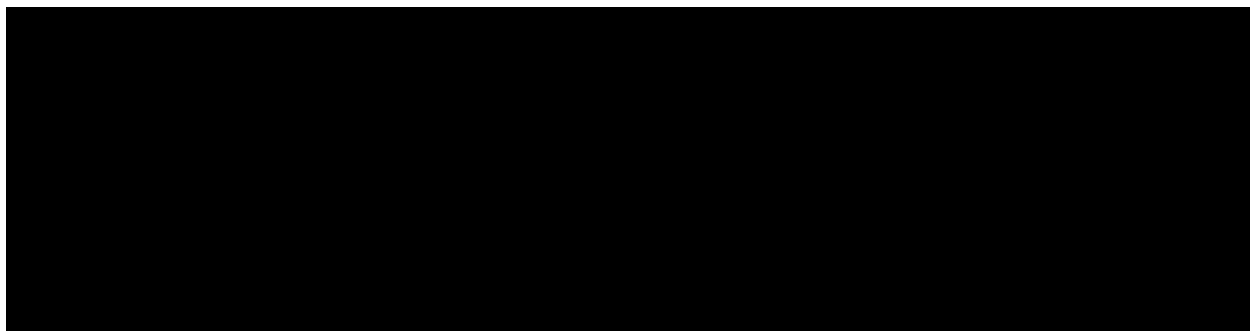
You can understand more about how we collect and use (process) your personal information in our [Privacy Notice](#).

Deloitte LLP does not accept any liability for use of or reliance on the contents of this email by any person save by the intended recipient(s) to the extent agreed in a Deloitte LLP engagement contract.

Opinions, conclusions and other information in this email which have not been delivered by way of the business of Deloitte LLP are neither given nor endorsed by it.



RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:  
2 of 4 (Appendix A)  
Kennedy, Amy (UK - Manchester)  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:01



1 Attachment

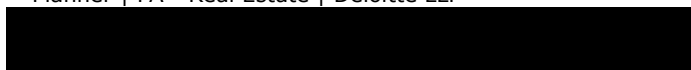


CCfE\_reps to St Helens Local Plan\_Appendix A\_March 2019.pdf

Apologies – now re-sent with attachment.

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP




---

**From:** Kennedy, Amy (UK - Manchester)

**Sent:** 13 March 2019 15:00

**To:** 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>



**Subject:** Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 2 of 4 (Appendix A)

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix A to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 2 of 4 and Appendices B and C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

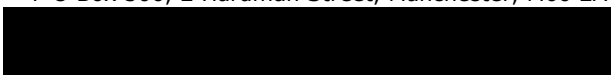
Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom







 Please consider the environment before printing.



#### IMPORTANT NOTICE

This communication is from Deloitte LLP, a limited liability partnership registered in England and Wales with registered number OC303675. Its registered office is 1 New Street Square, London EC4A 3HQ, United Kingdom. Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see [www.deloitte.co.uk/about](http://www.deloitte.co.uk/about) to learn more about our global network of member firms. For details of our professional regulation please see [Regulators](#).

This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please notify [it.security.uk@deloitte.co.uk](mailto:it.security.uk@deloitte.co.uk) and destroy this message immediately. Email communications cannot be guaranteed to be secure or free from error or viruses. All emails sent to or from a @deloitte.co.uk email account are securely archived and stored by an external supplier within the European Union.

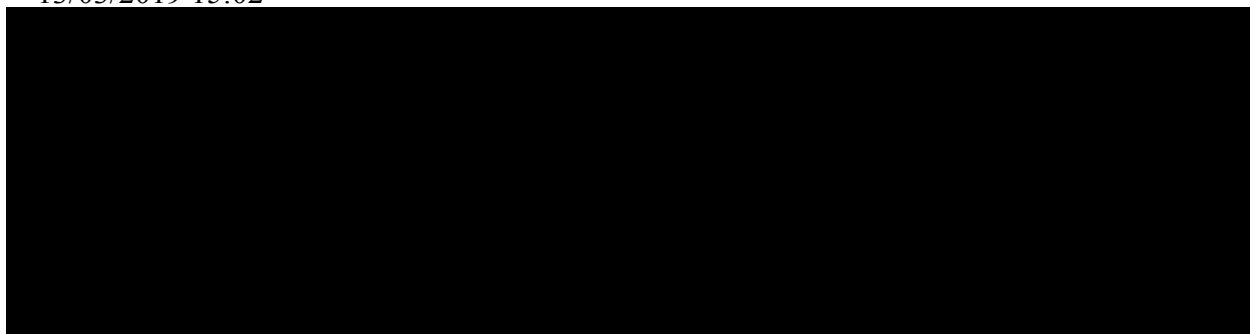
You can understand more about how we collect and use (process) your personal information in our [Privacy Notice](#).

Deloitte LLP does not accept any liability for use of or reliance on the contents of this email by any person save by the intended recipient(s) to the extent agreed in a Deloitte LLP engagement contract.

Opinions, conclusions and other information in this email which have not been delivered by way of the business of Deloitte LLP are neither given nor endorsed by it.



RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:  
3 of 4 (Appendix B)  
Kennedy, Amy (UK - Manchester)  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:02



1 Attachment



CCfE\_reps\_to\_St\_Helens\_Local\_Plan\_Appendix\_B\_March\_2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix B to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 3 of 4 and Appendix C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

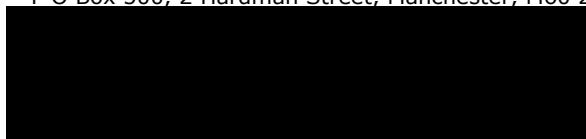
Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



 Please consider the environment before printing.





#### IMPORTANT NOTICE

This communication is from Deloitte LLP, a limited liability partnership registered in England and Wales with registered number OC303675. Its registered office is 1 New Street Square, London EC4A 3HQ, United Kingdom. Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see [www.deloitte.co.uk/about](http://www.deloitte.co.uk/about) to learn more about our global network of member firms.

This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please notify [it.security.uk@deloitte.co.uk](mailto:it.security.uk@deloitte.co.uk) and destroy this message immediately. Email communications cannot be guaranteed to be secure or free from error or viruses. All emails sent to or from a @deloitte.co.uk email account are securely archived and stored by an external supplier within the European Union.

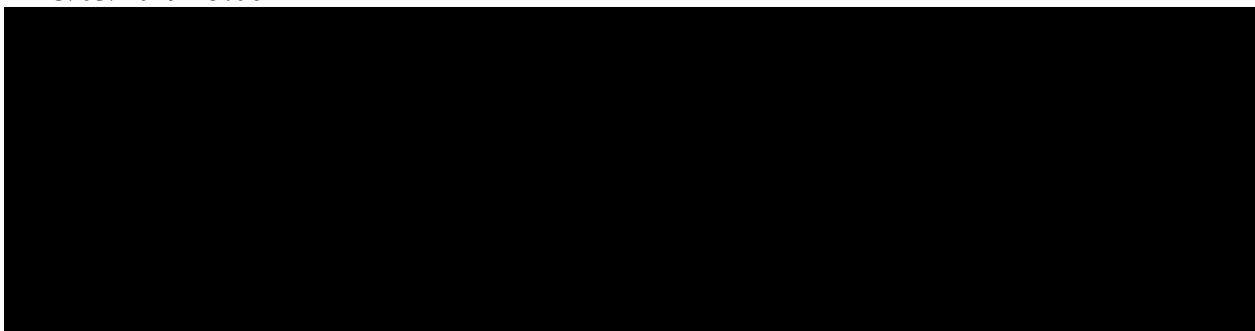
You can understand more about how we collect and use (process) your personal information in our [Privacy Notice](#).

Deloitte LLP does not accept any liability for use of or reliance on the contents of this email by any person save by the intended recipient(s) to the extent agreed in a Deloitte LLP engagement contract.

Opinions, conclusions and other information in this email which have not been delivered by way of the business of Deloitte LLP are neither given nor endorsed by it.



Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)  
 Kennedy, Amy (UK - Manchester)  
 to:  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
 13/03/2019 15:06



1 Attachment



CCfE\_reps to St Helens Local Plan\_Appendix C\_March 2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix C to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 4 of 4 and is the final part of our representations. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP  
 P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



Please consider the environment before printing.



**IMPORTANT NOTICE**

This communication is from Deloitte LLP, a limited liability partnership registered in England and Wales with registered number OC303675. Its registered office is 1 New Street Square, London EC4A 3HQ, United Kingdom. Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see [www.deloitte.co.uk/about](http://www.deloitte.co.uk/about) to learn more about our global network of member firms.

This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please notify [it.security.uk@deloitte.co.uk](mailto:it.security.uk@deloitte.co.uk) and destroy this message immediately. Email communications cannot be guaranteed to be secure or free from error or viruses. All emails sent to or from a @deloitte.co.uk email account are securely archived and stored by an external supplier within the European Union.

You can understand more about how we collect and use (process) your personal information in our [Privacy Notice](#).

Deloitte LLP does not accept any liability for use of or reliance on the contents of this email by any person save by the intended recipient(s) to the extent agreed in a Deloitte LLP engagement contract.

Opinions, conclusions and other information in this email which have not been delivered by way of the business of Deloitte LLP are neither given nor endorsed by it.





**Representations to the Submission Draft  
St Helens Borough Local Plan 2020 – 2035**  
Prepared on behalf of the Church Commissioners  
for England

March 2019



## 2 Response to Draft Plan Policies

- 2.1 This section provides comments on the detailed policies within the Draft Plan that relate to the Commissioners' landholdings in Rainford.

### Policy LPA01: Presumption in Favour of Sustainable Development

- 2.2 To ensure sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11). The Commissioners therefore support the principles underpinning draft Policy LPA01. 01

- 2.3 However, to ensure the Council's approach is sound in being positively prepared, the Commissioners suggest that the wording of Part 1 of the policy needs to refer to key themes of the NPPF such as "significantly boosting the supply of homes" (Paragraph 59). Part 1 of the Policy could therefore be amended to include additional text as follows (in bold): 02

*In line with national planning policy, there will be a presumption in favour of sustainable development. **This will take into account the need expressed in the National Planning Policy Framework to "significantly boost" the supply of housing.** The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the Borough.*

### Policy LPA02: Spatial Strategy

- 2.4 The inclusion of Rainford as a 'Key Settlement' within Part 1 of draft Policy LPA02 is supported by the Commissioners. 03 However, we believe Part 3 of the policy (which refers to development on previously developed land) should be amended. Whilst encouraging the use of previously developed land is consistent with the NPPF, the Commissioners believe that the lower thresholds for developer contributions proposed within draft Policy LPA02 is unsound.

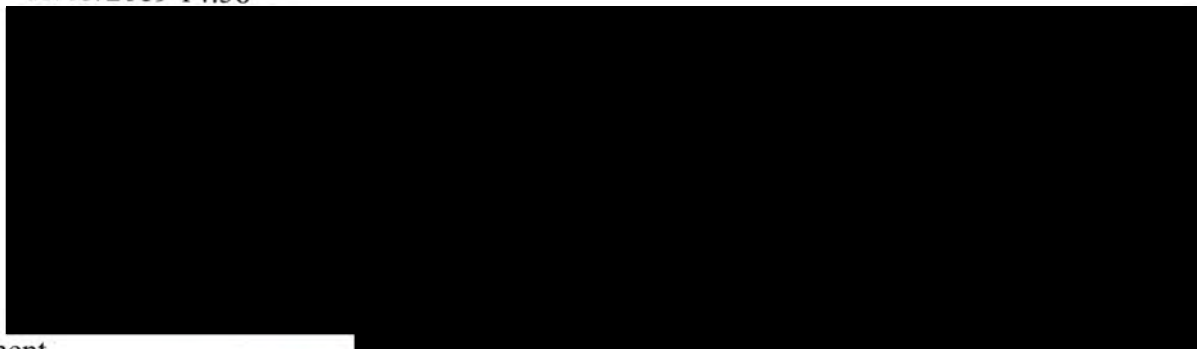
- 2.5 We believe the notion of setting lower thresholds for developer contributions on previously-developed sites is unjustified and not positively prepared. The premise of lowering and relaxing developer contributions for previously-developed land is predicated on the fact that those sites will have viability issues associated with them. 04

- 2.6 However, this essentially implies that greenfield sites will have fewer constraints and so are less likely to face viability issues, which is not necessarily correct. Greenfield sites can also face viability issues due to site specific factors such as ground conditions, drainage or access, whilst some brownfield sites may be relatively unconstrained; especially if they have already been cleared with site preparation works completed. Central Government has introduced several initiatives to remove obstacles to brownfield development, and the Commissioners therefore believe this element of the policy is superfluous.

PO0632



Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 1 of 4 (main representations)  
Kennedy, Amy (UK - Manchester)  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 14:58



1 Attachment



CCfE\_reps to St Helens Local Plan\_without appendices\_March 2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 1 of 4 and the main representations are attached. The technical appendices will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



 Please consider the environment before printing.







#### IMPORTANT NOTICE

This communication is from Deloitte LLP, a limited liability partnership registered in England and Wales with registered number OC303675. Its registered office is 1 New Street Square, London EC4A 3HQ, United Kingdom. Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see [www.deloitte.co.uk/about](http://www.deloitte.co.uk/about) to learn more about our global network of member firms. For details of our professional regulation please see [Regulators](#).

This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please notify [it.security.uk@deloitte.co.uk](mailto:it.security.uk@deloitte.co.uk) and destroy this message immediately. Email communications cannot be guaranteed to be secure or free from error or viruses. All emails sent to or from a @deloitte.co.uk email account are securely archived and stored by an external supplier within the European Union.

You can understand more about how we collect and use (process) your personal information in our [Privacy Notice](#).

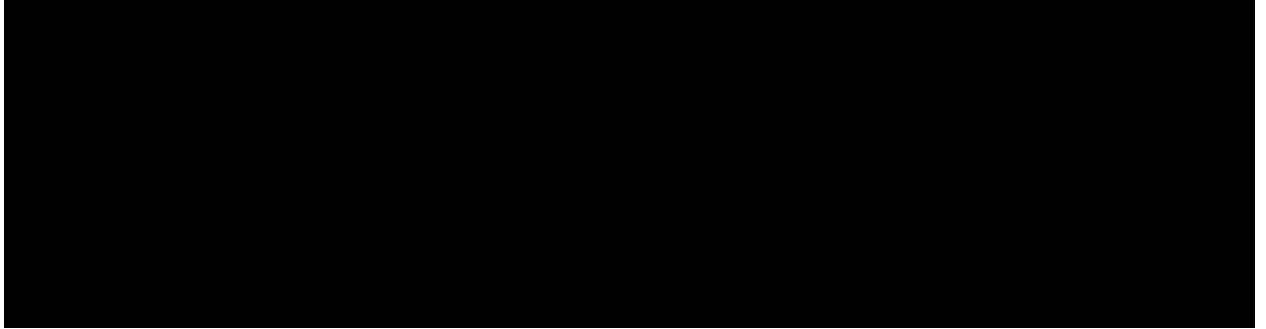
Deloitte LLP does not accept any liability for use of or reliance on the contents of this email by any person save by the intended recipient(s) to the extent agreed in a Deloitte LLP engagement contract.

Opinions, conclusions and other information in this email which have not been delivered by way of the business of Deloitte LLP are neither given nor endorsed by it.





RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:  
2 of 4 (Appendix A)  
Kennedy, Amy (UK - Manchester)  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:01



1 Attachment



CCfE\_reps to St Helens Local Plan\_Appendix A\_March 2019.pdf

Apologies – now re-sent with attachment.

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

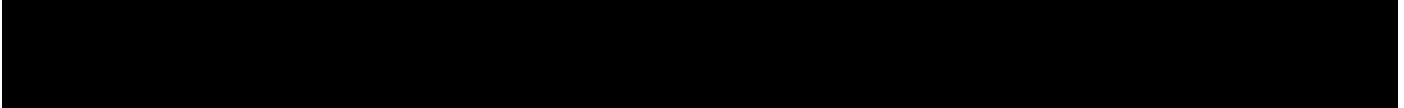



---

**From:** Kennedy, Amy (UK - Manchester)

**Sent:** 13 March 2019 15:00

**To:** 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>



**Subject:** Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 2 of 4 (Appendix A)

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix A to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 2 of 4 and Appendices B and C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom





 Please consider the environment before printing.



#### IMPORTANT NOTICE

This communication is from Deloitte LLP, a limited liability partnership registered in England and Wales with registered number OC303675. Its registered office is 1 New Street Square, London EC4A 3HQ, United Kingdom. Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see [www.deloitte.co.uk/about](http://www.deloitte.co.uk/about) to learn more about our global network of member firms. For details of our professional regulation please see [Regulators](#).

This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please notify [it.security.uk@deloitte.co.uk](mailto:it.security.uk@deloitte.co.uk) and destroy this message immediately. Email communications cannot be guaranteed to be secure or free from error or viruses. All emails sent to or from a @deloitte.co.uk email account are securely archived and stored by an external supplier within the European Union.

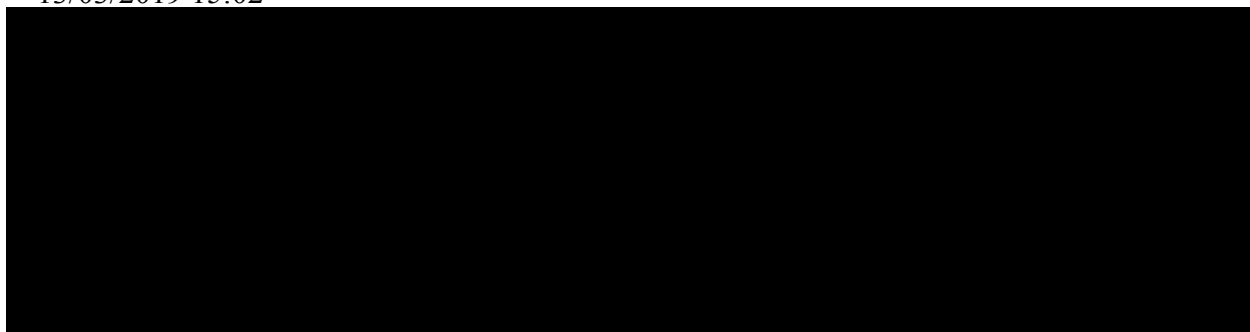
You can understand more about how we collect and use (process) your personal information in our [Privacy Notice](#).

