



ST HELENS
BOROUGH COUNCIL

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

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

PLAN ORDER

PO0701 – PO0800

SEPTEMBER 2020

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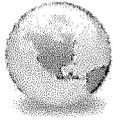
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PO0701

EFO094



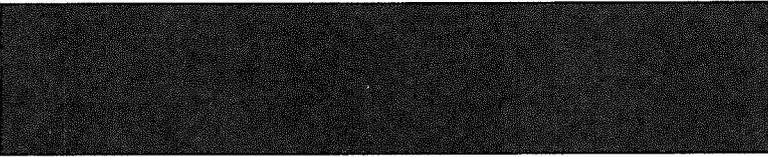
{In Archive} Representation

Ken Roughley

to:

planningpolicy

21/02/2019 16:27



Site 8HS

① - LPA02

② - LPA04

③ - LPA05

④ - LPA06

⑤ - IDP

1 Attachment



lpsd-representation-form (3).mht

Dear Sirs,

Please find attached my representation form.

Thank You

KenR



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Kenneth	First name:
Last Name: Roughley	Last Name:
Organisation/company: [REDACTED]	Organisation/company:
Address: 13 Rainford Road Dentons Green St Helens	Address:
Postcode: WA10 6BT	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] **Date:** 21/02/2019

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

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

Yes (Via Email) Yes

No

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

RETURN DETAILS

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

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

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

or by e-mail to: planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	Yes	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"/> X NO
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> X NO
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> X NO

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> X (NO) the plan is based on flawed methodology
Effective?	<input type="checkbox"/> X (NO) the Plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> X(NO) it does not comply with NPPF 2018

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

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

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.
 This version does not satisfy the requirement for sustainable development.
 Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan

10
2

The Housing Need assessment does not use standard Methodology, and no case for exceptional circumstances has been made.] ③

The plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not(yet) available or included on the Brownfield Register.] ①

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.] ④ ⑤

The Borough has significant long term and intractable problems at Windle island, Bleak Hill Road.] ④ ⑤

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 ⑤

The increase in traffic proposed in the plan will have significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.] ④ ⑤



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.

With reference to the Green Belt the council records 2/3rds of the Borough area is contaminated. Council records support this and indicate that less than 7% of the total area of the lowest level contaminated sites needs to be made available for development to remove ALL Green Belt and safeguarded land from consideration, this must be re-considered.

With the uncertainty resulting from Brexit, why build on productive farmland and destroy this valuable asset.

The North-West has recently been identified as the most congested area outside of London, a fact most of us have experienced So with the growth of the super-port and logistics warehousing HGV,LGV and residential traffic will demand massive highway infrastructure improvements. The *Infrastructure Delivery Plan (IDP)*, however does not indicate how this is to done, outside of the current ongoing improvements.

Please continue on a separate sheet if necessary

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

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

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

X NO	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.**

PO0702

EL0009



St.Helens Borough Local Plan 2020-2035 Submission Draft
Andrew Windress
to:
planningpolicy
28/02/2019 13:55

- ① - SPATIAL VISION
- ② - LPA02
- ③ - LPA05
- ④ - GBR (2018)



2 Attachments



St Helens Local Plan 2020-35 Reprs.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



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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. ✓

-
- 4.8 The site is well contained, being situated between established residential neighbourhoods to the west and the major developments associated with the racecourse to the east. ✓
 - 4.9 The site is proposed to be removed from the Green Belt. However, it is currently designated as being within the Green Belt. Paragraph 134 of the NPPF sets out the five purposes of the Green Belt, which include checking the unrestricted sprawl of large built-up areas, prevention of neighbouring towns merging into one another, assisting in safeguarding the countryside from encroachment, preserving the setting and special character of historic towns and assisting in urban regeneration by encouraging the recycling of derelict and other urban land. ✓
 - 4.10 Due to the location and enclosure of the HPR site, as well as existing mature landscaping to the west and south, any new development of the cleared part of the site would not result in sprawl, the merging of neighbouring towns or encroachment into the countryside. ✓
 - 4.11 Furthermore, the preservation of existing landscaping on the site provides an opportunity to enhance the biodiversity of the area for the benefit of existing and future occupants. ✓

Policy LPA05 and LPA05.1

- 4.12 Whilst the principles of a minimum housing target are supported, it is considered that the HPR site should be allocated for new housing development for the reasons outlined throughout these representations. ✓
- 4.13 Paragraph 4.18.15 underlines how “the Council is keen to promote the role of small sites in helping to meet its housing requirement.” ✓
- 4.14 It should also be noted that the use of minimum densities to estimate typical housing density and yield rates for the sites that are proposed for allocation can lead to inflated site yields, as it does not take into account the various unique planning constraints (highways, design, green space, ecology, flood risk, landscaping etc.) which face each site. These constraints may serve to reduce the net developable area of the proposed allocated sites. As such, it is likely that further land may be required to meet the housing requirement in future years if yields have not been as high as anticipated.] ⑧
- 4.15 For these reasons, it is considered that further housing allocations should be designated on less sensitive sites including the HPR site to give greater flexibility in housing provision and greater chance of continually meeting the housing needs of St. Helens.] ⑧

PO0703

ELO013

- ① - LPA06, 8HS
- ② - LPA02



St Helens Local Plan 2020-2035 Draft
Linda Watson
to:
planningpolicy@sthelens.gov.uk
04/03/2019 10:01



1 Attachment



Review of greenbelt land.doc

Good Morning, please find attached my letter of representation in relation to the above, many thanks.

Sent from [Mail](#) for Windows 10

My understanding of the key principles of the government with regards to protecting greenbelt land are –

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

I do not feel these current proposals are justified and I do not feel the local council are listening to the people of Eccleston, Windle, and Rainford with regards to the release of greenbelt land. If the above principles were being applied then brownfield sites would be utilised and the borough would look like a better place instead of numerous unused eye sores being left to decay around the borough.

You will obviously be aware of many sites in St Helens that could be utilised and I am sure the sites chosen first will be those most lucrative for everyone involved. I just hope that the lives of the people living in St Helens will actually be considered before any decisions are finally made. We all live in hope, please do the right thing for the residents of Eccleston.

Theresa May stated in the house of commons that local councils must listen to the voices of the local people living in the areas where greenbelt is being considered for release, I sincerely hope you take some notice of this statement.

Yours Sincerely
Linda Watson



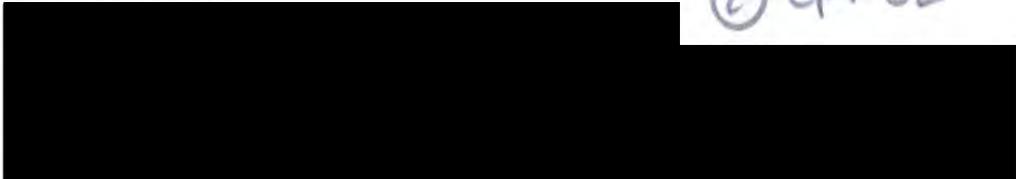
2

PO0704



St Helens Local Plan
Mitchell, Councillor Cathy
to:
planningpolicy@sthelens.gov.uk
04/03/2019 12:40

① IDP
② LPA02



Dear Sirs,

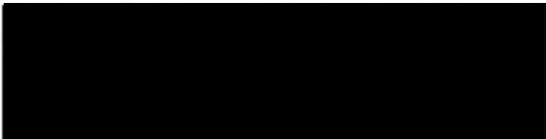
① I represent residents in Burtonwood and Winwick. My concerns over the local plan are primarily in relation to infrastructure. A large number of houses built close to these villages will need separate road infrastructure as the local roads are rural in nature and already support a large volume of traffic.

② In addition, I am concerned that insufficient attention has been given to the role of greenbelt in separating settlements and preventing urban sprawl, particularly around the villages of Burtonwood and Winwick and would ask that this be looked at again.

Best wishes
Cathy

Cllr Cathy Mitchell
Deputy Leader of the Council

Burtonwood & Winwick Ward (Labour)



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PO0705

①-LPA05 ②-LPA06, 8HS
③-LPA02

Page 1 of 1
E10020



FW: LOCAL PLAN
Colin b
to:
planningpolicy@sthelens.gov.uk
06/03/2019 18:21



1 Attachment



local plan cb.docx

I have chosen to respond by letter.

The online form is not user friendly. Hard copies of the form do not provide adequate space for a considered response

COLIN BARKER
1 THE NOOK
WINDLE
ST HELENS
WA10 6EN



6 FEBRUARY 2019

LOCAL PLAN
ST HELENS COUNCIL
TOWN HALL
VICTORIA SQUARE
ST HELENS
WA10 1HP

Dear Sir/Madam

Reference: St Helens Local Plan
Green Belt Review (2018)
Policy LPA05

I have chosen to respond by letter as your online form is not user friendly. Hard copies of the form do not provide sufficient space for considered response.

I am writing to object to the St Helens Council Local Plan(2018). In particular, I am objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

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. I do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances".

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.

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

①

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.

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:-

"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.

2

3

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.

3

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

COLIN BARKER

PO0706



St Helens Borough Local Plan 2020-2035 (Submission Draft)

Angela Liptrot

to:

planningpolicy@sthelens.gov.uk

10/03/2019 16:51

[Redacted]

My name is Angela Liptrot and I live at 16 Eagle Crescent, Rainford, StHelens, WA11 8BG; [Redacted]

I would like to submit my objections/representations to you regarding the St Helens Borough Local Plan 2020-2035 (Submission Draft), in particular relating to the proposed residential building planned for site HA8 Rookery Lane.

I am also making representation on behalf of my husband , Ronald Liptrot, and son, Daniel Liptrot who live at the same address.

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 statements of common ground

01

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.

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.

02

I [Redacted] and am very familiar with the are and the potential impact of this level of development on the surrounding community , landscape and infrastructure.

[Redacted] and I fear for their safety and the future of the environment we all live in were this development to proceed when I believe need has not been proven and alternatives not

PO0707



St Helens Local Plan 2020/2035 Draft
Dave Watson to: planningpolicy

10/03/2019 18:36

[REDACTED]

Dear Sir/Madam

I am a resident [REDACTED] and I continue to be distressed about the proposed release of greenbelt land [REDACTED]

[REDACTED] Some areas of greenbelt have now been taken out of the equation, why then is the piece of land from Houghtons Lane to Crantock Grove remained in the plan? this is one piece of land that alone has three public footpaths which are regularly used by ourselves and many, many members of the community.

On a personal note, which I know will not be acknowledged, but I wanted to include this anyway, [REDACTED] because of the amazing views and the fact that we would be able to live in the countryside (greenbelt area) of Eccleston, with an improved quality of life, which improved overnight on moving here, we have access to some wonderful walks which we use on a daily basis to exercise [REDACTED] It is an absolute pleasure living here in this part of the town.

We see the local wildlife in their natural habitats where they are safe and treated with respect. We see many local people enjoying these wonderful walks on our doorstep and importantly they are maintaining a healthy lifestyle and mental health wellbeing, which is extremely important with the very busy lives we all lead. There are many people in this neighbourhood from all walks of life and at different stages in their lives, some living with illness, mental health issues and dementia, some are working some are retired, all of whom, currently have the opportunity to get out into the greenbelt and enjoy a peaceful walk. I urge you to use these footpaths yourselves before making any decisions to see what could be potentially lost. There are a wide variety of different species of animals in this area; indeed, our understanding is there are water voiles and other protected species- birds, owls, and bats living in this area which should be considered equally as important as the need to build houses, and their protection should be a primary factor for any decisions made.

The fact that the local council has decided to look at this land for development has had a dramatic impact on the people of Eccleston; the community will be affected beyond belief, it will no longer be a village environment, our beautiful walks will be snatched away and replaced by a massive scale development taking many, many years to complete. Our quality of life will deteriorate overnight and it will be extremely stressful for the very long period of time for the building work required. The scale of this proposed development will greatly affect the health of the people living in Eccleston because of the long term building works, the heavy machinery, the chaos on the roads during building and when the development is completed. This will undoubtedly cause road safety issues on a large scale, as those many people who can no longer access the foot paths will be attempting to cross the East Lancashire Road to enjoy a walk, this already very busy road will become busier than ever, this will be extremely dangerous and I find this very concerning.

I am sure that the people unaffected by this and who do not live in the area will have no issues with the concerns we raise as a community, as this will be, I do not doubt, be an extremely lucrative development for all involved. Sadly this will be at the cost of the lives of all the people currently living in Eccleston. This greenbelt land can never be recovered if the planning department decides to release the land to developers - once

it has gone it has gone forever. There must be other land suitable to build more housing in the borough of St Helens where such development would make improvements rather than have a negative impact. The plans require the use of greenbelt land, which is also by the way, well farmed all year round by the local farmers, this is prime agricultural land. Local produce is in demand and now that we are getting closer to Brexit, I would have thought that farmers would be encouraged and indeed supported to continue farming and supplying local produce, sadly this does not appear to be the case in St Helens. This plan will ensure that more farmland is lost to greedy developers whilst we will have to rely on buying non-local produce, creating a larger carbon footprint than necessary.

On top of the above, and thinking ahead to this development being completed, how will Eccleston look with many more thousands of residents; where will their children be educated, where will the GPs surgeries, Dentists etc be, the pressure on our two local hospitals is already over capacity. There is already a great strain dealing with the current residents and most of us have to go outside of the area for our health care needs to be met? What will happen with the old country lanes that are at the heart of Eccleston and are part of the country charm? 01

Will the roads be sufficient to deal with many more thousands of cars on a daily basis? What are the plans for managing the increased traffic, What about the impact on the environment, does this not impact on sustainability?

Where will all the wildlife go? They have lived in this habitat and been safe for generations, are their needs not important? Is anyone considering the wider issues and impact on the environment and the community in the long term?

This has caused me and those in my household and wider community a great deal of anxiety. The forever home we thought we had [REDACTED] is now like a bad dream and we will want to sell our property if this land is released for development. And so, our dreams of living in a beautiful, scenic and healthy neighbourhood in St Helens will be history and we will all be left devastated if this goes ahead, thanks to the decisions made about this land by people who do not live here. We will then be forced to move out of St Helens as there will be nowhere left to live that will provide a healthy quality of life that we have become accustomed to [REDACTED]. We are not the only people who are now having to consider moving away from St Helens, however I fear that sadly this will not be important to anyone else but ourselves.

I hope you read this letter in the sense in which it is written. We are pleading with you to make the right decision and keep Eccleston in the countryside for all of us to enjoy and cherish for future generations to come. I urge you to consider other land in the St Helens area and I am aware of land in the area (brownfield sites) that would not have such an impact on so many people, where neighbourhoods will change beyond all recognition and I do not know why on earth such a big development in any one area is even being considered in such a small town.

Obviously everyone understands that houses have to be built as the population is constantly growing but why do we have to use up beautiful parts of the valuable countryside where a good quality of life is being experienced by many people using the local footpaths which lead to some beautiful country walks. Eccleston has had, and is still undergoing, a major development at the Triplex site, Knowsley Road developments and Cunningham Grange only being completed in the last few years. Have we not done our fair share of development without completely changing the face of Eccleston? 02

My understanding of the key principles of the government with regards to protecting greenbelt land are -

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

I do not feel these current proposals are justified and I do not feel the local council are listening to the people of Eccleston, Windle, and Rainford with regards to the release of greenbelt land. If the above principles were being applied then brownfield sites would be utilised and the borough would look like a better place instead of numerous unused eye sores being left to decay around the borough. 02

You will obviously be aware of many sites in St Helens that could be utilised and I am sure the sites chosen first will be those most lucrative for everyone involved. I just hope that the lives of the people living in St Helens will actually be considered before any decisions are finally made. We all live in hope, please do the right thing for the residents of Eccleston.

Theresa May stated in the house of commons that local councils must listen to the voices of the local people living in the areas where greenbelt is being considered for release, I sincerely hope you take some notice of this statement.

Yours Sincerely
David Watson
[REDACTED]

PO0708



Objections to St.Helens council housing plan - Rainford green belt

paul seddon

to:

planningpolicy

10/03/2019 19:57

Hide Details

Hi

I am writing this e mail to strongly object to the proposals of the St.Helens council housing plan regarding building houses on the fields next to Rookery/Higher lane, Rainford.

This e mail is sent by following people

Paul Seddon, 8 Green lane, Rainford, WA11 8EJ

Susan Seddon, 8 Green lane, Rainford, WA11 8EJ

James Seddon, 8 Green lane, Rainford, WA11 8EJ

Jessica Seddon, 8 Green lane, Rainford, WA11 8EJ

I have read the plan and although I do see a requirement for new homes and agree that this is needed for the area to expand I do not agree with the removal of green belt land to achieve this as there are many alternatives.

I would also like to make the following points.

There is no exceptional circumstances to justify not using the standard method for calculating housing need

The economic analysis is flawed and based on over optimistic assumptions which would then lead to fewer required houses and the level of land required is not as high as set in the local plan and therefor no exceptional circumstances requiring change the green belt land.

Other reasonable alternatives have not been fully explored, redevelopment of brown field sites and previously used sites and lowering housing figures.

No new infrastructure will be needed and it will have less impact on the environment.

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

I see no other explanation other than the use of this land will enable the council to make an easy sale of prime land. Not what I would expect from a so called Labour council.

I very much doubt that there will be many affordable homes on this proposed site, just 4 and 5 bedroom houses like the last site on Mill Lane in Rainford.

In regards to HA8 Rookery lane.

St.Helens council has said that this is least appropriate green belt site allocated for phase 1.

The site is next to industrial units which could cause problems and St.Helens council have prevented the development of land in this situation before, SHLAA 2016 ref 16m and 142

The site is Grade 1 farming land which is currently used and worked providing employment, this would be lost and would be against the whole plan to encourage economic growth.

There has been no consultation with natural England regarding the loss of this land.

PO0709

①-LPA02 ②-LPA05

E10045



Representations on the revised St Helens Plan
 Lisa Ainsworth
 to:
 planningpolicy
 11/03/2019 06:11



Dear Sir/madam

I wish the following comments to be passed on to the inspector relating to the revised St Helens plan.

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.

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.
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- 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.

Kind regards
 Mrs Lisa Ainsworth
 53 Pilkington st

Rainford
St. Helens
Merseyside
Wa118hg

PO0710

① - LPA02

② - LPA05

EL0046



Representations on the revised St. Helens plan

to: planningpolicy@sthelens.gov.uk

11/03/2019 06:13

Dear Sir/madam

I wish the following comments to be passed on to the inspector relating to the revised St Helens plan.

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
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- the level of land needed is therefore not as high as set out in the Local Plan
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- 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.

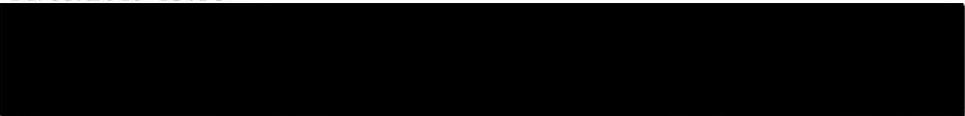
Kind regards
 Mr Kevin Mulholland
 53 Pilkington st
 Rainford
 St. Helens
 Merseyside
 Wall18hg

PO0711

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.

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:	[REDACTED]
Mobile No:	[REDACTED]
Email:	[REDACTED]

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.

- 3.6 Our Client has a number of concerns with this Policy. Point 1 of the Policy identifies that regeneration and growth will be focussed on the key settlements, when looking at the allocations identified on the Key Diagram however it is clear that a number of these allocations are isolated, away from settlements and in some cases, located on the boundary of the Authority. It is considered that a number of the allocations within the Plan do not accord with this point and fail from the outset to meet the sustainability aspirations advocated by the Council throughout the Plan. This also runs contrary to Point 2 of the Policy which seeks to direct development towards sustainable locations.
- 3.7 Furthermore, Point 1 makes reference to St Helens Core Area, although this is not defined. Whilst it is outlined on the Key Diagram it does not provide satisfactory detail in order to ascertain where the boundary lies, giving rise to misunderstanding and misinterpretation. Our Client considers that a detailed map outlining the St Helens Core Area should be appended within the Plan. (6)
- 3.8 It is also noted that Point 1 lists the key Settlements which will form the focus of new development yet it fails to detail the Bold Forest Garden Suburb, the single-most important development opportunity within the Borough for decades. This is also the case for the Key Settlements and Spatial Areas List detailed at 4.6.3 of the Plan. The Council provides an indicative capacity of circa 3000 dwellings for the Garden Suburb, it therefore equates to a significant settlement and a focus for growth within the Borough. Our Client considers that the Bold Forest Garden Suburb should be recognised as a Key Settlement and that its importance within the Plan is emphasised throughout.
- 3.9 Building on this, our Client is again concerned about the provisions of Point 3 of Policy LPA02 which details that lower thresholds for developer contributions will be sought for developments on previously developed land. Our Client considers that this goes against the fundamental aim of developer contributions, which should be used as a tool to make development acceptable in planning terms. It should not be used as a tool to make developments more viable as advocated by Point 3. Our Client considers that developer contributions should only be used as a mechanism to make development acceptable in planning terms and that the provisions of Point 3 as currently written within the New Local Plan should be removed.

3.10 Our Client is supportive of the positive move by the Council to review and identify land within the Green Belt for Housing and Employment use, including the identification of land as Safeguarded for future need. However, the Council should ensure that adequate land is allocated for housing in order to accommodate the population growth that would result from the provision of additional employment land which is promoted by Point 5.

3.11 Our Client remains concerned that the Council have overlooked the importance of the Bold Forest Garden Suburb in the delivery of the Plan. This is evidenced by Point 6 of Policy LPA02 where by specific reference, and policy protection, is offered to the strategic rail freight interchange, recognising it as a "transformational employment opportunity". Our Client considers that the Bold Forest Garden Suburb should be treated in a similar vein, as it too represents a transformational opportunity for the Borough. It should have its own entry in the Policy and specific policy protection against development which may prejudice the Site being delivered. If the Council is as ambitious as its Vision, Aims and Objectives would suggest, then the opportunity that the Garden Suburb presents should not be understated and the Council should be pushing for its delivery throughout the Plan.

3.12 At Point 8 the policy makes reference to supporting the delivery of the Bold Forest Park. Our Client would highlight that the Council's aspirations for the Park would also be met by the delivery of the Garden Suburb and that this should be incorporated into the Policy.

3.13 Taking all of the above into account our Client's position at this time is to object to Policy LPA02.

Policy LPA03: Development Principles

3.14 Policy LPA 03 moves on from the spatial approach and sustainable approach established in Policy LPA01 and LPA02 of the New Local Plan respectively. The Policy requires all development proposals, where relevant, to support principles related to population growth, economic well-being, inclusivity, the built and natural environmental, minimising travel, promoting healthy communities and lowering the carbon footprint.

3.15 Our Client broadly supports this policy and welcomes the amendments made to it following the Preferred Options consultation. Our Client also welcomes the recognition of a need for a mixture of homes to meet the needs and aspirations of existing and future residents.

- Our Client has numerous concerns around Policy LPA02 relating to the definition of St Helens Core Area, the use of Developer Contributions and the identification of Bold Forest Garden Suburb as a key settlement in its own right. Our Client is concerned that the overall importance of Bold Forest Garden Suburb has been understated throughout the Plan; (6)
- In addition to the above there are concerns that the Council are seeking to allocate considerably more employment land that studies suggest is required. Whilst there is no objection to this in itself the Council should increase its housing allocations to meet the population growth this would generate. (10)
- Our Client is concerned that whilst being the key housing allocation, and the largest by over 2000 dwellings, there is no site-specific policy relating to its delivery and Council expectations with regard to development parameters or planning obligations, nor is there mention of a subsequent Supplementary Planning Document which may serve to address such matters; (15)
- The Council should revisit the housing delivery projections outlined under Policy LPA05. Presently, our Client considers that the delivery of 480 dwellings out of an allocation of over 2500 during the next 16 years is unrealistically low and unambitious. Given the status of the allocation and its importance within the Plan, the Council should be encouraging the delivery of the Site as soon as possible in order to meet the needs of the Borough; (13)
- Our Client is concerned that there is a lack of evidence relating to infrastructure requirements and considers that the list of what the Council deems to be required is little more than a wish-list, with little evidence provided to support it. With regard to strategic land allocations the Council should list detailed, site-specific infrastructure requirements within the Plan; and (13)
- Our Client remains concerned that the New Local Plan indicates a new Greenway Route running through their land interest but provides no detail on what this entails, who will provide it and when, and how will it be funded. The Council should provide greater clarity on this within the Plan. (7)

5.4 Our Client welcomes the opportunity to again provide comments on the New Local Plan and is encouraged by its progress to date. Notwithstanding this there remain some areas

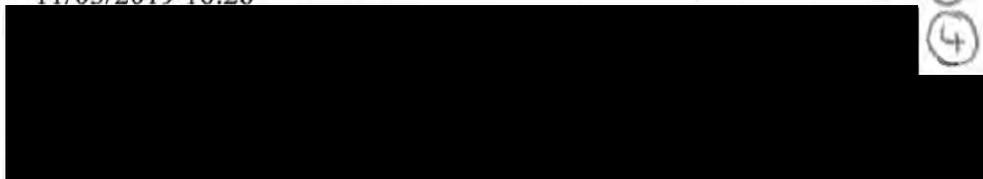
PO0712

ELOO58



The New 'St.Helens Borough Local Plan 2020-2035'
Gerry Ryder
to:
planningpolicy@sthelens.gov.uk
11/03/2019 16:28

- ① - LPA02
- ② - LPA05
- ③ - LPA06
- ④ - General



Dear Sir/Madam,

As a Member of Rainhill Civic Society, I wish to comment on the proposed Local Plan for 2020-2035.

Rainhill Civic Society is a local amenity society founded over 50 years ago in Rainhill. One of its aims is the preservation and enhancement of the township of Rainhill. The society has approximately 300 members and works with the local community, the Parish Council and other groups to make Rainhill an enjoyable place to live. This response has been collated by the Society's Planning Sub-committee and has been approved and minuted by the full Committee of the Society.

Policy LPA02

The Society objects to the releasing of land from the Green Belt after 2035, also known as 'safeguarding'. The Society agrees that any form of new development on Green Belt land is inappropriate and should only be considered in exceptional circumstances, in accordance with Section 13: Protecting Green Belt Land of the National Planning Policy Framework (NPPF, 2019). The 3HS site lies within Flood Zone 2 and Flood Zone 3 and the removal of this green space is likely to increase the risk of flooding in the area due to existing surface water drainage issues and flooding from the brook. The 'safeguarding' of 3HS and potential future development will have adverse impacts on biodiversity. The 3HS site is home to several species of flora and fauna, including up to 13 protected species, which are likely to be threatened by future development.

①

Policy LPA05 & Appendix 7

The Society objects to Policy LPA05 and Appendix 7, which outline the Council's aim for 486 dwellings per annum across the Borough and 956 units for the safeguarded 3HS site. Housing requirements outlined in Table 4.5 and Table 4.6 lack consistency. Table 4.6 illustrates a requirement for 7,245 houses which equates to an additional 1,437 houses and approximately 57 hectares of land as opposed to the 288 hectares as outlined in Table 4.5. Furthermore, the Local Plan does not acknowledge the availability of brownfield land to accommodate for 5,808 houses, as outlined on St Helens Council brownfield register. There has been a decline in the Borough's local population since 1981, and so the need for additional housing in the area is unjustified. The decline of industries in St Helens since the mid-1980s suggests that income-based salaries to purchase property come from outside of 3HS and the Borough.

②

New housing development has the potential to further increase the strain on local resources such as schools, hospitals, doctors and dental surgeries which are currently struggling with demand. With the assumption of two cars per household, housing development will have detrimental impacts on public health due to increased air pollution from personal and commercial road vehicles. As outlined in section 8.27, air pollution in St Helens Borough is higher than the national average with high numbers of cardiovascular and respiratory disease in adults and children. Between 2013-2015, approximately 51.9 deaths per 1,000 occurred in St Helens from respiratory diseases under the age of 75, compared with the national average of 33.1. To the east of 3HS, Thatto Heath is the second highest area affected in St Helens. These numbers are likely to increase as a result of new development.

②

The introduction of increased road traffic will add further strain and congestion on local communication routes such as Warrington Road (A57), the only A-road through Rainhill, Rainhill Road (B5413) including Skew Bridge, Portico Lane (B5201) / Prescott Road junction which are currently at capacity according to St

Helens Council. Increased traffic will also impact small resident estates and minor B and C roads including Two Butt Lane, Kendal Drive Estate (Rainhill), Royal Oak Estate (Whiston), Mill Lane, View Road, Stoney Lane, Blundells Lane, Longton Lane and Holt Lane.

2

As a statutory body, Sports England objected to the Stage 1 Local Plan due to the change of use of Eccleston Park Golf Club (3HS). The Council has an obligation to address such objections from statutory bodies either as being resolved or upheld. St Helens Council should provide compelling evidence for over subscription of the golf creational facilities in the local area which is still awaited.