Deloitte LLP does not accept any liability for use of or reliance on the contents of this email by any person save by the intended recipient(s) to the extent agreed in a Deloitte LLP engagement contract.

Opinions, conclusions and other information in this email which have not been delivered by way of the business of Deloitte LLP are neither given nor endorsed by it.



RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:  
3 of 4 (Appendix B)  
Kennedy, Amy (UK - Manchester)  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:02



1 Attachment



CCfE\_reps\_to\_St\_Helens\_Local\_Plan\_Appendix\_B\_March\_2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix B to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 3 of 4 and Appendix C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

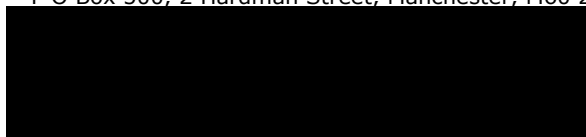
Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



 Please consider the environment before printing.





#### IMPORTANT NOTICE

This communication is from Deloitte LLP, a limited liability partnership registered in England and Wales with registered number OC303675. Its registered office is 1 New Street Square, London EC4A 3HQ, United Kingdom. Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see [www.deloitte.co.uk/about](http://www.deloitte.co.uk/about) to learn more about our global network of member firms.

This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please notify [it.security.uk@deloitte.co.uk](mailto:it.security.uk@deloitte.co.uk) and destroy this message immediately. Email communications cannot be guaranteed to be secure or free from error or viruses. All emails sent to or from a @deloitte.co.uk email account are securely archived and stored by an external supplier within the European Union.

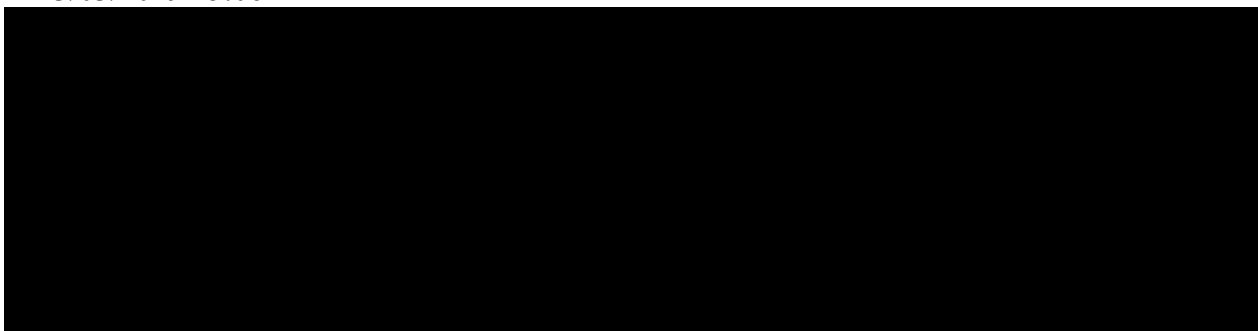
You can understand more about how we collect and use (process) your personal information in our [Privacy Notice](#).

Deloitte LLP does not accept any liability for use of or reliance on the contents of this email by any person save by the intended recipient(s) to the extent agreed in a Deloitte LLP engagement contract.

Opinions, conclusions and other information in this email which have not been delivered by way of the business of Deloitte LLP are neither given nor endorsed by it.



Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)  
 Kennedy, Amy (UK - Manchester)  
 to:  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
 13/03/2019 15:06



1 Attachment



CCfE\_reps to St Helens Local Plan\_Appendix C\_March 2019.pdf

**For the attention of: The Planning Policy Team**

Dear Sir / Madam

Please find attached Appendix C to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 4 of 4 and is the final part of our representations. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

**Amy Kennedy**

Planner | FA - Real Estate | Deloitte LLP  
 P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



 Please consider the environment before printing.





**IMPORTANT NOTICE**

This communication is from Deloitte LLP, a limited liability partnership registered in England and Wales with registered number OC303675. Its registered office is 1 New Street Square, London EC4A 3HQ, United Kingdom. Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see [www.deloitte.co.uk/about](http://www.deloitte.co.uk/about) to learn more about our global network of member firms.

This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please notify [it.security.uk@deloitte.co.uk](mailto:it.security.uk@deloitte.co.uk) and destroy this message immediately. Email communications cannot be guaranteed to be secure or free from error or viruses. All emails sent to or from a @deloitte.co.uk email account are securely archived and stored by an external supplier within the European Union.

You can understand more about how we collect and use (process) your personal information in our [Privacy Notice](#).

Deloitte LLP does not accept any liability for use of or reliance on the contents of this email by any person save by the intended recipient(s) to the extent agreed in a Deloitte LLP engagement contract.

Opinions, conclusions and other information in this email which have not been delivered by way of the business of Deloitte LLP are neither given nor endorsed by it.



**Representations to the Submission Draft  
St Helens Borough Local Plan 2020 – 2035**  
Prepared on behalf of the Church Commissioners  
for England

March 2019



## 2 Response to Draft Plan Policies

- 2.1 This section provides comments on the detailed policies within the Draft Plan that relate to the Commissioners' landholdings in Rainford.

### Policy LPA01: Presumption in Favour of Sustainable Development

- 2.2 To ensure sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11). The Commissioners therefore support the principles underpinning draft Policy LPA01. 01

- 2.3 However, to ensure the Council's approach is sound in being positively prepared, the Commissioners suggest that the wording of Part 1 of the policy needs to refer to key themes of the NPPF such as "significantly boosting the supply of homes" (Paragraph 59). Part 1 of the Policy could therefore be amended to include additional text as follows (in bold): 02

*In line with national planning policy, there will be a presumption in favour of sustainable development. **This will take into account the need expressed in the National Planning Policy Framework to "significantly boost" the supply of housing.** The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the Borough.*

### Policy LPA02: Spatial Strategy


- 2.4 The inclusion of Rainford as a 'Key Settlement' within Part 1 of draft Policy LPA02 is supported by the Commissioners. 03 However, we believe Part 3 of the policy (which refers to development on previously developed land) should be amended. Whilst encouraging the use of previously developed land is consistent with the NPPF, the Commissioners believe that the lower thresholds for developer contributions proposed within draft Policy LPA02 is unsound.

- 2.5 We believe the notion of setting lower thresholds for developer contributions on previously-developed sites is unjustified and not positively prepared. The premise of lowering and relaxing developer contributions for previously-developed land is predicated on the fact that those sites will have viability issues associated with them. 04

- 2.6 However, this essentially implies that greenfield sites will have fewer constraints and so are less likely to face viability issues, which is not necessarily correct. Greenfield sites can also face viability issues due to site specific factors such as ground conditions, drainage or access, whilst some brownfield sites may be relatively unconstrained; especially if they have already been cleared with site preparation works completed. Central Government has introduced several initiatives to remove obstacles to brownfield development, and the Commissioners therefore believe this element of the policy is superfluous.

PO0633

ELO211


 RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2

1 Attachment


 41575\_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,  
Melissa**Melissa Wilson**  
**Senior Planner**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

- ① LPA01
- ② LPA02
- ③ LPA03
- ④ LPA04
- ⑤ LPA05
- ⑥ LPA05
- ⑦ LPA05
- ⑧ LPA05.1
- ⑨ LPA06

⑩ LPA07

⑪ LPA08

⑫ LPA09

⑬ LPA11

⑭ GBR

⑮ EVA

⑯ LPC01/2

⑰ LPC02

⑱ LPC13

⑲ LPD01

⑳ LPC01/3

㉑ LPC05

㉒ LPD01

㉓ LPD02

㉔ LPC01/5

㉕ LPC10

㉖ LPD01

㉗ LPD03

㉘ LPC01/6

㉙ LPC12

㉚ LPD01

㉛ LPD07

㉜ SHMA

Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseYorPfo>



I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

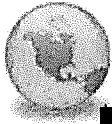
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

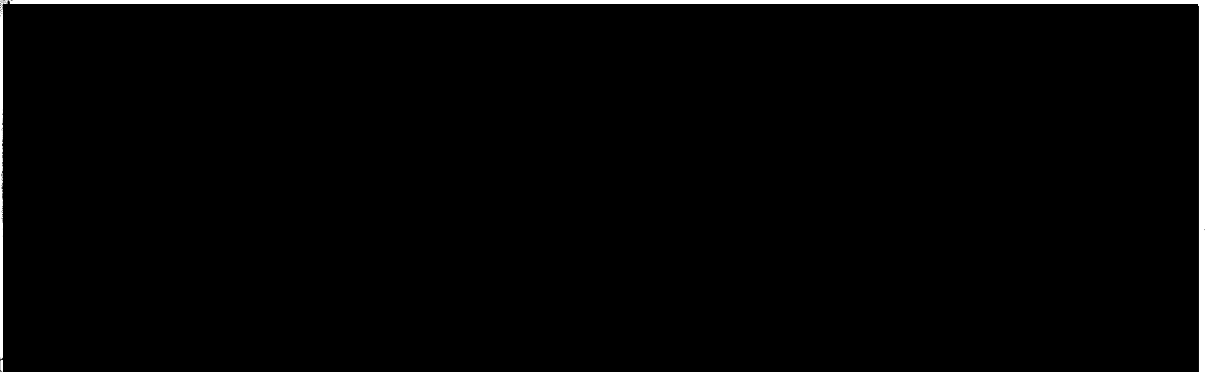
This email is for the use of the addressee. It may contain information which is confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or attachments to anyone other than the addressee. If you receive this communication in error please advise us by telephone as soon as possible. Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



Think of the environment. Please avoid printing this email unnecessarily.



Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2  
[NLP-DMS.FID606600]  
Brian O'Connor



1 Attachment



SPLIT 41874\_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19\_Part\_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseY9rPfO>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

**lichfields.uk**

This email is for the use of the addressee. It may contain information which is confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or attachments to anyone other than the addressee. If you receive this communication in error please advise us by telephone as soon as possible.  
Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



Think of the environment. Please avoid printing this email unnecessarily.



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title: Mr
First Name: Kate	First name: Brian
Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood	Address: Ship Canal House 98 King Street Manchester
Postcode: WA3 6GR	Postcode: M2 4WU
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

<b>Signature:</b> [REDACTED]	<b>Date:</b> 13/03/2019
------------------------------	-------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
See cover letter		See cover letter		See cover letter					
Other documents (please name document and relevant part/section)				See supporting Representations and Appendices					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See supporting Representations and Appendices

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**See supporting Representations and Appendices**

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

			<b>Yes, I wish to participate at the oral examination</b>
--	--	--	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



EL0211

# **St Helens Local Plan Soundness Representations**

Taylor Wimpey UK Limited

13 March 2019

**LICHFIELDS**

41874/03/SPM/MWI  
17081285v8  
17081285v8

## 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

PO0634

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  <b>LPA01 02</b>		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X
						Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (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 not considered in any way.



(out of 956) on the site until the traffic issues are resolved. It is difficult to see how this can be resolved practicably or economically in such a land locked parcel of land.

74. The site is the last piece of green space remaining that separates Knowsley, Eccleston Park, Nutgrove, Thatto Heath, and if lost to development will see all these settlement merge into one mass of urban development to perpetuate sprawl. These communities would lose a valuable asset and green space essential to health and wellbeing and contrary of National Policy.
75. The fact that site lacks visual amenity and openness beyond its boundaries is not a reason for concluding that the parcel does not possess enough greenfield value.
76. The council in order to develop this site still have to address the concerns of Sport England. The site should remain as Green Belt and be used for recreation.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- The LPSD may not be DtC compliant in respect of economic growth, transport, agriculture and healthcare.
- The spatial strategy is based on flawed economic data that needs review.
- Housing Need assessment needs review to reflect latest information to comply with NPPF para 31 and National Audit Office guidance.
- A more robust Agricultural policy at Regional and local level is needed to ensure Food Security.
- A strategic policy directing development to central urban areas is needed to be consistent with National Policy.
- Redevelopment and recycling of Previously Developed Land (PDL) not currently on the Brownfield Register requires addressing before development of Green Belt land in order to be consistent with National Policy.
- Regional Strategy needs review to ensure achievable and sustainable economic growth that satisfies the obligations under the Duty to Cooperate and Statements of Common Ground.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

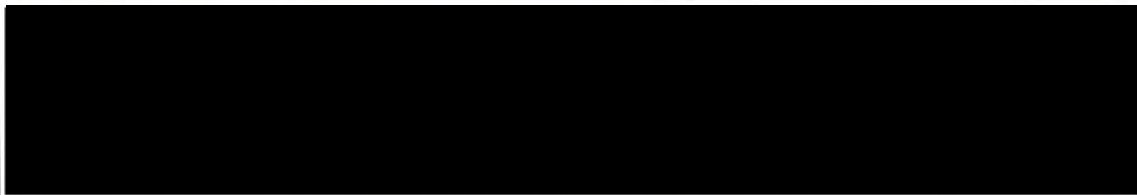
**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<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
--	----------	--

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



## 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.



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 LPSPD. ✓

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 LPSPD 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 LPSPD 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 LPSPD 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

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

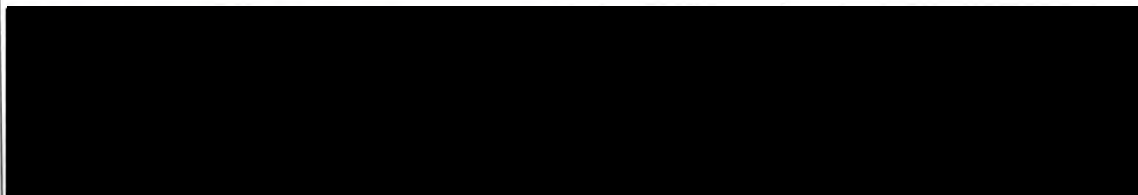
**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
---	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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

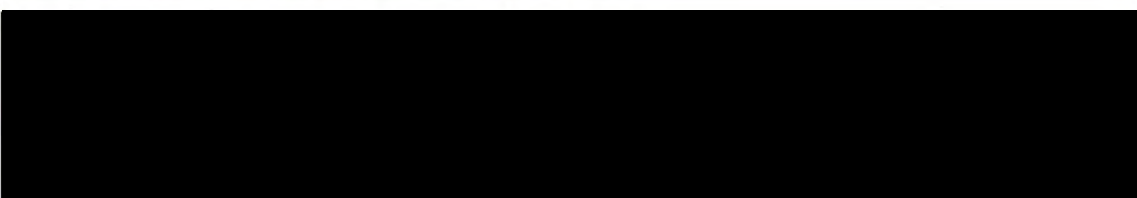
<sup>15</sup> CPRE Needless demand. Sept 2017.



<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.

PO0635



St. Helens  
Council

683  
**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: Sharon	First name:
Last Name: Railton	Last Name:
Organisation/company:	Organisation/company:
Address: 29 Rookery Lane Rainford, St Helens Merseyside	Address:
Postcode: WA11 8EF	Postcode:
Tel No:	Tel No:
	Mobile No:
	Email:

Signature:

Date:

12.03.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 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.**



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 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.



PO0636



St. Helens  
Council

684

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: Jemma	First name:
Last Name: Jones.	Last Name:
Organisation/company:	Organisation/company:
Address: 6, ORWELL CLOSE STANDISH LOWER CROSSLAND, WIGAN.	Address:
Postcode: WN6 8JH	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:



Date:

13-03-19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or by e-mail to:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Please note we are unable to accept faxed copies of this form.

### FURTHER INFORMATION

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.ssthelens.gov.uk/localplan](http://www.ssthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



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.

PO0637





St. Helens  
Council

685  
**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: <b>MR</b>	Title:
First Name <b>CRAIG</b>	First name:
Last Name: <b>JONES</b>	Last Name:
Organisation/company:	Organisation/company:
Address: <b>6. ORWELL CLOSE STANDISH LOUGHRAN CROSSLAND.</b>	Address:
Postcode: <b>WN6 8SH. WIGAN.</b>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <b>12/3/19.</b>
--	-----------------------

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.**



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 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.

PO0638





St. Helens  
Council

686

**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: <u>MRS</u>	Title:
First Name <u>MARGARET</u>	First name:
Last Name: <u>AINSCOUGH.</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>13, ECCLES ROAD.</u> <u>KITT GREEN, WIGAN</u>	Address:
Postcode: <u>WNS 04R.</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	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 - 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.**

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.

PO0639



St. Helens  
Council

687

**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: MR	Title:
First Name: GARY	First name:
Last Name: AINSCOUGH.	Last Name:
Organisation/company:	Organisation/company:
Address: 13, ECCLES ROAD, KITT GREEN, WIGAN	Address:
Postcode: WN5 0HR.	Postcode:
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

[REDACTED]

Date:

13/3/19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



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.

PO0641



St.Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](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>HAZEL</u>	First name:
Last Name: <u>ROBY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>50 CLAREMONT AVE, BILLINGE</u>	Address:
Postcode: <u>WN5 7LT</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <u>10/03/19</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 - 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.**



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.



PO0642



St. Helens  
Council

690

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

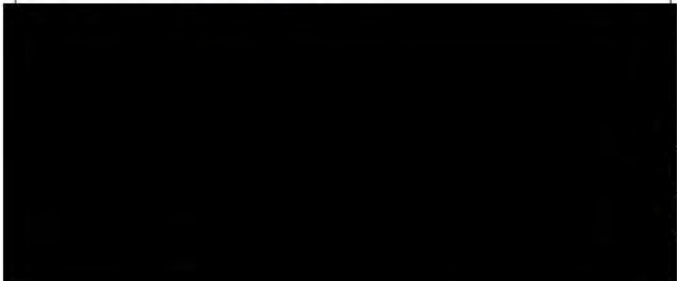
Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).


Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name <i>JULIE</i>	First name:
Last Name: <i>LOMAX</i>	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date: *26/02/19*

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: <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	
<p>Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.</p> <p>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):</p> <p>a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.</p> <p>b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';</p> <p>c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.</p> <p>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.</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.