4

Policy LPA06

NPPF outlines the importance of Green Belt and its protection to prevent urban sprawl and the merging of neighbouring towns (NPPF, 134). The Society acknowledges the importance of all Green Belt sites, including Eccleston Park Golf Club (3HS) and therefore objects to its 'safeguarding' for the future. The potential for re-development at 3HS after 2035 will remove the only Green Belt / Open Green space remaining between the areas of Rainhill, Eccleston Park, Whiston, Nut Grove and Thatto Heath. The loss of 3HS will ultimately have adverse environmental, social and economic impacts on Rainhill, the wider borough and its residents. In the case of the Local Plan, no Statement of Common Ground (SoCG) has been issued with neighbouring authorities.

3

Yours faithfully

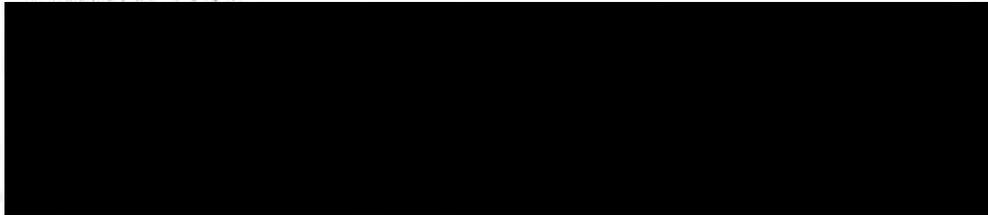
Gerald Ryder
74 Deepdale Drive
Rainhill
St Helens
L35 4NW



PO0713



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



6 Attachments



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



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



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



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



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



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

Good morning

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

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

Kind regards
Alice Fitton

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



Turley

1 New York Street
Manchester M1 4HD



Linkedin

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St.Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: C/O Agent	Title: Miss
First Name: C/O Agent	First name: Alice
Last Name: C/O Agent	Last Name: Fitton
Organisation/company: Harworth Estates Ltd	Organisation/company: Turley
Address: C/O Agent	Address: 1 New York Street, Manchester
Postcode:	Postcode: M1 4HD



Signature: 	Date: <input type="text" value="11/03/2019"/>
---	--

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)
Yes <input checked="" type="checkbox"/> (Via Email) No <input type="checkbox"/>

**St Helens Borough Council Local Plan -
Submission Draft**

Moss Nook Urban Village, Watery Lane, Moss
Nook

Representations on behalf of Harworth Estates Ltd

March 2019

3. Representation to Draft Policies

- 3.1 The St Helens Borough Local Plan will set out the framework for growth and development of the borough and as such this section identifies Harworth's views in relation to the emerging policies that are considered relevant to the land at Moss Nook Urban Village.
- 3.2 Harworth generally supports the Spatial Vision for the borough which seeks to provide good quality new market and affordable housing, broadening the housing stock, to meet local needs, and to provide safe and sustainable communities. Moreover, the Vision states that *'Effective use shall have been made of the Borough's stock of brownfield land to help meet these needs'*.
- 3.3 Harworth is therefore able to contribute towards the borough meeting its Spatial Vision by delivering residential development at Moss Nook Urban Village, a brownfield site which will comprise a broad development mix, to meet local needs and provide a safe and sustainable community for existing and future residents.

Core Policies

- 3.4 Harworth is supportive of **Policy LPA02 'Spatial Strategy'** which focusses the sustainable regeneration and growth of the borough through to 2035 within the key settlements, including St Helens Core Area, where Moss Nook Urban Village is located. (6)
- 3.5 Harworth generally supports emerging **Policy LPA05 'Meeting St Helens Borough's Housing Needs'**, which seeks to allocate land at Moss Nook Urban Village for residential development. However, emerging Policy LPA05 seeks to restrict the density of residential development, based on the location of a development site within the borough. Harworth do not support this requirement of emerging Policy LPA05 given that the suitable density for development will depend on many characteristics of a development site and its surrounding area. (5)
- 3.6 The third point for Policy LPA05 should therefore be amended to state:
"New development should optimise the amount of housing developed on a site, reflective of the physical, environmental and social characteristics of the land and its surrounding area". [Bold text = suggested amendment] (9)

Moss Nook Urban Village, St Helens

- 3.7 Harworth supports the allocation for residential development at Moss Nook Urban Village (Site Ref. 10HA) within emerging **Policy LPA05.1 'Strategic Housing Sites'**. The allocated site comprises 26.74 ha of land, bound by Sutton Brook to the north, Watery Lane to the east, Sutton Road to the south, and residential properties accessed off Bentlinck Street to the west of the site. (7)
- 3.8 However, the boundaries of the extant hybrid planning permission at Moss Nook (Ref. P/2011/0058) comprises a total site area of c. 54.19 ha, extending beyond Sutton Brook to the north and beyond Watery Lane to the east, which reflects agreements in place to invest in and utilise neighbouring Council-owned land to deliver high quality

PO0714

① - LPA05 ② - LPA06, 8HS
③ - LPA02



Response to Local Plan
Stephen Haw
to:
planningpolicy
12/03/2019 17:15



1 Attachment



Stephen Haw response to Local Plan.docx

Please find attached my response to the St Helens Local Plan Publication period.

Kind regards
Stephen Haw

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:-

"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.

Careful reading of the local plan suggests that the release of Green Belt 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 Green Belt.

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 sincerely,

Stephen Haw

12 Kiln Lane
Windle
St Helens
Merseyside
WA10 6AB

PO0715

EL0120



St Helens Borough Local Plan 2020 - 2035 (Submission Draft) - Representations submitted

on Behalf of Mr A Jones

Guy Evans

to:

planningpolicy@sthelens.gov.uk

12/03/2019 18:19



① GBR

② LPA05

③ LPA06

④ LPA02

⑤ TABLE 4-6

⑥ TABLE 4-5

⑦ TABLE 4-8

3 Attachments



Appendix 1_DTA Elton Head Road_St Helens Council response to preapp Nov2017.pdf



LP submission draft representations v311.03.19.pdf



lpsd-representation-form COMPLETED for Mr A Jones 12.03.19.pdf

Dear Sir / Madam

Please find attached representations submitted on behalf of Mr A Jones in respect of land south of Elton Head Road, Thatto Heath, St Helens.

Confirmation of receipt would be appreciated.

Regards

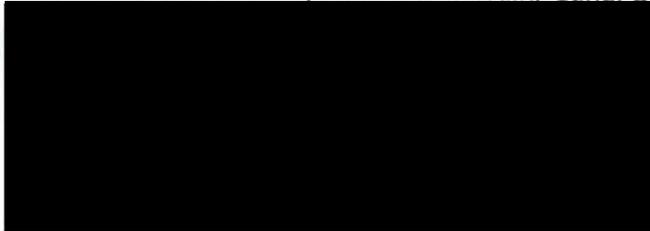
Guy Evans BSc (Hons) MSc MRTPI

Director

Chartered Town Planner



CASSIDY + ASHTON | 10 Hunters Walk, Canal Street, Chester, CH1 4EB



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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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: Guy
Last Name: Jones	Last Name: Evans
Organisation/company:	Organisation/company: Cassidy + Ashton
Address: c/o Agent	Address: 10 Hunters Walk, Canal Street, Chester
Postcode:	Postcode: CH1 4EB
[Redacted]	

Signature:	[Redacted]	Date:	12.03.2019
-------------------	------------	--------------	------------

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

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

Yes (Via Email)

No

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

RETURN DETAILS

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

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

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

or by e-mail to: **planningpolicy@sthelens.gov.uk**

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05.1 LPA06 LPA02 LPA05	Paragraph / diagram / table	Table 4.8 Table 4.5	Policies Map	Yes	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 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 <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

Refer to separately submitted representation / response statement

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.

Refer to separately submitted representation / response statement

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"/> x	<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:

Requirement for detailed discussion around housing land supply and the Plan's spatial strategy. Critical analysis of housing land requirements and supply (Table 4.6) required. Critical analysis of Green Belt Review and site selection required.

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.**

Cassidy+ Ashton

Architecture + Building Surveying + Town Planning

C+A



St. Helens
Council

ST HELENS BOROUGH LOCAL PLAN 2020 - 2035

SUBMISSION DRAFT
JANUARY 2019

**A BALANCED PLAN FOR
A BETTER FUTURE**

**St. Helens Borough Local Plan
Submission Draft Consultation
Response Statement on behalf of the
Jones Family – Land off Elton Head Road**

CASSIDY + ASHTON | 10 Hunters Walk, Canal Street, Chester, CH1 4EB

7.0 COMMENTS ON STRATEGIC POLICIES

7.1 A range of draft strategic policies are being proposed to guide and determine development at a strategic level. Our comments on certain strategic policies are outlined below:

7.2 Policy LPA02 – Spatial Strategy

7.3 Part of this policy states:

1. *The sustainable regeneration and growth of St. Helens through to 2035 and beyond will be focussed (as far as practicable, having regard to the availability of suitable sites) on the Key Settlements, namely St. Helens Core Area; Blackbrook and Haydock; Newton-le-Willows and Earlestown; Rainford; Billinge; Garswood; and Rainhill.*

2. *New development will be directed to sustainable locations that are appropriate to its scale and nature and that will enable movements between homes, jobs and key services / facilities to be made by sustainable non-car modes of transport.*

4. *This Plan releases land from the Green Belt to enable the needs for housing and employment development to be met in full over the Plan period from 1 April 2020 until 31 March 2035, in the most sustainable locations.*

7.4 **Land off Elton Head Road falls within Lea Green within the proposed St. Helens Core Area as seen in Figure 4.1 – Diagram of Key Settlement Areas.**

7.5 **Lea Green provides an appropriately sized conurbation to accommodate future development and is well related to the main urban centre of St. Helens to benefit from the services and facilities it offers, in conjunction with the strong supply of services and facilities specific to Lea Green itself.**

7.6 **We are in agreement with Policy LPA02, in that development across the borough should be directed towards sustainable locations, particularly the Key Settlements and the St. Helens Core Area. However, we are of the view that there is potential conflict with point 4 in consideration of the sites identified for release from the Green Belt and supported as allocations, i.e. are they the most appropriate and deliverable and are they best suited to meet the needs for housing in full over the Plan period. As has been highlighted through these representations, we are of the view that there are alternatives, proven to be deliverable, better placed to satisfy the spatial strategy and so endorse the soundness of the Plan.**

PO0716

ELO125



Letter from J Thow re Greenbelt Eccleston
Doug Thow
to:
planningpolicy
12/03/2019 19:23

- ① - LPA06
- ② - LPA06, 8HS
- ③ - LPA02



1 Attachment



Development objection letter 2019 J Thow.docx

Dear Sirs

Please find attached my letter for the attention of the Planning Inspector regarding the protection of the greenbelt land in Eccleston and Windle.

I would be grateful if this could be passed to the appropriate parties.

Regards
June Thow

1 Chapel Lane
Eccleston
St Helens
WA10 5DA

12TH March 2019

Dear Sirs,

This letter is to register my formal opposition to the proposal to remove from the greenbelt land in Eccleston and Windle, in particular the area described in the St Helens LPSD as 8HS. This is the land south of the A580 between Houghtons Lane and Crantock Grove, Eccleston and Windle."

First of all, I wish to complain in the strongest terms about the deliberately misleading term that is being used to describe the future status of this large area of land. We understand that it will be removed from greenbelt protection and reclassified as "safeguarded". I feel the terminology used was deliberately chosen to mask the real intention and is therefore deceitful at best.

The local plan in respect of this area is unsound and cannot be considered either positively prepared, justified, effective nor consistent with national policy. This plan does not satisfy the criteria for development to be sustainable and the reasons for my objections are developed in the individual detailed points listed below.

- 1) Developing area 8HS will result in the irreplaceable loss of top quality, highly productive farmland. At a time of growing population and food supply concerns this argument must carry the highest ranking.
- 2) There are massive areas of brownfield and semi-derelict industrial sites throughout the borough. This land may be indeed costly to remediate but at a time when developers are able to pay a £75 million bonus to a chief executive (Persimmon) and are making a profit of over £60K per house (Persimmon once again) they are clearly able to contribute substantially to land clean-up costs. Not a single home should be built on green field land until the existing stock of brownfield land is redeveloped.
- 3) Development of 8HS will result in the loss of an irreplaceable, community-cherished open space which acts as a vital "lung" barrier between the massively busy A580 and existing housing. Traffic on the A580 is forecast to increase in following years as a consequence of warehousing developments both inside and outside the borders of the borough and also the upscaling of operations at the Liverpool Superport making this barrier function even more important.
- 4) The current road system (both locally and outside the immediate area) is completely unsuitable to cope with peak time traffic – and this is before further development. Eccleston roads developed from meandering cart tracks - Houghtons Lane being a perfect example being little more than a farm track which has become a dangerous rat run by people attempting to avoid the chaos at Windle Island. Even if the roads are given a token improvement local to the development, the same pressures will be magnified away from the immediate area at junctions such as those at both ends of Chapel Lane/Church Lane/Bleak Hill Road/Rainford road etc. etc.
- 5) As a result of increased traffic, air quality must deteriorate further especially close to major junctions and areas of traffic build up.
- 6) Development of that land will result in yet another entirely car dependent (by definition – unsustainable) community bolted on at random to the extreme outskirts of the borough. We

PO0717

LLO142



Objection to Rainford Local Plan

jacqui ashton

to:

planningpolicy@sthelens.gov.uk

12/03/2019 22:50

Hide Details



SITE 8HA

① - LPA05

② - GENERAL

③ - S.A.

> ④ - DEC PARA 1.7.2

⑤ - LPA02

1 Attachment



REPRESENTATION ON THE LOCAL PLAN FOR RAINFORD.docx

See attached Representation.

Sincerely Jacqui Ashton

REPRESENTATION ON THE LOCAL PLAN FOR RAINFORD

Name: Jacqueline Ashton

Address; 79 Rookery Lane, Rainford. St Helens. WA11 8BL

I am a Rainford resident

I am horrified at the proposed removal of greenbelt status and subsequent development plan for around 1200 houses across the six greenbelt sites within the village,(and also the 2000 plus across other greenbelt sites in St Helens). ✓

In relation to Rainford, my reasons for my opposition of the plans are as follows:

[The scale of the proposed development in Rainford is disproportionate, given the size of the village. It will increase the village footprint by a third.] (1)

[The existing infrastructure is barely coping with the demands on it currently, as illustrated below:-

There are major parking problems in and round the village centre already- these present a risk to safety on the roads and also compromise our elderly residents accessing the shops and amenities easily. The road junction adjacent to the Village Hall, when turning right down Church Rd is already dangerous due to traffic coming around a blind bend in the other direction. The risks of a road accident have increased here since Thickwood Moss Rd became one way and there is now a need for a mini roundabout. I mention this as illustrative of how the wider impact of seemingly small changes to infrastructure- if not thought through holistically, can be detrimental to the environment and public safety - yet change on the scale proposed in the Preferred Options contain no details of how infrastructure and increased traffic- including heavy construction vehicles over an unknown period of development - will be managed safely.] (1)

[I am also very concerned that emergency vehicles such as fire engines would not be able to access the two residential roads either side of the Co-op Supermarket and RED café in the event of an incident.] (1)

[As congestion is still a problem, despite traffic management strategies having been completed in 2016 along the Church road section where the village centre shops are situated, I am certain this situation can only get worse with the Council's proposals designed to increase the village population and accompanying traffic so drastically.] (1)

Rainford residents already have to wait up to several weeks for access to GP appointments in both surgeries. We have recently lost one full time GP, with no plans to recruit a replacement at the Higher Lane surgery.

There is no NHS dentistry service meaning many of our citizens have to travel out of area.]

In relation to public services – Rainford has lost its bank, the police station is not manned and the library hours have been reduced. The bus service is inadequate, with a very scant service ✓

the elite landowners wishing to cash in, but tenants who work hard and whose business also support associated local agricultural-related industry – feed and bedding merchants, hay/haylage /straw producers, farriery, livery services and who have important stewardship responsibility for the land and wildlife thereon.

The removal of the greenbelt and subsequent development will change the character of these areas forever - as an example, Holiday Moss farm has 60 plus horses, all of these are owned, loaned, ridden, cared for and enjoyed by 100 plus people, their friends and families. Multiply this by the other livery areas affected and Rainford stands to lose essential character and valuable income associated with this lifestyle.

NOT
RELEVANT

Horses need acreage to graze, their action on the land supports habitat and food sources for birdlife, the paths around these farms are used by dog walkers, ramblers and family groups etc – Will they come in future to walk through the housing estates envisaged by the Council? I doubt it! Grazing land will be lost, and the associated benefits of outdoor lifestyle enjoyed by many will be compromised.

- REFER
TO LPPD

The case for the Council's preferred options is essentially flawed, its own figures dispute the need for the scale of housing development on Rainford's greenbelt that they are proposing, whilst failing to state the negative impact on infrastructure, pollution levels, village character and green spaces this will have - all of which are proven detrimental to physical and mental wellbeing of those living in Rainford and those who visit for the leisure and recreational opportunities that this heritage village offers.

I would also like to add, in respect of the overall figures in the Plan, that the case for development is essentially flawed for the following reasons:

- 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

5

the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

4

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.

PO0718



St Helens LP 2020-2035 (Submission Draft)

Tony McAteer

to:

planningpolicy

13/03/2019 08:46



2 Attachments



Local Plan Reprs Form.pdf Local Plan Reprs.pdf

Dear Sirs

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Regards

Tony McAteer
McAteer Associates Ltd



St. Helens
Council

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

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Mark	First name: Tony
Last Name: Fillingham	Last Name: McAteer
Organisation/company: EcclestonHomes Ltd	Organisation/company: McAteer Associates Ltd
Address: Suite114 Newton House Bichwood House Warrington	Address: 4 St Johns Wood Lostock Bolton
Postcode: WA3 6FW	Postcode: BL6 4FA

Signature: 

Date:

12 March 2019

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Policy LPA02 LPA03 LPA05 LPA06 LPA01		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)				See Attached representations						

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
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McAteer
associates^{ltd}
PROVIDING PLANNING SOLUTIONS

St. HELENS BOROUGH LOCAL PLAN 2020-2035

Representations to the Submission Draft

January 2019

On behalf of

Eccleston Homes Ltd

McAteer Associates Ltd
4 St Johns Wood
Lostock
Bolton
BL6 4FA

2 Policy LPA02

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-

04

PO0719



St Helens LP 2020-2035 (Submission Draft)

Tony McAteer

to:

planningpolicy

13/03/2019 08:46



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St. Helens
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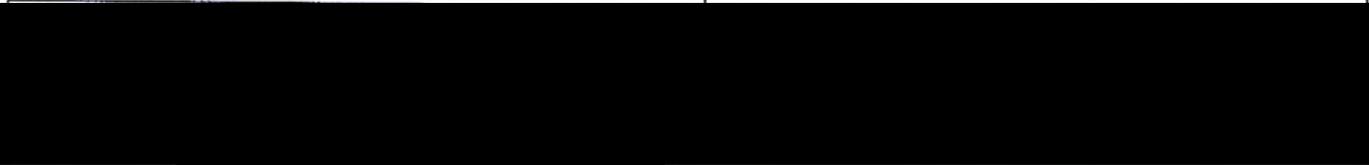
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Signature:	Date: <input type="text" value="12 March 2019"/>
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associates^{ltd}
PROVIDING PLANNING SOLUTIONS

St. HELENS BOROUGH LOCAL PLAN 2020-2035

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January 2019

On behalf of

Eccleston Homes Ltd

McAteer Associates Ltd
4 St Johns Wood
Lostock
Bolton
BL6 4FA

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PO0720



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Tony McAteer

to:

planningpolicy

13/03/2019 08:46



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McAteer
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PROVIDING PLANNING SOLUTIONS

St. HELENS BOROUGH LOCAL PLAN 2020-2035

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2.4 Eccleston Homes consider that the wording of the policy should be amended to allow Safeguarded Land to come forward within the current Plan period if it can be demonstrated that the housing needs of the Borough cannot be met through the housing allocations being put forward in the Plan.

2.5 Eccleston Homes also consider the Green Belt Assessment used to determine whether sites should be allocated for housing or Safeguarded Land cannot be the sole determining factor. As will be demonstrated elsewhere they hold an interest in the land south of Station Road, Haydock. Given that the land is capable of delivery within the next two years, Eccleston Homes do not consider the Green Belt Assessment properly reflects deliverability or their advancement in comparison to allocated housing sites, and this land should be allocated for housing. 04

2.6 Eccleston Homes consider that it would be more appropriate to rank sites based on their impact on the Green Belt. This has been an approach adopted elsewhere in the North West and could easily be linked to the spatial distribution set out in the policy.

04

PO0721



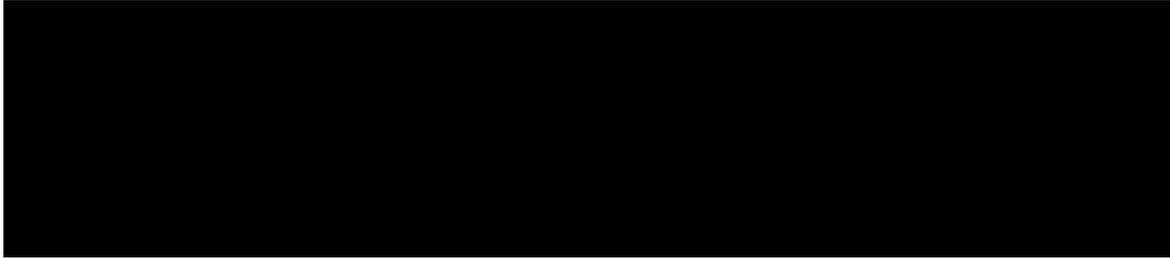
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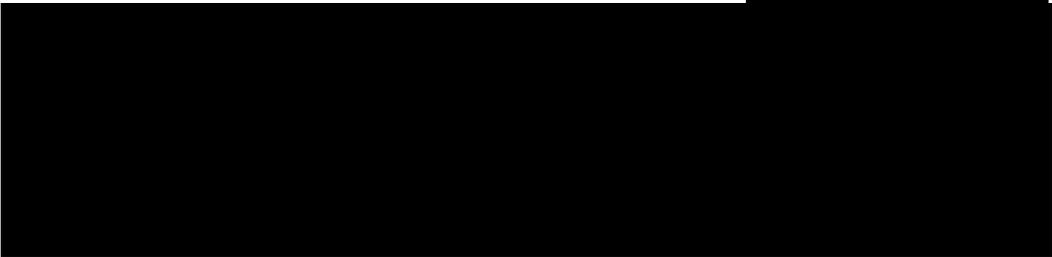
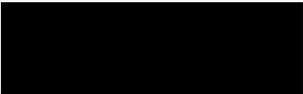
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PO0722



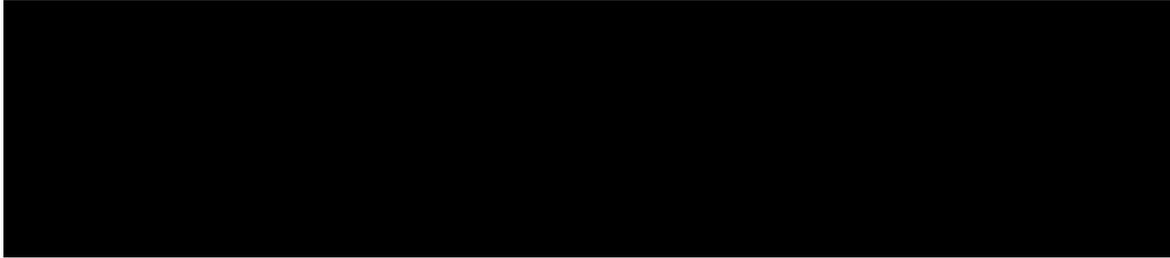
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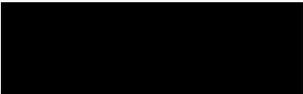
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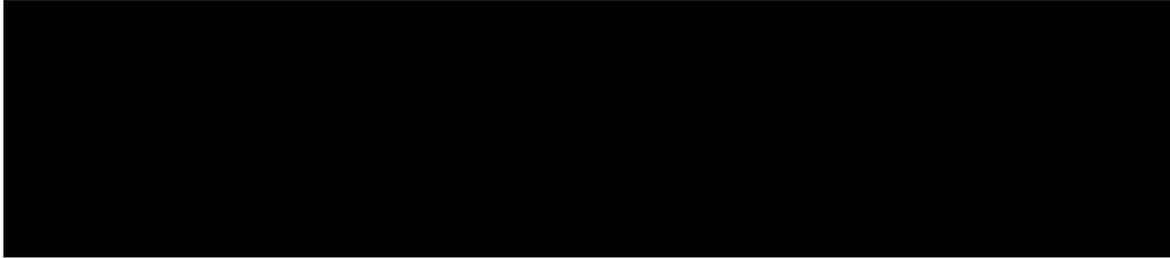
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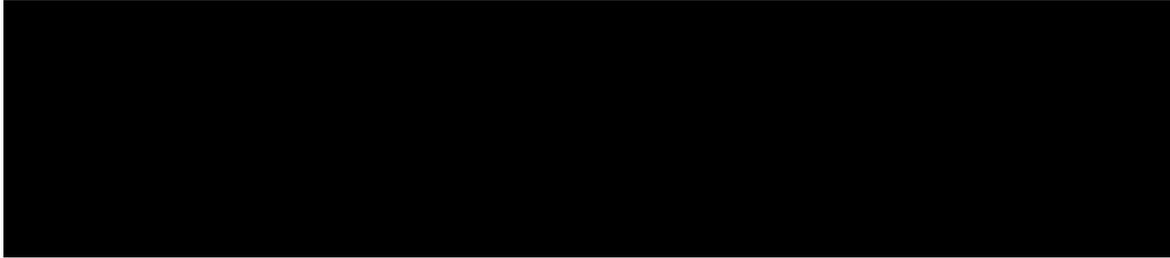
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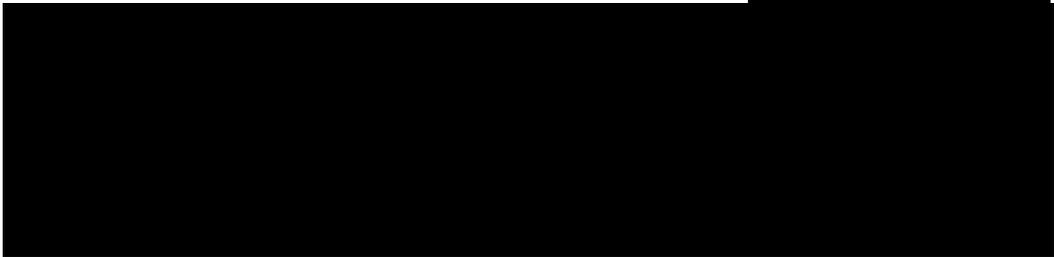
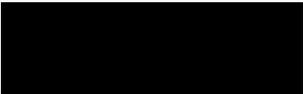
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- 3.9 Section 4.6 of the Local Plan sets out the reasoned justification for the approach taken by Policy LPA02 and notes, in essence that there is there has been no identified need for St Helens to meet any unmet need from neighbouring boroughs. Equally, there has been no spare capacity identified within neighbouring boroughs in which to help meet St Helens' development needs. St Helens' neighbouring districts are also all intending to undertake a review of Green Belt boundaries.
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- 3.10 Whilst we do not disagree with the above assumption, we are concerned that the trust of the above approach is that, notwithstanding the LCR's aspirations for the City Region to drive forward growth, it appears that individual Councils are not taking a more insular approach to meeting their own development needs. We address the Council's housing requirement (and OAN) in more detail below, but at its most high level, the proposed housing requirement of 486dpa sits significantly below the 860dpa identified by the SHELMA as being required to support a growth scenario across the LCR. 19
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- 3.11 We acknowledge that there has been a change in planning policy since the publication of the SHELMA (and Mid-Mersey SHMA) namely in the form of the Standardised Methodology for calculating OAN (SMOAN). However, the SMOAN looks only at the housing needs calculated on a borough-by-borough basis and is not a methodology for calculating the housing needs across a combined authority area; particularly where the aspirations of that area go significantly beyond meeting the baseline housing needs of the area. This is evidenced by the significant drop in housing needs identified from those identified within the SHELMA to those derived from the SMOAN. Our Clients are concerned that if housing growth across the LCR is simply a summation of the SMOAN for each individual authority within the LCR, that the aspirations for growth within the City Region will be missed entirely. 20
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- 3.12 It is clear from the supporting text of the Local Plan that St Helens should be pushing for growth as part of the wider City Region. Left to its own market forces the Plan sets out that the borough has experienced development and investment that have been substantially below those achieved in the 1990's notes declining trends. There is clearly a need for a step change within the borough. Paragraph 4.6.7 of the Local Plan notes that there is a substantial need for new housing development linked to demographic needs and the need to provide housing sufficient to support economic growth.

3.13 We have concerns that the Council's 'Spatial Strategy for meeting development needs' set out at paragraph 4.6.8 of the Local Plan does not indicate how the Council has sought to disaggregate development across the Key Settlements and other areas across the borough. The housing strategy simply seems to be the result of combining currently identified SHLAA Sites and a number of allocations across the borough. The Council has not made clear what its 'strategy' for distributing that growth is. It is not clear, therefore, whether each of the Key Settlements in particular can be assured of being allocated the development that they need as settlements.

21

3.14 We generally support the need for Green Belt release within the borough as set out within Local Plan and we support the need to identify Green Belt land for release further to a comprehensive review of the Green Belt; indeed we agree with the Council that it should maintain an effective Green Belt. However, without an indication of the levels of development that the Council considers should be met at each of the Key Settlements it is difficult to consider the case for exceptional circumstances for Green Belt release across the borough. In its simplest terms, how has the Council weighed harm to the Green Belt in a specific area against the need for development where it has not defined the need for development in that area.

22

3.15 As set out later within these representations our Client to our Site being discounted from the Green Belt Assessment in relation to the Site. We agree with the Green Belt Assessment which considers the Site (Site reference GBP_048) to be of "Low" value to all purposes of including land within the Green Belt; and overall makes a "weak" contribution to the Green Belt. However, the Site has subsequently been discounted from the Green Belt Assessment on the basis that its part designation as a 'Amenity Greenspace' is a prohibitive constraint to development. We disagree with that conclusion and address this later within these representations and within the attached Development Framework Document (DFD). We consider that the Site should be allocated for development and released from the Green Belt.

23

24

Policy LPA03 – Development Principles

3.16 We support the Council's aspirations for development to be guided by a number of development principles, and the need for the Council to address the challenges faced through population growth; economic well-being; contribution to inclusive

25

PO0725



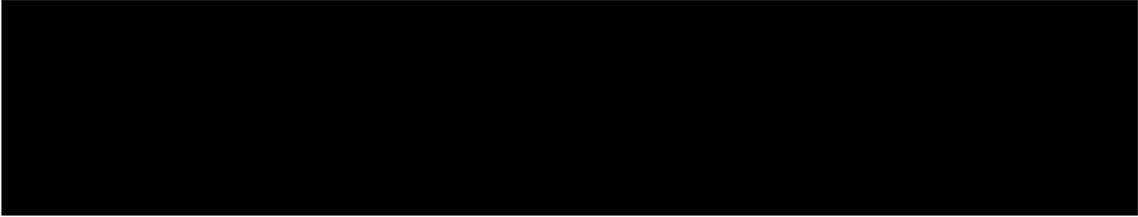
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Postcode: CW12 1LB	Postcode:
	Tel No:
	Mobile No:
	Email:

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March 2019

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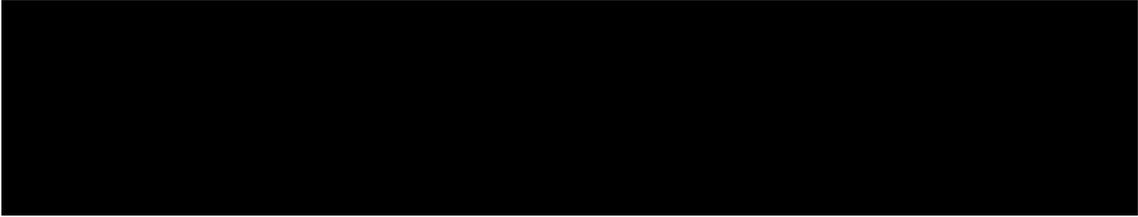
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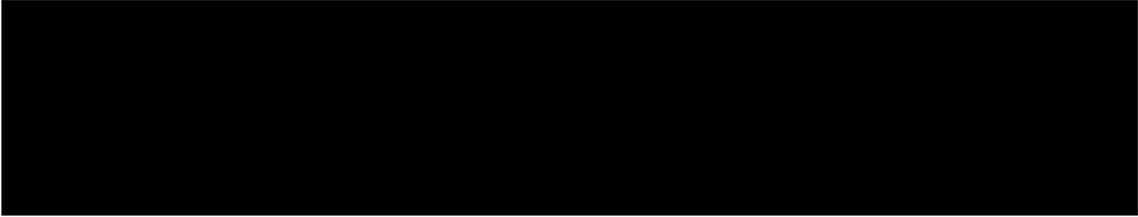
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4.1.1 In principle, Gladman are fully supportive of the direction taken in Policy LPA01, which sets out that decisions will be made in accordance with the presumption in favour of sustainable development and should affirm the Council's commitment to 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.

01

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.

02

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:

03

"strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements

and opportunities, such as those arising from major improvements in infrastructure” (emphasis added)

- 4.2.2 It is unlikely that the Plan will be submitted, examined and adopted by the end of 2019. Accordingly, the plan period may need to be reconsidered so that it covers an appropriate time horizon. This may require additional housing and employment land to be identified to ensure these needs are met in full over the plan period. 03

Previously Developed Land

- 4.2.3 Although it is recognised that the majority of land outside the built-up urban area falls within Green Belt, Gladman do not consider the use of wording that the re-use of Previously Developed Land (PDL) will remain a key priority. Indeed, paragraph 117 of the NPPF 2019 clearly states that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or brownfield land except where this would conflict with other policies in the Framework. National policy does not set such a high bar as to require development proposals to be located on PDL as a priority it merely considers it preferable and does not discount the sustainability credentials of greenfield development proposals. Gladman suggest that references to development on PDL as a priority be removed from the Local Plan and instead flexibility to be added to the policy which offers ‘support’ to the re-use of PDL in Key settlements. 04

Green Belt release

- 4.2.4 Gladman supports the reasoning behind the need to release land from the Green Belt owing to the fact that every update of the SHLAA since 2010 has found that there is inadequate land in urban areas to meet housing needs in the longer term. 05

4.3 Policy LPA04: A strong and sustainable economy

- 4.3.1 The above policy seeks to deliver a minimum of 215.4ha of land for employment development over the period 2018 - 2035.
- 4.3.2 In principle, Gladman are supportive of the economic ambition and commitment towards the creation of sustainable locations by allocating employment development to meet the needs of the current and future generations of the borough as well as strengthening its position in the Liverpool City Region (LCR). However, it is vital 06

PO0728



St Helens Local Plan Submission Draft
McBride, Sean
to:
'planningpolicy@sthelens.gov.uk'
13/03/2019 12:30



5 Attachments



St Helens Local Plan Submission Draft Rep - March 2019.pdf



Vision Document - Land at Weathercock Hill Farm Rev A 13 03 19_compressed (2).pdf



Weathercock Hill Farm_Ecological Statement(1.1).pdf



Landscape Feasibility Statement - Land at Weathercock Hill Farm.pdf 2503.TN.pdf

Dear Sir/Madam

Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards
Sean

Sean McBride
Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH



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Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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

Representations submitted on behalf of Persimmon Homes North West

March 2019



EL0177

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

PO0729



St Helens Local Plan Submission Draft
McBride, Sean
to:
'planningpolicy@sthelens.gov.uk'
13/03/2019 12:30



5 Attachments



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

Representations submitted on behalf of Persimmon Homes North West

March 2019



EL0177

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06

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07

PO0730



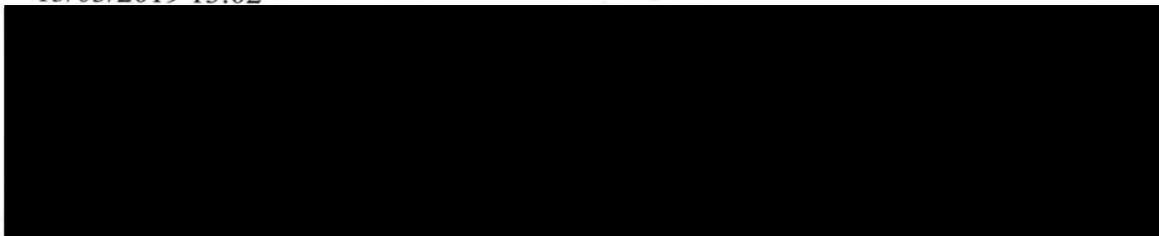
St Helens Submission Draft Local Plan: Representations on behalf of Bericote Properties Ltd [NLP-DMS.FID586504]

Katie Howarth

to:

planningpolicy@sthelens.gov.uk

13/03/2019 13:02



2 Attachments



41575_09 Bericote St Helens Soundness Reps 13.03.2019.PDF



41575_09 Ipsd-representation-form Bericote 7.03.2019.pdf

Dear Sir/Madam

On behalf of our client, Bericote Properties Ltd, pleased find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form is also attached.

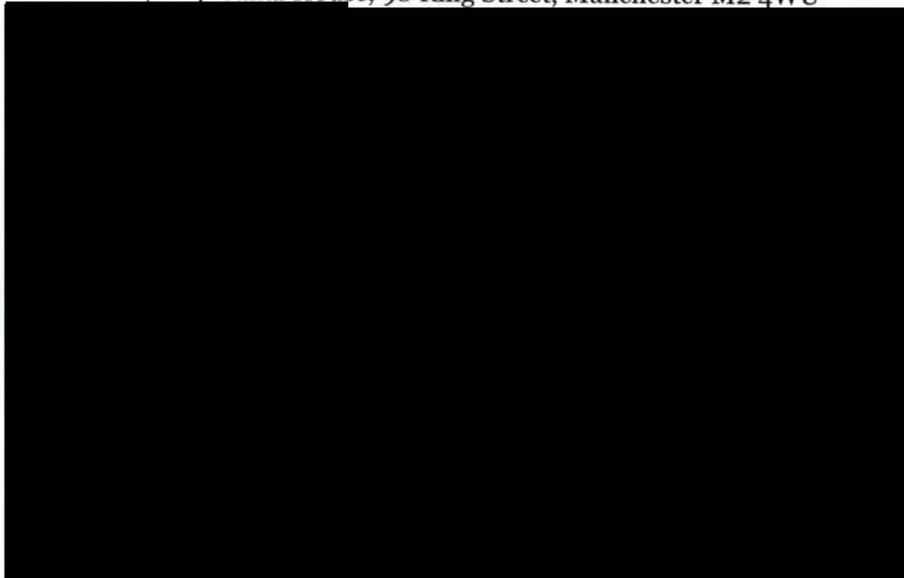
It would be much appreciated if you could confirm receipt of this response by return.

Regards

Katie Howarth

Associate Director

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



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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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: Mrs
First Name: Simon	First name: Caroline
Last Name: Spencer	Last Name: Musker
Organisation/company: Bericote Properties Limited	Organisation/company: Lichfields
Address: 8 Hamilton Terrace Leamington Spa	Address: Ship Canal House 98 King Street Manchester
Postcode: CV32 4LY	Postcode: M2 4WU
Tel No:	[REDACTED]
Mobile No:	
Email:	

Signature: [REDACTED]

Date:

7/3/2019

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

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

Yes (Via Email)

No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

Policy	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 cover letter	

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

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

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:
Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input 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 cover 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.

See cover 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)

			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 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.**

- a Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - ii Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

This letter demonstrates that a number of policies within the Local Plan that require amendments in the context of the tests of soundness established by the Framework.

St Helens Local Plan

Policy LPA02: Spatial Strategy

Policy LPA02 sets out the spatial strategy for St Helens over the plan period and identifies locations for sustainable growth. LPA02 (5) specifies that substantial new employment development will take place on large sites that are capable of accommodating large employment buildings (over 9,000 sq. m).

Consideration of Policy

Bericote generally supports the strategy for sustainable growth as set out in Policy LPA02 and the Council's acknowledgement of the need for development to be delivered in sustainable locations (Part 1 and 2). 01

Bericote strongly supports the release of Green Belt land to meet employment and housing needs over the Plan Period (LPA02 (4)) in line with the Framework [§136]. The Local Plan period being pursued by the Council runs to 2035 which is the minimum necessary to meet national policy¹. However, planning to 2035 allows no margin for delays in the adoption process and Bericote would advocate an elongated plan period to ensure the Plan can meet the requirements of national policy when it comes to being adopted.

Bericote objects to LPA02 (5) which specifies that substantial new employment development will take place on large sites that are capable of accommodating large employment buildings (over 9,000 sq. m) as it conflicts with the ability for Bericote to fully utilise the M6Major.com Site and this is contrary to the Framework² which requires planning polices to promote effective use of land. Given that the site is proposed to be removed from the Green Belt in the Plan and has planning permission for 135,000 sq. m of employment floorspace there is no justification for restricting the scale of non-strategic logistics buildings on the remainder of the M6Major.com Site. 02

Tests of Soundness

- 1 **It is not effective:** Policy LPA02(5) fails to facilitate the effective use of land where an extant planning permission already exists.
- 2 **Consistent with national policy:** In the event of any delay in the plan preparation process through to adoption, the local plan timeframe is too short. In addition, the Framework requires planning policies

¹ The Framework 2019 - §22

² The Framework 2019 - §117

to help create conditions in which business can invest, expand and adapt³ as well as efficiently using land⁴.

02

Recommended Change

To address the conflict above and ensure Policy LPA02 is sound, it is requested that the Council:

- 1 Elongate the local plan timeframe.
- 2 In relation to the M6Major.com Site amend the policy wording so that it facilitates employment buildings on the remaining land of less than 9,000 sq. m.

Reasoned Justification 4.6.10 – 4.6.12

Bericote Properties supports the removal of the M6Major.com Site from the Green Belt and the provision of new employment development falling within Classes B1, B2 and B8 being primarily focussed on large previously undeveloped sites in close proximity to the M6 and M62 in order to meet modern requirements and market demand.

Figure 4.2: Key Diagram

Bericote Properties supports the removal of the M6Major.com Site from the Green Belt and its identification for new employment development.

03

Policy LPA03: Development Principles

Policy LPA03 seeks to ensure that all developments minimise their impact on the environment and provides a number of principles that all new development proposals within St Helens will be expected to comply with to ensure that they contribute towards achieving the sustainable growth of strong, thriving, healthy communities.

Policy LPA03 seeks to ensure that all developments minimise their impact on the environment and provides a number of principles that all new development proposals within St Helens will be expected to comply with, to ensure that they contribute towards achieving the sustainable growth of strong, thriving and healthy communities.

Consideration of Policy

Bericote Properties supports Policy LPA03 (5) (e) which promotes the effective use of land, buildings and infrastructure in the context of the statements made above in relation to Policy LPA02.

04

Tests of Soundness

Bericote Properties considers that Policy LPA03 is sound.

Recommended Change

Bericote Properties considers that no further change to the policy wording is required.

³ The Framework 2019 - §80

⁴ The Framework 2019 - §117

PO0731



Re: Representation
Mel Benyon
to:
planningpolicy
13/03/2019 13:24



1 Attachment



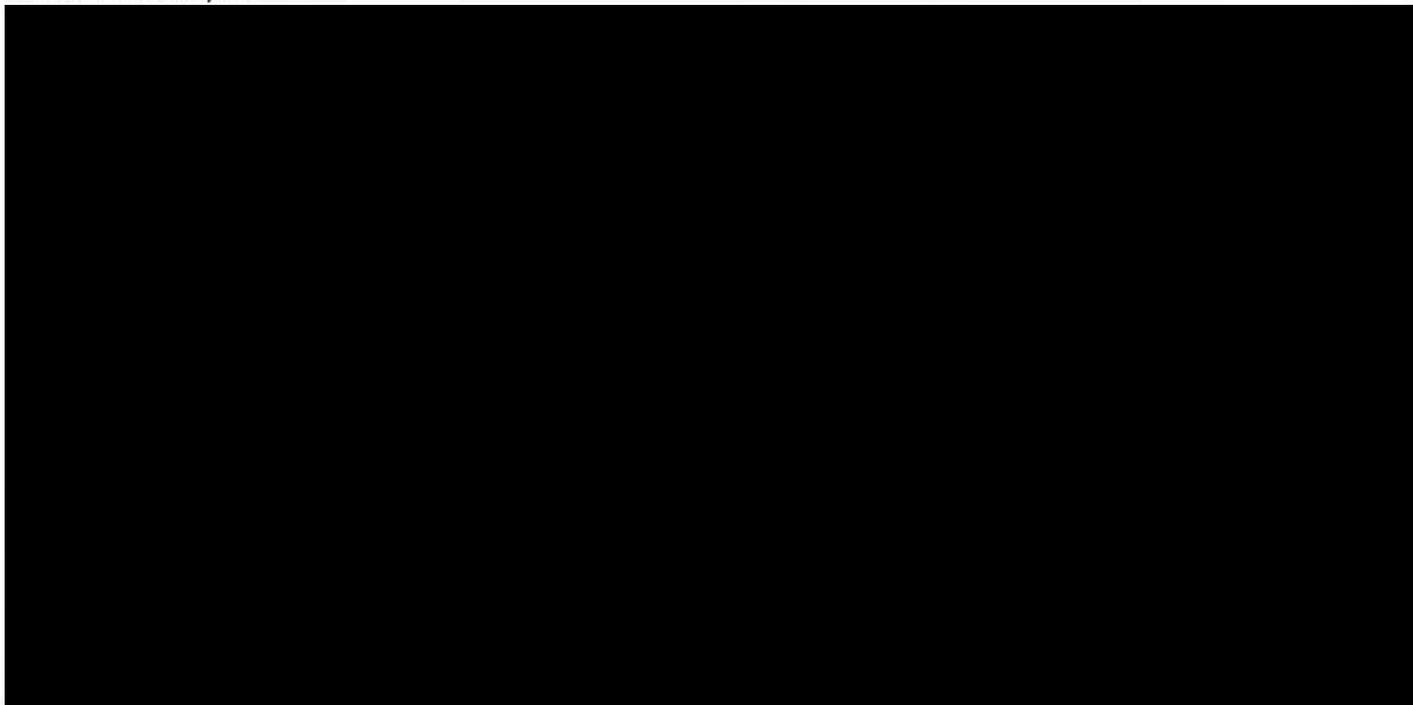
OBJECTION LETTER.docx

Dear Sirs

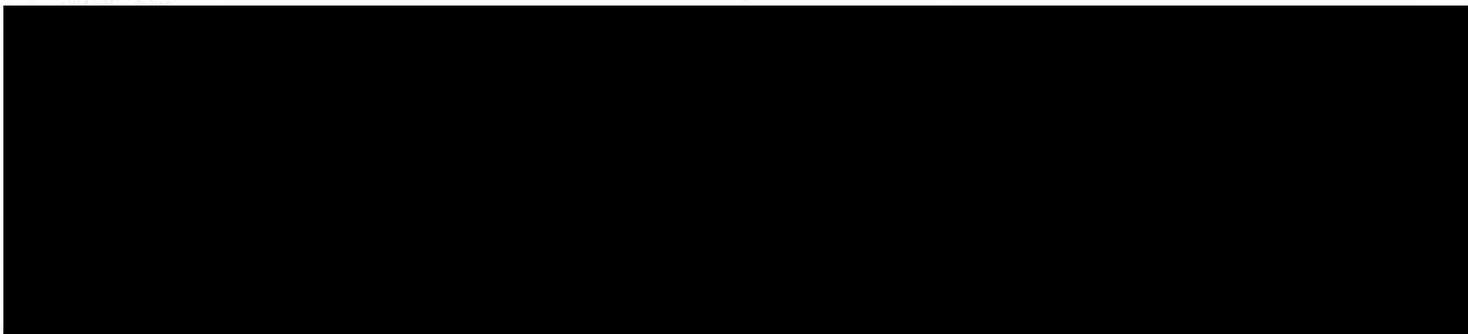
Please find attached my representation for the current Local Plan to development WA10 8HS 'Eccleston Vale'.

Kind regards

Mrs Melissa Benyon



Lancots Lane
Sutton Oak.
St Helens
UK
WA9 3EX



Melissa Benyon
9 Ecclesfield Road
Eccleston
St Helens
WA10 5LU

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on current or accurate figures.

It would appear figures from 2014 are being used to forecast 486 houses per year, when the Office for National Statistics estimate from 2016,383 houses. Surely, the most up to date figures should be utilised for something as important as a 15-year plan.

01

Putting that to one side, the Council's own Brownfield Register suggests land availability for 5808 houses. Given the table 4.6 of the plan, which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figures from that table would still only equate to 1724 houses and 57Ha of land for housing. It makes little sense then why Table 4-5 allocates 288Ha of land for housing.

02

The council further then claims the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha or development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required.

03

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That does not even begin to look at other sites not on the register due to contamination issues.

04

The plan makes little to no mention of Brownfield or Previously Developed Land that is not yet available or included in the register. The council's own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 433Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. It appears the Council have no policy in place for bringing back these sites for use; it is completely unreasonable to assume that they cannot be made available within the 15-year plan period.

05

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of green belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply cannot be considered sound.

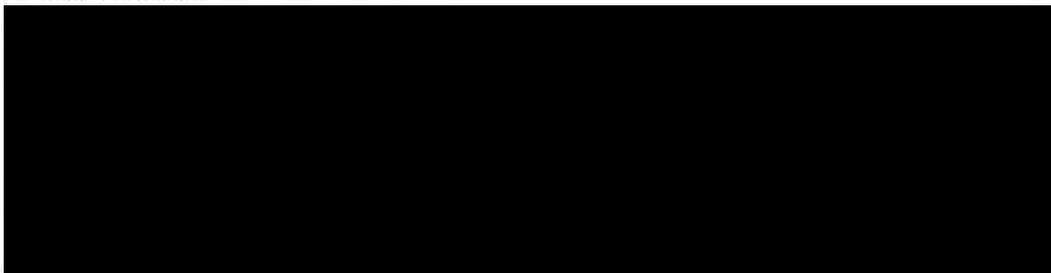
06

PO0732

Le 2017/5

3/1/5

Fwd: Local Plan Objection
Cllr J Tasker



① - LPA 06

② LPA 02

③ LPA 05

1 Attachment



Local Plan Objection.docx

④ PARA 1.7.2

Good afternoon,

Please find attached my response to the Local Plan. Can you please confirm that it has been received?

Thanks,

James

I am responding to the St Helens Council Local Plan 2020 – 2035 ‘Submission Draft’ (LPSD) as a Rainhill Ward Councillor on St Helens Metropolitan Borough Council.

Rainhill

Myself and many residents in Rainhill are concerned about the releasing of the former Eccleston Park Golf Course (3HS) site from the green belt. I believe that there isn't an exceptional circumstance to justify the releasing of this land from the green belt for future development. I don't believe that St Helens Council have taken into account the developments that are happening in nearby Knowsley. In Whiston a brand new garden village is being built that will eventually hold up to 2000 homes, shops and a number of warehouses. There are also hundreds of homes being built along Scotch Barn Lane which is just around the corner from the 3HS site. Rainhill is located right next to Whiston so these developments are having a direct impact on our community.

I have been engaging with residents and the local community group Rainhill Save Our Green Belt (RSOGB) for the last two and a half years. In this time RSOGB have organised events such as walks, public meetings and petitions. A recent RSOGB 2 day meeting attracted hundreds of residents. The feedback from Rainhill residents is clear that they don't want to lose green belt land when other options are available. Because of this I strongly object to the releasing of site 3HS from the green belt for future development.

In Rainhill we are concerned about the added traffic and the pollution this will bring. We are also concerned that by building on site 3HS this will add further strain to local services such as hospitals, schools and doctors.

My Objections

Policy LPA02

I object to the releasing of land from the Green Belt after 2035, also known as ‘safeguarding’ Section 13: Protecting Green Belt Land of the National Planning Policy Framework (NPPF, 2019) states that green belt land should only be released in exceptional circumstances. St Helens Council have not identified an exceptional circumstance that could justify this land being released from green belt. The 3HS site lies within Flood Zone 2 and Flood Zone 3 and the removal of this green space is likely to increase the risk of flooding in the area due to existing surface water drainage issues and flooding from the brook. The ‘safeguarding’ of 3HS and potential future development will have adverse impacts on biodiversity. The 3HS site is home to several species of flora and fauna, including up to 13 protected species, which are likely to be threatened by future development.

Policy LPA05 & Appendix 7

PO0733



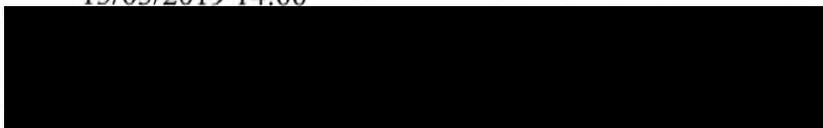
OBJECTION LETTER

Cathrine Benyon

to:

planningpolicy

13/03/2019 14:00



1 Attachment



OBJECTION LETTER.docx

Dear Sirs,

See attached objection letter to St Helens Council Local Plan in relation to development of 'Eccleston Vale'.

Regards,

Cath Benyon

Director

Aidapt Bathrooms Ltd

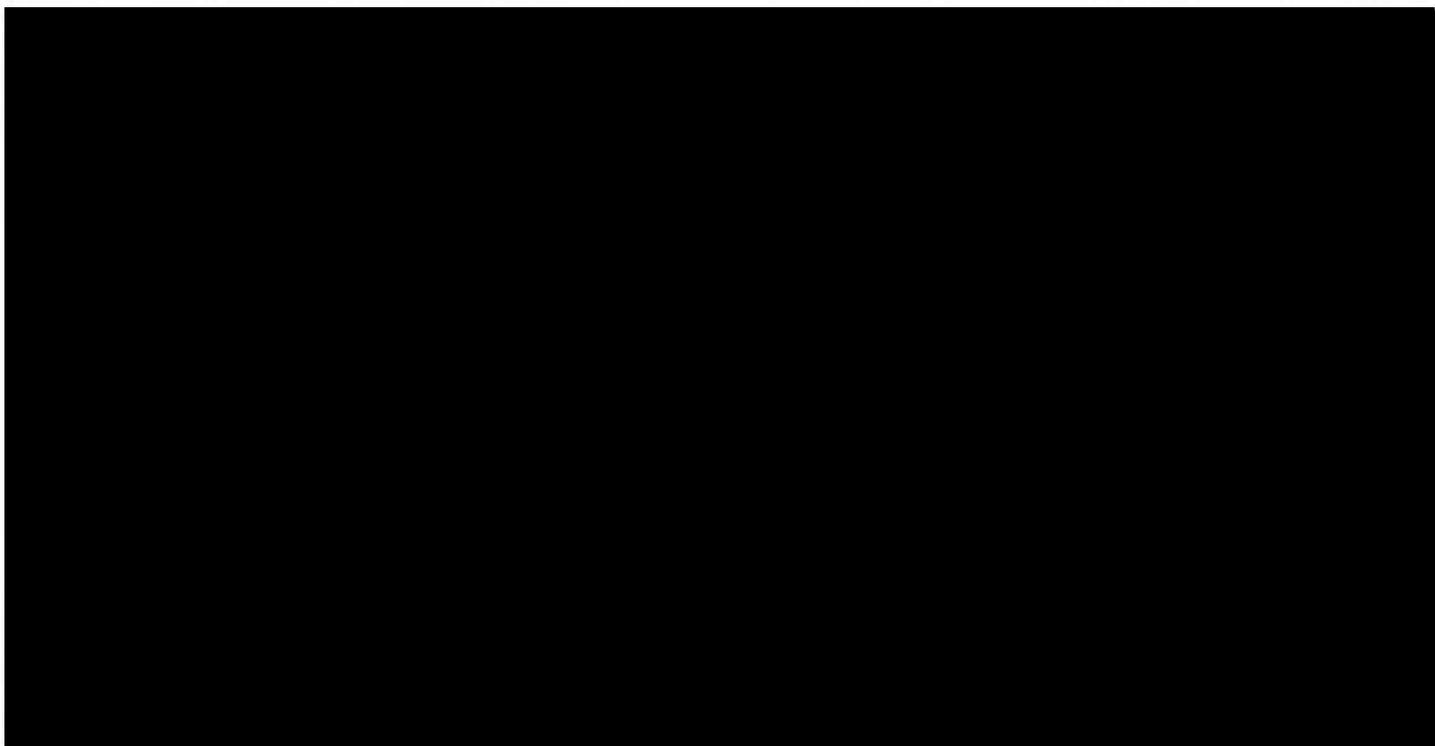
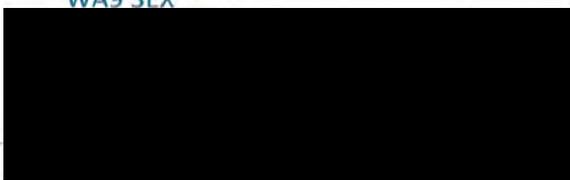
Lancots Lane

Sutton Oak

St Helens

Merseyside

WA9 3EX



Catherine Hanwright
56A, The Oaks,
Houghtons Lane
Eccleston
St Helens
WA10 5LD

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on current or accurate figures.