#### **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.

PO0643



St. Helens  
Council

691  
**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: <u>MRS</u>	Title:
First Name: <u>EMMA</u>	First name:
Last Name: <u>HUGHES</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>WHITEGATES BILLINGE</u>	Address:
Postcode: <u>WN5 7MA</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	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 - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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.

PO0644





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

**13 MAR 2019**

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Ms</i>	Title:
First Name: <i>RACHEL</i>	First name:
Last Name: <i>FREARSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>14 FOXGLOVE CLOSE, BROUGHTON,</i>	Address:
Postcode: <i>LE9 6YU</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

*04/03/19*

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.ssthelens.gov.uk/localplan](http://www.ssthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

#### **3. To which part of the Local Plan does this representation relate?**

Policy		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.

PO0645





St. Helens  
Council

693

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 LINDSEY	First name:
Last Name: CAREY.	Last Name:
Organisation/company:	Organisation/company:
Address: 2 SHELBOURNE DRIVE HINDLEY UGAY	Address:
Postcode: WN2 3NE	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [Redacted]	Date: 3/3/19.
-----------------------	---------------

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		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

#### **LPA01 Presumption in Favour of Sustainable Development**

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

***"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible"*** this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

#### **Policy LPA02: Spatial Strategy**

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase ***"as far as practicable"*** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.



PO0646



St. Helens  
Council

694

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name <i>THOMAS</i>	First name:
Last Name: <i>IRWIN</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>132 GREENLAW ROAD, STOLVEAVON</i>	Address:
Postcode: <i>AB39 8AL</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	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 - 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?	Yes <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.

PO0647





St. Helens  
Council

695

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

**13 MAR 2019**

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Ms</i>	Title:
First Name <i>KIRSTY</i>	First name:
Last Name: <i>WILKINSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>7 LANGLEY GROVE, DURHAM</i>	Address:
Postcode: <i>DL14 6UJ</i>	Postcode:
Tel No:	Tel No:
Mobile No:	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 - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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.

PO0648





St. Helens  
Council

698

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

**13 MAR 2019**

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MISS</i>	Title:
First Name: <i>WENDY</i>	First name:
Last Name: <i>SINGLETON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>3 FAIRWAYS DRIVE, WALMET ISLAND</i>	Address:
Postcode: <i>LA14 3HT</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

*07/03/19*

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: <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 or is unsound or fails to comply with the duty to cooperate</u> . 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>Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.</p> <p>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):</p> <p>a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.</p> <p>b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';</p> <p>c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.</p> <p>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.</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.

#### **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.

PO0649





St. Helens  
Council

699  
**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

**13 MAR 2019**

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

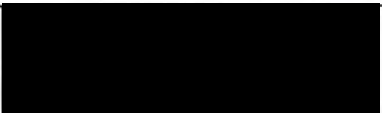
**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>ROBERT</i>	First name:
Last Name: <i>ATHERTON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>2 HOWFORD MILL COTTAGE SELKIRK</i>	Address:
Postcode: <i>TD7 5JH</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 

Date: *21/02/19*

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 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.



PO0650



St. Helens  
Council

701  
**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: MISS	Title:
First Name SODIE	First name:
Last Name: TUNSTALL	Last Name:
Organisation/company:	Organisation/company:
Address: 23, PARKFIELD ST WIGAN	Address:
Postcode: WN6 7ED.	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 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.

PO0652





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.

PO0653





St. Helens  
Council

705

**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: <u>MR</u>	Title:
First Name <u>SHANE</u>	First name:
Last Name: <u>CAREY.</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 SHELburne Drive</u> <u>HINDLEY, LIVERPOOL.</u>	Address:
Postcode: <u>WN2 3NE</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature

Date:

4/3/19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <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>Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.</p> <p>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):</p> <p>a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.</p> <p>b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';</p> <p>c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.</p> <p>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.</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.

#### **LPA01 Presumption in Favour of Sustainable Development**

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

**"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible"** this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

#### **Policy LPA02: Spatial Strategy**

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase **"as far as practicable"** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

PO0654





St.Helens  
Council

706

**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: <u>MR</u>	Title:
First Name <u>HOWARD</u>	First name:
Last Name: <u>RAILTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>50 CLAREMONT ROAD, BILLINGE</u>	Address:
Postcode: <u>WN5 7LT</u>	Postcode:
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

[REDACTED]

Date:

10/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Please note we are unable to accept faxed copies of this form.

## FURTHER INFORMATION

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments</p>
<p>Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.</p> <p>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):</p> <p>a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.</p> <p>b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';</p> <p>c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.</p> <p>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.</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.

#### **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.



PO0655



St. Helens  
Council

707

**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: <u>MR</u>	Title:
First Name: <u>STUART</u>	First name:
Last Name: <u>ALDRIDGE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>637 GASTANG ROAD, PRESTON</u>	Address:
Postcode: <u>PR3 5DQ</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

08/03/19

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 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.

PO0656



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft) 1  
Representation (i.e. Comment) Form**

Ref: LPSD

**13 MAR 2019**  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

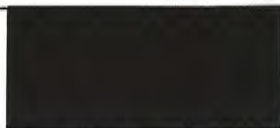
This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>STUART</i>	First name:
Last Name: <i>FIRTH</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>82 ALT CROSS CROXTETH</i>	Address:
Postcode: <i>L11 4UP</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:



Date:

*02/03/19*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - 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?	Yes <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.

PO0657





St. Helens  
Council

723

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: <u>MR</u>	Title:
First Name <u>GARY</u>	First name:
Last Name: <u>RALTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>26 COLERIDGE AV.</u> <u>DOWTONS GREEN,</u>	Address:
Postcode: <u>WA10 6RN</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

09/03/19

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: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

#### **LPA01 Presumption in Favour of Sustainable Development**

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

***"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible"*** this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

#### **Policy LPA02: Spatial Strategy**

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase ***"as far as practicable"*** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

PO0658





St. Helens  
Council

724

**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: <u>MR</u>	Title:
First Name: <u>LEWIS</u>	First name:
Last Name: <u>RAILTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>26 COLERIDGE AV.</u> <u>PONTONS GREEN</u>	Address:
Postcode: <u>WA10 6RN</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

02/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - 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		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	
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.



PO0659



St.Helens  
Council

725

**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: <u>MR</u>	Title:
First Name <u>IAN</u>	First name:
Last Name: <u>ROBY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>50 CLAREMONT ROAD,</u>	Address:
<u>BILLINGE,</u>	
Postcode: <u>WN5 7LT</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

09/03/19

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: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

#### **LPA01 Presumption in Favour of Sustainable Development**

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

***"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible"*** this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

#### **Policy LPA02: Spatial Strategy**

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase **"as far as practicable"** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

PO0660



St. Helens  
Council

729

**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: <u>MR</u>	Title:
First Name: <u>JOHN</u>	First name:
Last Name: <u>LYON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>5 TRURO CLOSE, ST. HELENS</u>	Address:
Postcode: <u>WA11 9EL</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

06/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate</u> . Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
Green Belt, 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.

PO0661





St. Helens  
Council

730  
St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>EMMA</i>	First name:
Last Name: <i>ROBY</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>50 CLAREMONT ROAD, BILLINGE</i>	Address:
Postcode: <i>WN5 7LT</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

*10/03/19*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough 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 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.

PO0663





St. Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>JOHN</i>	First name:
Last Name: <i>GASKELL</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>2A ROCKOLY LANE</i>	Address:
Postcode: <i>WALL 8ER</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

*11/02/19*

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: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments**

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

#### **LPA01 Presumption in Favour of Sustainable Development**

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

***"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible"*** this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

#### **Policy LPA02: Spatial Strategy**

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase **"as far as practicable"** makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.



PO0664



St. Helens  
Council

734

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: MR	Title:
First Name CRAIG	First name:
Last Name: AINSCOUGH.	Last Name:
Organisation/company:	Organisation/company:
Address: 23, Pigeon ST WIGAN	Address:
Postcode: WN6 7ED.	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

01/3/19.

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		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	
<p>Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.</p> <p>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):</p> <p>a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.</p> <p>b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';</p> <p>c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.</p> <p>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.</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.

#### **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.

PO0665



St. Helens  
Council

736

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

**13 MAR 2019**

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name <i>BILLY</i>	First name:
Last Name: <i>RICHARDSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>9A VILLAGES TERR NEWTOWN,</i>	Address:
Postcode: <i>CA9 3PL</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

*06/03/19*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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.

PO0666



St.Helens  
Council

13 MAR 2019

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSP

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Stephen	First name:
Last Name: Brine	Last Name:
Organisation/company:	Organisation/company:
Address: Friars Cottage Houghtons Lane, Eccleston, St Helens Postcode: WA10 5QE	Address:
Tel No:	Postcode:
Mobile No: [REDACTED]	Tel No:
Email: [REDACTED]	Mobile No:
	Email:

Signature: [REDACTED]	Date: 12-3-19.
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or by hand delivery to:**

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or by e-mail to:**

planningpolicy@sthelens.gov.uk

*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	01, 02	Paragraph		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
	04, 05	Diagram					Habitats Regulation Assessment
	06, 08	Table					
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Please tick as appropriate		

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see attached representation.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached representation

Please continue on a separate sheet if necessary

**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? (This is a compulsory question)

<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.**



STEPHEN BRINE  
FLIMS COTTAGE  
HOUGHTONS LANE  
ECCLESTON  
ST. HELENS, WAT0 5QE

## **PART B -YOUR REPRESENTATION**

I firmly believe that the Submission Draft fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF)

I believe that St Helens Borough Council ("the Council") has failed to meet legal and procedural requirements in preparing the Submission Draft and have provided no evidence that they have complied with their Duty to Cooperate. The Submission Draft is not positively prepared, justified, effective or consistent with National Planning Policy.

Please note that I am in agreement to the representations made by **St Helens Green Belt Association (SHGBA)** and **Eccleston Community Residents Association (ECRA)** but in addition I would also make the following specific points:

### **Duty to Cooperate**

The Submission Draft provides no evidence that the Council have satisfied their Duty to Cooperate. There is no evidence that the Council has satisfied this legal requirement. The Council seems to be competing with neighbouring local authorities for the same residents which will just create inward migration

①

### **LPA01 Presumption in Favour of Sustainable Development**

I support Policy the Presumption in Favour of Sustainable Development but I am concerned that some policies in the Submission Draft will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just

②

### **LPA02 Spatial Strategy**

In setting out this very ambitious strategy for St Helens there is one notable omission from the Submission Draft Spatial Strategy. This is the failure to highlight the great importance government attached to Green Belts. The "essential characteristics of Green Belts are their openness and their permanence". The Submission Draft Spatial Strategy (Policy LPA02, page 17) makes no mention of the "great importance" of Green Belt, their essential characteristics or purposes.

I understand that "exceptional circumstances" need to be demonstrated to release land from Green Belt. I cannot see anywhere in the Submission Draft where "exceptional circumstances" have been demonstrated.

③

### **LPA04 A Strong and Sustainable Economy**

The Submission Draft suggests that St Helens growth trends are significantly higher than historic annual growth rates.

The economic outlook in the Submission Draft is based on out of date forecasts and employment growth is highly aspirational and optimistic. It is relying almost entirely on significant growth of logistic warehousing and does not take into account that warehousing jobs will be at risk because of future automation. It also does not take into account the influence that Brexit could have on the Liverpool Super Port and employment in transportation and warehousing in the region.

PO0667



St. Helens  
Council

301

13 MAR 2019

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MS</i>	Title:
First Name: <i>FRANCES</i>	First name:
Last Name: <i>HARROP</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>FARM COTTAGE, HOUGHTON, LANG, ECCLESTON ST. HELENS</i>	Address:
Postcode: <i>WA10 5QG</i>	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <i>12/3/19</i>
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 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 ① ③	② ④ ⑤ ⑥	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see attached representation.



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached representation

Please continue on a separate sheet if necessary

**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 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.



### **Brownfield Sites.**

I understand that there are many brownfield sites across St Helens that could be used for housing and employment development before Green Belt sites are released. I believe the Council should develop a strategy so that those sites can be utilised before Green Belt sites. Those sites which are contaminated should have a plan in place to make the land uncontaminated. The developers who wish to build houses in St Helens should only be given the option of Brownfield sites with the cost of cleaning up the sites being borne by the developers.

1 Brownfield sites tend to be closer the Town Centre and already have road infrastructure in place. New homes being built on the sites closer to the Town Centre would mean the residents would have greater access to public transport, both buses and trains, and the services in the Town Centre. I believe developing the Brownfield sites which are closer to the Town Centre would help regenerate the Town Centre.

3 Releasing Green Belt land should be a last resort because when it is released it is lost forever. Developers should not be given the option of building houses on Green Belt land when there are Brownfield sites that could be cleaned up and developed. Cleaning up contaminated land in St Helens in this way would benefit all the residents of St Helens. If developers are allowed to build houses on Green Belt land and make greater profits then there is no incentive for them whatsoever to clean up and develop Brownfield sites.

### **8HS - Land South of A580 between Houghtons Lane and Crantock Grove, Windle.**

As I have already stated I do not believe that there is a need in the future for an additional 486 new homes per year in St Helens. Further if there is a need for some new homes I believe they should be developed in and close to St Helens Town Centre by developing unused Brownfield sites and vacant buildings. I believe this would help regenerate St Helens Town centre.

I therefore believe that the land known as 8HS should **not** be released from Green Belt and should **not** be developed on and the Council should reconsider their Local Plan in relation to that land for the following reasons:

- 6
1. **Housing in Eccleston.** Eccleston has already provided its fair share of housing in recent years, with the most recent example being the 262-home development on the former Triplex site. The developers of that site have still not been able to sell all of the new houses and a number remain unsold and unoccupied.
  2. **Road Infrastructure.** The above new development in Eccleston has already put local infrastructure under great strain. The roads in and around the Eccleston area are already congested and are inadequate to support existing traffic levels never mind increased traffic levels. 1,027 new homes on this site alone could increase the number of vehicles in the locality by approximately 1,900.
  3. **Traffic Congestion.** Story Homes, developers who wish to develop this site, suggest access to this new development would be from a new junction where Houghtons Lane meets the A580. If a new junction was created then there would be approximately 1,900 cars exiting on to the A580 on a stretch of road which already backed up at peak times. Further if any of the new residents wished to travel into St Helens (which I am sure the Council would hope would happen) then they would have to travel east on the A580 and attempt to turn right at Windle Island. It is widely known and accepted that Windle Island at present cannot manage



**Conclusion.**

As I have stated I accept and support the Council in the need to regenerate and develop St Helens. I also appreciate that it is difficult for them but I would like to believe that when considering the Local Plan that the Council will listen to and take on board the views of the many residents in St Helens and in particular residents of the areas directly affected by the Local Plan. (3)

I firmly believe for the reasons that I have stated that the Council should not release any Green Belt land but instead should develop Brownfield sites and vacant buildings closer to the Town Centre. It seems illogical not to develop unused Brownfield sites and vacant buildings in this way which would clearly benefit the people of St Helens far greater than St Helens losing prime Green Belt land which would then be lost forever. (6)

I have already stated that I believe that Eccleston has already provided its fair share of housing in recent years. To release such a large area of Green Belt land at 8HS in Eccleston and Windle will reduce the attractiveness of the area and change the character of the area. This would be a significant loss of Green Belt land which is not only enjoyed by Eccleston residents but also residents of St Helens generally. (2)

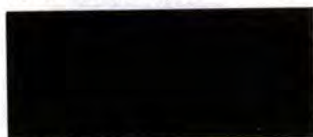
If the development on the land at 8HS was to proceed there would be substantial over development in the Eccleston area which the existing road infrastructure and services would be unable to support. The local schools, doctors, dentists and other key services are already oversubscribed and would be unable to meet the demand of all the new residents. (6)

It is clear that financial contributions for education and off-site highway works are very likely to be required if 8HS was developed and there may be further requirements subject to detailed assessment of infrastructure needs. It is extremely worrying that the Council seems to have selected 8HS for such a large development without first fully identifying the needs and addressing fully how they will be met and funded. It is totally irresponsible to consider releasing Green Belt land to enable developers to develop on without first looking at the long term costs and detrimental effects to the locality and St Helens generally. (1)

I would urge the Council to reconsider their Local Plan with a view to creating a Plan which would help regenerate the Town Centre and also protect the Green Belt and attractiveness of it for the residents of St Helens and their future generations. (2)

Please can you acknowledge safe receipt and confirm that my comments will be considered.

Yours faithfully,



Frances Harrop



PO0668

PF1350

# BOLD & CLOCK FACE VILLAGE ACTION GROUP PART B REPRESENTATION

① - LPA01

② - LPA02

③ - Gen. Selt Review

④ - LPA04

⑤ - LPA05

⑥ - LPA05.1

⑦ - IDP

⑧ - LPA07

⑨ - LPA09

⑩ - LPC05

⑪ - LPC06

⑫ - LPC07

⑬ - LPC08

⑭ - LPC09

This Representation is submitted on behalf of Bold and Clock Face Village Action Group in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.

The representation is supported by **427 signed Part A forms** in support and agreement of the representation made.

The representation 14 Part B forms as listed in the table of contents below.

1. Legally Compliant.....	3 Pages
2. Policy LPA01: Sustainable Development.....	3 Pages
3. Policy LPA02: Spatial Strategy.....	12 Pages
4. Policy LPA04: A Strong and Sustainable Economy.....	4 Pages
5. Policy LPA05: Meeting Housing Needs.....	3 Pages
6. Policy LPA05.1: Strategic Housing Sites.....	3 Pages
7. Policy LPA07: Transport and Travel.....	7 Pages
8. Policy LPA08 Infrastructure Delivery Funding.....	3 Pages
9. Policy LPA09: Green Infrastructure.....	6 Pages
10. Policy LPC05: Open Space.....	3 Pages
11. Policy LPC06: Biodiversity and Geological Conservation.....	6 Pages
12. Policy LPC07: Greenways.....	3 Pages
13. Policy LPC08: Ecological Network.....	4 Pages
14. Policy PLC09: Landscape Protection and Enhancement.....	2 Pages
15. Appendix	
a. Local Development Scheme 2018-2021	
b. Bold Forest Park Area Action Plan, Adopted 2017	
c. Bold Forest Park Area Action Plan Supporting Technical Document	
d. Bold Forest Park Ecological Network Development	
e. Burtonwood Development	
f. Partial Phase 1 Habitat Survey and 3 Bat Transects	
g. Assessment of the Local Plan and Green Belt Review	

The Group trust this document will be submitted, in its entirety as part of the public consultation.