It would appear figures from 2014 are being used to forecast 486 houses per year, when the Office for National Statistics estimate from 2016, 383 houses. Surely, the most up to date figures should be utilised for something as important as a 15-year plan. 01

Putting that to one side, the Council's own Brownfield Register suggests land availability for 5808 houses. Given the table 4.6 of the plan, which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower density of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figures from that table would still only equate to 1724 houses and 57Ha of land for housing. It makes little sense then why Table 4-5 allocates 288Ha of land for housing. 02

The council further then claims the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha or development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required. 03

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That does not even begin to look at other sites not on the register due to contamination issues. 04

The plan makes little to no mention of Brownfield or Previously Developed Land that is not yet available or included in the register. The council's own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 433Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. It appears the Council have no policy in place for bringing back these sites for use; it is completely unreasonable to assume that they cannot be made available within the 15-year plan period. 05

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of green belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply cannot be considered sound. 06

PO0734



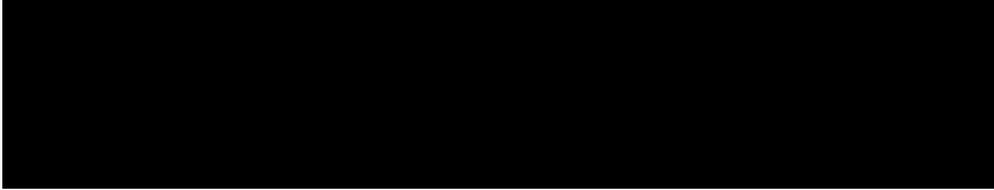
St Helens Local Plan 2020 - 2035, Submission Draft - Representations

Dan Ingram

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:20



2 Attachments



27020.A3.DI.SG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



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Kind regards.

Dan.

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Senior Planner





St. Helens
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Representation (i.e. Comment) Form**

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Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMORSE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

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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

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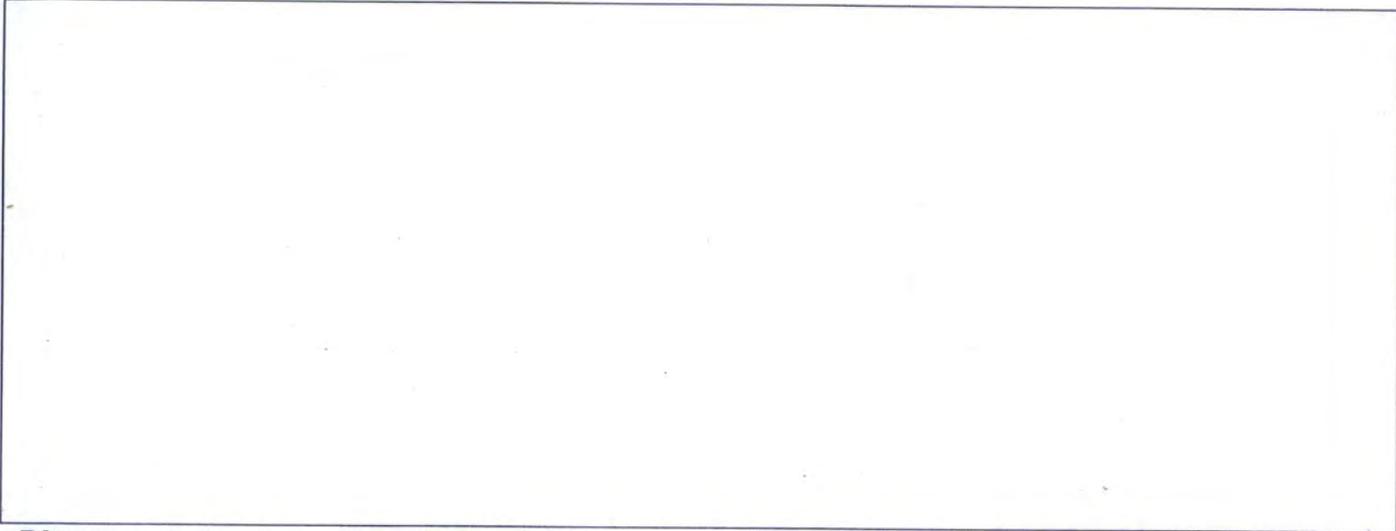
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St Helens Borough Local Plan 2020 - 2035

Submission Draft

Representations on behalf of Miller Homes

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9.1 This Section will provide our Client's comments on other policies contained within the New Local Plan.

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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

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Policy LPA03: Development Principles

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PO0735



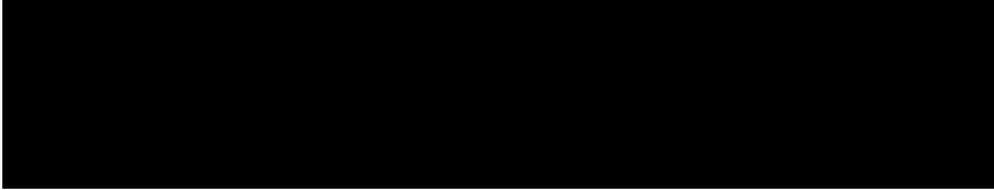
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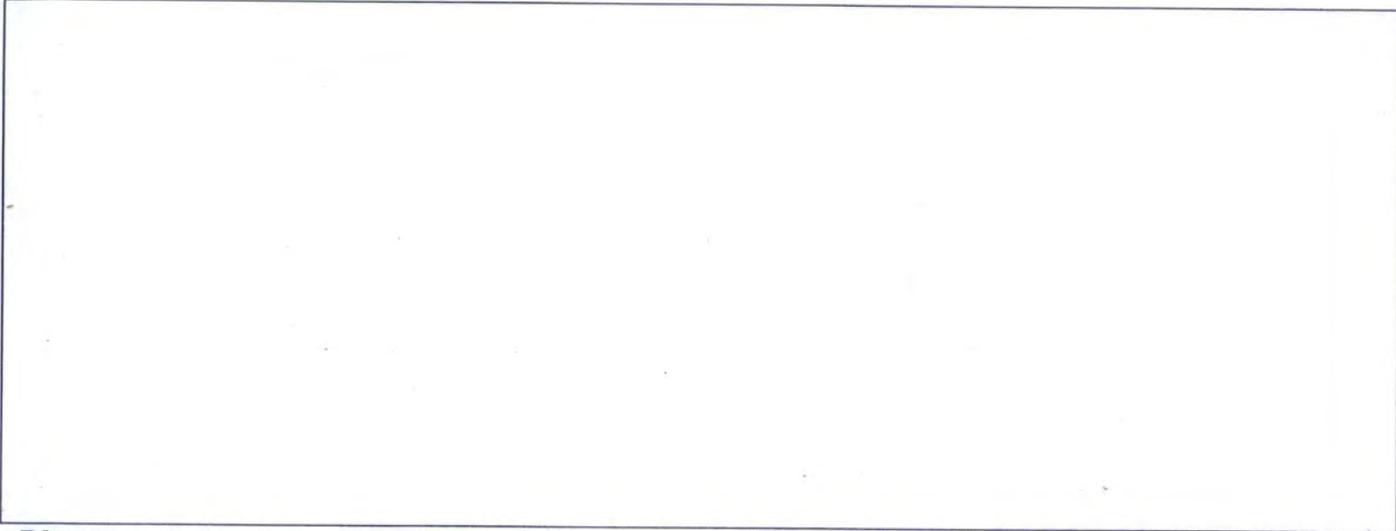
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PO0736



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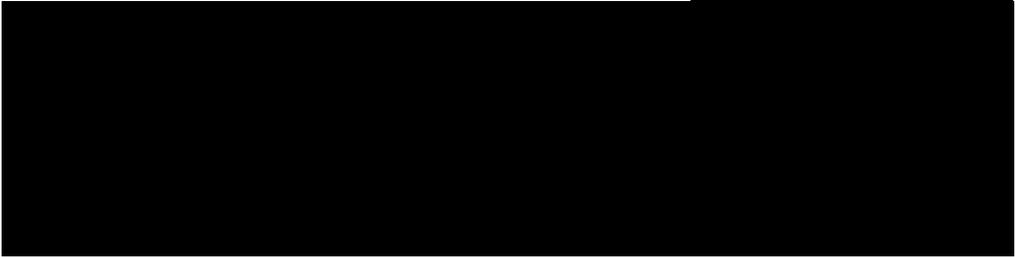
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Postcode:	Postcode: M3 3BZ

Signature

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Yes (Via Email)

No

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

RETURN DETAILS

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

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

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

or by e-mail to: planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

- 9.18 Our Client would seek to ensure that suitable planning obligations, particularly with regard to highway infrastructure, are incorporated into such a development to ensure that these do not rest solely with new residential developments.

Policy LPA05: Meeting St Helens Borough's Housing Needs

- 9.19 This Policy outlines how the Council intends to meet the housing needs for the Borough over the Plan Period, including providing details of sites allocated for housing as part of the New Local Plan. Our Client has a number of observations with Policy LPA05 which are detailed below.

Housing Requirement

- 9.20 Policy LPA05 identifies that between 2016 and 2035 a minimum of 9,324 net additional dwellings should be provided within the Borough, at a rate of 486 dwellings per annum. This figure has been arrived at on the basis of the St Helens SHMA Update (2019) and represents a significant reduction from the figure provided within the Preferred Options Draft of the Local Plan. This set out a requirement of 10,830 dwellings from 2014 – 2033; equating to an average requirement of 570 dwellings per annum. It is acknowledged that the housing requirement is based on the Standard Methodology now advocated by the Government, with an uplift to meet economic growth aspirations and affordability.

- 9.21 The Council's Vision, Aims and Objectives suggest that the Council will be ambitious within the Plan in order to promote growth and address identified needs within the Borough. Accordingly, whilst our Client has no objection to the proposed housing requirement, it is important that the Council plans positively for growth during the Plan period and ensures that there is sufficient flexibility within the Plan to exceed this requirement in the event of non-delivery of sites. The provision of additional housing beyond the requirement should not be viewed as a negative.

28

Monitoring

- 9.22 Our Client acknowledges and supports the provisions of Point 4 of Policy LPA05, recognising the importance of the Council monitoring the delivery of new homes annually in order to ensure that there is an adequate supply of new housing that is sufficient to demonstrate a five-year supply of housing land, inclusive of the appropriate buffer.

PO0737



St Helens Local Plan
Ian Leyland
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:36



1 Attachment



Green Belt Letter - Mr I Leyland.docx

Please find attached my response to the St Helens Local Plan to be considered as part of the consultation process.

Sent from [Mail](#) for Windows 10

Mr I Leyland
42, Ecclesfield Road,
Eccleston,
St Helens

13th March 2019

Reference: St Helens Local Plan

Dear Sirs,

I have recently read the latest version of the Local Plan which I think continues to be fundamentally flawed and inconsistent with National Policy. I would ask the following points be taken into account and considered.

Duties of an Elected Representative

The local Councillors taking decisions on whether to approve the plan are elected representatives of the people of St Helens. Whilst I recognise that there is always a balance between leadership and representing the people as an elected politician, the Councillors have a duty to consider the views of those who have elected them.

In terms of the local plan, and in particular the release of Green Belt land for housing, there is overwhelming opposition to the Council Proposals from the people. I have heard very few voices, if any, in support of this. When the opposition to a proposal is so universal then the Councillors would be failing in their democratic duties to approve such a plan and would undermine the confidence of the political process.

Unrealistic Aspirations

The plan is based on unrealistic expectations regarding future growth. Whilst it is right for a council to be aspirational, they should at least be realistic and base their assessment on the latest information. The Office for National Statistics estimate from 2016 that there is a requirement for 383 houses per year, yet the local plan still refers to the older figures from 2014, which forecasts a requirement for 486 houses per year.

Brown Field First

The Government and Council have a stated policy of Brownfield first. The Council's own Brownfield Register suggests land availability for 5808 houses. It would be my contention that provides sufficient Brown Field land for development and there is no requirement to release green belt land at this time.

Future Development

Whilst the Council are claiming that there is a requirement to release land from the Green Belt to Safeguard for longer term development to plan beyond this 15 year Local Plan, the amount being proposed to be released is excessive. How can the Council possibly justify safeguarding an additional

PO0738



St Helens Local Plan
Ian Leyland
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:36



1 Attachment



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155Ha for development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required. 04

Given the amount of Brownfield land already available, plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound. 05

Lack of Infrastructure

The plan lacks detail on the necessary future infra-structure to meet demands in terms of houses, schools and medical services. 06

The plan promotes unsustainable traffic growth in the exact areas that the Borough already has significant problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. 07

It also lacks detail on how it will deal with the additional demand for medical services and educational requirements that such a rapid proposed growth of population would require.

Given all the above I return to my first point regarding the peoples trust and confidence in their elected officials and the political system. I am sure most would recognise that this is currently at an all-time low with a number of people suggesting and feeling that they are unrepresented. The fact is that if the land is released unnecessarily it will further damage the relationship of the people and with the political class. What the Council leaders would be doing is demonstrating an arrogance that only their views matter, and that consultation with the electorate is meaningless. Not releasing the green belt land, and listening and responding to the views put forward would be a step to repair an already damaged and fragile relationship.

Taking all of the above cumulatively, the Local Plan in its current form, when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence, it must surely follow that it cannot be considered sound and rejected. 08

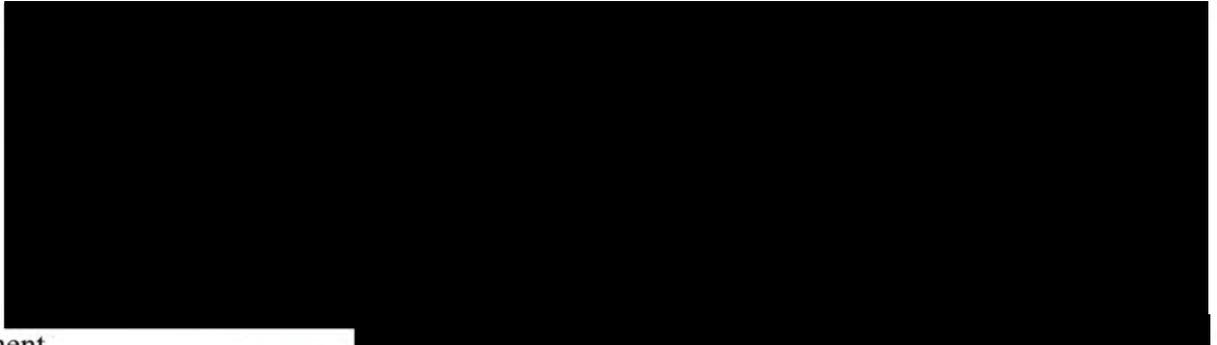
Yours Sincerely,

I Leyland

PO0739



Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 1 of 4 (main representations)
 Kennedy, Amy (UK - Manchester)
 to:
 planningpolicy@sthelens.gov.uk
 13/03/2019 14:58



1 Attachment



CCfE_reps to St Helens Local Plan_without appendices_March 2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 1 of 4 and the main representations are attached. The technical appendices will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP
 P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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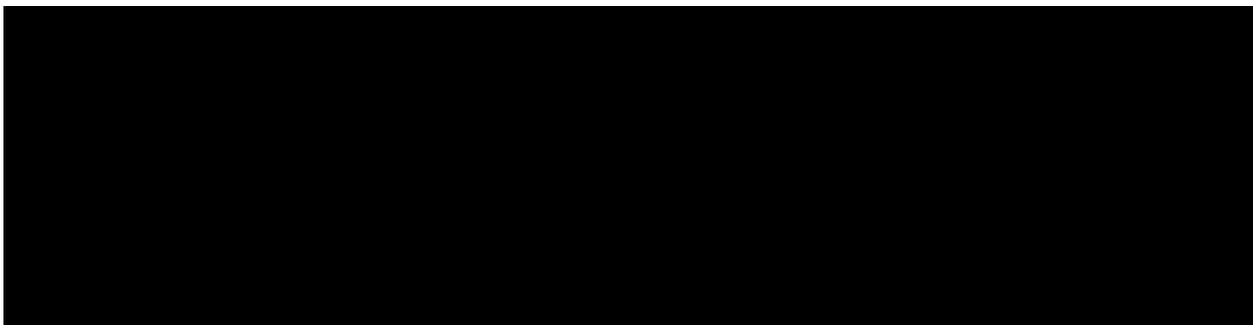
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
2 of 4 (Appendix A)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:01



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix A_March 2019.pdf

Apologies – now re-sent with attachment.

Amy Kennedy

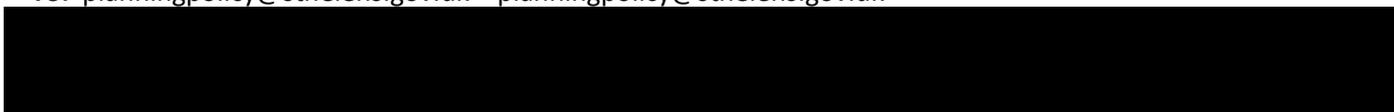
Planner | FA - Real Estate | Deloitte LLP



From: Kennedy, Amy (UK - Manchester)

Sent: 13 March 2019 15:00

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



Subject: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 2 of 4 (Appendix A)

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix A to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 2 of 4 and Appendices B and C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom





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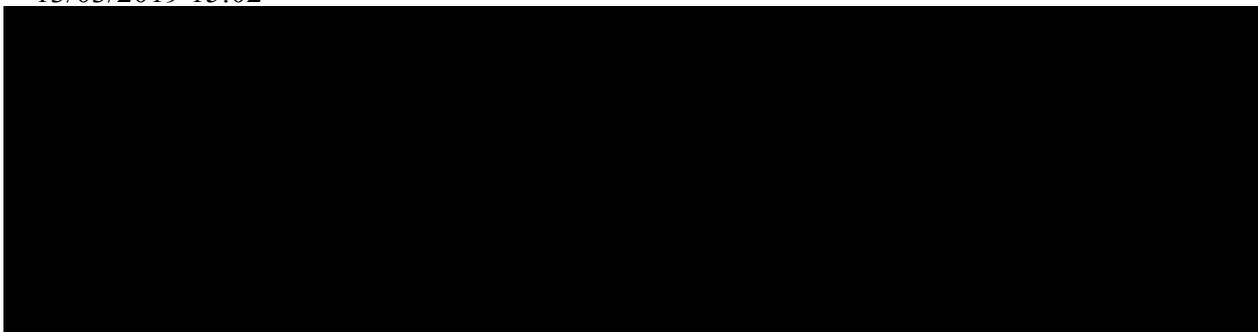
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
3 of 4 (Appendix B)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:02



1 Attachment



CCfE_reps_to_St_Helens_Local_Plan_Appendix_B_March_2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix B to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 3 of 4 and Appendix C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP
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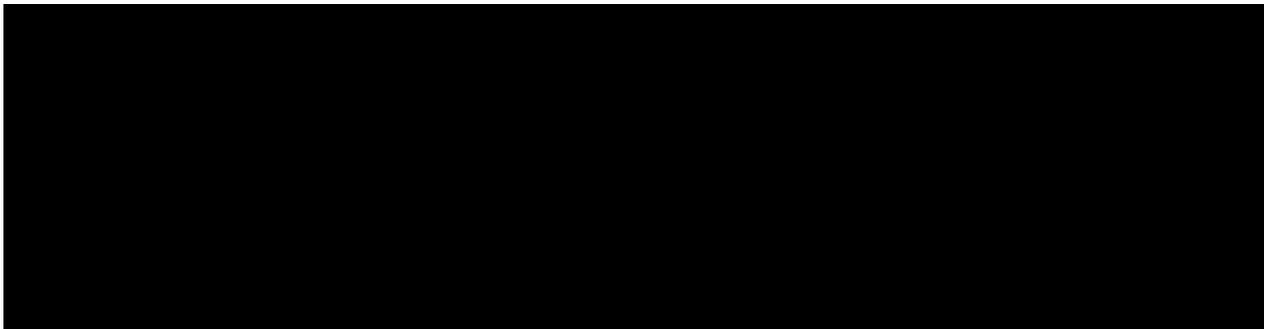
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Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:06



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix C_March 2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix C to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 4 of 4 and is the final part of our representations. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP
P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom



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**Representations to the Submission Draft
St Helens Borough Local Plan 2020 – 2035**
Prepared on behalf of the Church Commissioners
for England

March 2019

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. 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. 03

- 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.

PO0740



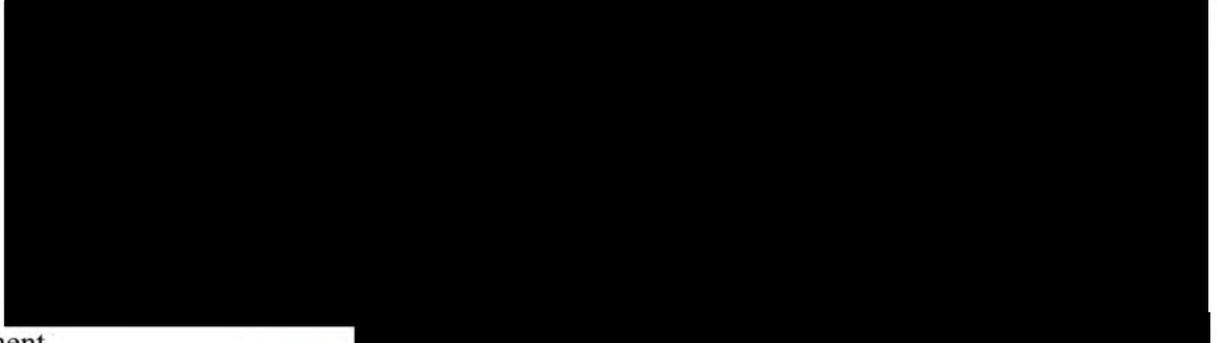
Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 1 of 4 (main representations)

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

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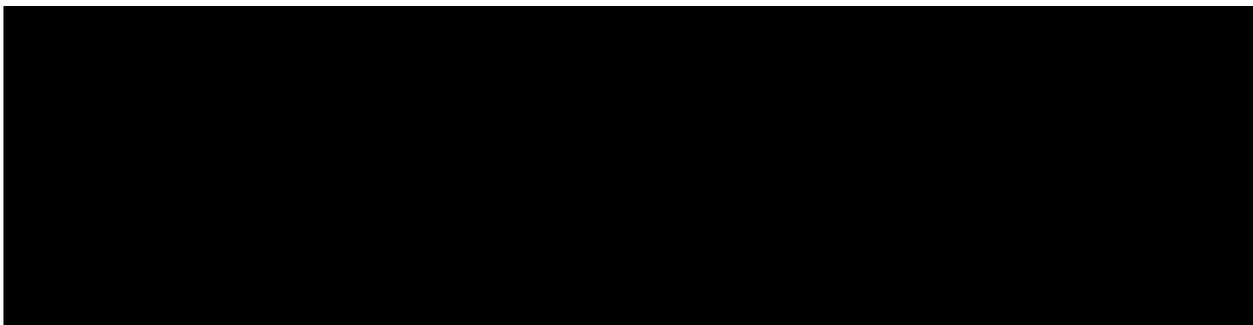
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
2 of 4 (Appendix A)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:01



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix A_March 2019.pdf

Apologies – now re-sent with attachment.

Amy Kennedy

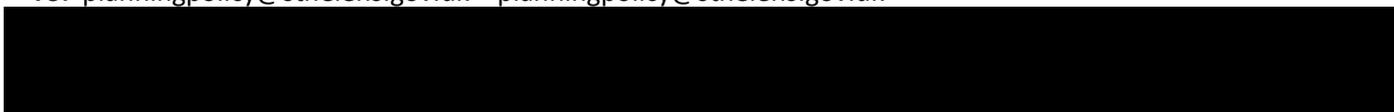
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From: Kennedy, Amy (UK - Manchester)

Sent: 13 March 2019 15:00

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



Subject: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 2 of 4 (Appendix A)

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix A to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 2 of 4 and Appendices B and C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP

P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom





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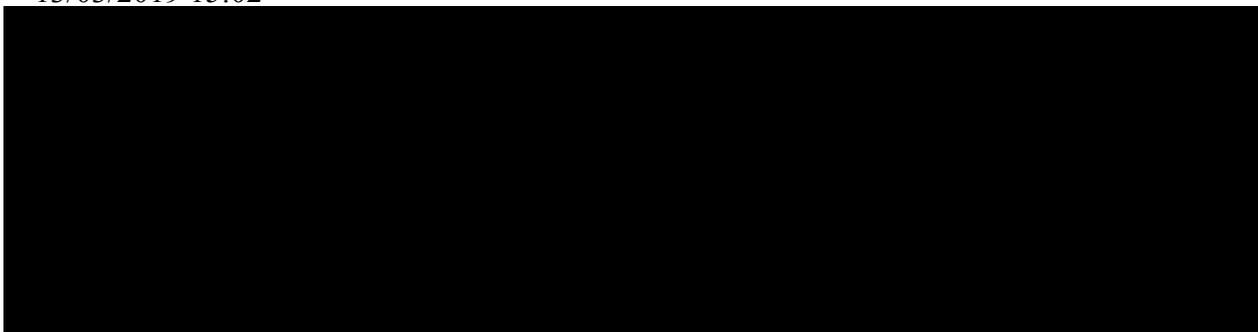
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
3 of 4 (Appendix B)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:02



1 Attachment



CCfE_reps_to_St_Helens_Local_Plan_Appendix_B_March_2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix B to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

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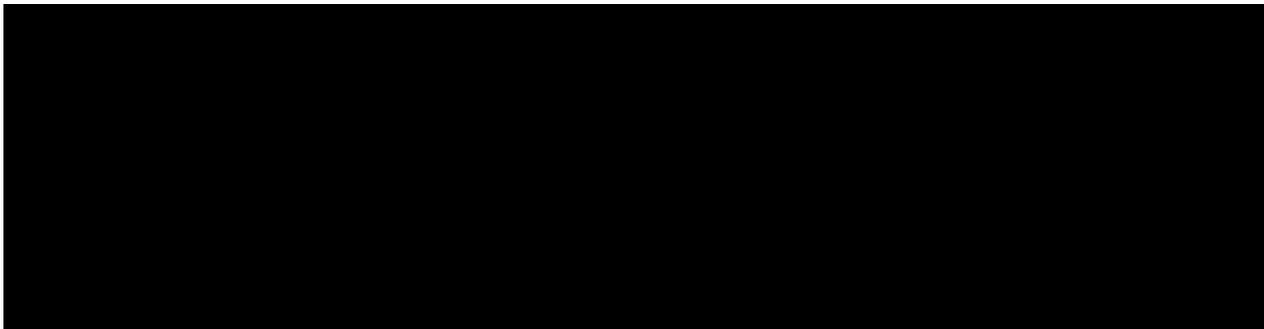
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Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:06



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.

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**Representations to the Submission Draft
St Helens Borough Local Plan 2020 – 2035**
Prepared on behalf of the Church Commissioners
for England

March 2019

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. 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. 03

- 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.

2.7 Consequently, in order to make the policy sound and positively prepared, it should be removed. Viability should be assessed on a case by case basis irrespective of the site's greenfield or brownfield status and any relaxation or lowering of developer contributions should be assessed accordingly.

04

2.8 The Commissioners also object to the extent of the Green Belt referred to in Part 4 of draft Policy LPA02, which references the draft Policies Map. We believe the Commissioners' site at Hydes Brow in Rainford should be removed from the Green Belt and allocated for residential land.

05

2.9 The Commissioners' land to the east of Higher Lane/south of Muncaster Drive at White House Lane is located within the St Helens Green Belt as shown on the draft Policies Map. This site was previously identified as safeguarded land (that is, to be removed from the Green Belt but not allocated until a Local Plan review) under draft Policy HS18 in the December 2016 Local Plan Preferred Options document.

2.10 The Draft Plan removes the site's draft safeguarded status, so that it remains in the Green Belt. The Commissioners object to this change. We believe the Green Belt boundary shown on the draft Policy Map is unjustified, not positively prepared, and inconsistent with national policy in that it reduces the Council's ability to respond flexibly to changing circumstances. This is contrary to national planning policy, which states at Paragraph 81 that:

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Planning policies should be flexible enough to accommodate needs not anticipated in the plan... and to enable a rapid response to changes in economic circumstance.

2.11 Paragraph 139 of national planning policy also supports the inclusion of safeguarded land stating:

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

2.12 The suitability of the Commissioners' sites above for development is detailed further in Section 3 of these representations.