**Bold and Clock Face Village Action Group.**

12 MAY 2019





St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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: MRS	Title:
First Name: SARAH	First name:
Last Name: HUGHES	Last Name:
Organisation/company: Bold & Clock Face Village Action Group	Organisation/company:
Address: 3 Frenchfields Cr St Helens	Address:
Postcode: WA9 4FZ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 13.05.19
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy	X	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No X
Sound?	Yes <input type="checkbox"/>	No X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No X

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

**Please see attached representation made on behalf of Bold and Clock Face Village Action Group with regards to Policy LPA01: Sustainable Development.**

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Please see attached representation made on behalf of Bold and Clock Face Village Action Group.**

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	<b>No</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:

**The community of Bold feel like they have been excluded from the St Helens Local Plan process and have not had a voice. The community need an opportunity to have their voice heard and concerns raised.**

**The area of Bold has a unique offering within the Borough of the Bold Forest Park and the associated Action Plan, which has been largely ignored.**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

## **Policy LPA01: Presumption in Favour of Sustainable Development**

**This representation is submitted on behalf of Bold and Clock Face Village Action Group in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.**

Bold and Clock Face Village Action Group have formed in response to what it perceives as the exclusion of the community from the Local Plan process. The Bold & Clock Face Village Action Group (the Group) recognise the efforts of St Helens Local Council in the desire to develop a workable Local Plan for the area. It is hoped that a Local Plan is adopted to ensure Green Belt land is protected and development is steered towards the most suitable areas. However, the Group consider the proposed plans in some areas are not legally compliant and fail to meet the test of soundness, as set out in Paragraph 35 of the National Planning Policy Framework (Feb 2019), for the reasons which have been set out below and therefore requires modification specifically in relation to proposed development within the Bold Forest Park boundary. The Group have aimed to address each of the Policy concerns in turn and have submitted a representation for each.

**I trust this document will be submitted, in its entirety as part of the public consultation.**

### **Policy LPA01: Presumption in Favour of Sustainable Development**

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPA01 and sites 4HA and 5HA within the Bold Forest Park and is not consistent with national policy. The Bold Forest Park Area Action Plan, as adopted by St Helens Council July 2017, and listed in the Local Development Scheme 2018-2021<sup>1</sup> as an adopted development plan document should play a key role in guiding decisions.

It is the Groups belief that the plan is not consistent with achieving sustainable development. Specifically, we believe it is in direct conflict with relevant policies with the Bold Forest Park Area Action Plan, adopted as a development plan by St Helens Council in July 2017.

Sustainable development can be described as 'economic development that is conducted without depletion of natural resources'. The NPPF states the *objective of sustainable development can be summarised as meeting the needs of the present, without compromising the ability of the future generations to meet their own needs*'. The length of the plan and the removal of such a significant amount of Green Belt land, especially in one area, to meet expected needs for some years beyond the term of the plan, makes a presumption of what those future generations needs will be. The UK is currently going through a period of significant change that had not been predicted as little as 5 years ago. It is not possible therefore, given the current climate, to predict with any degree of certainty the impact of economic, social and environmental factors on needs in 15 to 30 years time. It therefore compromises the ability of future generations to react to those needs by limiting available

---

<sup>1</sup> St Helens Council Local Development Scheme 2018-2021, Section 2.1



## Policy LPA01: Presumption in Favour of Sustainable Development

options in the future. It will also have an unprecedented impact on the local environment and without exception lead to depletion of natural resources. With this in mind, it is the Groups belief that St Helens Council should take a more cautious approach in its release of Green Belt land. The release of Green Belt land to support developments in the future should be subject to further review once all the viable Brownfield land has been depleted. This would support and help to facilitate the St Helens Council approach to a Brownfield first policy and allow for alternative viable options to be meet the needs of future generations.

Achieving sustainable development has three overarching objectives, economic, social and environmental.

BFPAAP Policy BFP1: A Sustainable Forest Park.

In developing the Forest Park infrastructure and attractions, the Council will work with its partners to seek an economic focus, balanced with environmental sustainability, in order to meet the needs of the community by:

- Promoting current employment sites within the Bold Forest Park;
- Promoting rural diversification which contributes to the Forest Park vision, aims and objectives and is consistent with Green Belt policy;
- Safeguarding and expanding the range of leisure and visitor facilities within the Forest Park;

The allocation of site 4HA is in direct conflict with Policy BFP1 of the BFPAAP. *The Bold Forest Park will provide a platform for sustainable rural entrepreneurship.*<sup>2</sup> NPPF Paragraph 83 states 'Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas.
- b) the development and diversification of agricultural and other land-based rural businesses.
- c) sustainable rural tourism and leisure developments which respect the character of the countryside'.

*'Rural entrepreneurs are at the heart of making the Forest Park successful in the long term'.<sup>3</sup>* A key message stated in the BFPAAP, was that *'evidence strongly suggests that the initial focus for the Forest Park Economy should be to develop facilities and infrastructure which develops the local equestrian businesses'<sup>4</sup>*. Development of this site will directly lead to the closure of a thriving stables that supports 62 horses, currently located entirely on site 4HA, and have a significant negative impact on a second livery yard business directly adjacent to the site. The stables not only add an economic value to the Forest Park, they are seen as a community hub for many youngsters, breaking down barriers and promoting social inclusion. They have embraced the ethos of the BFPAAP, adapting land management tasks of crucial pasture land to improve the environment and boost biodiversity. They are the perfect example of how the three objectives for achieving sustainability are intrinsically linked and can be achieved.

---

<sup>2</sup> Bold Forest Area Action Plan, Adopted 2017, Page 2, 2.1.2

<sup>3</sup> Bold Forest Area Action Plan, Adopted 2017, Page 13, 6.1.15

<sup>4</sup> Bold Forest Area Action Plan, Adopted 2017, Page 13, Key Message

The importance of the equestrian sector was recognised in the BFPAAP and was put forward as a key focus for recreation in the Forest Park and a significant factor in shaping the character of the Forest Park area. The sector aspires to develop a coherent network of bridleways and infrastructure, which will support an ambitious visitor offer of events and activities including endurance riding.<sup>5</sup> It was noted in the BFPAAP that much of the land is utilised for pasture and hay-cropping, which is vital in the ability for these businesses to survive and operate within the Bold Forest Park. Loss of the open space character of the area and urbanisation will directly impact on the attractiveness of the area to equestrian visitors and the ability to offer events and activities for this sector. Allocation of this land for development fails to promote current employment sites, fails to contribute to the Forest Park vision, aims and objectives and fails to safeguard and expand the range of leisure facilities.

---

<sup>5</sup> Bold Forest Area Action Plan, Adopted 2017, Page 6, 3.2.7

adverse impacts upon the local economy, the environment or on the quality of visitors' experience.'

This is in line with the **NPPF Paragraph 83** which states: '*Planning policies and decisions should enable:*

- a) the sustainable growth and expansion of all types of business in rural areas.*
- b) the development and diversification of agricultural and other land-based rural businesses.*
- c) sustainable rural tourism and leisure developments which respect the character of the countryside'.*

The **LPSD Policy LPA04 Section 9**, in principal supports this and states that it, '*will prevent the unjustified loss of existing tourism, cultural and visitor resources and assets.*'<sup>3</sup>

The objectives of the Forest Park have been set out as follows:

1. Create new economic opportunities through sustainable development within Bold Forest Park.
2. Create opportunities for tourism and leisure related businesses, supported by the natural economy.
3. Create an easily understood and accessible network of linked open spaces within Bold Forest park and the surrounding areas.
4. Promote the provision and positive use of green space for the benefit of the local community and visitors; and
5. Enhance the natural environment through targeted delivery of green infrastructure programmes that improve and expand the biodiversity and landscape quality of the Bold Forest Park area.

Supplemented with:

6. Create quality outdoor space with opportunities for physical activities and positive use of green space to improve mental health and wellbeing of the local community and visitors.

The vision, aims, objectives and Policies for the Forest Park demonstrate that the rural economy, that the Park promotes, principally the visitor economy and the natural environment and open spaces in which it resides are intrinsically linked. One example of this is the development of the equestrian sector within the Bold Forest Park. Evidence gathered to support the Bold Forest Park Area Action Plan, '*strongly suggests that the initial focus for the Forest Park Economy should be to develop facilities and infrastructure which.... Develop the local equestrian businesses.*'<sup>4</sup> The equestrian business within the Forest Park falls within both category b. of the **NPPF Paragraph 83**, as a land based rural business and category c. as a rural

---

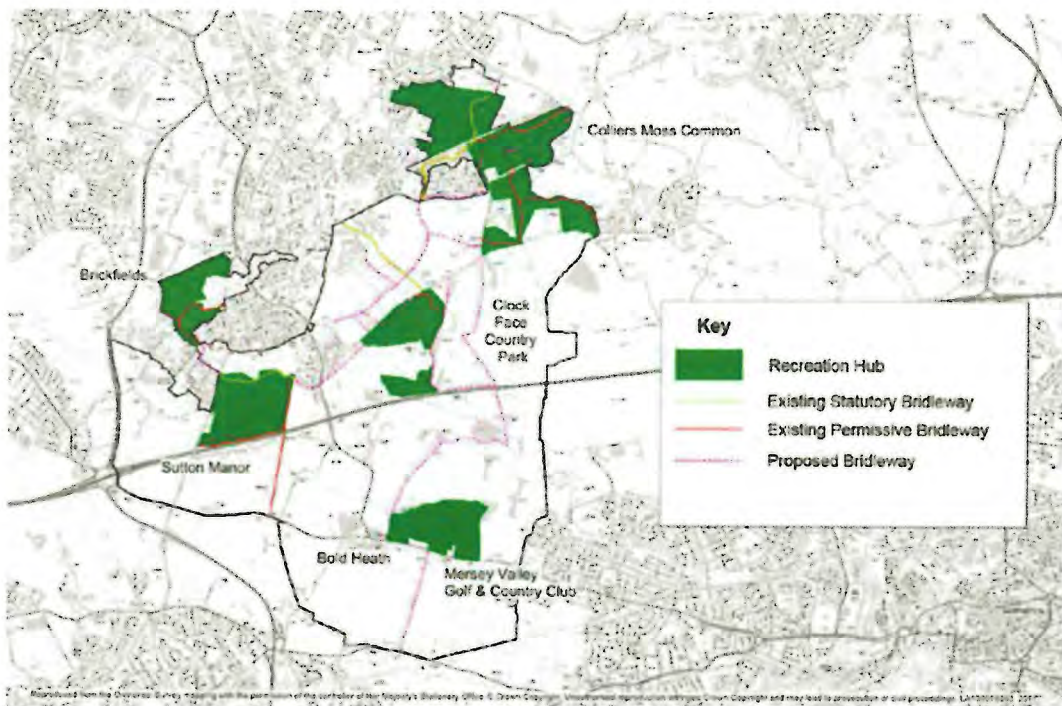
<sup>3</sup> St. Helens Borough Local Plan 2020-2035 Submission Draft January 2019, Page 30

<sup>4</sup> Bold Forest Area Action Plan, Adopted 2017, Page 13



tourism and leisure development that respects the character of the countryside. The sector relies heavily on the natural environment and open spaces both as a natural resource for stabling, horse pasture and hay cropping but also as an environment for the physical leisure pursuit of off road riding, potential eventing and the riding school. The open space where these activities take place is sufficiently separated from other areas so as not to compromise the safety of visitors through the clash of other planned activity routes such as mountain biking. In this instance Paragraph 82 of the NPPF should apply due to the specific locational requirements of the different sectors. The British Horse Society in 2014 estimated the annual expenditure at £33 million<sup>5</sup> and suggested businesses in St Helens and the Bold Forest Park in particular, were best placed to benefit from the development of a three day “Mersey Circular” event. The proposed development site 4HA, entirely covers the open space that supports and will allow this key sector to further expand and develop. To allow this site to be removed from Green Belt protection and be allocated for housing development will directly result in the closure of at least one large business within this sector and have a significant effect on the viability of a second. The visitor numbers that this sector attracts will be impeded not only by the closure of these businesses but the loss of the open space allowing for the safe pursuit of this activity. The reduction in visitor numbers will have a detrimental secondary impact on many supporting businesses within the area including a local independent public house and restaurant.

**Figure 1. Existing and Proposed Bridleway Network<sup>6</sup>**



<sup>5</sup> The Equine Economy of the Mersey City Region, Hackett K., British Horse Society, 2014

<sup>6</sup> Bold Forest Park Area Action Plan, Adopted 2017, Page 42



PO0669

WF0037

① LPA01

④ LPA04

⑦ LPA05.1

② LPA02

⑤ LPA04.1

⑧ LPA06

③ LPA03

⑥ LPA05

⑨ LPA07

**Representor Details**

Web Reference Number	WF0037
Type of Submission	Web submission
Full Name	mr mark railton
Organisation	
Address	The old poultry farm, 29 Rookery Lane, Rainford, St helens WA11 8EF
Agent Details	

⑩ PARA

1.7.2 DHC

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

There are no exceptional circumstances to justify not using the standard method to calculate housing need

The economic analysis is flawed and based on over-optimistic assumptions

②



The level of land needed for housing and employment is therefore not as high as set out in the Plan

There are therefore no exceptional circumstances to change Green belt boundaries

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

1.7 Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth.

#### 7. Please set out modification(s) you consider are necessary

There are no exceptional circumstances to justify not using the standard method to calculate housing need

The economic analysis is flawed and based on over-optimistic assumptions

The level of land needed for housing and employment is therefore not as high as set out in the Plan

There are therefore no exceptional circumstances to change Green belt boundaries

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

The Council has identified a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. These figures are in addition to any new dwellings needed to replace demolition losses.

The brownfield land register 2017 identifies enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield, at an average build out rate of 40 per hectare this equates to 35 hectares should be required.

In the Local Plan Preferred Options (LPPO) consultation in 2016/17, the Council proposed to release 51 sites (totalling about 1,187 hectares in area) from the Green Belt to meet future needs for housing and employment development. The current proposals (set out in the LPSD 2019) would result in 27 fewer sites and around 492 hectares less land being released from the Green Belt to meet development needs. I am at a loss as to why 695 hectares is being allocated to housing and employment when only 35 hectares would be required to meet the forecasted housing demand? I can see that a contingency of 20% has been included in the capacity of land removed from the Green Belt as an allowance for the fact that some sites may not be developed as quickly as expected. This seems excessively high, would a more realistic and sensible approach be to allocate 5%, to encourage brown field land to be delivered before greenbelt land is released.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.



I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

#### Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "as far as practicable" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes. I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

#### Policy LPA03: Development Principles

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

#### Policy LPA04 Strategic Employment Sites



PO0670

SIR SHA

WF0068

① LPA01

④ LPA04

⑦ LPA05.1

⑩ LPA07

② LPA02

⑤ LPA04.1

⑧ S.A.

⑪ PAR 1.7.2

③ LPA03

⑥ LPA05

⑨ LPA06

DEC.

**Representor Details**

Web Reference Number	WF0068
Type of Submission	Web submission
Full Name	Mr Mark Railton
Organisation	
Address	29 Rookery lane Rainford, St helens WA11 8EF
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.
- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed for housing and employment is therefore not as high as set out in the Plan
- There are therefore no exceptional circumstances to change Green belt boundaries

②



J) Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

K) The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

L) Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth.

## 7. Please set out modification(s) you consider are necessary

### LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for to the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible" this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

### Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "as far as practicable" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes. I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

PO0671



**Representor Details**

Web Reference Number	WF0221
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey WA5 3RH
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Policy LPA04.1, Statagic Employment Sites
Paragraph / diagram / table	Section 4.13
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Bold Forest Park Area Action Plan, Adopted July 2017

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

From consulting the National Planning Policy Framework (NPPF, last updated 19th February 2019, especially paragraphs 133 -147) I read that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also explicitly states that once established Green Belt boundaries should only be altered in 'exceptional circumstances' and that these "Very special circumstances" will not exist unless any potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." The Draft Local Plan (St Helens Borough Local Plan 2020-2035: Proposed Submission Draft, December 2018) includes a proposal to allow the extension of the Omega industrial site west into the eastern side of Bold Forest Park (in the report, designated as Area 1EA, comprising 31 hectares), which is currently part of the St Helens Green Belt. I consider that the proposed change is unsound because of a lack of justification for the required 'exceptional circumstances' needed to allow conversion of Green Belt land – in this case farmland - to industrial use. This change to a secure, well-established, Borough, County, and mature tree-lined Green Belt boundary is being proposed to meet projected future employment requirements for Warrington, adjacent to St Helens. Warrington currently has a net 14,000 commuters coming into the borough each day so is not generally short of employment opportunities for its population, and is presently using up the vast potential of the Omega South employment area land with both warehouses and housing, suggesting that their



priority is not to create significant additional employment within the Borough. In the future, this proposed change could make a small contribution to Warrington's employment numbers, but it is insignificant compared with all the many and various opportunities proposed within Warrington itself, with an available land area consisting of hundreds of hectares in total. In addition, Warrington is having to compete with other areas in the north west of England such as Haydock, Heywood, Middlewich and Knowsley for warehouse business. It is, therefore, unclear how an argument of 'exceptional circumstances' might be made for this proposed change from farmland to warehousing at this location. 01

The proposed area 1EA is within Bold Forest Park. Removal of this land from Green Belt goes against the stated aims of the Bold Forest Park Area Action Plan that was signed by St Helens Council in 2017 after significant work to look at all aspects of environmental value and protection and enhancement of the area. (In the AAP Technical Report, the land 1EA is shown as Medium/High sensitivity [Section 2.3.7] – the highest category given, and also as 'Conserve/Enhance' in Figure 9. The designated nature conservation site of Booth's Wood would be right on the edge of the proposed area 1EA, removing the protecting buffer such that the industrial site would run right up against the TPO'd trees and the boundary of the original mediaeval deer park.) 02

Since the numbers quoted in the Draft Local Plan apparently demonstrate that this area of farmland is not needed to meet St Helens employment requirements, it would appear that the anticipated benefit that could arise from this proposed industrial extension would be in the form of a relatively small amount of additional Council revenue (70% of which would go to St Helens, 30% to Warrington). Set against this is the damage done to the agricultural land of Bold Forest Park and the rest of the Park countryside by having the intended warehouses on its eastern side. In addition, even more traffic and air pollution will be generated in the west Warrington area from the increased diesel lorry traffic. Local Warrington residents will be affected by the increased pollution, noise and congestion. 03

In the documentation for this proposal to remove area 1EA from the Green Belt, there is a general statement, as made for other areas under consideration, that there are people living within 1km of the area who are in the bottom 20% of the economic scale. If this statement is considered to have any particular significance, it should perhaps be noted that the population on and around this southeast side of the Bold Forest Park countryside area is of very low density apart from the extensive Warrington-based Lingley Green and Whittle Hall areas of Great Sankey, which comprise mostly of new modern three- and four- and five- bedroom detached houses. If the report is suggesting as a justification that there may be a potential employment opportunity for any nearby population in St Helens, it should be noted that, in practice, the M62 cuts these populations off such that they are at least 8km away by road and about 1.5 hours away by existing public transport from this area (using information from Google maps in March 2019). 04

In the event that such a development is allowed to proceed, the documentation does not contain any information e.g. under 'Requirements' that might help mitigate the environmental damage done to Bold Forest Park. This seems to have been considered for certain other sensitive areas, but was this considered here? Many of the trees and woods in the Bold Forest Park area probably date from the first half of the 18th century when the new Bold Hall was built, when they lined the original driveway – and many are now protected by TPOs. There is a variety of wildlife and under the St Helens AAP there is the intention to increase tree cover by 10% in this area. However, the generally open aspect of the farmland means that once the current strong treelined boundary is breached, the whole area across to the St Helens conurbation from the Warrington boundary would be visible to the development. The development at Omega South is currently well screened from the St Helens Green Belt area by mature trees along the County and Borough boundary. 05

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 06

PO0672



**Representor Details**

Web Reference Number	WF0248
Type of Submission	Web submission
Full Name	Mrs Catherine Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08



PO0673

**Representor Details**

Web Reference Number	WF0249
Type of Submission	Web submission
Full Name	Mr Brendan Houlihan
Organisation	
Address	68 Ecclesfield Rd Eccleston St Helens WA10 5NB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 0
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

PO0674



**Representor Details**

Web Reference Number	WF0250
Type of Submission	Web submission
Full Name	Mr Richard Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

No

**3. To which part of the Local Plan does this representation relate?**

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

**7. Please set out modification(s) you consider are necessary**

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08



PO0675

**Representor Details**

Web Reference Number	WF0313
Type of Submission	Web submission
Full Name	Mrs Ann-Marie Barrow
Organisation	
Address	11 Lynton Way Windle St. Helens WA10 6EQ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

This version of the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council

PO0676



**Representor Details**

Web Reference Number	WF0346
Type of Submission	Web submission
Full Name	Mrs Elizabeth Graner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA10 4EY
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- 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.

01

02

03

04

05

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -



PO0677

**Representor Details**

Web Reference Number	WF0347
Type of Submission	Web submission
Full Name	Mr Alan Garner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA104EY
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- 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.

01

02

03

04

05

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

PO0678

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
---------------	---------------------

PO0679

**Representor Details**

Web Reference Number	WF0436
Type of Submission	Web submission
Full Name	Ms Sarah Byrne
Organisation	N/A
Address	9 Amanda Road, Rainhill L35 8PN
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA01, LPA02, LPA05, LPA06, LDP01
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

I am unable to comment if the Local Plan is legally compliant as I am not legally trained. I would have selected 'Don't Know' if that was available. However, I do believe that the plan is contradictory throughout - please see below.

LPA01 and LPA02: —

Points 2 and 4 of this Policy refer to the development providing necessary infrastructure and services, and that the development will be sustainable or made to be sustainable. Infrastructure and services such as doctor and dentist surgeries, schools, hospitals and roads (particularly Warrington Road) are already oversubscribed — I do not see how the development will be sustainable or be made to be sustainable if this is the case given austerity cuts, particularly to the NHS. Additionally, the ageing population of Rainhill does not correlate with the proposed need for more housing to be built; care homes and local authority are services are already at maximum capacity, hence the rise in council tax to accommodate this.

Point 8 of this Policy refers to the quality of life, health and well-being for residents. I disagree with this point. As stated above, doctor and dentist surgeries, schools, hospitals and roads (particularly Warrington Road) are already oversubscribed — I do not see how the development will be sustainable or be made to be sustainable if this is the case given austerity cuts, particularly to the NHS. I believe the development will add to an already strained NHS, and in the long term will impact the physical and mental health of residents, in addition to the staff having to provide these services.

PO0680



**Representor Details**

Web Reference Number	WF0445
Type of Submission	Web submission
Full Name	Mr Paul McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Yes
Paragraph / diagram / table	
Policies Map	Areas 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

01

02

03

04

05

06

07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- 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 3:12:06 PM
---------------	----------------------

PO0681



**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.

01

02

03

04

05

**7. Please set out modification(s) you consider are necessary**

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

06

07



- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- 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
---------------	----------------------

PO0682



CPRE Lancashire response  
jackie.copley  
to:  
planningpolicy  
13/03/2019 09:20



# 1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

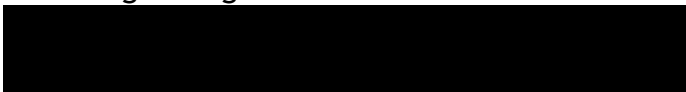
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

**Jackie Copley MRTPI MA BA(Hons) PgCert**  
Planning Manager



## Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

CPRE Lancashire is a Company Limited By Guarantee registered in England, No. 5291461

Registered Charity Number: 1107376

*This email and any files transmitted with it are confidential and intended for the addressee(s) only. If you are not the intended recipient any disclosure, distribution, copying or printing is strictly prohibited. If you have received this email in error please notify the sender. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of CPRE Lancashire. Finally, this email and its attachments have been checked for viruses before submission, however the recipient should also check for the presence of viruses. CPRE Lancashire accepts no responsibility for any damage caused by any virus transmitted by this email.*



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

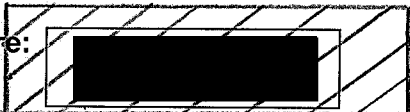
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
--	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough 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 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 type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

- 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; and
- d) Consistent with national policy – there are some policies in conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

See specific policy reference below.

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.

### LPA01 Presumption in Favour of Sustainable Development

We strongly support Policy LPA01 Presumption in Favour of Sustainable Development, as this is what CPRE campaigns to achieve, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to our beloved rural land. There is so much benefit from our countryside for everyone, that we should not sacrifice it so easily.

CPRE is not a NIMBY (Not in My Back-Yard) organisation. We 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. However, we previously recommended a definition of sustainable development be included in LPA01. We continue to urge for a definition to be included to make sense of what actually is 'sustainable development'. We recommend the Brundtland Report 1987 definition: *"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs"*. It contains two key concepts:

- the concept of "needs", in particular the essential needs of the world's poor, to which overriding priority should be given; and
- the idea of limitations imposed by the state of technology and social organization on the environment's ability to meet present and future needs."

We also recommend the deletion of the wording of *"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible"* as this form of wording will limit the development management function of the Council in the future. This is because 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, CPRE Lancashire is concerned that the planning team will not have the capacity to do this sufficiently and as a result 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. Yet, we are 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. We explain the planning reasons more fully under appropriate policy headings.

PO0683



ELOOS 6



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
 Dan Ingram  
 to:  
 planningpolicy@sthelens.gov.uk  
 11/03/2019 13:18

1 Attachment



26800.A3.DI.DM - St Helens LP Submission Draft Reps - Travers Farm, Bold 190311 with Appendices.pdf

To whom it may concern,

Please find attached a copy of representations, including Vision Statement, prepared by Barton Willmore on behalf of our Client, Andrew Cotton and Family, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan Ingram  
 Senior Planner

Consider the Environment, Do you really need to print this email?

The information contained in this e-mail (and any attachments) is confidential and may be privileged. It may be read, copied and used only by the addressee, Barton Willmore accepts no liability for any subsequent alterations or additions incorporated by the addressee or a third party to the body text of this e-mail or any attachments. Barton Willmore accepts no responsibility for staff non-compliance with our IT Acceptable Use Policy.

① - GEN

② - Spatial Vision

③ - Objective 4

④ - key Diagram

⑤ - LPA01

⑥ - LPA02

⑦ - LPA03

⑧ - LPA04

⑨ - LPA04.1

⑩ - LPA05

⑪ - LPA05.1

⑫ - LPA06

⑬ - LPA08

⑭ - LPA09

⑮ - LPC01

⑯ - LPC02

⑰ - LPC07

⑱ - LPC09

⑲ - Appendix 5



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

EF0176

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: ANDREW	First name: DAN
Last Name: COTTON	Last Name: INGRAM
Organisation/company:	Organisation/company: BARTON WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

Signature: [Redacted]	Date: 13/03/19
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐



# Please use a separate copy of Part B for each separate comment/representation.

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



---

# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on Behalf of Andrew Cotton and Family

March 2019

### 3.0 SUBMISSION DRAFT POLICIES

#### **Policy LPA01: Presumption in Favour of Sustainable Development**

- 3.1 Policy LPA01 of the New Local Plan sets out the Council's approach to sustainable development for the plan period. The Plan outlines at 4.3.2 that the operation of this Policy will be guided by Paragraph 11 of the National Planning Policy Framework (2018).
- 3.2 Whilst the Policy follows the broad thrust of the NPPF it introduces additional wording and tests which are not present within Paragraph 11 of the NPPF, for example at Point 2 of the Policy which outlines that planning applications which accord with the Local Plan will be approved without delay unless material considerations indicate otherwise. The material considerations test is no longer included within Paragraph 11 of the NPPF and in this regard the Policy is inconsistent with the NPPF.
- 3.3 Furthermore, the Policy does not allow for a balance to be struck between benefits and harm, this is outlined within Paragraph 11 of the NPPF and again Policy LPA01 is inconsistent with national planning policy in this regard.
- 3.4 Our Client is concerned that the principles of sustainability advocated by Policy LPA01 do not accord with those outlined within the NPPF and would therefore object to this Policy on these grounds. Our Client considers that the Policy should be compliant with the provisions for sustainable development as outlined within the NPPF but considers that should this be the case, the Policy would not need to be included within the Plan as it would just be repeating the contents of the NPPF. On this basis, it is recommended that Policy LPA01 be removed from the Plan altogether.

#### **Policy LPA02: Spatial Strategy**

- 3.5 This policy sets the Council's overall strategy for new development in St Helens over the New Local Plan period. Key aims of the Plan are: to support the continued regeneration of St Helens and other key settlements; ensure that the scale, nature and location of development is appropriate and sustainable; encourages the use of brownfield land; identifies land for release from the Green Belt (and safeguarded) to ensure that identified development needs (and future development needs) can be delivered in full; focusses strategic employment in accessible locations; support the function and role of St Helens Town Centre, and other local centres; support the wellbeing and health of residents, workers and visitors; and protect and develop existing transport infrastructure.

## 5.0 CONCLUSIONS

5.1 These representations have been prepared and submitted by ~~Barton Willmore on behalf of our Client, Andrew Cotton and Family.~~

5.2 Reflecting on the comments made in these representations, our Client is supportive of the approach applied by the Council to the following:

- The Vision and Plan objectives, in our Client's view broadly reflect national planning policy, and provide for a commitment to the fulfilment of deliverable yet aspirational social and economic goals, our Client does however consider that the delivery of Bold Forest Garden Suburb should be included both within the Vision and as a Strategic Aim in its own right; ①
- The Key Diagram, subject to the Bold Forest Garden Suburb being identified in its own right; ②
- Policy LPA03, establishing the broad development principles for the Borough; ③
- The decision by the Council to pursue the delivery of a minimum of 215 hectares of employment land during the Plan Period; ④
- The decision by the Council to include our Client's land interest in the key housing allocation within the Plan; ⑤
- The decision by the Council to identify land for release from the Green Belt for housing and employment and additional safeguarded land to meet future needs; and ⑥
- The provision of flexibility within housing policies to allow for lower provision than policy requirements if necessary on account of viability. ⑦

5.3 Despite these observations, our Client cannot at this stage provide their full endorsement of the New Local Plan as providing a sound planning document. There are a number of areas, as outlined below, which remain a cause of concern for our Client:

- Our Client considers that policy LPA01 should be removed from the Plan in its entirety as it only replicates National Planning Policy; ⑧

PO0684



EF0008



St Helens Local Plan - Representations OBO Parkside Regeneration LLP  
 William Mulvany  
 to:  
 planningpolicy@sthelens.gov.uk  
 04/03/2019 12:14

①-LPA02

②-FIGURE 4.1

③-FIGURE 4.2

④-LPA04.1

⑤-LPA10

⑥-APPENDIX 5

## 9 Attachments



lpsd-representation-form Policy LPA02.pdf lpsd-representation-form Policy LPA04.1.pdf



lpsd-representation-form Policy LPA04.pdf lpsd-representation-form Policy LPA10.pdf



lpsd-representation-form Appendix 5.pdf Parkside Masterplan red.pdf Parkside Rail Safeguarding red.pdf



FPC-ARP-XX-XX-FN-RX-00001 red.pdf 2018-09-14 Arup Feedback on AECOM Rail Technical Note.pdf

Dear Planning Policy

Please find attached representations to the Submission Draft Local Plan that are submitted on behalf of our client Parkside Regeneration LLP.

Please acknowledge safe receipt.

Kind regards

WILL MULVANY

Associate: Chartered Town Planner  
 BSc (Hons), MA, MRTPI



Junction 41 Business Court, East Ardsley, Leeds, WF3 2AB



**RTPI**

Chartered Town Planner



**RIBA**

Chartered Practice

**THE ACADEMY  
OF URBANISM**



SMARTER  
PLANNING  
CHAMPION



Scanned By Trend Micro Hosted Email Security (Mon Mar 4 12:14:25 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	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Will
Last Name:	Last Name: Mulvany
Organisation/company: Parkside Regeneration LLP	Organisation/company: Spawforths
Address: C/O Agent	Address: Junction 41 Business Court, East Ardsley, Leeds
Postcode:	Postcode: WF3 2AB

Signature:

Date:

4 March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Please note we are unable to accept faxed copies of this form.

## FURTHER INFORMATION

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**



## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy	LPA02	Paragraph / diagram / table		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	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

It is considered that the Local Plan is sound and legally compliant in principle in respect of the Spatial Strategy as set out at Policy LPA02. In particular, our client **supports** development at the former Parkside Colliery as a transformational employment opportunity that will make a major contribution to the economic development of St.Helens Borough, the Liverpool City Region and beyond.

However, our client **conditionally objects** to the supporting Figures 4.1 Key Settlements Plan and 4.2 Key Diagram in respect of the Parkside East site area, specifically the rail safeguarding area on the Parkside West allocation. The alignment is incorrect and needs to reflect the alignment identified in the live planning application for Phase 1 of redevelopment of the former Parkside Colliery.

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend the rail safeguarding area for Parkside East on Figures 4.1 and 4.2, alongside the Policies Map to reflect that promoted by the site owners and attached to these representations.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	-------------------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Our client is the owner of the former Parkside Colliery (Allocation 8EA). It is allocated for employment development in the Local Plan as a key transformational employment site. It is one of the key allocations within the Local Plan and it is important that any considerations in respect of the spatial strategy, particularly where these may impact on delivery of the Parkside scheme, provide an opportunity for discussion and response through the Inspector.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

PO0685

EF00009



St.Helens Local Plan 2020-35 - Representation / Comment Form - 8HA Rainford

Swift, Susan M

to:

planningpolicy@sthelens.gov.uk

07/03/2019 13:07



1 Attachment



Mrs M MORGAN - Comments form for 8HA - St Helens Local Plan - March19.pdf

Dear sir / madam

please find enclosed by comments form in response to the development proposal for 8HA Rainford

Regards

Marian Morgan

Site 8HA

① - LPA02

② - LPA04

③ - LPA07

④ - LPA01





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: MARIAN	First name:
Last Name: MORGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 101 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

08/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**



## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy	LPA02	Paragraph / diagram / table	4.4 4.6.10 3.2	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	3.5.7 4.10 4.4 4.3 3.3.30	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)								

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

This Local Plan is not Legally Compliant or sound as the proposal to remove 8HA is contrary to the statements within Policy LPA02.

The proposal for removal of Green Belt in Rainford on site 8HA fundamentally breaches NFFP policy, and fails to meet the conditions required for the selection of land for removal, and is needed for the preservation of open countryside in Rainford from encroachment.

Selecting 8HA is contradictory to the NFFP policy, as 8HA would be an inappropriate use of Green Belt as there are no exceptional circumstances in Rainford or St.Helens for its removal.

St.Helens is a borough with a falling population and house prices below the national average, and Rainford already has a large number of affordable family houses on the market for sale. Green Belt land was created to prevent urban sprawl & over development & it has served its purpose well within the Rainford area.

This proposal in the Local Plan would undo all this good work over many years.

St.Helens Council own register shows that there is enough brownfield land within St.Helens for 5,818 houses, that would support the Council's housing supply for nearly 12 years.

St.Helens Council want to build 486 new houses per year in the borough, but latest figures from the Office for National Statistics shows St.Helens only needs 383 houses per year.



The Green Belt around Rainford should be maintained for Agricultural purposes and the rural economy in Rainford.

This would protect future farming employment to locally grow our own food, with Brownfield sites used as alternative locations of proposed developments as stated within policy LPA02.