Policy LPA05: Meeting St Helens' Housing Need

2.13 The Commissioners object to draft Policy LPA05 on the basis that it is not positively prepared, justified, effective or consistent with national policy, which states at Paragraph 67 of the NPPF that:

Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites taking into account their availability suitability and likely economic viability. Planning Policies should identify a supply of:

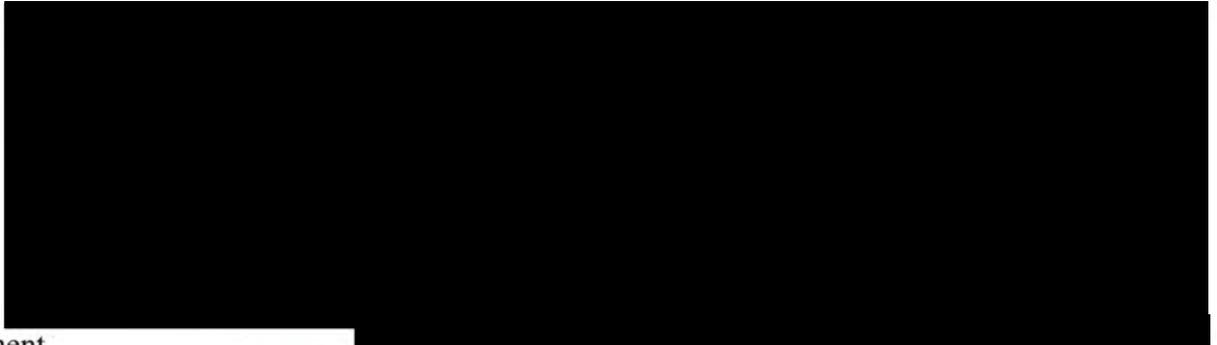
07

- a) *Specific, deliverable sites for years one to five of the plan period, and,*
- b) *Specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15 of the plan.*

PO0741



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

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Planner | FA - Real Estate | Deloitte LLP
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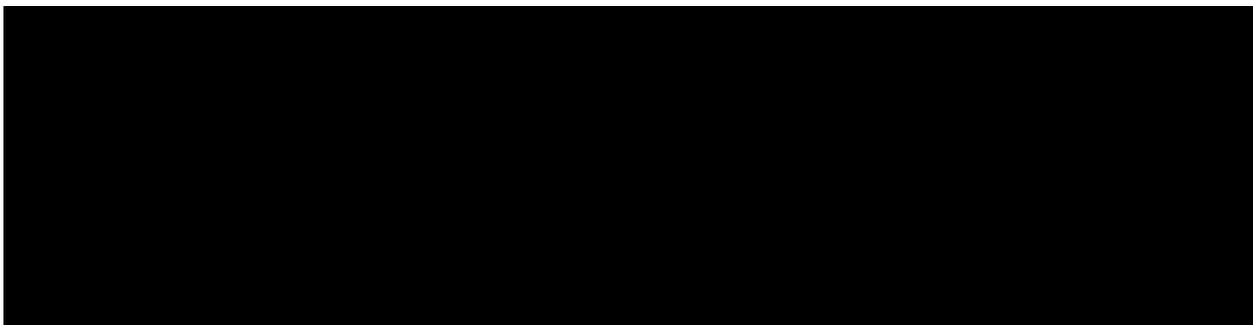
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
2 of 4 (Appendix A)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:01



1 Attachment



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Apologies – now re-sent with attachment.

Amy Kennedy

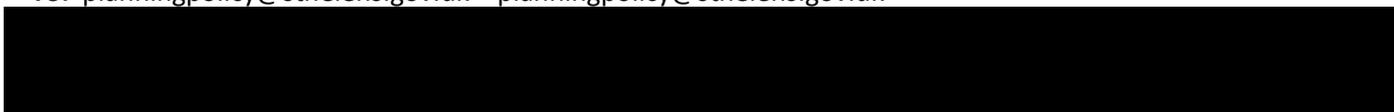
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From: Kennedy, Amy (UK - Manchester)

Sent: 13 March 2019 15:00

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



Subject: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 2 of 4 (Appendix A)

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix A to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 2 of 4 and Appendices B and C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

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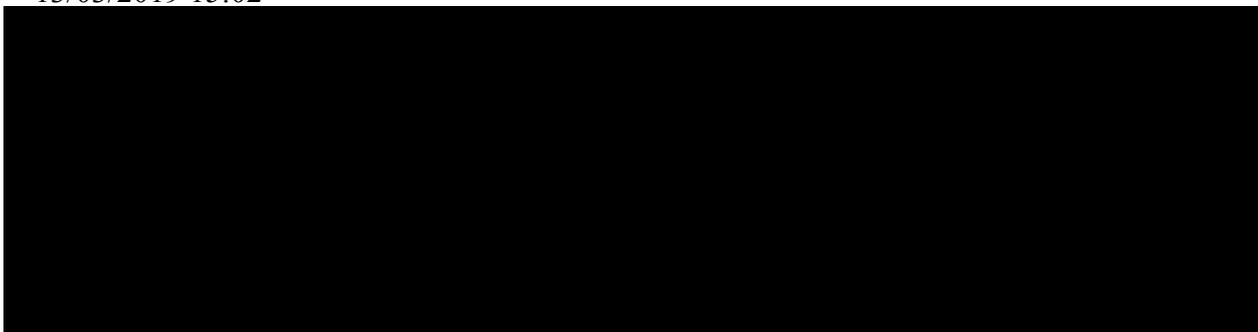
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
3 of 4 (Appendix B)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:02



1 Attachment



CCfE_reps_to_St_Helens_Local_Plan_Appendix_B_March_2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix B to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

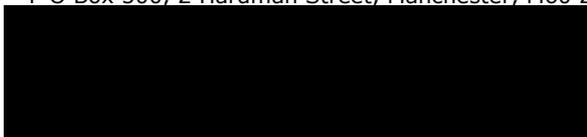
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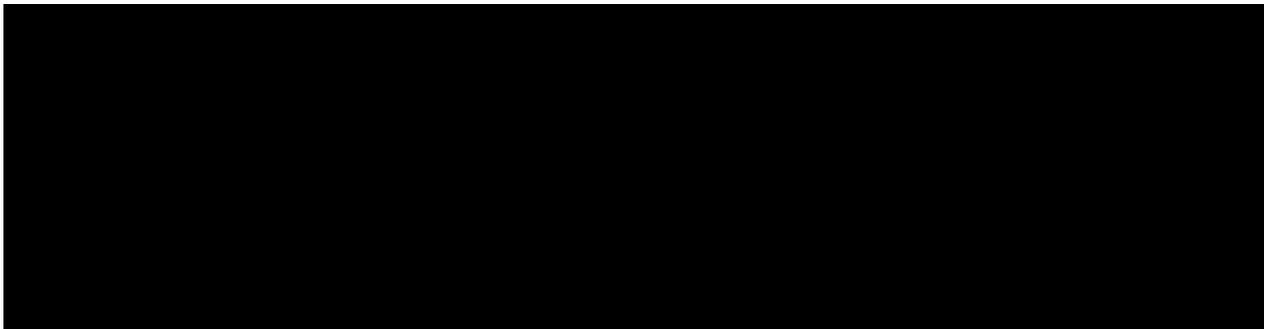
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Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:06



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix C_March 2019.pdf

For the attention of: The Planning Policy Team

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**Representations to the Submission Draft
St Helens Borough Local Plan 2020 – 2035**
Prepared on behalf of the Church Commissioners
for England

March 2019

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.

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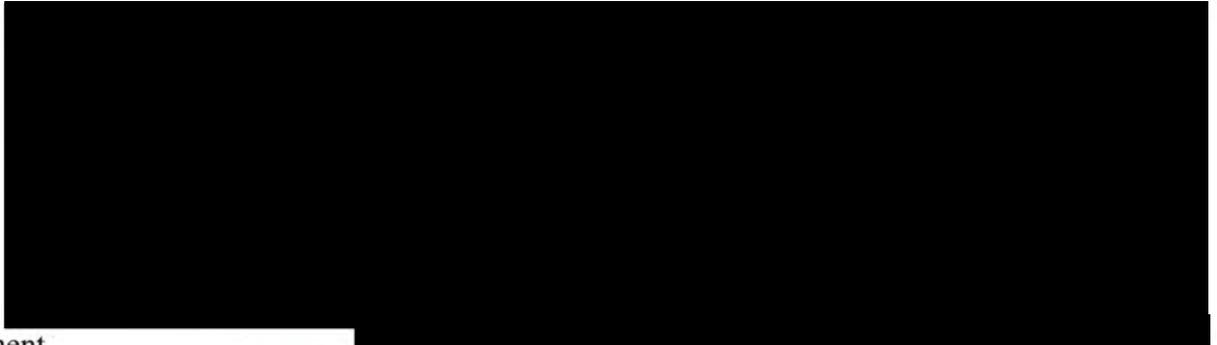
07

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PO0742



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

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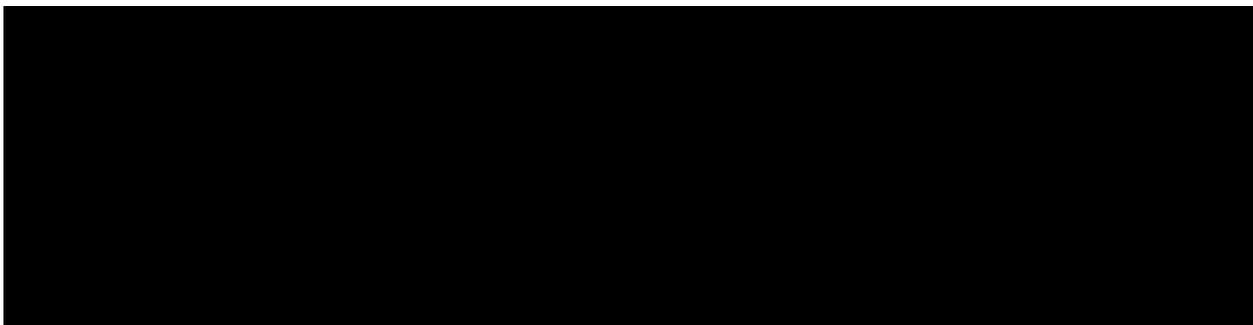
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
2 of 4 (Appendix A)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:01



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix A_March 2019.pdf

Apologies – now re-sent with attachment.

Amy Kennedy

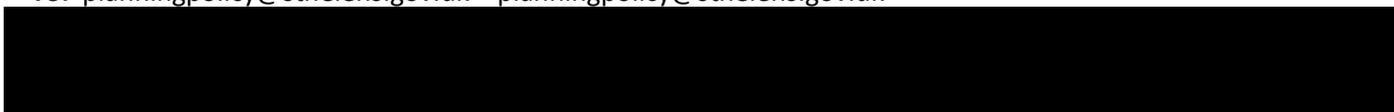
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From: Kennedy, Amy (UK - Manchester)

Sent: 13 March 2019 15:00

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



Subject: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 2 of 4 (Appendix A)

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix A to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 2 of 4 and Appendices B and C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

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P O Box 500, 2 Hardman Street, Manchester, M60 2AT, United Kingdom





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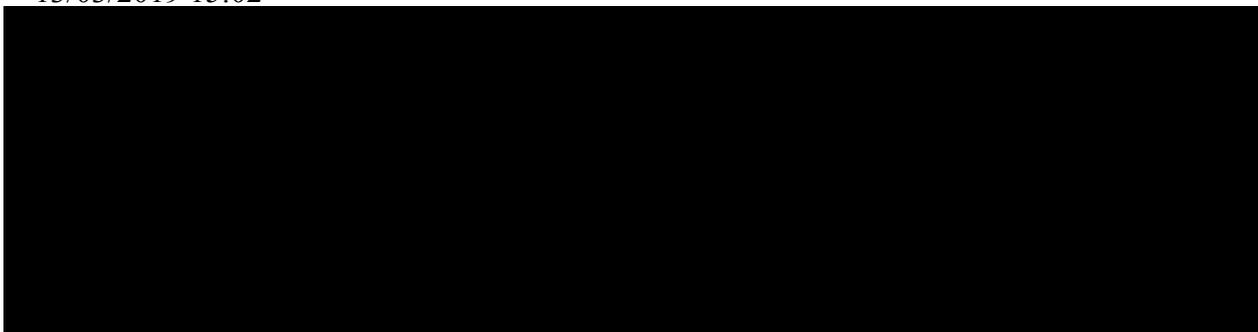
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
3 of 4 (Appendix B)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:02



1 Attachment



CCfE_reps_to_St_Helens_Local_Plan_Appendix_B_March_2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

Please find attached Appendix B to our representations on the Submission Draft St Helens Borough Local Plan 2020-2035 submitted on behalf of the Church Commissioners for England.

Please note that this email is 3 of 4 and Appendix C will follow under separate cover. A CD containing an electronic copy of the collated representations and appendices will follow via the post.

Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

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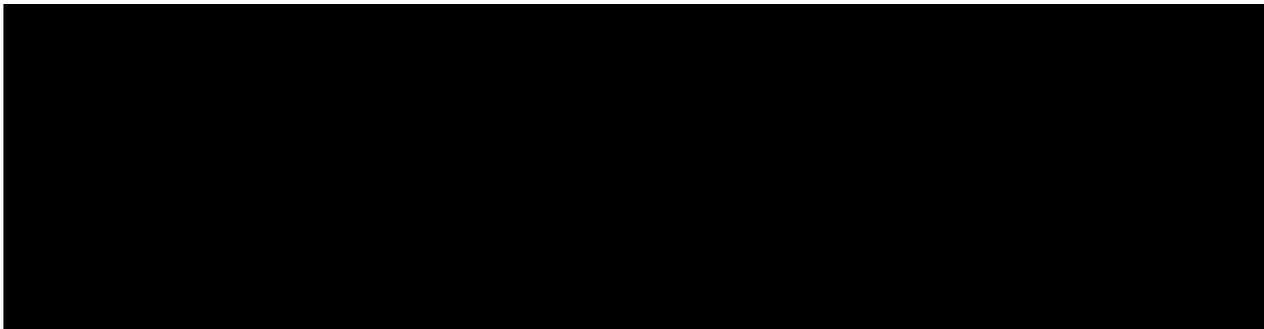
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Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:06



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

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**Representations to the Submission Draft
St Helens Borough Local Plan 2020 – 2035**
Prepared on behalf of the Church Commissioners
for England

March 2019

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. 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. 03

- 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.

2.7 Consequently, in order to make the policy sound and positively prepared, it should be removed. Viability should be assessed on a case by case basis irrespective of the site's greenfield or brownfield status and any relaxation or lowering of developer contributions should be assessed accordingly.

04

2.8 The Commissioners also object to the extent of the Green Belt referred to in Part 4 of draft Policy LPA02, which references the draft Policies Map. We believe the Commissioners' site at Hydes Brow in Rainford should be removed from the Green Belt and allocated for residential land.

05

2.9 The Commissioners' land to the east of Higher Lane/south of Muncaster Drive at White House Lane is located within the St Helens Green Belt as shown on the draft Policies Map. This site was previously identified as safeguarded land (that is, to be removed from the Green Belt but not allocated until a Local Plan review) under draft Policy HS18 in the December 2016 Local Plan Preferred Options document.

2.10 The Draft Plan removes the site's draft safeguarded status, so that it remains in the Green Belt. The Commissioners object to this change. We believe the Green Belt boundary shown on the draft Policy Map is unjustified, not positively prepared, and inconsistent with national policy in that it reduces the Council's ability to respond flexibly to changing circumstances. This is contrary to national planning policy, which states at Paragraph 81 that:

06

Planning policies should be flexible enough to accommodate needs not anticipated in the plan... and to enable a rapid response to changes in economic circumstance.

2.11 Paragraph 139 of national planning policy also supports the inclusion of safeguarded land stating:

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

2.12 The suitability of the Commissioners' sites above for development is detailed further in Section 3 of these representations.

Policy LPA05: Meeting St Helens' Housing Need

2.13 The Commissioners object to draft Policy LPA05 on the basis that it is not positively prepared, justified, effective or consistent with national policy, which states at Paragraph 67 of the NPPF that:

Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites taking into account their availability suitability and likely economic viability. Planning Policies should identify a supply of:

07

- a) *Specific, deliverable sites for years one to five of the plan period, and,*
- b) *Specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15 of the plan.*

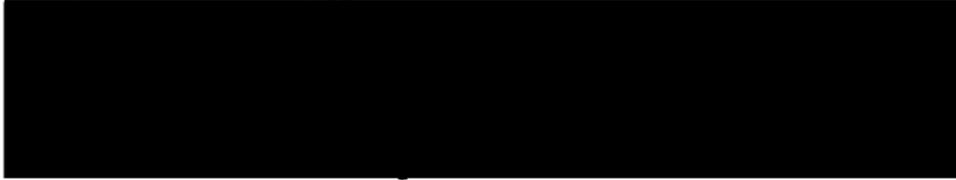
PO0743



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

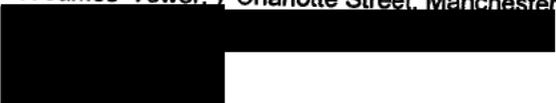


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St. Helens
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**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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

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: M1 4DZ
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 <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 Wednesday 13th March 2019** by:

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

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

or by e-mail to: planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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.

4. Specific Policies

Policy LPA02: Spatial Strategy

- 4.1. We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Garswood (*"a village in the north of the Borough...large enough to form a Key Settlement"*), recognises that Garswood has potential for and can support new development. The spatial distribution effectively addresses the existing housing and employment issues within the borough and development in these regions will lead to sustainable development across the borough. 05
- 4.2. 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, including proposing development at Garswood, and releasing of Green Belt land for housing. We therefore support the identification of Garswood for new development.
- 4.3. The policy highlights that *"the re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites"*. This needs re-wording to avoid ambiguity. The use of brownfield land is understandably a priority in terms of regeneration and sound planning, but brownfield sites should not be prioritised over allocated greenfield sites in terms of phasing. 06
- 4.4. At LPA02(4) the policy highlights that *"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"*. We object to this on the basis that there is no clarity on when a full review of the local plan will be triggered. Further clarity should be provided on this point, including with reference to the Housing Delivery Test and / or Five Year Supply. Additionally, we advocate that safeguarded land should come forward for development within the plan period, should housing allocations become stalled or not deliver housing within the timescales identified. 07
- 4.5. The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included; the issues are covered in Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. 08
- 4.6. At paragraph 4.6.2 'Sub-regional context', it confirms St Helens Council has cooperated extensively with nearby districts including the Greater Manchester City Regions. We support the need which has been identified within the Liverpool City Region to accommodate the growth of the logistics and warehousing sector, in order to support underlying economic trends and the growth of the port of Liverpool. 09
- 4.7. We also support the Plan's aims to address the issue of insufficient employment land to meet the needs of modern businesses. We support mixed use development and smaller employment uses interspersed with residential development as this will encourage St Helens Borough's residents to work closer to home, reduce the number of people who commute to other locations or move away to secure work. 10

Policy LPA03: Development Principles

- 4.8. 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 because some will not be relevant to a particular proposal. 11

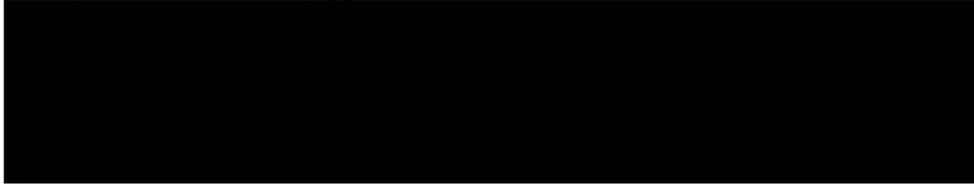
PO0744



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Emer Cunningham

to:
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13/03/2019 15:02

Cc:
Doug Hann, Matthew Hard



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St. Helens Council

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Ref: LPSD

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

Table with 2 columns: 1. Your Details, 2. Your Agent's Details (if applicable). Rows include Title, Name, Organisation, Address, Postcode, and Contact Information.

Signature and Date fields. Signature is redacted, Date is 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? 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.

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Merseyside
WA10 1HP**

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

3. To which part of the Local Plan does this representation relate?									
Policy	<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"/> No , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	<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.

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.

4. Specific Policies

Policy LPA02: Spatial Strategy

- 4.1. We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Garswood (*"a village in the north of the Borough...large enough to form a Key Settlement"*), recognises that Garswood has potential for and can support new development. The spatial distribution effectively addresses the existing housing and employment issues within the borough and development in these regions will lead to sustainable development across the borough. 05
- 4.2. 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, including proposing development at Garswood, and releasing of Green Belt land for housing. We therefore support the identification of Garswood for new development.
- 4.3. The policy highlights that *"the re-use of previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites"*. This needs re-wording to avoid ambiguity. The use of brownfield land is understandably a priority in terms of regeneration and sound planning, but brownfield sites should not be prioritised over allocated greenfield sites in terms of phasing. 06
- 4.4. At LPA02(4) the policy highlights that *"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"*. We object to this on the basis that there is no clarity on when a full review of the local plan will be triggered. Further clarity should be provided on this point, including with reference to the Housing Delivery Test and / or Five Year Supply. Additionally, we advocate that safeguarded land should come forward for development within the plan period, should housing allocations become stalled or not deliver housing within the timescales identified. 07
- 4.5. The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included; the issues are covered in Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. 08
- 4.6. At paragraph 4.6.2 'Sub-regional context', it confirms St Helens Council has cooperated extensively with nearby districts including the Greater Manchester City Regions. We support the need which has been identified within the Liverpool City Region to accommodate the growth of the logistics and warehousing sector, in order to support underlying economic trends and the growth of the port of Liverpool. 09
- 4.7. We also support the Plan's aims to address the issue of insufficient employment land to meet the needs of modern businesses. We support mixed use development and smaller employment uses interspersed with residential development as this will encourage St Helens Borough's residents to work closer to home, reduce the number of people who commute to other locations or move away to secure work. 10

Policy LPA03: Development Principles

- 4.8. 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 because some will not be relevant to a particular proposal. 11

PO0745



St Helens Borough Local Plan 2020-2035 Submission Draft - Representations on behalf of Bellway Homes Ltd
Claire Pegg/GBR
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:33

① - LPA 05
② - LPA05 Table 4.6
③ - LPA02
④ - GBR



3 Attachments



lpsd-representation-form_Bellway Homes Ltd_Rainhill Hall Farm.pdf Appendix 1 - Previous Representations.pdf



Bellway - Rainhill Hall Farn - St Helens Submission Draft - March 2019.pdf

Hello,

Please find attached representations made to the St Helens Borough Local Plan 2020-2035 Submission Draft on behalf of Bellway Homes Limited with regards to Land at Rainhill Hall Farm.

I will send Appendices 2 and 3 under separate cover due to their large file size.

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

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

Kind regards,
Claire

Claire Pegg MRTPI MRICS
Senior Consultant
Development & Planning, UK Consulting



No 1 Marsden Street | Manchester | M2 1HW

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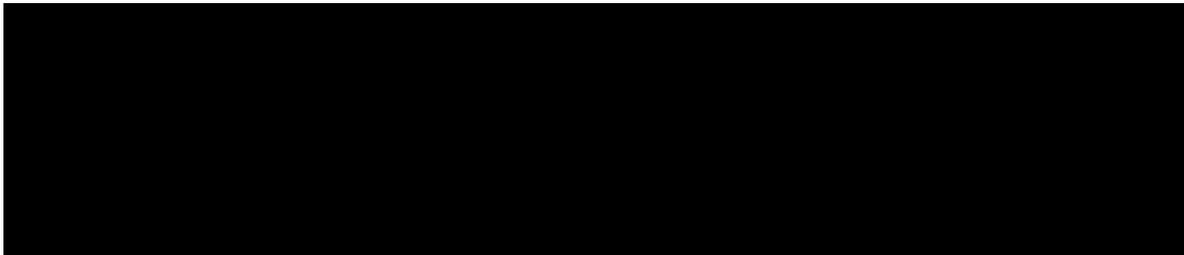
St. Helens Borough Local Plan 2020-2035 Submission Draft

Claire Pegg/GBR

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:31



2 Attachments



lpsd-representation-form_Bellway Homes Ltd_Rainhill Hall Farm.pdf



Bellway - Rainhill Hall Farn - St Helens Submission Draft - March 2019_merge.pdf

Hello,

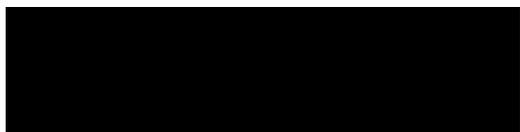
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Kind regards,
Claire

Claire Pegg MRTPI MRICS
Senior Consultant
Development & Planning, UK Consulting



No 1 Marsden Street | Manchester | M2 1HW

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St.Helens
Council

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

Ref: LPSD

(For official use only)

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

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;

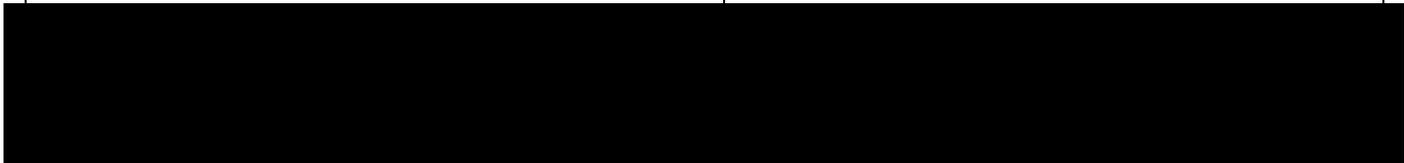
Part A – Personal Details

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: Miss
First Name: Mike	First name: Claire
Last Name: Stone	Last Name: Pegg
Organisation/company: Bellway Homes Limited (Strategic Land Division)	Organisation/company: Cushman & Wakefield
Address: Bellway Homes Limited (Head Office), Seaton Burn House, Dudley Lane, Seaton Burn, Newcastle upon Tyne, Postcode: NE13 6BE	Address: 1 Marsden Street Manchester Postcode: M2 1HW



Signature: 	Date: 13.03.2019
---	-------------------------

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

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

Yes (Via Email)

No

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

RETURN DETAILS

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

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

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

or by e-mail to: planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA02; LPA05	Paragraph / diagram / table		Policies Map	X	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review					

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

Please tick as appropriate

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

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

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

Please see accompanying statement of 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 accompanying statement of representations.

Please continue on a separate sheet if necessary

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

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

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

<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 assist the appointed Planning Inspector in his or her consideration and examination of the submitted development plan, Bellway Homes Limited (Strategic Land Division) would like to participate in discussions around whether the Local Plan is sufficient to meet the aspiration of national planning policy to boost significantly the supply of housing, whether the proposed distribution of allocations accords with the spatial vision and welcome the opportunity to discuss the merits of the site at Rainhill Hall Farm. Bellway Homes Limited (Strategic Land Division) do not consider that this can be achieved by relying on the submitted written representations alone.

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

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



**CUSHMAN &
WAKEFIELD**

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

BELLWAY HOMES LIMITED

March 2019

3.0 Green Belt Review

- 3.1 As part of the Local Plan evidence base, the Council has undertaken a review of the Green Belt (GB). The methodology and assessment results are set out in the Green Belt Review, December 2018. ✓
- 3.2 The draft Local Plan recognises that a number of sites must be released from the GB for the Council to meet its housing and employment needs. ✓
- 3.3 Paragraph 4.18.11 of the draft Local Plan acknowledges that the GB Review methodology has resulted in some key settlements not having had any suitable sites identified within or near to them. ✓
- 3.4 This is particularly the case for Rainhill, which Policy LPA02 identifies as a Key Settlement, where the Policy states sustainable regeneration and growth will be focussed. The supporting text to Policy LPA02 states that land for new development will be identified in sustainable locations, generally within, on the edge of, or close to Key Settlements and that among other factors, this should take account of past rates of housing delivery in relation to settlement size (paragraph 4.6.8). ✓
- 3.5 Further, the Spatial Vision sets out the Council's aspiration for the "balanced regeneration and sustainable growth of its built-up areas", with Strategic Objective 5.3 seeking to enhance the vitality and viability of town centres. ✓
- 3.6 It is significant that no allocations are proposed in Rainhill south of the railway line and it is therefore clear that the GB Review process conflicts with the aspirations of Policy LPA02, the Spatial Vision and Strategic Objectives.] ③
- 3.7 Paragraph 8.19 of the January 2019 SHMA Update identifies barriers to owner-occupation in St Helens due to access to capital for deposits. The SHMA notes that schemes such as Help-to-Buy can assist with this, alongside other affordable housing products. New build developments on greenfield or GB sites are best placed to meet this affordable housing need as they do not face the same viability issues as smaller, technically constrained or brownfield sites. ✓

Stage 1B Assessment

- 3.8 We now turn to the Stage 1B assessment of the GB parcels within which the site is located. ✓
- 3.9 The sites are within Green Belt Parcel (GBP) 090, with the areas of the site north and south of Blundells Lane each occupying approximately a quarter of GBP_090_C and GBP_090_B respectively. Both these sub-parcels scored "high" in the Stage 1B GB assessment and were therefore discounted from further assessment stages. ✓
- 3.10 The detailed sub-parcel assessments are contained at Appendix C of the GB Review. We consider the assessment to be incorrect and have undertaken a reassessment as set out in the table on the following page.] ④
- 3.11 When discussing the boundary features, we have referred to Table 2.1 of the GB Review which explicitly states protected woodlands greater than 20m in width should be considered strong boundary features. ✓
- 3.12 We have also considered paragraph 2.18 of the GB Review which defines "sprawl" as an untidy or irregular spread [of development]. Paragraph 2.19 then states that in determining the extent to which sprawl may occur, the sub-parcel size, proximity to large built up areas (like Rainhill) and other strong physical features should be considered. ✓

5.0 Conclusion

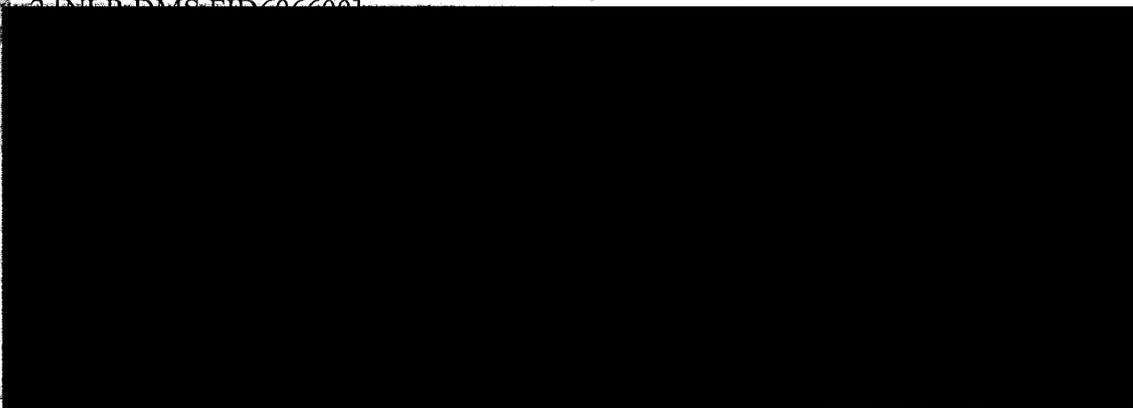
- 5.1 These representations have demonstrated that there is a clear case for considering supporting the release of the site from the Green Belt and allocation for residential development.
- 5.2 The delivery of up to 340 new homes at the site would make a significant and necessary contribution towards the Council's housing need, which as set out in Section 2, should be significantly higher to account for the Council's significant economic growth aspirations.
- 5.3 The development of the site would also assist in supporting Rainhill as a key settlement, ensuring a fair and balanced distribution of new development in St Helens in accordance with the Spatial Vision and settlement hierarchy set out in Policy LPA02.
- 5.4 The site presents an appropriate and logical location for development, adjacent to the settlement edge, without causing harm to the wider landscape or threatening the remainder of the Green Belt sub-parcels or wider parcel.
- 5.5 We consider that the Council incorrectly dismissed the relevant sub-parcels at Stage 1B of the GB Review and should have progressed the assessment through Stage 2 and Stage 3 of the review. Our own assessment of the sub-parcels at these later assessment stages demonstrates that sub-parcel's capacity for some development, principally adjoining the settlement edge of Rainhill.
- 5.6 We consider that the release of the site from the Green Belt is wholly justified as the scheme will deliver a high quality residential environment, with significant associated socio-economic benefits. The development has a willing landowner and developer, and Bellway are able to start delivering homes at the site in the short term.
- 5.7 In summary:
- The site is sustainably located, near to a wide range of community services and infrastructure;
 - The site is extremely well-located for access to a range of public transport options;
 - The site is not subject to any significant technical constraints;
 - The development will deliver high-quality market and affordable homes;
 - The development would contribute towards meeting the Council's housing land supply, at a time when there is an identified requirement to release land from the Green Belt;
 - The proposed development would deliver economic benefits through increased local spend from new residents; job creation during the construction phase; and monies to the Council through Council Tax;
 - The release of the site from the Green Belt would not prejudice the preservation of the wider parcel; and
 - The land owner and reputable developer are willing and available to deliver homes in the short term.
- 5.8 The development of the site is strongly considered to comprise sustainable development and accord with national and local planning policy. The proposal can be sensitively designed to ensure there is no significant adverse landscape impact and the desktop review has not identified any insurmountable technical constraints to the delivery of housing. The site is available, suitable and achievable for residential development and we therefore ask the Council to afford strong consideration to the release of this site from the Green Belt as an immediately deliverable allocation.

PO0746

ELO211



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



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

1 Attachment



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

- ⑩ LPA07
- ⑪ LPA08
- ⑫ LPA09
- ⑬ LPA11

- ⑰ GBR
- ⑱ EVA

Sir/Madam,

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

Kind regards,
Melissa

- | | | | |
|-----------|---------|---------|---------|
| ⑭ LPC01/2 | ⑰ LPC02 | ⑳ LPC13 | ㉑ LPD01 |
| ⑮ LPC01/3 | ⑱ LPC05 | ㉒ LPD01 | ㉓ LPD02 |
| ⑯ LPC01/5 | ㉔ LPC10 | ㉕ LPD01 | ㉖ LPD03 |
| ⑰ LPC01/6 | ㉗ LPC12 | ㉘ LPD01 | ㉙ LPD07 |
| | | | ㉚ SHMA |

Melissa Wilson
Senior Planner

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



Sir/Madam,

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

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

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

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

Kind regards
Brian

Brian O'Connor
Associate Director

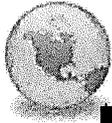
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

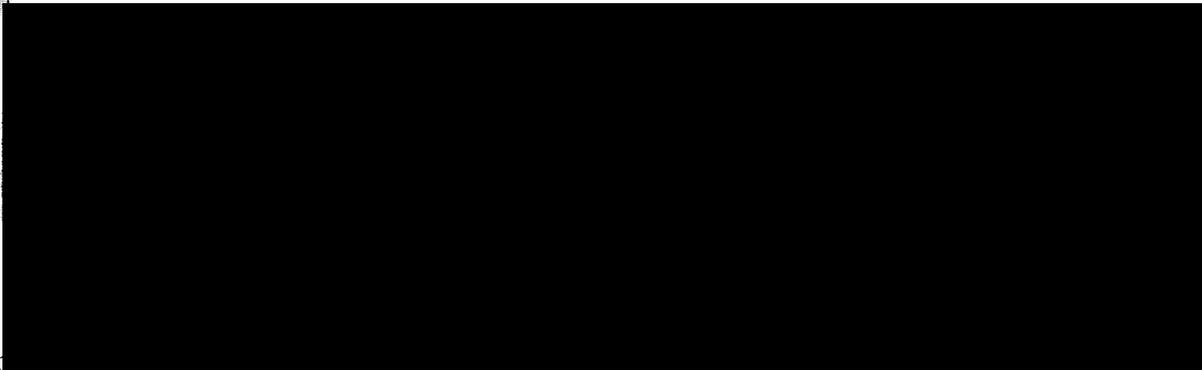
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Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2
[NLP-DMS.FID606600]
Brian O'Connor



1 Attachment



SPLIT 41874_03 St Helens Local Plan Consultation - Soundess Repts 13.03.19_Part_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, pleased 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>

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Kind regards
Brian

Brian O'Connor
Associate Director

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

lichfields.uk

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

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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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]

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.

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 <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	
See supporting Representations and Appendices	

ELO211

St Helens Local Plan Soundness Representations

Taylor Wimpey UK Limited

13 March 2019



41874/03/SPM/MWI
17081285v8
17081285v8

3.0 Policy LPA02: Spatial Strategy

✓ ②

Introduction

- 3.1 Policy LPA02 sets out the spatial strategy for St Helens over the plan period and identifies locations for sustainable growth.

Consideration of Policy

- 3.2 TW supports the strategy for sustainable growth as set out in Policy LPA02 and the Council's acknowledgement of the need for development to be delivered in sustainable locations (Part 1 and 2). TW broadly supports the spatial strategy identified by Policy LPA02 and the directing of development to Key Settlements including St Helens Core Area, Newton-le-Willows and Earlestown and Garswood.
- 3.3 TW supports the settlement hierarchy as set out in the explanatory text §4.6.3. TW agrees that the greatest focus for new development should be on St Helens Core Area and Newton-le-Willows and Earlestown which is the '*largest distinct Key Settlement after the Core Area*'. TW supports the provisions of the explanatory text [§4.6.7] which identifies that the "*Borough has a substantial need for new housing development that is linked to demographic needs and the need to provide sufficient housing to support employment growth*".
- 3.4 Ensuring a sufficient housing supply will help to deliver a wider housing mix that is suitable of meeting the market and affordable requirements of the local population. It will also help to support service provision and maintain the vitality of the borough. In this context, TW supports the allocation of the land at Gorsey Lane and Gartons Lane under Policy LPA05. However, TW are of the opinion that Newton-le-Willows, as largest Key Settlement, should be apportioned a higher quantum of development; and the allocation of the wider Vista Road and Common Road site would further contribute to overall housing requirement in this area whilst aligning with the spatial strategy overall. Lichfields, on behalf of TW has undertaken a technical review of the Strategic Housing Market Assessment (SHMA) Update 2019; which identified concerns over the proposed housing figures. The findings of this review inform TW's response to Policy LPA05. This Technical Note is at Appendix 1.
- 3.5 In relation to Part 3 of the policy, TW supports the delivery of development of previously developed land in Key Settlements. TW does note, however, that the supply of previously developed sites is finite and should not prejudice the delivery of sustainable residential development on other suitable sites. It is noted that the prioritisation for reusing brownfield land does not impact, or limit, the delivery of sustainable development on other suitable and available sites. It is also noted that these sites must also be considered 'developable' in accordance with Annex 2 of the Framework. TW supports the provisions of Point 3 in lowering developer contribution thresholds, but would require this to be appropriately evidenced through the Council's Economic Viability Assessment.
- 3.6 TW supports the release of Green Belt to meet employment and housing needs over the Plan Period (Point 4) in line with the Framework [§136] as it has been identified that surrounding authorities cannot accommodate housing needs arising from the Borough. TW would note that the Council must ensure that adequate, deliverable land is released from the Green Belt in order to meet the housing requirement and longer-term needs of the Borough. The Local Plan period being pursued by the Council runs to 2035 which is the minimum necessary to meet national policy⁴. However, planning to 2035 allows no margin for delays in the adoption process and

⁴ The Framework 2019 - §22

2

Taylor Wimpey would advocate an elongated plan period to ensure the Plan can meet the requirements of national policy when it comes to being adopted.

3.7 Lichfields, on behalf of TW has undertaken a review of the Green Belt Review supporting the Local Plan and this appended to these representations (Appendix 2).

3.8 Furthermore, it is considered the Policy accords with the Framework [§139] in respect of identifying Safeguarded Land subject to our further comments. TW would note that, in line with the Preferred Options Document, it would be beneficial to set out the provision of Safeguarded Land available i.e. 15 years post plan period to align with the Plan Period. Furthermore, Taylor Wimpey would advocate the use of a Plan B approach to the safeguarded sites whereby they could come forward in the event of the authority not being able to demonstrate a 5-year supply of housing land. This approach has been successfully used in the neighbouring authority of West Lancashire.

3.9 In respect of Part 8, TW acknowledges the need for new development to support the natural environment. However, it has concerns over Part (c) that requires new development to “mitigate their contribution to climate change and to adapt to its impacts”. The Local Plan fails to provide a clear strategy or guidance as to how developments are expected to incorporate climate changes mitigation or adaption measures or, in what capacity. This part of the Policy therefore conflicts with the provisions of the Framework⁵ and it is impossible to understand the viability implications of this vague policy requirement.

3.10 In respect of 8(d) Taylor Wimpey supports the delivery of improvement projects in locations such as the Bold Forest Park.

Tests of Soundness

- 1 **It is not effective:** The Policy fails to provide a clear strategy for how developments mitigate for and adapt to the impacts of climate change. Furthermore, Taylor Wimpey consider that a Plan B approach to the safeguarded land would be appropriate.
- 2 **Consistent with national policy:** In the event of any delay in the plan preparation process through to adoption, the local plan timeframe is too short.

Recommended Change

- 3.11 To address the conflict above and ensure the Policy is sound, it is requested that the Council:
- 1 Elongate the local plan timeframe and allocate sufficient land to meet the needs of the plan period. Include a Plan B approach to the safeguarded land to allow them to come forward in the event of the Council not being able to demonstrate a 5-year supply of housing land.
 - 2 Provide a clearer strategy and guidance as to how developments are to include measures to mitigate for and adapt to climate change.

⁵ The Framework 2019 - §149

PO0747



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Vincent
Last Name:	Last Name: Ryan
Organisation/company: Jones Homes (North West) Ltd	Organisation/company: Barton Willmore
Address: c/o Agent	Address: Tower 12, 18/22 Bridge Street, Spinningfields, Manchester
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
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 <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 Wednesday 13th March 2019** by:

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

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

or by e-mail to: planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

See separate document.

Please continue on a separate sheet if necessary

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

See separate document.

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"/>	<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:

See separate document

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.

4115

EL0216



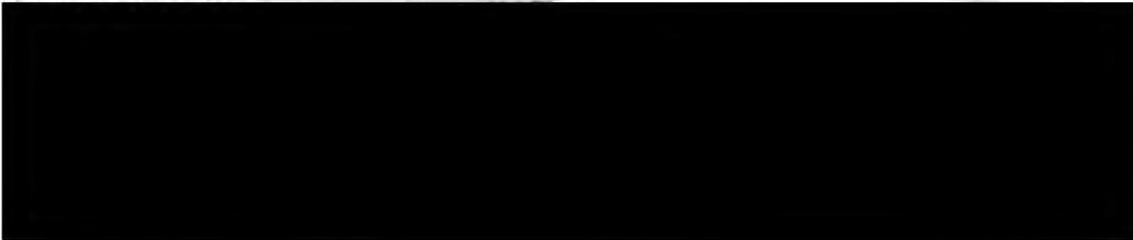
Representations on behalf of Jones Homes (North West) Limited - Submission Draft

Lorraine Robertson

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:49



1 Attachment



27131.A3.VR Representations and Encl. by Jones Homes NW FINAL 13.03.19.pdf

Local Plan Team,

On behalf of our Client, Jones Homes (North West) Limited, please find enclosed representations to the Submission Draft Local Plan.

Please confirm receipt.

Many Thanks

Lorraine

Lorraine Robertson
Senior Planner



Tower 12, Bridge Street, Spinningfields, Manchester, M3 3BZ



**BARTON
WILLMORE**

Consider the Environment, Do you really need to print this email?

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① - LPA02

② - LPA05

③ - LPA05 - TABLE 4.6

④ - GBR

⑤ - HERITAGE IMPACT ASS

⑥ - LPA06

⑦ - APPENDIX 4 MONITORING FRAMEWORK

⑧ - SHLAA

⑨ - LPA04

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18/22 Bridge Street
Spinningfields
Manchester
M3 3BZ

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

By Email: planningpolicy@sthelens.gov.uk

27131/A3/VR
13 March 2019

Dear Sir/Madam,

ST HELENS BOROUGH LOCAL PLAN 2020-2035 – SUBMISSION DRAFT CONSULTATION REPRESENTATIONS BY JONES HOMES (NORTH WEST) LIMITED

On behalf of our Client, Jones Homes (North West) Limited, we write to set out our representations to the above consultation.

These representations are intended to assist St Helens Council (“the Council”) in finalising its Local Plan and evidence base in advance of submission to the Secretary of State, to ultimately ensure that the Local Plan is sound, in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF). We trust that these representations are of assistance to the Council.

Introduction

Jones Homes is one of the UK’s leading housebuilders, creating high quality homes in desirable locations since 1959. Currently building more than 600 homes a year in the UK, Jones Homes offers an impressive portfolio of apartments, mews and townhouse residences, as well as spacious detached homes.

Jones Homes, which is part of The Emerson Group, boasts a strong record of delivering successful developments in St Helens. Recent housing schemes that have been delivered, or are in the process of being delivered, include:

- Newlands Grange – 153 units
- Eccleston Grange – 283 units
- Former Caremlite Monastery – 12 units

Orbit Developments, also part of the Emerson Group, has completed a local centre at Eccleston Grange and Linkway West, a 67,602 sq.ft leisure and retail development in the centre of St Helens. These developments represent a £12.5 million investment across the local area.



utilised and is of poor quality, lacking dedicated car parking, leading to users having to park on the highway, and having no changing facilities. There is no known shortage of recreational facilities in Newton-le-Willows and informal discussions with the Council officers have revealed that the principle of releasing the land for housing has not been considered. The release of under-utilised Council-owned land for housing would be in accordance with Government initiatives encouraging Councils to make the most of such assets in contributing towards addressing the national housing crisis and releasing much needed capital for diversion into cash-starved public services.

We therefore conclude that the exclusion of the Council-owned land from the Site boundary is not sufficiently justified and we request that the Council takes the pro-active decision to reinstate the land.

Comments on Strategic Policies

Our Client supports the need for significant housing and employment growth and acknowledges the pragmatic approach by the Council in aiming to bring forward development which, at a minimum, seeks to meet the future residential and employment needs of the Borough and identifies additional land provision to provide flexibility in supply and beyond the Plan period. Our Client is concerned, however, the SDLP does not aim to support and deliver the wider aspirations of the Liverpool City Region ("LCR"), despite Paragraph 1.7.1 of the SDLP highlighting the extent to which the Council 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 Market Assessment 2017 ("SHELMA") which sought to assess the likely needs for housing and employment land across the LCR *as a whole*. We consider that a close alignment with the aspirations of the LCR is essential to help drive forward economic growth and reverse current trends of decline in deprivation and affordability within the Borough.

Policy LPA02 – Spatial Strategy

Our Client **supports** the SDLP's approach in identifying a number of Key Settlements, which includes Newton-le-Willows. We support the need for development to be focussed on these Key Settlements as the most sustainable locations to accommodate the levels of development required to meet needs and deliver economic growth. However, **we consider that this policy wording should be amended to specify that meeting development needs will necessitate development both in and around those Key Settlements.** This is because sufficient development cannot be located within existing settlement boundaries.

Our Client **supports** Paragraph 4 of Policy LPA02, which sets out that Green Belt release will be required to meet the development needs of the Borough over the Plan period and that further Green Belt land is required to be safeguarded to meet the needs of the Borough beyond the Plan period. We **support** the release of Green Belt land within the SDLP and the need for Safeguarded Land.

Policy LPA04 – A Strong and Sustainable Economy

We note at Paragraph 4.12.3 of the SDLP that the Council rightly acknowledges that the economy of the Borough is *'inextricably linked'* to that of the wider LCR. It is stated that the Council will continue to work alongside its City Region partners *'to take full advantage of the continued growth of the City Region and to help deliver the economic growth'*. However, in order to reflect the economic growth scenario supported in the SHELMA, a step change in proposed housing delivery is also required to reflect this, otherwise the Borough will not be able to fully contribute towards or take advantage of its position within the LCR.

St Helens Local Plan: Preferred Options

Representations on Behalf of Jones Homes (North West) Ltd

January 2017

3. STRATEGIC POLICIES

3.1 The Council has outlined a number of strategic policies within the Preferred Options Document. 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. Notwithstanding this, 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

3.2 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. We consider it is essential for this policy to be included within the emerging Local Plan, and its inclusion demonstrates compliance with Paragraph 14 of the NPPF.

Policy LPA02 – Spatial Strategy

3.3 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 located in and around these Key Settlements as the most sustainable locations to accommodate the levels of development required to meet needs and deliver economic growth.

3.4 The Council sets out its justification for Green Belt release in Paragraphs 4.11 - 4.27 of the Preferred Options document. The Council maintains that Green Belt release is required because it is recognised that the Green Belt has not been substantially altered since 1983 and there is a need for a comprehensive review of the Green Belt boundaries. This will ensure that sufficient land is allocated by the Council to meet the development needs for the Borough for both the plan period, and the subsequent 15 years post plan period (until 2048).

3.5 Our Client supports the Council's approach by the Council to release land from the Green Belt for housing (and employment uses) to ensure the needs of the Borough can be met in full within the Plan period and beyond. We consider this to be a pragmatic approach taken by the Council, and compliant with Paragraph 157 of the

NPPF which sets out the need to take account of longer term requirements of the Borough.

Policy LPA03 – Development Principles

- 3.6 We support the Council's aspirations for development to be guided by a number of development principles, and the need for the Council to address the challenges faced through population growth; economic well-being; contribution to inclusive communities; contribution to high quality and built environment; minimising the need to travel; and lowering St Helen's carbon footprint. ✓
- 3.7 Clarification is required with regard to the relationship between Policy LPA01, which outlines a presumption in favour of sustainable development, and Policy LPA03 which contains a number of development principles. This is to ensure that proposals which comply with the presumption in favour of sustainable development are not refused on the basis of development principles contained within Policy LPA03. ✓
- 3.8 We do not consider that schemes which comply with the presumption in favour of sustainable development as required by Policy LPA01, but do not fully comply with Policy LPA03, should be refused, particularly where it is beyond the scope of the development. ✓
- 3.9 For example - (Development Principle 6(e)) Ensuring that all new development addresses flood risk mitigation/adaption when the Site is not located within a flood risk area to achieve the policy requirements of Policies LPA01 and LPA03. Sufficient flexibility should be built into the wording of the policy to adapt to individual site circumstances. ✓

Policy LPA05 – Meeting St Helens' Housing Needs

- 3.10 Our Client supports the need for additional housing within St Helens and consider that it is evident throughout the Preferred Options that the Council is currently unable to meet its full housing needs without Green Belt release. Our Client supports the need for Green Belt release. (2) ✓
- 3.11 Policy LPA05 identifies a requirement of 10,830 dwellings from 2014 – 2033, which equates to an average requirement of 570 dwellings. This is the same requirement as set out within the Core Strategy (2012). We refer the Council to our earlier comments ✓

PO0748

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 AIM + OBJECTIVE

10 Attachments



Ltr to St. Helen's Council JP 13.03.19.pdf Site Location Plan.pdf



lpsd-representation-form Strategic Aims and Objectives.pdf lpsd-representation-form Policy LPA03.pdf



lpsd-representation-form Proposals Map .pdf lpsd-representation-form Policy LPA04.pdf



lpsd-representation-form Spatial Vision.pdf lpsd-representation-form Omission Site.pdf



lpsd-representation-form Policy LPA02.pdf Proposals Map Extract Newton-le-Willows.pdf

Dear Sir or Madam

Please find attached a response to the Local Plan – Pre-submission Draft Submitted on behalf of Revelan.

Kind regards

John Pearce BSc (Hons) MTPL MRTPI

Senior Planner



harris lamb
PROPERTY CONSULTANCY



Harris Lamb Ltd | 75-76 Francis Road | Birmingham | B16 8SP



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St. Helens
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Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	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: [REDACTED]
Email:	Email: [REDACTED]

Signature: [REDACTED] Date: 13th March 2019

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

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Yes (Via Email)

No

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

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

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

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3. To which part of the Local Plan does this representation relate?										
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Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

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

Please see attached.

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

Our Ref: P1635/JP
Date: 13th 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]

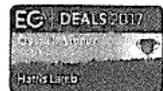
**St Helens Pre-Submission Draft Local Plan
Response by Revelan Developments Ltd.**

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.

PO0749

ELO220



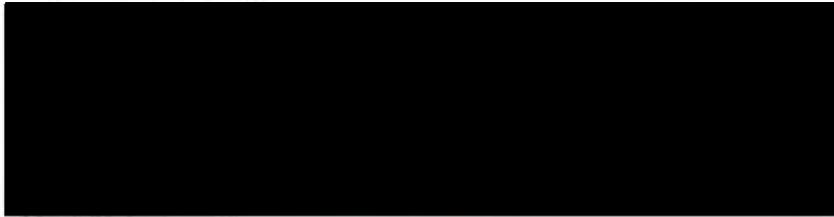
Local Plan Representations - Morris Homes

Paul Williams

to:

planningpolicy

13/03/2019 15:56



① - LPA05

② - LPA06

③ - GBR 2018

3 Attachments



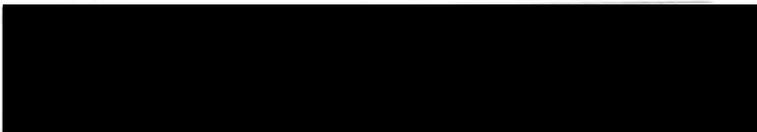
Morris Homes + Appendix.pdf Form 1.pdf Form 2.pdf

Please find attached.

With thanks,

Paul Williams

Director



Mosaic Town Planning: 10th Floor,
Chancery Place, 50 Brown St., Manchester,
M2 2JG

Registered in England No 06018747 at above address



St.Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Andrew	First name: Paul
Last Name: Thompson	Last Name: Williams
Organisation/company: Morris Homes North Ltd	Organisation/company: Mosaic Town Planning
Address: Morland House, Altrincham Road, Wilmslow, Cheshire	Address: 10 th Floor, Chancery Place, 50 Brown St, Manchester
Postcode: SK9 5NW	Postcode: M2 2JG



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

Please tick as appropriate

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

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<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
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**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**



mosaic
town planning

St. Helens Local Plan

Representations on behalf of
Morris Homes North Ltd

March 2019





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

2.12 It is also important for soundness that the plan should be able to demonstrate and maintain a 5 year housing supply from the outset. This is more likely to be achieved by releasing additional smaller to medium sizes sites from the Green Belt which can be readily delivered without major infrastructure or land assembly constraints. One such site is land at Elton Head Road, St Helens. (1)

2.13 Morris Homes therefore object to **Policy LPA02: Spatial Strategy** on the grounds that the proposed Green Belt boundaries are inadequate to meet future development needs with regard to the extent of the sites proposed for either housing allocation or safeguarding. (2)

3 LAND SOUTH OF ELTON HEAD ROAD

3.1 The site promoted by Morris Homes is 2.88ha of land on the southern side of Elton Head Road to the south of St. Helens and sits directly adjacent to the settlement boundary (see Appendix for plan). ✓

3.2 The site is bounded by existing residential development to the north and open countryside to the west, south and east. However, the open countryside parcel immediately to the east is already proposed for safeguarded land and there are trees to the southern boundary. There is existing built development on the south side of Elton Head Road with an enclave of dwellings to the east of the site. ✓

3.3 There are a number of services and facilities within walking distance, including a local convenience shop, pharmacies, post office and restaurants. Portico Nursery and Pre-school, Nutgrove Methodist Aided Primary School and St. Austins R C Primary School are also located nearby. ✓

Green Belt Assessment

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



Conclusion

- 3.27 This representation demonstrates that the site fails to meet the five purposes for including land in the Green Belt, as outlined in Paragraph 134 of the National Planning Policy Framework and that it would relate well to the existing urban form and settlement boundary. Indeed, the Council has previously concluded that it should be released from the Green Belt. ③
- 3.28 The site is underused grassland of no particular ecological or landscape value, in a sustainable location with services and facilities nearby and easy access to larger urban centres. Its release would be in line with the spatial strategy and principles of development, Policy LPA02 and LPA03 of the emerging Local Plan. ②
- 3.29 The site is both deliverable and developable in terms of the NPPF definitions, being in a suitable location with a realistic prospect that housing will be delivered in the next five years. The landowner is willing to sell the land and an established developer is already in place to deliver a high-quality housing scheme. ①
- 3.30 It is important that St. Helens is not over dependent on large site allocations with long lead-in times, given that delivery rates from brownfield sources are also unreliable. The subject site is not of a strategic scale with associated infrastructure or land assembly issues, and as recognised by Paragraph 68 of the National Planning Policy Framework, “... **medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly**”. Morris Homes have already developed 350 homes in a successful development to the south east of the site, with a further 100 under construction. Releasing the site would provide immediately deliverable housing land, producing continuity in output and contributing to the housing supply of St. Helens and the wider housing market area. ①
- 3.31 In the event that either the Local Plan Inspector supports a higher housing requirement or concludes that the identified sources of land will be insufficient to maintain a five year supply, the site is a strong contender for immediate development. Alternatively, it should be safeguarded to ensure that housing land supply can be maintained when the Local Plan is reviewed, without the need for a further Green Belt review. ①

PO0750



St Helens Borough Local Plan 2020-2035 Submission Draft - Representations on behalf of the Knowsley Estate
Olivia Hewitt/GBR

to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:05



① - LPA05
② - LPA06
③ - TABLE 4-6

2 Attachments



lpsd-representation-form_The Knowsley Estate_Bushey Lane.pdf



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

④ - LPA02
⑤ - GREEN BELT REVIEW

Hello,

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

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

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

Kind Regards,

Olivia

Olivia Hewitt MRTPI
Consultant - Manchester
Development and Planning



CUSHMAN & WAKEFIELD
1 Marsden St | Manchester M2 1HW | UK
Facebook | LinkedIn | Twitter | YouTube



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Access to or use of this email or its attachments by anyone else is strictly prohibited and may be unlawful. If you are not the intended recipient(s), you may not use, disclose, copy or distribute this email or its attachments (or any part thereof), nor take or omit to take any action in reliance on it. If you have received this email in error, please notify the sender immediately by telephone or email and delete it, and all copies thereof, including all attachments, from your system. Any confidentiality or privilege is not waived or lost because this email has been sent to you by mistake.