Affordable housing is only likely in St. Helens where the housing density can be increased to provide affordable housing units per hectare & public transport is more readily available for low income families as public transport is not frequent or reliable enough to hold down a full-time job.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove 8HA from the Local Plan as it currently breaches NFFP policy.

There is no very special circumstances to release this A1 Agricultural land from the Green Belt in Rainford, and would not hold up in a court of law if challenged on this point

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

PO0686



① - LPA05    ② - Para 1-7.2 DTC  
③ - LPA06, 8HS    ④ - LPA02

Page 1 of 1  
EFO015



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

wendy gore

to:

planningpolicy@sthelens.gov.uk

10/03/2019 19:05



1 Attachment



lpsd-representation-form - WG.doc

Dear Sir/Madam,

Please find attached my completed comment form.

Yours faithfully

Wendy Gore



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Wendy	First name:
Last Name: Gore	Last Name:
Organisation/company:	Organisation/company:
Address: Laurel Cottage 2 Catchdale Moss Lane Eccleston St Helens	Address:
Postcode: WA10 5QG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	
------------	--	-------	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)



Yes ☒ (Via Email)

No ☐

Please note - 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	LA05 & LA06	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 <input type="checkbox"/>	No x
Sound?	Yes <input type="checkbox"/>	No x
Complies with the Duty to Cooperate	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: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	x
Justified?	x
Effective?	x
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <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	
There are no exceptional circumstances to justify St Helens Borough Council (SHBC) not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the Housing Need assessment does not use Standard Methodology. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. SHBC are using an older forecast (2014) of 486	



this cannot be justified.

The level of land needed is therefore not as high as set out in the SHBC 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.

SHBC 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 will fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

In respect of the parcel of land defined as 8HS in the SHBC plan. This is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a main thoroughfare for traffic from Liverpool Super port to the M6. This section of the A580 is extremely busy, noisy and polluted with existing traffic, including increasing numbers of cars and Heavy Goods Vehicles.

The roads adjacent to the A580 on the Eccleston village side are narrow and cannot accommodate the extra cars that a further 1000 houses will generate and pedestrian safety has not been considered.

[REDACTED] Catchdale Moss Lane is 230 metres from the junction of the A580 and during the last year there have been numerous road traffic accidents on the busy A580 within 500 metres of our home. Unfortunately two of the accidents in the last year involved two fatalities one at each accident. One was at the junction of Catchdale Moss Lane with the A580 and the other was at junction of Houghtons Lane with the A580. Houghtons Lane junction is where it is proposed, in the SHBC plan, at 8HS, that 1000 houses be built on land which is currently greenbelt. These junctions are notoriously bad junctions and historically have incurred road traffic accidents involving fatalities on the A580 due to the heavy traffic using the busy A580. If SHBC plans to build 1000 houses at 8HS goe ahead and the subsequent traffic increase, then the incidence of road traffic accidents and potential for further fatalities is inevitable.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the SHBC Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There are no exceptional circumstances under which this parcel of land should be removed from the green belt and be 'safeguarded'. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use within the plan. It cannot be sound policy to sacrifice Green Belt and productive farmland whilst leaving other sites, including that in St Helens town centre, to further decay and decline. These sites should be developed and built upon before Green belt is considered for use as they have good public transport, bus and train connections to Liverpool, Manchester and beyond to employment areas. The parcel of land at 8HS is not well serviced by public transport. The train stations are over 3 miles away. The current bus routes do not connect Eccleston and Windle, where 8HS is situated, with employment areas.

The 8HS site has Windle Brook running through it. This lies on a flood plain and any development needs to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and



there is nowhere to build them within the area of 8HS.

3

The SHBC plan does not address essential areas for the need for infrastructure, roads, education, public transport, health and policing requirements for an increased population. It instead concentrates on house building and low skilled employment.

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.

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

***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>No</b> , I do not wish to participate at the oral examination	<b>Yes</b> , I wish to participate at the oral examination
--	--

1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 26

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

PO0687



① - LPA05    ② - Para 1.7.2 DTC  
③ - LPA06, 845    ④ - LPA02

Page 1 of 1  
EFO028



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

John Gore

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:59



1 Attachment



2019 03 11 lpsd-representation-form - JG.doc

Dear Sir/Madam,

Please find attached my completed comments form.

Yours faithfully,

John Gore



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

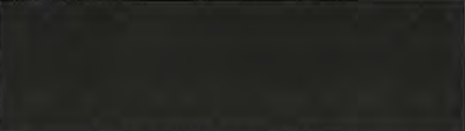
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John	First name:
Last Name: Gore	Last Name:
Organisation/company:	Organisation/company:
Address: Laurel Cottage 2 Catchdale Moss Lane Eccleston St Helens	Address:
Postcode: WA10 5QG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text"/>
--	----------------------------

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	LA05 & LA06	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

**4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No x
Sound?	Yes <input type="checkbox"/>	No x
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No

Please tick as appropriate

**5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	
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

There are no exceptional circumstances to justify St Helens Borough Council (SHBC) not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the Housing Need assessment does not use Standard Methodology. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. SHBC are using an older forecast (2014) of 486



this cannot be justified.

The level of land needed is therefore not as high as set out in the SHBC 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.

SHBC 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 will fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

In respect of the parcel of land defined as 8HS in the SHBC plan. This is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a main thoroughfare for traffic from Liverpool Super port to the M6. This section of the A580 is extremely busy, noisy and polluted with existing traffic, including increasing numbers of cars and Heavy Goods Vehicles.

The roads adjacent to the A580 on the Eccleston village side are narrow and cannot accommodate the extra cars that a further 1000 houses will generate and pedestrian safety has not been considered.

[REDACTED] Lane is 230 metres from the junction of the A580 and during the last year there have been numerous road traffic accidents on the busy A580 within 500 metres of our home. Unfortunately, two of the accidents in the last year involved two fatalities, one at each accident. One was at the junction of Catchdale Moss Lane with the A580 and the other was at junction of Houghtons Lane with the A580. Houghtons Lane junction is where it is proposed, in the SHBC plan, at 8HS, that 1000 houses be built on land which is currently greenbelt. These junctions are notoriously bad junctions and historically have incurred road traffic accidents involving fatalities on the A580 due to the heavy traffic using the busy A580. If SHBC plans to build 1000 houses at 8HS goes ahead and the subsequent traffic increase, then the incidence of road traffic accidents and potential for further fatalities is inevitable.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the SHBC Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There are no exceptional circumstances under which this parcel of land should be removed from the green belt and be 'safeguarded'. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use within the plan. It cannot be sound policy to sacrifice Green Belt and productive farmland whilst leaving other sites, including that in St Helens town centre, to further decay and decline. These sites should be developed and built upon before Green belt is considered for use as they have good public transport, bus and train connections to Liverpool, Manchester and beyond to employment areas. The parcel of land at 8HS is not well serviced by public transport. The train stations are over 3 miles away. The current bus routes do not connect Eccleston and Windle, where 8HS is situated, with employment areas.

The 8HS site has Windle Brook running through it. This lies on a flood plain and any development needs to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and



there is nowhere to build them within the area of 8HS.

The SHBC plan does not address essential areas for the need for infrastructure, roads, education, public transport, health and policing requirements for an increased population. It instead concentrates on house building and low skilled employment.

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.

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

***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>No</b> , I do not wish to participate at the oral examination	<b>Yes</b> , I wish to participate at the oral examination
--	--

11

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

PO0688



Sine 8HS

EF0033



Response to local plan.  
**Iris Wainwright** to: planningpolicy

From: Iris Wainwright [REDACTED]  
To: planningpolicy@sthelens.gov.uk

1 attachment



lpsd-representation-form IW.docx

① - PARA 1.7.2

② - LPA02

12/03/2019 09:04

③ - LPA06

④ - LPA06 - SPECIALIST  
8HS

Hello,

Please find attached my response to the local plan. Please acknowledge receipt.

Regards,

Iris Wainwright.

Sent from my iPad



St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Iris	First name:
Last Name: Wainwright	Last Name:
Organisation/company:	Organisation/company:
Address: 38, Crantock Grove, Windle, St. Helens. Merseyside	Address:
Postcode: WA106EJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

6<sup>th</sup> March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)



Yes ☐X (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**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	LPA02	Paragraph / diagram / table	4.18.10	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				St. Helens borough local plan 2020-2035 green belt review December 2018					

### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### **5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>



6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The "exceptional circumstances" for releasing Green Belt has not been met. Also I cannot find any explanation in the local plan stating why the council think that exceptional circumstances have been met.

It is reassuring to know that the council have a "brownfield first" policy. It states that this will provide 7,817 dwellings which is a considerable amount towards their target. Having read the St. Helens Council "contaminated land inspection strategy" dated January 2017 it states that there are 135.9 square kilometres of contaminated land in the borough. According to table 1 of the document between 2001 and 2015 200 sites per year totalling 3,006 were removed from the inspection list reducing the total from 9,105 sites needing investigating to 6,099 sites remaining. However there does not appear to be a process for moving any sites that have been either decontaminated or were found not to be contaminated onto the brownfield register. It seems inconceivable that none of the remaining sites will become available between now and 2035 and with this amount of sites that could be either low level or not contaminated then the "exceptional circumstances" criteria for releasing green belt surely cannot be met. The total number of Hectares needed to cover safeguarded land is 148. This is tiny (less than 2%) of the remaining total number of hectares of contaminated land.

The following is an extract from the St Helens Council green belt review 2018.

5.11 Overall, the parcels and sub-parcels recommended for allocation in the Local Plan (2020-2035) would provide a combined 2,172 new homes for the Plan period<sup>15</sup>. The safeguarded sites could provide over 2,640 new homes for beyond the Plan period, which when added to new homes on sites included in the Plan as allocations but likely to come forward for construction after 2035, suggests that land for over 5,000 new homes would be available for beyond the Plan period. The allocated and safeguarded sites would therefore be sufficient to meet the housing development needs of the Borough within the Plan period and for a substantial period thereafter.

Based on the above the removing of sites from the green belt and safeguarding them does not meet the exceptional circumstances test. How can it be exceptional when clearly sufficient land exists for the current plan and there is already a supply to cover approximately 2,400 additional dwellings after 2035.

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.

Leave the Green Belt boundary as it is and look to utilise low level contaminated land. Developers are only too willing to spend millions of pounds on green belt land. Surely it is in the council's interests to work with developers in cleaning up large areas of contaminated land. Councillor Long went onto local television that it would cost £40m to clean up areas of contamination in St. Helens. Whilst this is a significant amount for a council it is a small amount when you consider the amount developers are prepared to pay for Green Belt land. Surely cleaning and developing contaminated land benefits every resident of the town and not just a few developers and land owners.

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</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

PO0689

Stn SHS

EFO034

① - PARA 1.7.2

② - LPA02

12/03/2019 10:26

③ - LPA06

④ - LPA06 SPECIFICATION  
SHS.



**Response to local plan .**

**David Wainwright** to: planningpolicy

From: David Wainwright [REDACTED]  
To: planningpolicy@sthelens.gov.uk

1 attachment



lpsd-representation-form DW.docx

Hello,

Please find attached response to local plan

Many thanks.

Sent from my iPad





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: David	First name:
Last Name: Wainwright	Last Name:
Organisation/company:	Organisation/company:
Address: 38, Crantock Grove, Windle, St. Helens. Merseyside	Address:
Postcode: WA106EJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

6<sup>th</sup> March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐X (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.



**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	LPA02	Paragraph / diagram / table	4.18.10	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				St. Helens borough local plan 2020-2035 green belt review December 2018		

### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### **5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>



6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The "exceptional circumstances" for releasing Green Belt has not been met. Also I cannot find any explanation in the local plan stating why the council think that exceptional circumstances have been met.

It is reassuring to know that the council have a "brownfield first" policy. It states that this will provide 7,817 dwellings which is a considerable amount towards their target. Having read the St. Helens Council "contaminated land inspection strategy" dated January 2017 it states that there are 135.9 square kilometres of contaminated land in the borough. According to table 1 of the document between 2001 and 2015 200 sites per year totalling 3,006 were removed from the inspection list reducing the total from 9,105 sites needing investigating to 6,099 sites remaining. However there does not appear to be a process for moving any sites that have been either decontaminated or were found not to be contaminated onto the brownfield register. It seems inconceivable that none of the remaining sites will become available between now and 2035 and with this amount of sites that could be either low level or not contaminated then the "exceptional circumstances" criteria for releasing green belt surely cannot be met. The total number of Hectares needed to cover safeguarded land is 148. This is tiny (less than 2%) of the remaining total number of hectares of contaminated land.

The following is an extract from the St Helens Council green belt review 2018.

5.11 Overall, the parcels and sub-parcels recommended for allocation in the Local Plan (2020-2035) would provide a combined 2,172 new homes for the Plan period<sup>15</sup>. The safeguarded sites could provide over 2,640 new homes for beyond the Plan period, which when added to new homes on sites included in the Plan as allocations but likely to come forward for construction after 2035, suggests that land for over 5,000 new homes would be available for beyond the Plan period. The allocated and safeguarded sites would therefore be sufficient to meet the housing development needs of the Borough within the Plan period and for a substantial period thereafter.

Based on the above the removing of sites from the green belt and safeguarding them does not meet the exceptional circumstances test. How can it be exceptional when clearly sufficient land exists for the current plan and there is already a supply to cover approximately 2,400 additional dwellings after 2035.

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.

Leave the Green Belt boundary as it is and look to utilise low level contaminated land. Developers are only too willing to spend millions of pounds on green belt land. Surely it is in the council's interests to work with developers in cleaning up large areas of contaminated land. Councillor Long went onto local television that it would cost £40m to clean up areas of contamination in St. Helens. Whilst this is a significant amount for a council it is a small amount when you consider the amount developers are prepared to pay for Green Belt land. Surely cleaning and developing contaminated land benefits every resident of the town and not just a few developers and land owners.

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</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

PO0690

Sinc 8HS

Page 1 of 1

EFOOSO



response to local plan  
Debbie Wainwright  
to:  
planningpolicy  
12/03/2019 21:06



1 Attachment



Lppsd-representation formDLW.doc

Please find attached my response to the local plan.

regards,

Debbie Wainwright

① - Para 1.7.2

② - LPA02

③ - LPA06

④ LPA06 - SPECIFICALLY  
8HS



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: Deborah, Louise	First name:
Last Name Wainwright	Last Name:
Organisation/company:	Organisation/company:
Address: 38, Crantock Grove, Windle, St. Helens, Merseyside	Address:
Postcode: WA106EJ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 12 <sup>th</sup> March 2019
-----------------------	-----------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes X ☐ (Via Email)

No ☐



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA02	Paragraph / diagram / table	4.18.10	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				St. Helens borough local plan 2020-2035 green belt review December 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	x <input type="checkbox"/>
Effective?	x <input type="checkbox"/>
Consistent with National Policy?	x <input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or <u>fails to comply with the duty to cooperate</u> . 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 "exceptional circumstances" for releasing Green Belt has not been met. Also I cannot find any explanation in the local plan stating why the council think that exceptional circumstances have been met.</p> <p>It is reassuring to know that the council have a "brownfield first" policy. It states that this will</p>	

②

provide 7,817 dwellings which is a considerable amount towards their target. Having read the St. Helens Council "contaminated land inspection strategy" dated January 2017 it states that there are 135.9 square kilometres of contaminated land in the borough. According to table 1 of the document between 2001 and 2015 200 sites per year totalling 3,006 were removed from the inspection list reducing the total from 9,105 sites needing investigating to 6,099 sites remaining. However there does not appear to be a process for moving any sites that have been either decontaminated or were found not to be contaminated onto the brownfield register. It seems inconceivable that none of the remaining sites will become available between now and 2035 and with this amount of sites that could be either low level or not contaminated then the "exceptional circumstances" criteria for releasing green belt surely cannot be met. The total number of Hectares needed to cover safeguarded land is 148. This is tiny (less than 2%) of the remaining total number of hectares of contaminated land.

The following is an extract from the St Helens Council green belt review 2018.

5.11 Overall, the parcels and sub-parcels recommended for allocation in the Local Plan (2020-2035) would provide a combined 2,172 new homes for the Plan period. The safeguarded sites could provide over 2,640 new homes for beyond the Plan period, which when added to new homes on sites included in the Plan as allocations but likely to come forward for construction after 2035, suggests that land for over 5,000 new homes would be available for beyond the Plan period. The allocated and safeguarded sites would therefore be sufficient to meet the housing development needs of the Borough within the Plan period and for a substantial period thereafter.

Based on the above the removing of sites from the green belt and safeguarding them does not meet the exceptional circumstances test. How can it be exceptional when clearly sufficient land exists for the current plan and there is already a supply to cover approximately 2,400 additional dwellings after 2035.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Leave the Green Belt boundary as it is and look to utilise low level contaminated land. Developers are only too willing to spend millions of pounds on green belt land. Surely it is in the council's interests to work with developers in cleaning up large areas of contaminated land. Councillor Long went onto local television that it would cost £40m to clean up areas of contamination in St. Helens. Whilst this is a significant amount for a council it is a small amount when you consider the amount developers are prepared to pay for Green Belt land. Surely cleaning and developing contaminated land benefits every resident of the town and not just a few developers and land owners.