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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

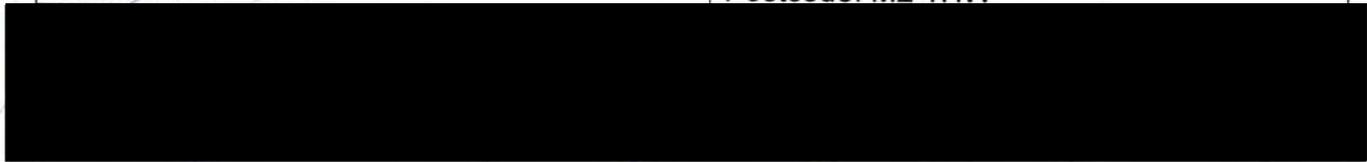
Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

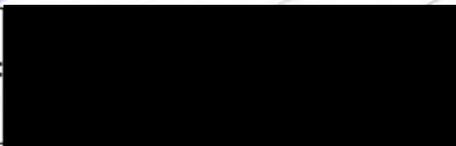
This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

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: Miss
First Name: Simon	First name: Claire
Last Name: Waller	Last Name: Pegg
Organisation/company: The Knowsley Estate	Organisation/company: Cushman & Wakefield
Address: The Estate Office, Knowsley Park Prescot Merseyside Postcode: L34 4AG	Address: 1 Marsden Street Manchester Postcode: M2 1HW



Signature: 	Date: 13.03.2019
--	------------------

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)
Yes <input checked="" type="checkbox"/> (Via Email) No <input type="checkbox"/>

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy	LPA02; LPA05; LPA06;	Paragraph / diagram / table		Policies Map	X	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)				Green Belt Review						

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

Please tick as appropriate

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

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

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

Please see accompanying statement of 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 accompanying statement of representations.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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



**CUSHMAN &
WAKEFIELD**

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

KNOWSLEY ESTATE

March 2019

3.0 Spatial Distribution of Development

- 3.1 As part of the Local Plan evidence base, the Council has undertaken a review of the Green Belt (GB). The methodology and assessment results are set out in the Green Belt Review, December 2018. ✓
- 3.2 The draft Local Plan recognises that a number of sites must be released from the GB for the Council to meet its housing and employment needs. ✓
- 3.3 Paragraph 4.18.11 of the draft Local Plan acknowledges that the GB Review methodology has resulted in some key settlements not having had any suitable sites identified within or near to them. ✓
- 3.4 This is particularly the case for Rainford, which Policy LPA02 identifies as a Key Settlement, where sustainable regeneration and growth will be focussed. The supporting text to Policy LPA02 states that land for new development will be identified in sustainable locations, generally within, on the edge of, or close to Key Settlements. ✓
- 3.5 Paragraph 4.63 of the draft Plan identifies Rainford Junction as a "satellite settlement" but recognises the close relationship between Rainford and Rainford Junction with Rainford acting as a service centre for Rainford Junction, whilst the latter provides a valuable train link. ✓
- 3.6 Further, the Spatial Vision sets out the Council's aspiration for the "balanced regeneration and sustainable growth of its built-up areas". ✓
- 3.7 It is significant that just one housing allocation (ref. 8HA) is proposed in, adjoining or even close to Rainford and it is therefore clear that the GB Review process conflicts with the aspirations of Policy LPA02, the Spatial Vision and Strategic Objectives.] (4)
- 3.8 Paragraph 8.19 of the January 2019 SHMA Update identifies barriers to owner-occupation in St Helens due to access to capital for deposits. The SHMA notes that schemes such as Help-to-Buy can assist with this, alongside other affordable housing products. New build developments on greenfield or GB sites are best placed to meet this affordable housing need as they do not face the same viability issues as smaller, technically constrained or brownfield sites.] (4)

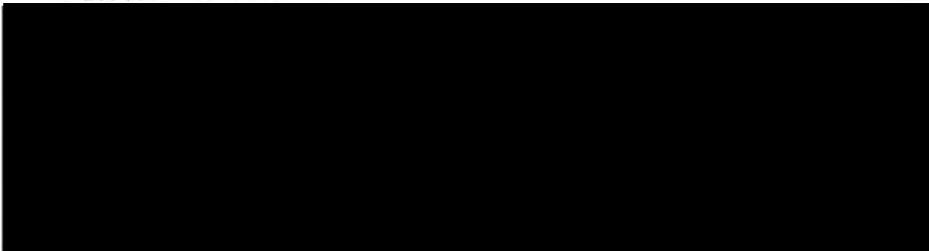
PO0751

ELO243

SITES - 8HA, 3HS, 8HS, 6HS, 7HS



St Helens Local Plan 2020-2035 Submission
Michael Wellock
to:
planningpolicy
13/03/2019 16:37



- ① - LPA02
- ② - GEN
- ③ - LPA04
- ④ - LPA04 (PARA 4.12.1
↓
4.12.1)
- ⑤ - LPA05
- ⑥ - PARA 4.6.10
- ⑦ - GBR
- ⑧ - LPA06
- ⑨ - GBR - SITE 8HA
- ⑩ - GBR - SITE 3HS
- ⑪ - GBR - SITE 8HS
- ⑫ - GBR - SITE 6HS
- ⑬ - GBR - SITE 7HS
- ⑭ - PARA 1.7.2

3 Attachments



SHLP SHGBA Version 5 13.03.19.pdf PE_Report_GBP_StHelens_Final_1000319.docx



SHGBA_St_Helens_LP_Economist_Report.pdf

Dear Sir/Madam,

Please find attached submissions prepared on behalf of Saint Helens Green Belt Association.

Please could you acknowledge safe receipt of this email.

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

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

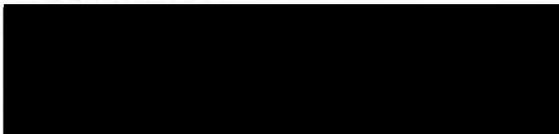
Yours faithfully,

Michael

--

Michael Wellock
Managing Director

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



ELO243

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

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

March 2019

Kirkwells

The Planning People

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

Introduction

11. The Submission Draft sets out an aspirational strategy for the Borough. This includes:

- Planning for an additional 215.4 hectares of land for employment development between 1st April 2018 and 31st March 2035;
- Over the period 1st April 2016 to 31st March 2035, planning for a minimum 9,234 net additional dwellings, at an average of 486 dwellings per annum;
- Releasing land from the Green Belt for 2,056 new homes¹; and
- Identifying 85.88² hectares of safeguarded land for employment and 148.34³ hectares of such land for housing.

Spatial Strategy

12. In setting out this very aspirational 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 attaches to Green Belts (NPPF, paragraph 133). The “essential characteristics of Green Belts are their openness and their permanence” (*op. cit.*). NPPF also sets out the 5 purposes of Green Belt (NPPF, paragraph 134). The Submission Draft Spatial Strategy (Policy LPA02, page 17) makes no mention of the “great importance” of Green Belt, its essential characteristics or purposes. The Strategy fails to deal with the strategic elements of Green Belts, only dealing with the development management policy for Green Belt contained in NPPF paragraphs 143 to 147.

13. The Spatial Strategy, in failing to recognise the great importance Government has placed on Green Belt and its strategic nature, is not consistent with national planning policy and, therefore, not sound. The Spatial Strategy should be revised

¹ Row p, Table 4.6, Submission Draft

² Table 4.7, Submission Draft

³ Table 4.8, Submission Draft

to incorporate references to the significance of Green, the essential characteristics of Green Belt and the five purposes of Green Belt.

1

14. Elsewhere in this submission we conclude that the “exceptional circumstances” which must be Strategy demonstrated in order to justify the release of Green Belt land have not been stated. Based on this evidence (Section 5 of this submission) the Spatial is not positively prepared, justified, effective or consistent with national planning policy. Further revisions of the Spatial Strategy will be needed to make the plan sound. These revisions should include deletion of the following from Spatial Strategy paragraph 4:

1

“This Plan releases land from the Green Belt to enable the needs for housing and employment development to be met in full over the Plan period from 1 April 2020 until 31 March 2035, in the most sustainable locations. Other land is removed from the Green Belt and safeguarded 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.”

1

15. There is an issue concerning the plan period. The front cover of the plan states the plan runs from 2020 to 2035, the employment policy LPA04 plans for the period 1st April 2018 to 31st March 2035 and the housing policy LPA05 runs from 1st April 2016 to 31st March 2035. Whilst the end dates are the same, the plan should be amended to include a consistent start date, so that it is clear what is the plan period for the Local Plan.

2

Exceptional Circumstances

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

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

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

71. Paragraph 137 of the NPPF then goes on to provide important guidance for plan-makers when considering “exceptional circumstances”:

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

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

72. Paragraphs 138 and 139 set out how plan-makers should draw up Green Belt boundaries:

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

139. When defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;

- b) not include land which it is unnecessary to keep permanently open;
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

73. The Submission Draft makes no reference to “exceptional circumstances” when considering Green Belt. This is a significant flaw in the preparation of the plan. Green Belt boundaries should only be changed in “exceptional circumstances” the Council have failed to conclude within the plan that “exceptional circumstances” exist, this is not consistent with national planning policy and, therefore, fails one of the tests of soundness.

74. Before concluding that “exceptional circumstances” exist to change Green Belt boundaries the Council should also, based on guidance in paragraph 137 of the NPPF, be able to “demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.” Perhaps unsurprisingly, given the Council have not demonstrated “exceptional circumstances” in the Submission Draft, this point has also not been addressed. Alternatives were set out in the Preferred Option Draft, but this work is not updated. We have set out how the Council should have considered not allocating the full amount of land and adopting a pre-cautionary approach by allocating for the earlier years of the plan and committing to an early review of the plan. The Council have not considered this option. Again, the Submission Draft is not consistent with the NPPF and fails this test of soundness. This is a reasonable option based on the uncertainty surrounding the housing figures and demographics and the future of the SM.

PO0752

EL0245

SITE 8LEA



Local Plan Submission Consultation
David Walton
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:40

- ① - LPA02
- ② - LPA03
- ③ - LPA04



1 Attachment



St Helens LP Submission Version - PBA Representation for Oak Tree Developments 13.03.19 inc apps.pdf

Dear Sirs

Please find attached our representation report which includes the standard form at Appendix B. The report provides context to our response.

Kind regards,
David Walton
Associate Planner



PBA has joined the Stantec family, find out more at peterbrett.com.



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Oak Tree Developments



St Helens Local Plan Submission Version Consultation Representations in Relation to Soundness of the Plan

Peter Brett Associates
March 2019

3 OUR OBSERVATIONS ON THE LOCAL PLAN SUBMISSION POLICIES

3.1 In this section, we provide our comments in relation to the draft Local Plan Submission Version document prepared by St Helens Council, dealing with policy matters in order under separate headings to assess whether the policies meet the tests of soundness as detailed in paragraph 35 of the NPPF (the latest version of which was published in February 2019).

Policy LPA02: Spatial Strategy

3.2 The Spatial Strategy at point 4 identifies that the emerging Local Plan releases land from the Green Belt. This includes our client's land as part of draft allocation 8EA Parkside West for employment uses.

3.3 Our client generally endorses the acceptance by St Helens Council that land at Newton Park, as part of the wider Parkside West allocation, no longer fulfils the purposes of the Green Belt and should therefore be removed from it. Paragraph 134 of the NPPF sets out that the Green Belt serves five purposes, which for ease of reference are to:

- check the unrestricted sprawl of large built-up areas
- prevent neighbouring towns merging into one another
- assist in safeguarding the countryside from encroachment
- preserve the setting and special character of historic towns
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land

3.4 The proposed allocation site clearly does not fulfil any of the Green Belt purposes. This area of Green Belt is bounded to the east by the M6 motorway, which provides a barrier to unrestricted sprawl of the urban area of Newton-le-Willows. Similarly, the M6 provides a physical barrier to ensure that built up area of St Helens in this location does not merge with smaller settlements in neighbouring Warrington Borough to the east and this also assists in safeguarding the countryside from encroachment, with or without the Green Belt status of this land. The Green Belt in this location does not preserve the setting and special character of a historic town and its development would not prevent urban regeneration elsewhere.

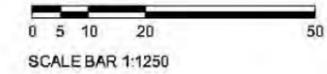
3.5 Please refer to the Planning Statement that forms part of our client's current planning application for further details regarding the role of the Green Belt in this location.

3.6 For the reasons outlined above, the Spatial Strategy Policy LPA02 is considered sound.

Handwritten notes on the right margin:

- ✓
- LPA 02
- ①
- ✓

**APPENDIX A RED-LINE SITE BOUNDARY OF OUR
CLIENT'S LAND AT NEWTON PARK DRIVE**



Location Plan scale 1:1250

nicol thomas

Revision	Date	Details
a	August 18	right of access added
b	Sept 18	Extra context, scale bar, north arrow added
c	Sept 18	Red line revised. Road coloured yellow
d	Sept 18	Amendments to clients requirements
e	Sept 18	Red line amended
f	Sept 18	Amendments to Land Registry
g	Feb 18	Planning red line
h	March 19	Red Line amended

nicol thomas
 architects project managers construction cost consultants principal designers
 Registered in England and Wales Reg No. 2140839
 Quality Assured to BS EN ISO 9001:1994 Certificate Number GB 4723
 Heyside House Blackshaw Lane Heyside Royton Oldham OL2 8NS
 t:01706 290088 f:01706 290099 e:oldham@nicolthomas.com
 Also at Birmingham (Registered office)
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Client: Oaktree Developments			
Job: Land off Newton Park Drive			
Drawing title: Location Plan			
Drawing Number: (Job number)	M4150 sk	103	Revision: H
Scale: 1:1250 at A3			
Date: August 2018			
Drawn by/ checked by: GRF			

**APPENDIX B LOCAL PLAN SUBMISSION DRAFT
REPRESENTATIONS FORM**



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

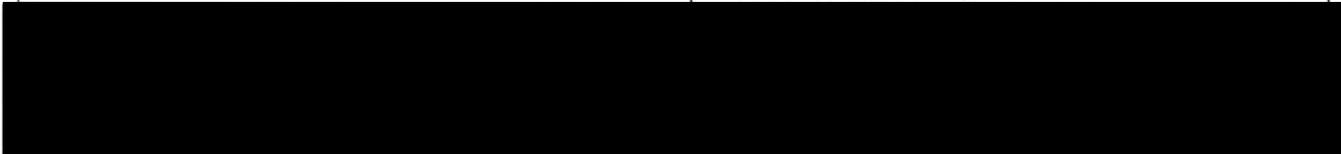
Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: David	First name: Bernard
Last Name: Lloyd	Last Name: Greep
Organisation/company: Oak Tree Developments	Organisation/company: Peter Brett Associates LLP
Address: c/o agent	Address: 61 Oxford Street Manchester
Postcode:	Postcode: M1 6EQ



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 13th March 2019** by:

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

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

or by e-mail to: planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	X	Paragraph / diagram / table	X	Policies Map	X	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 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?	X <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 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 our attached submission '44807 – Representation on behalf of Oak Tree Developments as to the Soundness of the Submission Draft Local Plan'
This provides context on why we believe the policies LPA04, LPA04.1, Table 4.1 and Employment Allocation EA9 are unsound as they have not properly considered NPPF

Paragraph 185 in the context of the Parkside West Employment Allocation.

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 our attached submission of which a summary is provided below.

To ensure that policy LPA04 meets the test of soundness it should be amended to acknowledge our client's land as a residential development allocation. Table 4.1 should be updated to include an allowance for C3 use as part of 8EA Parkside West. This would be through an enabling scheme to be subject of a suitable planning application that preserves the Grade II listed buildings as desired in the currently adopted Core Strategy and enhances the setting of the Newton Park Farm site.

Housing policy may need updating to account for this allocation albeit given its size it may be considered as a windfall site.

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.**

PO0753

ELO246

Sites 5EA & 6EA

① - LPA02

② - LPA03

③ - LPA04



Representation to the Local Plan Consultation - Sites 5EA and 6EA

Matthew Thomas

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:41



2 Attachments



31020 - Local Plan Letter to St Helens - 13.03.19.pdf



WIE15628-100-R-1-2-2 Supplementary Transport and Access Review.pdf

④ - LPA04-1

⑤ - Appendix 5
Site profiles

Hi,

Please find attached a letter of representation to the St Helens Borough Local Plan 2020-2035 that has been made on behalf of Canmoor Developments Ltd.

The representations specifically support the proposed allocation of sites 5EA and 6EA.

I trust that this will be taken into account in the preparation of the plan.

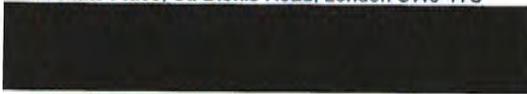
Regards,

Matthew

Matthew Thomas
MPlan MRTPI
Principal Planner

Michael Sparks Associates
Chartered Architects

11 Plato Place, St. Dionis Road, London SW6 4TU



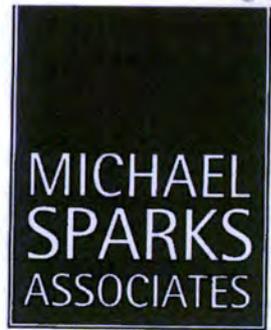
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E10246

MSA/31020/1/001

13 March 2019



CHARTERED ARCHITECTS

11 PLATO PLACE
ST. DIONIS ROAD
LONDON SW6 4TU



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

Dear Sir / Madam,

NEW ST HELENS LOCAL PLAN 2020-2035 SUBMISSION DRAFT CONSULTATION

Further to the Council's publication of the draft new St Helens Local Plan 2020-2035 please find representations made below on behalf of Canmoor Developments Ltd in respect of sites 5EA and 6EA that have draft allocations for employment development within the Draft Local Plan.

Canmoor Developments are a pre-eminent warehouse and industrial developer with offices in London and Manchester, who have developed a significant portfolio of employment floorspace across the UK. They have made considerable investment across the north-west region to provide modern employment units for business that support the creation of jobs and are working with the respective landowners of sites 5EA and 6EA with the intention of developing these sites to add to their pipeline of warehouse and industrial development.

It is the intention that these sites will be developed to provide high quality, modern employment units that meet the high levels of occupational demand in this part of the UK and it is on this basis that these representations are made.

Sites 5EA and 6EA have been promoted for development as they are seen to be ideally placed to meet the demands of the occupational market, due to their location in close proximity to the Haydock Lane Industrial Estate, junctions 23 and 24 of the M6 as well as the East Lancashire Road/A580.

Whilst the sites are labelled as 5EA and 6EA in the emerging Local Plan, they are referred to by Canmoor as Link 23 and Millfield Park respectively.

MICHAEL SPARKS ASSOCIATES LLP

Partners : Michael Sparks · Ashley Chambers · Anthony White · Neville Campbell · Sam Darwin · Paul Wahba · Lee Page · Rebecca Driscoll

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We use the word "partner" to refer a member of the LLP or an employee of equivalent standing.

Policy LPA02: Spatial Strategy

Policy LPA02 of the emerging Local Plan sets out the general policy approach to the provision of new development in St Helens over the period of the new Local Plan. The policy identifies that there is a specific need to accommodate growth across the logistics and warehousing sector. There is a particular demand for large scale units of over 9,000 sq m, which follows overall economic trends for larger employment units and demand in the north west is supported by investment into the port of Liverpool and Manchester Airport. The Link 23 and Millfield Park sites are both capable of accommodating units of 9,000 sq m and above and their allocation would meet an identified need.

The Council's evidence base identifies that additional land is required to meet the employment needs of St Helens across the plan period and the Council's approach to allocating sites EA5 and EA6 to meet this need is considered to be in accordance with the requirements of paragraph 23 of the NPPF that states the following:

Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area...

The objectives of this policy are considered to be sound and in accordance with National Policy.

Policy LPA03: Development Principles

The principles for new development set out within Policy LPA03 are supported. This policy should be read in conjunction with draft Policies LPA02 and LPA04, as the allocation of further employment land to meet the defined need will contribute to job creation and increase opportunities for residents within St Helens., particularly those that live near to Haydock.

The objectives of this policy are considered to be sound and in accordance with National Policy.

Policy LPA04: A Strong and Sustainable Economy

Policy LPA04 recognises that there is a requirement for the delivery of a minimum of 215.4 hectares of land for employment development over the plan period. Our client is supportive of this assertion, and the allocations identified within the draft Policies Map, as noted in the draft policy, are similarly supported.

These allocations, including the Millfield Park and Link 23 sites, will contribute to meeting the economic needs of St Helens Borough and the Liverpool City Region over the next plan period and allow for the continued investment into St Helens to provide jobs and economic growth. As noted through the Green Belt review and evidence base that supports the preparation of the emerging plan these sites are considered suitable to be removed from the Green Belt for employment development.

①

②

③

PO0754

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-092A

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



4 Attachments

-  L004- Land at St Helens Road - Repts to Submission Local Plan.pdf  Appendix 3- Agricultural Land Report.pdf
 -  Appendix 4- Comprehensive Repts to Submission Local Plan.pdf
 -  Appendix 4a- Interim Housing Needs Assessment.pdf
- ① LPA05 ⑥ S.O.5.1
 ② LPA02 ⑦ LPA02 - PARA 3
 ③ GBP ⑧ LPA02 - PARA 4
 ④ S.A. ⑨ LPA03
 ⑤ S.O.4.1 ⑩ LPA04

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

- ⑪ LPA05 - PARA 3 ⑮ LPC02
- ⑫ LPA05 - PARA 4 ⑯ LPC04
- ⑬ APPENDIX 4 ⑰ LPA07 - PARA 3, 4
- ⑭ TABLE 4.6 ⑱ LPA07, PARA 9
- ⑰ LPA05.1 ⑳ LPC10 - PARA 6
- ⑳ LPA06 ㉓ LPC13 - PARA 4
- ㉒ LPC01 ㉔ LPD07
- ㉕ LPD02
- ㉖ LPD03

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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)
Graham Lamb
to:
planningpolicy@sthelens.gov.uk
13/03/2019 17:03



1 Attachment



Appendix 1- Delivery Statement.pdf

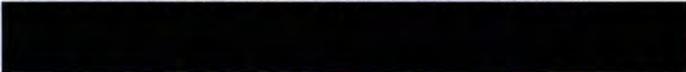
Email 2

Graham Lamb
Associate Planner

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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From: Graham Lamb

Sent: 13 March 2019 17:01



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

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group

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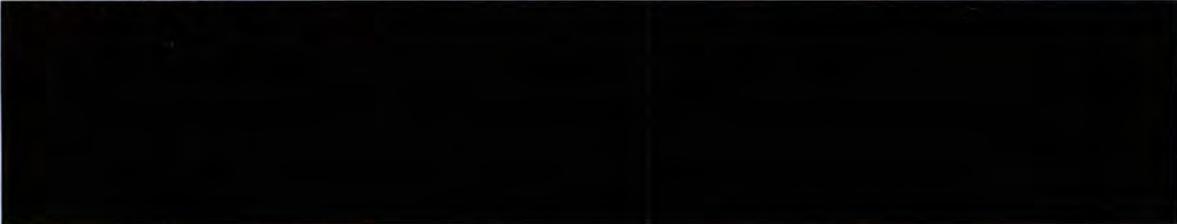
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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)
Graham Lamb
to:
planningpolicy@sthelens.gov.uk
13/03/2019 17:04



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

Email 3

Graham Lamb
Associate Planner

Pegasus Group

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From: Graham Lamb
Sent: 13 March 2019 17:01
To: planningpolicy@sthelens.gov.uk

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

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group

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

Dear Sir/Madam,

**Land North of St Helens Road, Eccleston Park, St Helens
St Helens Local Plan Submission Draft (January-March 2019 Consultation)**

We are instructed on behalf of the client, I Birchall & D Birchall (c/o P Wilson & Company LLP Chartered Surveyors), to submit representations to the Local Plan Submission Consultation of the emerging St Helens Local Plan. The client are the landowners of a parcel of land referred to as land north of St Helens Road, Eccleston Park.

A Delivery Statement has been prepared for the site, which is contained at **Appendix 1**. As demonstrated in the document, the site has capacity to deliver up to 625 homes in a highly sustainable location. This document demonstrates how the site is entirely suitable, deliverable and viable for housing development, as well as being an entirely appropriate Green Belt release site.

Further technical studies have also been prepared to further demonstrate the suitability of St Helens Road site for housing development, as set out below and attached:

- Accessibility Statement (**Appendix 2**)
- Agricultural Land Report (**Appendix 3**)

The need to allocate additional sites

Pegasus Group has prepared comprehensive representations and an Interim Housing Report to the St Helens Local Plan on behalf of another client, Redrow, who have separate land interests within Eccleston (both reports are contained at **Appendix 4**).

So whilst not directly related to this site, these reports (particularly sections 4-9 of the main representation) outline a compelling case as to why the Council need to allocate more sites in order for the plan to be found sound and to meet emerging housing requirements, as summarised below:

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- There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned.
- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites.
- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan.

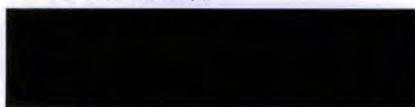
1

2

To conclude, we politely suggest that the Council need to allocate more sites in order for the plan to be found sound. As demonstrated in the appended documents, the St Helens Road, Eccleston site is available and suitable for development and should therefore be considered for housing allocation.

I trust the enclosed is clear, however should you have any queries on these representations please do not hesitate to contact me on the details provided below.

Yours sincerely,



Graham Lamb
Associate Planner



Encs.





**ST HELENS BOROUGH LOCAL PLAN 2020-2035:
SUBMISSION DRAFT**

**REPRESENTATION BY
REDROW HOMES NORTH WEST**

Date: 13th March 2019

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

Pegasus Group

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

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

} 16

Site Selection Methodology

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

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

7.27 This text supports an approach where allocated sites will be evenly distributed amongst the key settlements, where practicable, guided by the Green Belt Review and SHLAA. To clarify the key settlements are as follows:

- St Helens Core Area- including St Helens Central Spatial Area, Moss Bank in the North, Clock Face to the South, Eccleston to the West and Parr and Sutton to the East (also includes Bold and Thatto Heath).
- Blackbrook and Haydock,
- Newton-le-Willows and Earlestown,
- Rainford,
- Billinge,
- Garswood, and
- Rainhill.

7.28 We fully support the need for a robust Green Belt Review as this is clearly important to demonstrate the exceptional circumstances required to amend Green Belt boundaries and identify sites.

7.29 That said, the 2019 NPPF is clear that when 'reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account' (para 138) and that 'when defining Green Belt boundaries plans should - ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development' (para 139).

7.30 Therefore, it is our strong view that the Green Belt Review should support rather than constrain the Council's ability to deliver growth to the key settlements.

} 13

Site Distribution

7.31 In the case of St Helens the findings of the Green Belt Review and SHLAA have led to an uneven distribution of sites, with very little proposed development in Billinge, Rainhill, and only moderate development within Rainford. Furthermore, whilst the Core Area will receive a large amount of development this is again unevenly distributed within the different sub areas within it, with Eccleston, Sutton and Parr in particular receiving very low growth; with the Town Centre and Thatto Heath wards attracting over 50% of the development.