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</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

***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.**



PO0691



CPRE Lancashire response  
jackie.copley  
to:  
planningpolicy  
13/03/2019 09:20



# 1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

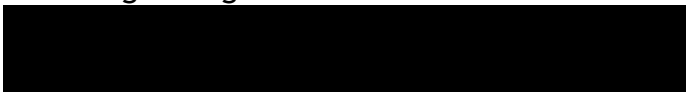
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

**Jackie Copley MRTPI MA BA(Hons) PgCert**  
Planning Manager



## Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

CPRE Lancashire is a Company Limited By Guarantee registered in England, No. 5291461

Registered Charity Number: 1107376

*This email and any files transmitted with it are confidential and intended for the addressee(s) only. If you are not the intended recipient any disclosure, distribution, copying or printing is strictly prohibited. If you have received this email in error please notify the sender. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of CPRE Lancashire. Finally, this email and its attachments have been checked for viruses before submission, however the recipient should also check for the presence of viruses. CPRE Lancashire accepts no responsibility for any damage caused by any virus transmitted by this email.*



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

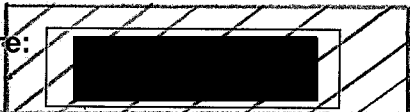
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
--	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough 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 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 type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

**Policy LPA02: Spatial Strategy**

We are pleased to read the re-use of previously developed land in Key Settlements will remain a key Priority in local plan Policy LPA02: Spatial Strategy, as we too strongly advocate a brownfield preference approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. We acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." However, observe that the use of the phrase "as far as practicable" will make LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future. Therefore we strongly urge for this phrase to be deleted, or LPA02 will remain ineffective, if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

CPRE Lancashire strongly opposes Green Belt release. We consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer has an interest in low value farmland being consented for residential use and having responded to the call for sites. Many developers chase land value rises from farmland being allowed for residential use, and they aren't in the least bit bothered about issues such as sustainability, ecology, rural economic sectors. If the developer's land is in a 'sustainable' location and it would constitute 'sustainable development' this would be mutually beneficial to both developer and wider society, but if the land is in a place that is 'unsustainable' then it would be at a cost to society and it should not be allowed.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. Understandably, the loss of Green Belt stirs up strong emotions and CPRE tenaciously defends it. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

CPRE Lancashire supports the policy intention that says: "The quality of life, health and wellbeing of St Helens Borough's residents, workers and visitors and the quality of the natural environment will be supported by:" and we applaud the text in the five supporting bullet points.

**Policy LPA03: Development Principles**

CPRE Lancashire also generally supports Policy LPA03: Development Principles, as we agree places should be inclusive and that deprivation should be alleviated in the future. Similar to our comments to LPA01 and LPA02 we are greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

**Policy LPA04 Strategic Employment Sites**

CPRE Lancashire is strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St Helens, which we regard as unjustly excessive. We believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of

PO0692



CPRE Lancashire response  
jackie.copley  
to:  
planningpolicy  
13/03/2019 09:20



# 1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

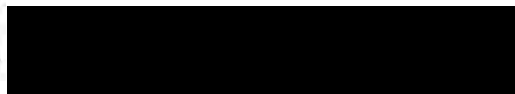
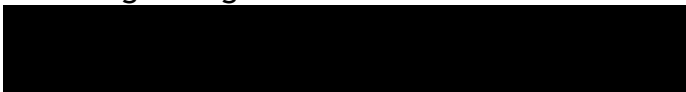
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

**Jackie Copley MRTPI MA BA(Hons) PgCert**  
Planning Manager



## Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

CPRE Lancashire is a Company Limited By Guarantee registered in England, No. 5291461

Registered Charity Number: 1107376

*This email and any files transmitted with it are confidential and intended for the addressee(s) only. If you are not the intended recipient any disclosure, distribution, copying or printing is strictly prohibited. If you have received this email in error please notify the sender. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of CPRE Lancashire. Finally, this email and its attachments have been checked for viruses before submission, however the recipient should also check for the presence of viruses. CPRE Lancashire accepts no responsibility for any damage caused by any virus transmitted by this email.*





St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

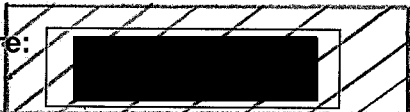
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
--	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough 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 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 type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

employment property and have an adverse effect on the property market. It would lead to widespread vacancy. We think the data in Tables 4.2, 4.3 and 4.4 is inaccurate.

Our view is supported by the expert opinion of economist Dr. Glenn Athey, who was commissioned by St Helens Green Belt Association (an umbrella residents group opposed to Green Belt loss). In his report, Dr Athey concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts has 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 a number of other assumptions underpinning employment land policies, including forecasts of port freight. In light of Dr Athey's expert opinion, CPRE Lancashire calls for the Council to 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. CPRE Lancashire calls for the economic data, analysis to be corrected.

This is particularly the case when considering the fact that all surrounding geography in Liverpool City Region, Greater Manchester, Cheshire and West Lancashire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland for development, which is important for future food security, and is currently protected by Green Belt designation on the basis of economic analysis that is flawed and consequently not fully justified. Some of the land so allocated is among the most versatile in the country. 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. CPRE Lancashire is 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.

In any case, what is the local benefit of B8 Warehousing formats with new technology replacing human resources resulting in very low density employment formats, causing great harm to Green Belt purpose? We think there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, and question the need for such an excessive amount in the countryside. The duty to cooperate has not been complied with on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities, resulting in 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. CPRE Lancashire believes local planning of large warehousing formats should be in accordance with promises by Government to protect Green Belt.

#### **Policy LPA04.1: Strategic Employment Sites**

CPRE Lancashire is opposed to needless release of Green Belt land for employment uses. Previously we raised concern over 2EA, 4EA, 7EA, and 8EA (LPA10), but we reserve the right to comment on other employment sites included in LPA04.1 at the examination.

It is supported that planning applications for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

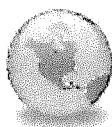
#### **Policy LPA05: Meeting St.Helens Borough's Housing Needs**

In recent years, CPRE has undertaken considerable research to show that housing assessments



PO0693

EF0059/  
01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to:  
planningpolicy SHC Local Plan  
13/03/2019 10:29

Sing

Cc:  
Dave Tyas, Mark Lewis  
Hide Details

From: [REDACTED]  
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>  
Cc: [REDACTED]  
[REDACTED]

3 Attachments



lpsd-representation-form R. Ward PAG Response.pdf



R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm  
Wednesday 13 March 2019

1, Richard Ward, a member of the Parkside Action Group (PAG), submit the following Representation documents as a part of the above local plan public consultation.

As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

Therefore, please find attached the following documents:

1. lpsd-representation-form R. Ward PAG Response.pdf
2. lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf
3. R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

EF0059

01-25



Re: PAG Response to Local Plan Draft Submission

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 10:21

Cc:

Hide Details

From: [REDACTED]  
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>  
Cc: [REDACTED]

3 Attachments



lpsd-representation-form R.Ward PAG Response(Signed Front Page March 2019).pdf



lpsd-representation-form R.Ward PAG Response.pdf



R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm  
Wednesday 13 March 2019

I, Richard Ward, a member of the Parkside Action Group (PAG), submit the following Representation documents as a part of the above local plan public consultation.

As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

Therefore, please find attached the following documents:

1. lpsd-representation-form R.Ward PAG Response.pdf
2. lpsd-representation-form R.Ward PAG Response(Signed Front Page March 2019).pdf
3. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

On 13/03/2019 09:31, Dave Tyas wrote:

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas  
Co-Chair PAG.





St Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by **no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 13/03/2019
-----------------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

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.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No X
Sound?	Yes <input type="checkbox"/>	No X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
Please see documents:	
1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)	
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)	



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see documents:

3. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
4. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	<b>No</b> , I do not wish to participate at the oral examination	<b>X</b>	<b>Yes</b> , I wish to participate at the oral examination
--	--	----------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before 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.**

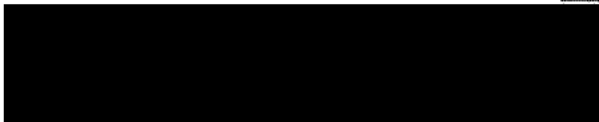
EF0059/01-25  
Policies:- LPA10, LPA04,  
LPA04.1, LPC09, LPC10,  
LPA02, LPC11, LPC12,  
LPC06, LPD09, ~~LPD09~~.  
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



**f. Changes to the St Helens Local Plan Submission Draft January 2019**

SHC have in the Local Plan 2012 approved Policy CAS 3.2 as a Nationally Significant Infrastructure Project, to which the Local People due to the planning rules at that time, have had to accept Policy CAS 3.2. Despite SHC and previous owners/developers, since 1993 when the colliery closed to date, all failed to complete their desires to enhance the need of employment and their claim that the site was of national significance to develop the former Parkside colliery site. Now SHC together with the joint venture group (SHC and Langtree plc) have recently submitted local level applications that fail to comply with Policy CAS 3.2 on several grounds, though the documentation submitted in the planning applications categorically show the applications are interlinked with each other as a much larger project that should be under an overall project a national level application for the whole indicated by figure 9 in Policy CAS 3.2 and by the previous owner Prologis.

The St Helens Local Plan Submission Draft January 2019 has several policies or areas that confirm the SHC intension not to have the Project taken as a whole but in smaller development. The main policy in the main document are:

(SHC Main document text is shown in black; Response Comments are in dark blue)

**4.4 Policy LPA02: Spatial Strategy**

10 6. Parkside West and Parkside East form transformational employment opportunity sites that will make a major contribution to the economic development of St. Helens Borough, the Liverpool City Region and beyond. Development that prejudices their development in accordance with Policies LPA04 and LPA10 will not be allowed.

10  
LPA02  
Site 7EA  
8EA

**Comments on paragraph 4.4 paragraph 6**

Paragraph 6 must be changed written as follows (strikethrough indicates change):

6. Parkside West and Parkside East form transformational employment opportunity sites that will make a major contribution to the economic development of St. Helens Borough, the Liverpool City Region and beyond. ~~Development that prejudices their development in accordance with Policies LPA04 and LPA10 will not be allowed.~~

LPA04 is purely employment figures and LPA10 (7EA) only refers to Parkside East as a SRFI. This means that Parkside west 8EA employment figure is 2351 jobs. As there is no policy for Parkside west to accommodate the figure of 2351 jobs.

Then the Local People change the Parkside west with the Local Peoples Policy LOCAL 10LP.

**Justification**

10 The LOCAL 10LP still accommodates the employment figure of 2351 jobs but the Warehousing B8 is altered to Office and Educational space, With the estimated and expected growth in population in the St Helens and neighbouring areas of Warrington and Wigan, the growth in jobs is not only a concern of the Local People but the government. The population increases in several ways, but not all are ready for the jobs market. That is to say, children under the age of normal employment, require to be educated to their natural abilities and goals. To not cater for the demand in the increase in population



10 without any respect to these educational needs is not very forward looking. This is where the Local People see their platform to shape their surroundings. Not just jobs but education: every parent wants the best for their children and will fight hard to make sure their children are not disadvantaged in any way. Gone are the workhouse days of the 19<sup>th</sup> century and early 20<sup>th</sup> century. Education, Education, Education is the key to the future. Parkside west is a prime location for an educational establishment. 10

Where the former colliery site having been restored totally back to agricultural land, that is proven in documentary evidence. What is known as the 'footprint' of the buildings, that is to say, the residual concrete standing area can accommodate buildings as the concrete has sealed any future use of return to agriculture in the near future. The rest of the former colliery land that was a part of the colliery workings, nature has taken over these areas but can not be used for agriculture yet: Due to the contamination of the ground from benzenes and other aldehydes associated with the coal volatile particulates. With respect to the spoil heaps these are best left untouched due to the inert material removed due to the mining process, where the 14 inches of restoration topsoil now cover, along with the intervening 26 years of natural plant growth has imposed. The mine shafts that are stated to have been backfilled with limestone must have a safe distance so as not to disturb the integrity of the shafts. The rest of what was called Parkside colliery continued to be in agricultural use from 1950's to 1993.

10 This means the Workings and Footprint of the former colliery (not the spoil heaps or shafts) are prime areas where an educational establishment of university standard can be built for the expected growth in population in the St Helens, Warrington and Wigan areas 2020 to 2035 and beyond. The owners of the former Parkside colliery will also profit from this type of development which will be similar to the warehousing scheme they are proposing with less upfront costs and building infrastructure: The Link Road across Parkside West will not be required saving millions of pounds. This does not mean the development of Parkside East can not still be developed. This just needs to be reappraised with the Local People's approval. Which can be discussed with the parties concerned. The remainder of the land which was farmed during the colliery days remain as agricultural land for use of the educational establishment and the public as a country park. Where the development stated above regards Parkside east the Rail Spur land can still be reserved. 10

Policy LOCAL 10LP verses Policy CAS 3.2; Policy PLA10 and LPSD 7EA and LPSD8EA

10 What this proposal justifies over the current Parkside West: Phase 1, Phase 2 and Link Road is that the traffic on the A49 Winwick Road through Newton High Street is not impacted upon to the A580/motorway M6 junction 23, the traffic on the A49 Newton Road through Winwick is not impacted upon to the motorways M6 junction 22 and M62 junction 9. The entrance to Parkside East can still be on the A579, along with Wigan Councils weight restriction on the A579 with penalties along the lines used in London congestion charge, whereby, the SRFI traffic is forced to use the Motorway M6. The A573 will not be connected will be assessed so as to prevent SRFI traffic using the site via this route. This the Local People see as a compromise between jobs as a platform to shape their surroundings. 10

Designated Heritage Assets

18 The Local People see Designated Heritage assets as one important educational asset that is irreplaceable, which must be retained for future generations. The Designated Heritage Assets under threat from the Parkside West site current proposal known as Phase 1, Phase 2 and the Parkside Link Road (PLR) are as follows: 18

Grade II listed Buildings and monuments

St Oswald's Well

Woodhead Farm house

Woodhead Farm Barn

Newton Park Farm house

Newton Park Farm Barn

The above are protected by the Planning (Listed Buildings and Conservation Areas) Act 1990 especially with respect to their "setting", and the NPPF 2018, 16. Conserving and enhancing the historic environment. See paragraphs 184, 185, 193 and 194, due to paragraph 193 stating:

*"This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

This means any harm is not a decision factor as the NPPF states irrespective as paragraph 184 states:

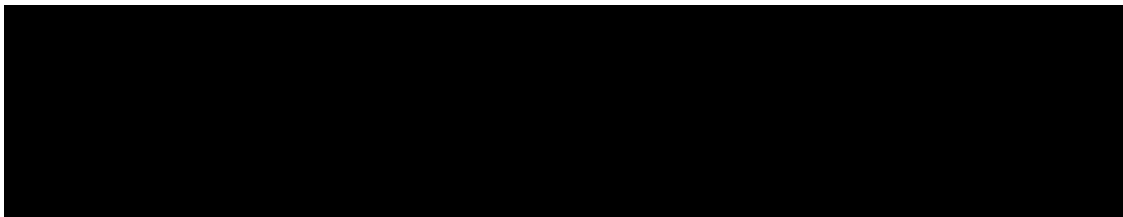
*"These assets are an irreplaceable resource, and should shall be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations."*

18 This means that substantial harm of a designated heritage asset can have harm as the registration process has ruled harm out or else how can future generations apply. So to class a designated heritage asset with a level of harm can not overrule future generations. The only level of harm a designated heritage asset due to the registration process is of the highest level. The only level one can give a heritage asset is to the significance, this is shown in paragraph 194. The listed buildings shown above have a significance of exceptional and therefore the Setting of the Listed building becomes the important factor as detailed in the Planning (Listed Buildings and Conservation Areas) Act 1990. 18

PO0694



St Helens Local Plan: Submission Draft Representations: Mulbury (Warrington) Ltd  
 Shaun Taylor  
 to:  
 planningpolicy@sthelens.gov.uk  
 13/03/2019 14:21



## 5 Attachments



Rep to Policy LPA02-Spatial Strategy .pdf



Rep to Policy LPA05-Meeting Housing need.pdf



Rep to Policy LPA06-Safeguarded Land .pdf



Rep to Policy LPC01- Housing Mix.pdf



Reps Report FINAL (with appendices).pdf

Dear Sir

Please find attached representations in relation to the above on behalf of our client, Mulbury (Warrington) Ltd.

We have submitted representations in relation to Policies:

- LPA02
- LPA05
- LPA06
- LPC01

In addition to the Representations Proformas, please also find attached report that should be read alongside these representations and made available to the Inspector in due course.

I would be grateful if you could confirm receipt of this email and its contents.

Kind regards  
 Shaun



**SATPLAN**  
 PLANNING & DEVELOPMENT

LIVERPOOL • LONDON • NEWCASTLE • MANCHESTER

**Shaun Taylor**  
 Managing Director







This e-mail message and accompanying data may contain information that is confidential. If you are not the intended recipient you are notified that all content is to be treated as confidential unless otherwise specified, and is not to be used, copied or forwarded to third parties without the prior written permission of the author. If you have received this e-mail in error please delete and notify the sender. E-mail is not necessarily secure or error free and it is your responsibility to ensure e-mails are virus free, as SATPLAN LTD does not accept responsibility or liability for any loss or damages arising from the use of this e-mail.



St Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;


**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Andy	First name: Shaun
Last Name: Brown	Last Name: Taylor
Organisation/company: Mulbury (Warrington) Ltd	Organisation/company: SATPLAN LTD
Address: Great Oak Farm Mag Lane Lymm	Address: The Bridgewater Complex 36 Canal Street Liverpool
Postcode: WA13 0TF	Postcode: L20 8AH
Tel No: N/A	
Mobile No: N/A	
Email: N/A	

Signature 	Date: <div>13.3.19</div>
---	--------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy	LPA02	Paragraph / diagram / table	Figure 4.1 (Key Settlements Plan) and Figure 4.2 (Key Diagram)	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or <u>fails to comply with the duty to cooperate</u> . 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

### **Criteria 1 & 2**

Policy LPA02 sets out the Spatial Strategy for the borough. The Policy is clear that growth in St



Helens should be focussed within the Key Settlements. In addition, Figure 4.1 (Key Settlements Plan) and Figure 4.2 (Key Diagram) within the LPSD clearly indicates that Site Ref. 3HS is on the edge of the St Helens Core Area and is therefore a highly sustainable location for future housing development. Paragraph 4.68 further notes that "Land for new development will be identified in sustainable locations, generally within, on the edge of, or close to Key Settlements".

We contend that residential development at Site 3HS is fully in accordance with Policy LPA02 as the site is clearly on the edge of the St Helens Core Area and in a highly sustainable location. The site can deliver a significant element of housing within the plan period (market and affordable homes) and should be allocated within the Local Plan rather than safeguarded – there are no deliverability issues associated with this Site. Whilst it may be reasonable to enable some new housing development to come forward in the outlying areas of the Borough, the Council has taken a disproportionate approach by not allocating the Eccleston Park Golf Course, given its better location and proximity to the urban core and its overall sustainability. For the reasons set out in section 5 of the accompanying representations, the site is sustainable, unconstrained and deliverable and should therefore be allocated to contribute towards the identified housing requirements.

#### Criteria 4

*Criteria 4 is concerned with releasing land from the Green Belt and safeguarding it to allow for longer term housing and / or employment needs to be met after 31 March 2035. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following a full review of this Plan.*

Monitoring the delivery of new homes annually to ensure that there is an adequate supply of new housing in accordance with the Housing Delivery Test and enough supply to provide the relevant 5-year supply plus the appropriate buffer is welcomed. However, should the deliverable housing land supply fall below five years there should be a mechanism by which safeguarded sites can come forward without the need for a full Local Plan Review. Waiting for such a review in the circumstances of there not being a five-year supply would frustrate the delivery of both market and affordable housing and would leave the Council vulnerable in planning appeal situations.

We suggest the policy wording is amended as set out in part 7 of this form. This ensure the policy is positively prepared and flexible.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A new or amended safeguarded land policy is required. We would suggest the following which is a modified version of a similar policy currently in use by West Lancashire Borough Council in their adopted Local Plan:

Safeguarded Sites will be considered for release prior to 2035 if one of the following scenarios applies:

1. Where the Council cannot demonstrate a 5-year deliverable supply of housing (this would apply at any time during the Plan period).
2. If at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from the most sustainably located Safeguarded Sites to make up the extra land supply required to meet the new housing target for the remainder of the plan period.

The Council will need to publish annual Housing Land Monitoring updates and we would advocate these are prepared alongside industry experts perhaps as part of a Housing Market Partnership.

This approach will make the Local Plan sound as it will ensure the Plan is flexible and capable of reacting to a change in circumstances without the need for a review of the Local Plan. This change also better reflects the guidance set out in NPPF and PPG in terms of flexibility, effectiveness and the delivery of housing.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	<b>No</b> , I do not wish to participate at the oral examination	<input checked="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:

It will be necessary to verbally explain the strong planning merits in favour of the Eccleston Park Golf Club site to represent our client's site accurately and provide information as required at EiP to the benefit of the Inspector.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

PO0695





St Helens Borough Local Plan 2020-2035 Representation  
sue lyon  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 16:12



1 Attachment



St Helens Borough Local Plan 2020-2035 Representation.pdf

Please find attached completed representation form, can you please confirm receipt.

Very Best regards

Sue Lyon



Member of St Helens Chamber of Commerce

# 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: MRS

First Name: SUE

Last Name: LLOYD

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: 9/3/19

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.**

## 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	<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?

☐ Yes

☐ No

Sound?

☐ Yes

☒ No

Complies with the Duty to Cooperate

☐ Yes

☒ No

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?

☒

Justified?

☒

Effective?

☒

Consistent with National Policy?

☒

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- Doesn't meet areas needs because there is no infrastructure in place - There is no need for the house - There are no exceptional circumstances to use greenbelt Land.
- Although we have a train station there are no parking facilities Disability or Child Friendly facilities. To go to the other side of the station you have to travel to Brynna & Double back.
- Extra traffic will increase the commute giving less time/worklife balance, additional pollution & the detrimental effect to wildlife.
- Reduce Garwood Residents Quality/Standard of living - No infrastructure extra pollution & Extra travelling time

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 plan would be fairer if NO Greenbelt land was developed until all Brownfield has been used first, as the manifesto states that all greenbelt should be protected.

Urban Sprawl - Greenbelt land is meant to separate towns + villages

There would be no financial benefit for the council as the money they raise in council tax they will ultimately lose in the costs involved in sending the children to Wigan 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.**

PO0696



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
 Hannah Payne  
 to:  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
 13/03/2019 16:22



# 1 Attachment



Representation Form.pdf

Dear Sir/Madam,

Please see attached completed Representation Form and accompanying representations submitted on behalf of Barratt Homes to be taken into consideration as part of the consultation on the St. Helens Local Plan Submission Draft.

Note that we would like to be informed of future progress on the Local Plan and request the opportunity to attend Examination in Public.

We would be grateful if you could confirm receipt by way of a return email.

Kind regards,

Hannah

**Hannah Payne** | Senior Planner



**indigo.**



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



This e-mail (including any attachments) is intended only for the recipient(s) named above.  
 It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person.  
 If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Hannah
Last Name:	Last Name: Payne
Organisation/company: Barratt Homes	Organisation/company: Indigo Planning Ltd
Address:	Address: St James' Tower, 7 Charlotte Street, Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	

Signature:	Date: <input type="text" value="13/03/2019"/>
------------	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## FURTHER INFORMATION

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### **3. To which part of the Local Plan does this representation relate?**

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### **5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see enclosed representation.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see enclosed representation.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
---	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please see enclosed representation.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

# indigo.

St James' Tower,  
7 Charlotte Street,  
Manchester, M1 4DZ

Local Plan  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP

By email

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

let.001.NF..21450010

13 March 2019

Dear Sirs

## ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

### Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

### Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

London • Manchester • Leeds • Birmingham • Dublin

Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E1 1DT  
Registered number 2078863 VAT number 849246134





# indigo.

Every update of the St. Helens Strategic Housing Land Availability Assessment since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. We consider that the policy addresses the housing delivery issues in the borough through a revised spatial distribution and release of Green Belt land for housing. We support this policy but have concerns over the emphasis placed on the delivery of brownfield sites.

02

However, the priority placed on the re-use of previously development land over other allocated sites is not considered appropriate. We question the rationale for lowering the threshold for developer contributions for developers of brownfield sites given it is incorrect to assume developers on greenfield sites have less constraints. As such, each site should be taken on its own merits with developers' contributions subject to viability considerations.

03

At LPA02(4), further clarity should be provided on when a full review of the Plan will be triggered.

04

The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included in LPA02 as health and wellbeing of St. Helens' residents is covered within Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. This part of the policy should therefore be removed.

05

## **Policy LPA03: Development Principles**

On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined.

06

Nonetheless, the development of the Florida Farm South draft allocation supports the development principles identified within this policy. It will provide circa 600 homes; contributing not only towards the boroughs housing target and a sustainable mix and tenures of quality homes but also through direct and indirect investment in the local area. This in turn will contribute towards the borough's regeneration objectives.

07

## **Policy LPA04: A Strong and Sustainable Economy**

The employment target of a minimum of 215.4ha up to 2035 has been reduced from the minimum of 306ha up to 2033 outlined in the Preferred Options Local Plan.

Although this target appears sufficient to meet anticipated need, this figure does not reflect the Spatial Vision and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general.

08

The allocation of employment sites within the Green Belt particularly those along

09

PO0697



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
 Hannah Payne  
 to:  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
 13/03/2019 16:22



# 1 Attachment



Representation Form.pdf

Dear Sir/Madam,

Please see attached completed Representation Form and accompanying representations submitted on behalf of Barratt Homes to be taken into consideration as part of the consultation on the St. Helens Local Plan Submission Draft.

Note that we would like to be informed of future progress on the Local Plan and request the opportunity to attend Examination in Public.

We would be grateful if you could confirm receipt by way of a return email.

Kind regards,

Hannah

**Hannah Payne** | Senior Planner



**indigo.**



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



This e-mail (including any attachments) is intended only for the recipient(s) named above.  
 It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person.  
 If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Hannah
Last Name:	Last Name: Payne
Organisation/company: Barratt Homes	Organisation/company: Indigo Planning Ltd
Address:	Address: St James' Tower, 7 Charlotte Street, Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	

Signature:	Date: <input type="text" value="13/03/2019"/>
------------	---

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 use a separate copy of Part B for each separate comment/representation.**

## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### **3. To which part of the Local Plan does this representation relate?**

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### **5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

### **6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see enclosed representation.

# indigo.

St James' Tower,  
7 Charlotte Street,  
Manchester, M1 4DZ

Local Plan  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP

By email

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

let.001.NF..21450010

13 March 2019

Dear Sirs

## ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

### Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

### Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

London • Manchester • Leeds • Birmingham • Dublin

Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E04 1TX  
Registered number 2078863 VAT number 849246134



# indigo.

Every update of the St. Helens Strategic Housing Land Availability Assessment since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. We consider that the policy addresses the housing delivery issues in the borough through a revised spatial distribution and release of Green Belt land for housing. We support this policy but have concerns over the emphasis placed on the delivery of brownfield sites.

02

However, the priority placed on the re-use of previously development land over other allocated sites is not considered appropriate. We question the rationale for lowering the threshold for developer contributions for developers of brownfield sites given it is incorrect to assume developers on greenfield sites have less constraints. As such, each site should be taken on its own merits with developers' contributions subject to viability considerations.

03

At LPA02(4), further clarity should be provided on when a full review of the Plan will be triggered.

04

The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included in LPA02 as health and wellbeing of St. Helens' residents is covered within Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. This part of the policy should therefore be removed.

05

## **Policy LPA03: Development Principles**

On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined.

06

Nonetheless, the development of the Florida Farm South draft allocation supports the development principles identified within this policy. It will provide circa 600 homes; contributing not only towards the boroughs housing target and a sustainable mix and tenures of quality homes but also through direct and indirect investment in the local area. This in turn will contribute towards the borough's regeneration objectives.

07

## **Policy LPA04: A Strong and Sustainable Economy**

The employment target of a minimum of 215.4ha up to 2035 has been reduced from the minimum of 306ha up to 2033 outlined in the Preferred Options Local Plan.

Although this target appears sufficient to meet anticipated need, this figure does not reflect the Spatial Vision and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general.

08

The allocation of employment sites within the Green Belt particularly those along

09



PO0698



St Helens Borough Local Plan 2020 Representation Form.  
Laura Lyon  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 16:46



1 Attachment



Laura St Helens Borough Local Plan 2020-2035 Representation.pdf

I have attached the St Helens Borough Local Plan 2020 - 2035 Form.

Kind Regards,

Laura

# 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: MISS

First Name: LAURA

Last Name: LYON

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: 13/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - 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		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	✓
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or <u>fails to comply with the duty to cooperate</u> . 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.	
<ul style="list-style-type: none"> <li>No exceptional circumstances to build on greenbelt with St Helens population declining.</li> <li>Does not meet the needs as there is no infrastructure in place to cope with extra housing. We have no dentists, doctors, schools etc full.</li> <li>Will increase the size of the village by 1/3rd, which is excessive.</li> <li>Will create more pollution with extra traffic and with Florida farm around the corner, it will affect residents health.</li> <li>It is a good area for local residents to walk their dogs in the 'countryside' with relative safety if this is built on the only other places are footpaths which are isolated.</li> <li>Damage to wildlife.</li> </ul>	

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Build on Brownfield land first and no building on green belt land until all brownfield has been built on in line with the manifesto to protect 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.**

PO0699





Local Plan Representative Form  
dunc.lee  
to:  
planningpolicy  
12/05/2019 09:40



1 Attachment



representation-form (1).doc

Hi

Please find attached Representation Form St Helens LPSD

Regards

Duncan Lee





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>Mr</u>	Title:
First Name: <u>Duncan</u>	First name:
Last Name: <u>Lee</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>30 Springfield Lane</u> <u>Eccleston</u> <u>St Helens</u>	Address:
Postcode: <u>WA10 5EP</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

12<sup>th</sup> May 2019

Formatted: Superscript

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019** by:

post to:                               **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:       Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:                   [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:**                               [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:**                       01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### **3. To which part of the Local Plan does this representation relate?**

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulation Assessment	<input checked="" type="checkbox"/>
Other documents (please name document and relevant part/section)									

### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> <u>X (No)</u>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> <u>X (No)</u>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> <u>X (No)</u>

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"/> <u>X the plan is based on flawed and unsound methodology</u>
Effective?	<input checked="" type="checkbox"/> <u>No – Plan is undeliverable</u>
Consistent with National Policy?	<input checked="" type="checkbox"/> <u>No – Does not comply with NPPF 2018</u>

### **6. Please give details of why 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 loss of Grade 1 & 2 agricultural land that comprises most of the allocated and safeguarded sites is not mentioned. Neither is the negative impact to farming and distribution jobs.

Increase in traffic proposed in "The Plan" will have a significant impact on air pollution, noise, tranquillity, general health and road safety. Having lived with "upgrade" to Windle Island over the past 6 months, the increase in traffic through the "rat runs" of Eccleston roads has been intolerable, increasing the risk to fellow road users and pedestrians, with the increase in traffic with the proposed plan, this would be on a permanent basis.

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 either missing or vague. There is no indication or reference to collaboration to the Hospital Trust, local CCGs or educational authorities. Local schools are already at capacity, not to mention the strain of the increase in population to the local area would have on doctor's surgeries.

The Council are using old forecasts (2014) for predicted housing need of St Helens which was 486, in a more recent ONS prediction in 2016 it was 383 houses per year.

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.

**There are enough Brownfield or Previously Developed Land sites spread across the borough to accommodate these housing requirements, rather than lumping them all within one area, which would remedy the strain on resources put oin one area.**

Please continue on a separate sheet if necessary

***Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.***  
***After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.***

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	<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.**

PO0700



{In Archive} LOCAL PLAN

roughley pamela

to:

planningpolicy

20/02/2019 20:24



1 Attachment



formECRA.doc

SITE 8HS

① LPA05

② LPA02

③ LPA04

④ LPA06

⑤ IDP

Please find attached a completed Representation Form - my apologies if I have now sent this twice - finger-trouble.

P. ROUGHLEY



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name: P	First name:
Last Name: ROUGHLEY	Last Name:
Organisation/company:	Organisation/company:
Address: 24 MILLFIELDS ECCLESTON	Address:
Postcode: WA10 5NS	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

20/02/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes **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	<b>ALL OF IT</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:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <b>X (NO)</b>
Sound?	Yes <input type="checkbox"/>	No <b>X (NO)</b> <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <b>X (NO)</b> <input type="checkbox"/>

Please tick as appropriate

#### **5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> <b>X (NO) the plan is based on flawed methodology and out-of-date information</b>
Effective?	<input type="checkbox"/> <b>X (NO) the plan is unrealistic and not deliverable</b>
Consistent with National Policy?	<input type="checkbox"/> <b>X (NO) the plan does not comply with NPPF 2018</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

The housing needs 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/yr will be required to meet housing needs in St.helens. The council are using an older forecast(2014) of 486.

The plan does not mention Brownfield and Previously Developed Land that is not (yet)

7 ①  
 7 ①  
 7 ②



available or included on the Brownfield Register.

Economic growth predictions are based on flawed historical information and do not justify the targets included in the plan. There are very few employment opportunities in St.Helens, town centre shops are closing at an alarming rate, even market stall in the various markets are sporting as many empty as used stalls.

The St.helens council statement of "Contaminated Land sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St.helens.

Two Green Belt sites of 56.6 and 148 ha are being reclassified as safeguarded and included in the plan to fulfil housing need – this is less than 7% of the 3,170 ha available, if it were to be remediated. By cleaning up this 7% two Green Belt sites could be released from the "safeguarded" register, thus saving part of the Green Belt. \*\*\*

The St.helens council in conjunction with LCRCA have no policy for bringing unsuitable sites outside the Brownfield register back into use.

It is NOT reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period and are, thus, not being considered.

**THE LOSS OF GRADE 1 AND 2 AGRICULTURAL LAND THAT COMPRISES MOST ALLOCATED AND SAFEGUARDED SITES IS NOT MENTIONED. THIS IS DISGRACEFUL WHEN SUCH LAND IS PLANNED TO BE USED FOR HOUSING WHEN OTHER ALTERNATIVES ARE POSSIBLE – SEE \*\*\* ABOVE.**

Also the negative impact on farming and distribution jobs in a town with high unemployment should be considered as a priority.

The borough has long term intractable problems at Windle Island, Bleak Hill, Skew Bridge, M6 to name a few, and the IDP has not outlined how local and borough-wide road improvements are to be made and funded.

**Indeed, the plan promotes unsustainable traffic growth causing severe traffic problems that will not satisfy the NPPF(2016).**

The IDP fails to explain the impact on HEALTHCARE, EDUCATION, AIR QUALITY AND POLLUTION.

There is no indication or reference that collaboration with the Hospital Trust, local GPs, Dentists, CCGs or education authorities has taken place to obtain their views on the additional loads they will all have to absorb if this plan goes ahead, or how such additional demands will be managed and funded.

The new medical centre at Millfields is almost complete but this has been built to service existing local needs, has extremely limited car parking facilities, and has an inadequate bus service for non-driving residents. Bus services in the area will, therefore, be impacted and need to be reviewed as things now stand, and more so with a future possible influx of thousands of new residents

The IDP acknowledges that there is a high proportion of GPs now over 55. Given that the population increase expected from the Plan requires between 10-16 new GPs plus replacements, how does the IDP propose they will be provided and funded?



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**A urgent review of the housing requirements in St.Helens needs to be completed based on reasonable and up-to-date information, giving full consideration to the current infrastructure and to the steps needed to ensure it is adequate to service the additional housing which is being planned. This should also be supported by plans to enhance the infrastructure where required and a Finance Plan to support the enhancements**

**In addition, a thorough examination of the brownfield and contaminated sites needs to be undertaken, and plans put in place to clean up these sites in the future which could then release green belt sites from the "safeguarded for future development" plan. This would be a more realistic approach to the use of "cleaned-up" contaminated sites instead of simply ignoring the problem.**

**Why use good agricultural land when the town comprises a number of "eye sores" which will never be addressed if the Council ignores these "eye sores" and simply uses up the Green Belt.**

**The Plan as outlined seems not to have been thought through properly, leaving many issued unaddressed and unplanned for – a case of build now and pick up the pieces later – a very unattractive and unsatisfactory proposition for the residents of Eccleston and Windle, and some potentially massive headaches for St.Helens Council in the future.**

**IN SUMMARY, ECRA WITH WINDLE BELIEVE THAT THIS VERSION DOES NOT SATISFY:**

- The requirement for sustainable development
- The criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs
- Sustainable housing, targets proposed are based on aspirational employment growth predictions i.e. unrealistic
- Effective land use by concentrating on Green Space development over town centre development with higher densities
- Food security by ignoring Agricultural Land Quality



**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

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>	<b>No</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
-----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**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.**