7.32 This uneven distribution is shown on the plans and table below (with a full version of the main plan contained at **Appendix 10**):

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

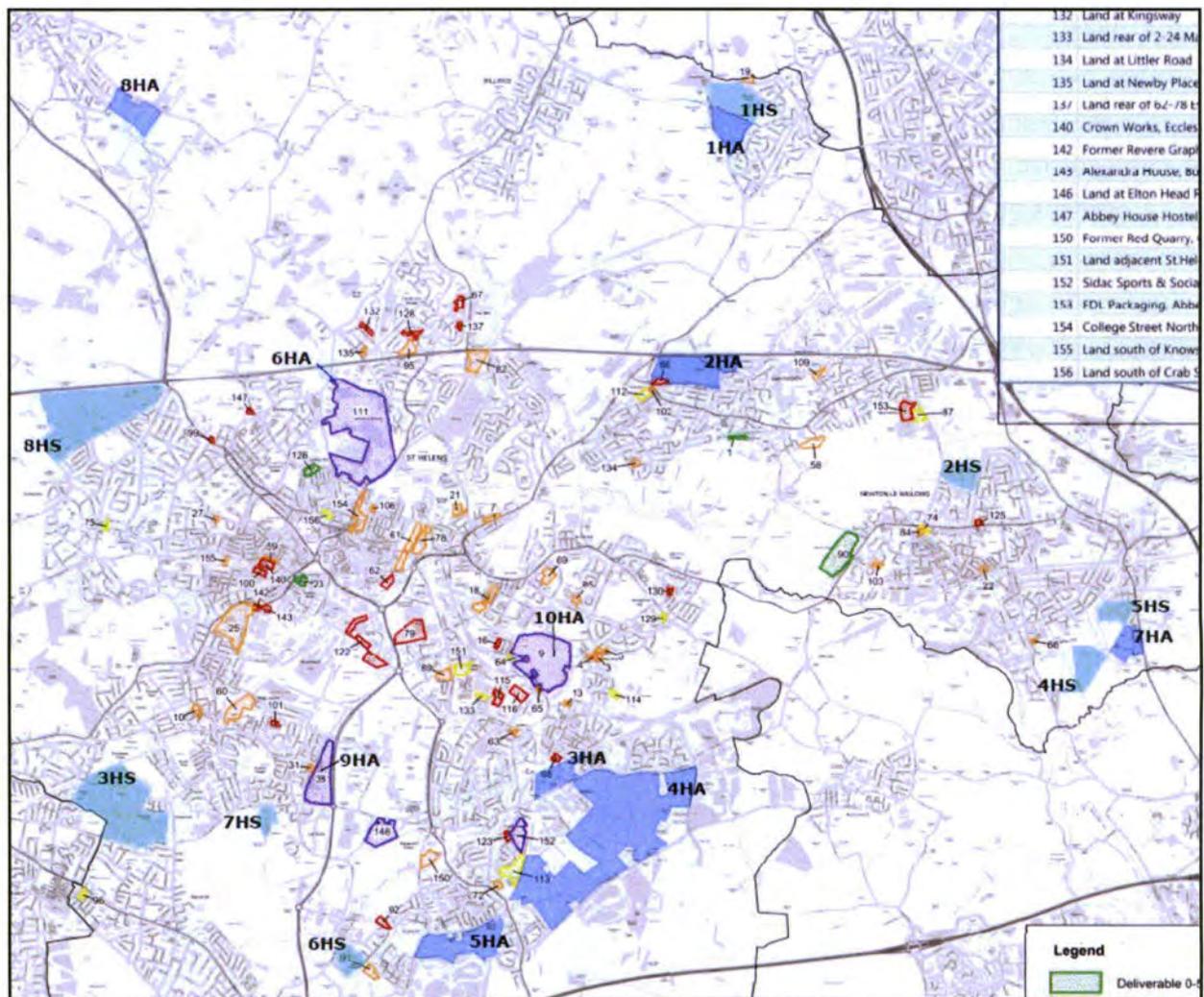


Figure 7.3 – Key Settlements Plan

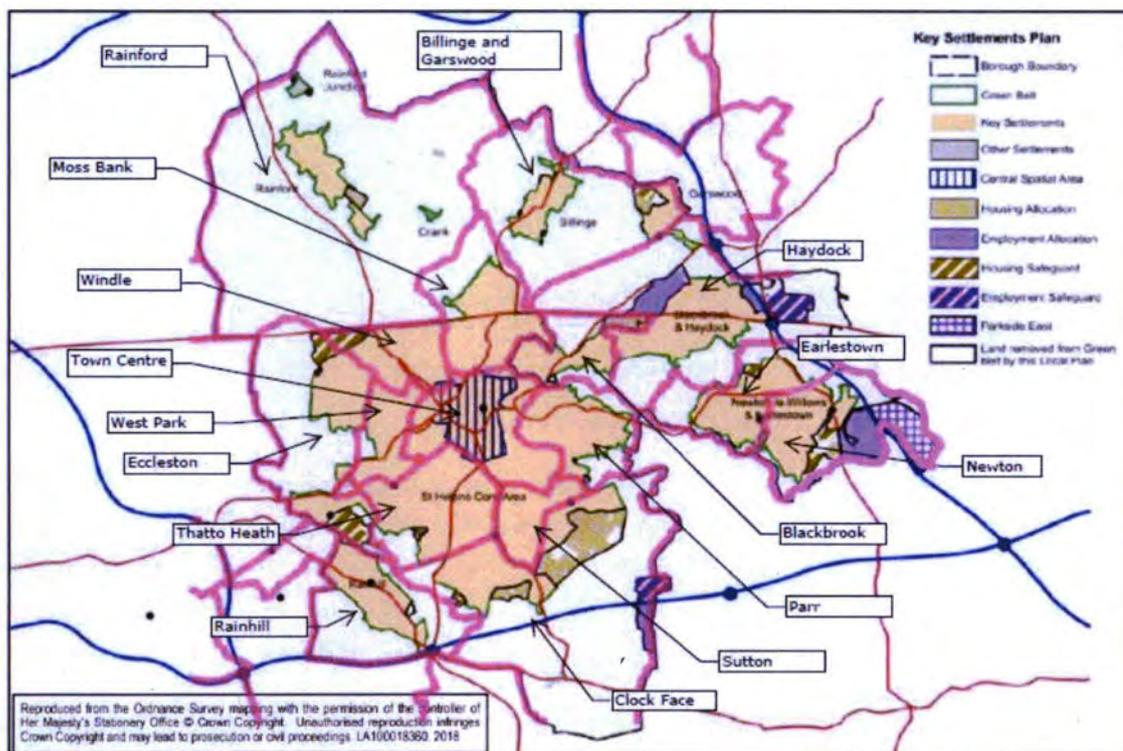


Figure 7.4 – Table showing Local Plan Distribution

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

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

PO0755

ELO261

① - LPA02



Local Plan
Ian Moorhouse
to:
planningpolicy@sthelens.gov.uk
13/03/2019 18:16
Hide Details
From: Ian Moorhouse [REDACTED]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

Dear Sirs

I write this email in response to the proposed local plan.

The revised local plan pays merely lip service to objections previously raised, particularly in respect of the use of green belt land.

The majority of the green belt land identified is in the Newton Le Willows and Haydock areas. Both currently have significant development.

The proposed plan offers no solutions as to issues in respect of local road infrastructure which is currently strained. Nor does it address the lack of adequate services such as GP facilities in the area.

Finally aside from the purely aesthetic issues created by green belt removal it does not address the health impacts to residents in areas where there are already existing pollution issues.

Yours faithfully

Sent from S7 Edge

①

PO0756

ELO280



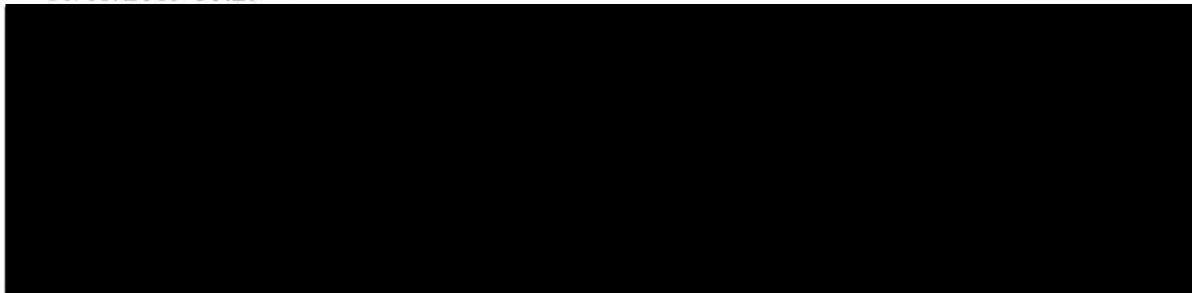
ECRA Response to SHLPSD(2018)

barton su

to:

planningpolicy

10/05/2019 10:29



1 Attachment



ECRA Final Submission_May19.docx

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

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

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

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

regards

Su Barton

ECRA Communication Lead

c/o 19 Brooklands Road, WA10 5HE

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



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

St Helens Green Belt Association (SHGBA)

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

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

Report from Kirkwells - SHGBA Response to SHLPSD

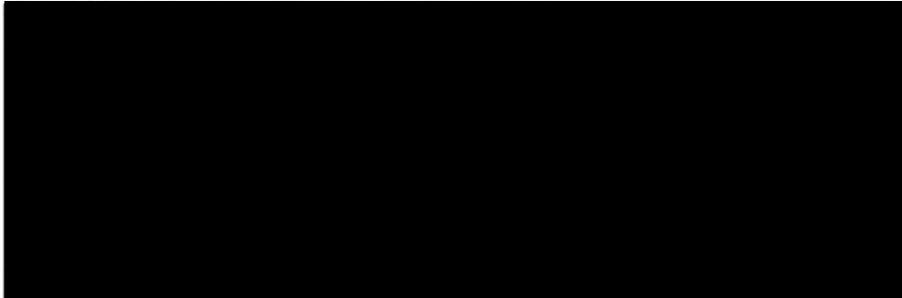
This report endorses and complements the SHGBA submission by Kirkwells Planning. The Local Plan Submission Draft (LPSD) is not consistent with national planning policy with regard to the following:

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

PO0757

Representations to Local Plan Submission Draft Consultation- Redrow Homes North West
Email 1 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:05

- ① - LPA05
- ② - LPA02
- ③ - GBR
- ④ - S.A.



- ⑤ - S.O. 4.1
- ⑥ - S.O. 5.1
- ⑦ - LPA02 - PARA 3
- ⑧ - LPA02 - PARA 4
- ⑨ - LPA03
- ⑩ - LPA04

4 Attachments

- Appendix 1-Site Location Plan-Redrow.pdf
- Appendix 2 Part 1-Delivery Statement-Redrow.pdf
- Representation Form-Redrow-May 19.pdf R005v6 - Repts to Submission Local Plan-Redrow.pdf

Dear Sir/Madam,

We are instructed on behalf of our client, Redrow Homes North West, to submit the attached form and representation (R005) to the Local Plan Submission Draft Consultation. Redrow have land interests in relation to the Burrows Lane, Ecclestone site, which is discussed in detail in the attached representation.

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Site Location Plan (attached to this email)
- Appendix 2 - Delivery Statement (Part 1 attached to this email)
- Appendix 3 - Accessibility Statement
- Appendix 4 - Phase 1 Ecology Survey
- Appendix 5 - Agricultural Land Assessment
- Appendix 6 - Detailed Site Pro Formas
- Appendix 7 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 8 - Council's Housing Trajectory
- Appendix 9 - Pegasus Housing Trajectory
- Appendix 10 - Spatial Distribution of Sites

- ⑪ - LPA05 - PARA 3
- ⑫ - LPA05 - PARA 4
- ⑬ - APPENDIX 4
- ⑭ - TABLE 4.6
- ⑮ - LPA05.1
- ⑯ - LPA06

We will follow up this submission by sending a CD in the post which contains the entirety of Redrow's submission to the Local Plan consultation.

⑰ - LPC01

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

⑱ - LPC02

Many thanks and kind regards,

⑲ - LPC03 - PARA 4

⑳ - LPD07

㉑ - LPD02

㉒ - LPD03

㉓ - LPC04

㉔ - LPA07 - PARA 3d

㉕ - LPA07 - PARA 9

㉖ - LPC10

Rebecca Dennis
Principal Planner

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

Email 2 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:06



3 Attachments



Appendix 2 Part 2-Delivery Statement-Redrow.pdf Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-
Email 3 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07



7 Attachments



Appendix 5-Agricultural Land Classification-Redrow.pdf Appendix 6-Detailed Site Pro Forma-Redrow.pdf



Appendix 8-Council's Housing Trajectory-Redrow.pdf



Appendix 9a-Pegasus Trajectory Best Case Scenario-Redrow.pdf



Appendix 9b-Pegasus Trajectory Worst Case Scenario 9b-Redrow.pdf



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



Appendix 7-Review of Employment-Led Local Plan Housing Requirement-Redrow.pdf

Email 3 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-
Email 4 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07



1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

Pegasus Group

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



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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Graham
Last Name:	Last Name: Lamb
Organisation/company: Redrow Homes North West	Organisation/company: Pegasus Group
Address:	Address: Suite 4b, 113 Portland Street, Manchester,
Postcode:	Postcode: M1 6DW



Signature:	Date: <input type="text" value="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

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

Please tick as appropriate

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

WHILST WE ARE SUPPORTIVE OF THE GENERAL WORDING OF THE SPATIAL STRATEGY, WE OBJECT TO THE CURRENT SPATIAL DISTRIBUTION OF SITES IN THE SUBMISISON VERSION OF THE PLAN. THE PLAN FAILS TO DISTRIBUTE DEVELOPMENT TO A NUMBER OF HIGHLY SUSTAINABLE AREAS, INCLUDING ECCLESTON. THE CURRENTLY SUGGESTED SPATIAL DISTRIBUTION THEREFORE FAILS TO ACHIEVE THE SPATIAL STRATEGY SET OUT IN THIS POLICY.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

THE SPATIAL DISTRIBUTION OF ALLOCATED SITES NEEDS TO BE RE-LOOKED AT, TO BE MORE DISPERSED IN NATURE, IN ORDER FOR THE PLAN TO BE SOUND.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

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

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

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

Yes, I wish to participate at the oral examination

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

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.



**ST HELENS BOROUGH LOCAL PLAN 2020-2035:
SUBMISSION DRAFT**

**REPRESENTATION BY
REDROW HOMES NORTH WEST**

Date: 13th May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

Pegasus Group

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



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

}

16

Site Selection Methodology

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

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

7.27 This text supports an approach where allocated sites will be evenly distributed amongst the key settlements, where practicable, guided by the Green Belt Review and SHLAA. To clarify the key settlements are as follows:

- St Helens Core Area- including St Helens Central Spatial Area, Moss Bank in the North, Clock Face to the South, Eccleston to the West and Parr and Sutton to the East (also includes Bold and Thatto Heath).
- Blackbrook and Haydock,
- Newton-le-Willows and Earlestown,
- Rainford,
- Billinge,
- Garswood, and
- Rainhill.

7.28 We fully support the need for a robust Green Belt Review as this is clearly important to demonstrate the exceptional circumstances required to amend Green Belt boundaries and identify sites.

7.29 That said, the 2019 NPPF is clear that when 'reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account' (para 138) and that 'when defining Green Belt boundaries plans should - ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development' (para 139).

7.30 Therefore, it is our strong view that the Green Belt Review should support rather than constrain the Council's ability to deliver growth to the key settlements.

}

3

Site Distribution

7.31 In the case of St Helens the findings of the Green Belt Review and SHLAA have led to an uneven distribution of sites, with very little proposed development in Billinge and Rainhill, and only moderate development within Rainford. Furthermore, whilst the Core Area will receive a large amount of development this is again unevenly distributed within the different sub areas within it, with Eccleston, Sutton and Parr in particular receiving very low growth; with the Town Centre and Thatto Heath wards attracting over 50% of the development.

3

7.32 This uneven distribution is shown on the plans and table below (with a full version of the main plan contained at **Appendix 10**):

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

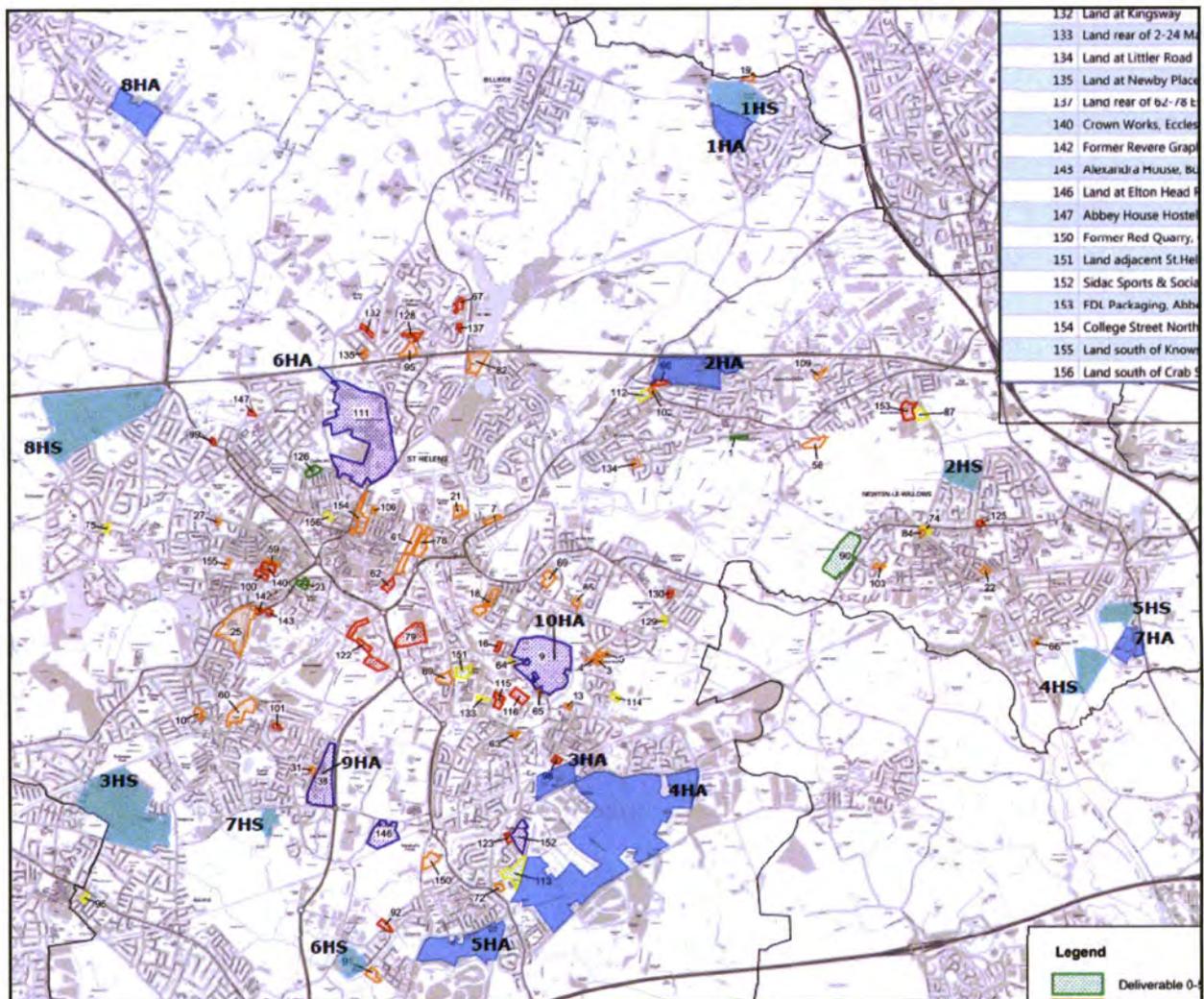


Figure 7.3 – Key Settlements Plan

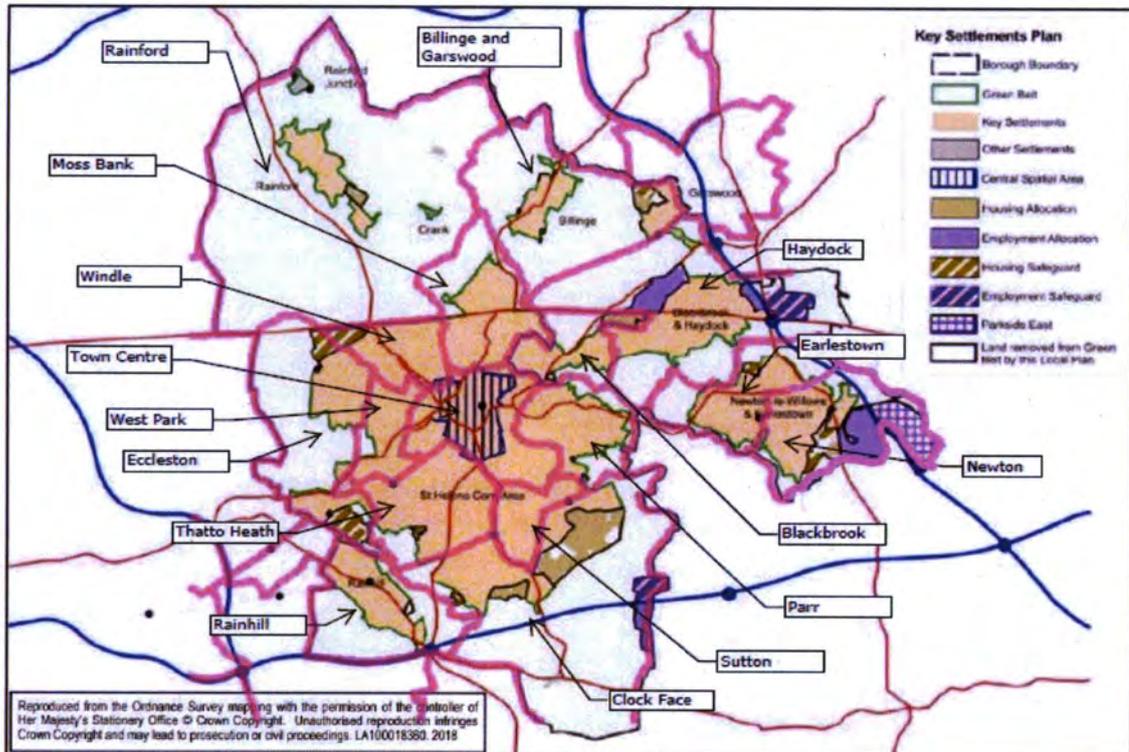


Figure 7.4 – Table showing Local Plan Distribution

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

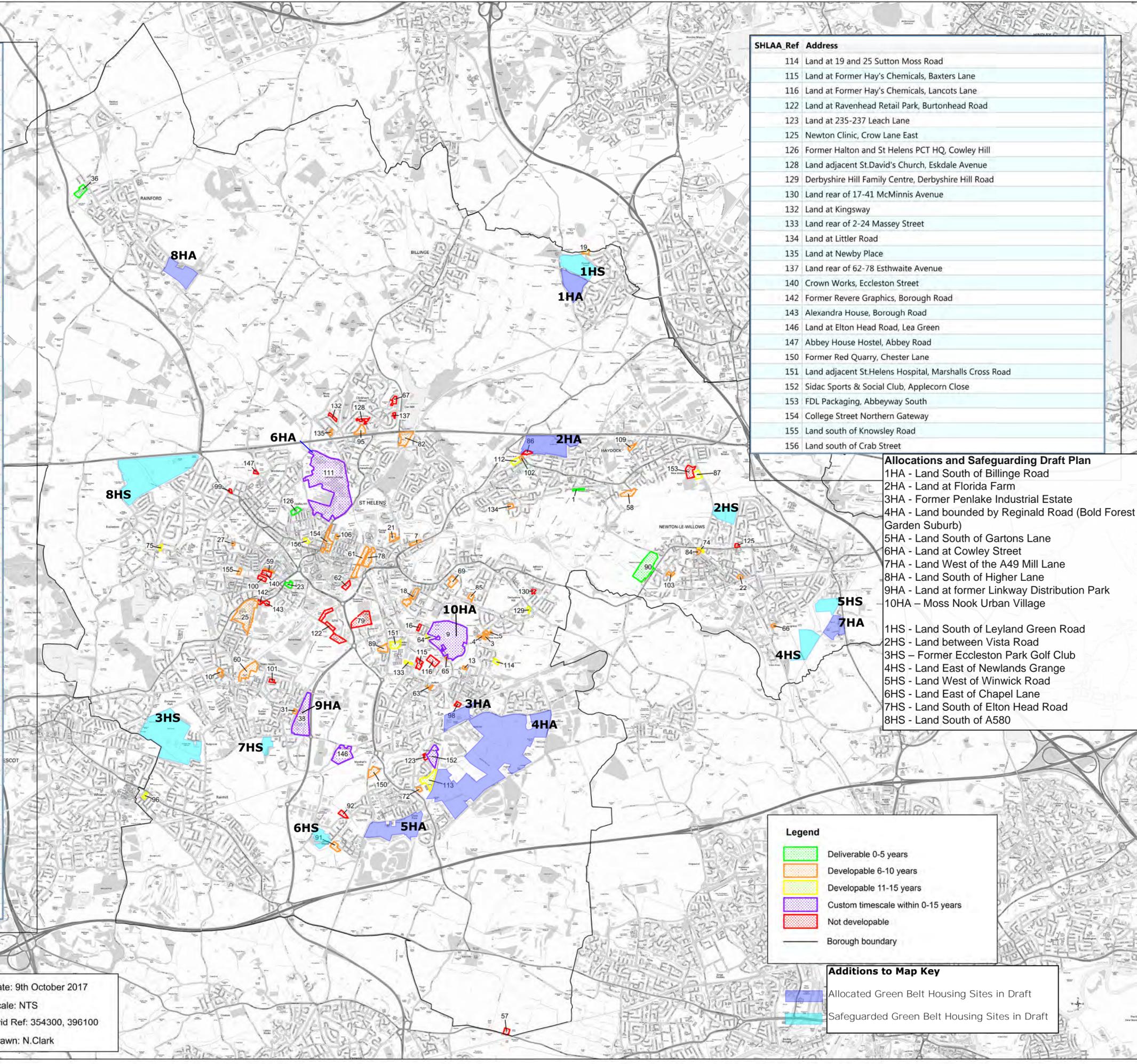
7.33 Based on the above, we suggest the distribution strategy should be reconsidered as it will not deliver the balanced sustainable development required by policy LPA02, and we suggest that additional allocations focus on boosting supply in the areas that are underserved within the Submission Plan including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

2

APPENDIX 10 - SPATIAL DISTRIBUTION OF SITES

SHLAA Ref	Address
1	Land rear of 1-27 Station Road
3	Land rear of 14 to 20 Weymouth Avenue
4	Land Between 8 & 34 Portland Way and 161 & 123 Berry's Lane
5	Land Between Weymouth Avenue & Berry's Lane
7	Land at Park Road
9	Moss Nook Urban Village, Watery Lane
10	Land at junction of Sunbury Street and Fir Street
13	Land rear of Carnegie Crescent and Goodban Street
16	Land opposite 2 to 28 Egerton Street
18	Land at Somerset Street and Sussex Grove
19	Leyland Green Road
21	Land at Holly Bank Street
22	Land at corner of Fairclough Street and Wargrave Road
23	Liverpool Arms and Former Sacred Heart RC Church and School, Borough Road
25	Alexandra Park - Former Pilkington HQ
27	Former Bethell Mission Bowling Green, Marsden Avenue
31	Former Sutton Arms PH, Elephant Lane
36	Land & Premises at Lords Fold
38	Land north of Elton Head Road
57	Former Poultry Farm, South Lane
58	Former Central Works, Church Road
59	Site of former 56-120 Eccleston Street
60	Vacant land adjacent to Rail Line, Elephant Lane
61	Land North and South of Corporation Street
62	Former British Lead Mill Works, Salisbury Street
63	Land at Waterdale Crescent
64	BT Depot, Sutton Road
65	Former Pumping Station, Sutton Road
66	Land off Wargrave Road
67	Land to the rear of Carr Mill Community Centre, Kentmere Avenue
69	Site of former Parr Community High School, Fleet Lane
72	Site of former St.Marks Primary School, Willow Tree Avenue
74	Site of former 119-133 Crow Lane West
75	Christ Church Parish Hall, Chapel Lane
78	Atlas Street
79	Former United Glass (Phase 2), Peasley Cross Lane
82	Land adjacent Laffak Road and Carr Mill Road
84	Land adjacent Church of Christ, Heather Brae
85	Site of former Our Lady's Primary School, Fleet Lane
86	Land north of Vicarage Road
87	Land west of Vista Road
89	Land rear of 64-94 Marshalls Cross Road
90	Land to the West of Common Road
91	Milton Street
92	Land adjacent Allotments, Walkers Lane
95	Site of former Carr Mill Infants School, Ullswater Ave
96	Land rear of 350 Warrington Road
98	Industrial Estate, Station Road and Peckers Hill Road
99	18 Rainford Road
100	Farmfoods, Boundary Road
101	Land rear of 13-33 Adelaide Avenue
102	Auto Safety Centre, Vicarage Road
103	Land rear of 39-67 Valentine Road
106	Site of former 126-154 Birchley Street and 107-125 Brynn Street
109	Land adjacent Piele Road
111	Land east of City Road, Cowley Hill
112	Land to the rear of Juddfield Street
113	Land at Willow Tree Avenue

SHLAA Ref	Address
114	Land at 19 and 25 Sutton Moss Road
115	Land at Former Hay's Chemicals, Baxters Lane
116	Land at Former Hay's Chemicals, Lancots Lane
122	Land at Ravenhead Retail Park, Burtonhead Road
123	Land at 235-237 Leach Lane
125	Newton Clinic, Crow Lane East
126	Former Halton and St Helens PCT HQ, Cowley Hill
128	Land adjacent St.David's Church, Eskdale Avenue
129	Derbyshire Hill Family Centre, Derbyshire Hill Road
130	Land rear of 17-41 McMinnis Avenue
132	Land at Kingsway
133	Land rear of 2-24 Massey Street
134	Land at Littler Road
135	Land at Newby Place
137	Land rear of 62-78 Esthwaite Avenue
140	Crown Works, Eccleston Street
142	Former Revere Graphics, Borough Road
143	Alexandra House, Borough Road
146	Land at Elton Head Road, Lea Green
147	Abbey House Hostel, Abbey Road
150	Former Red Quarry, Chester Lane
151	Land adjacent St.Helens Hospital, Marshalls Cross Road
152	Sidac Sports & Social Club, Applecorn Close
153	FDL Packaging, Abbeyway South
154	College Street Northern Gateway
155	Land south of Knowsley Road
156	Land south of Crab Street



Allocations and Safeguarding Draft Plan	
1HA	- Land South of Billinge Road
2HA	- Land at Florida Farm
3HA	- Former Penlake Industrial Estate
4HA	- Land bounded by Reginald Road (Bold Forest Garden Suburb)
5HA	- Land South of Gartons Lane
6HA	- Land at Cowley Street
7HA	- Land West of the A49 Mill Lane
8HA	- Land South of Higher Lane
9HA	- Land at former Linkway Distribution Park
10HA	- Moss Nook Urban Village
1HS	- Land South of Leyland Green Road
2HS	- Land between Vista Road
3HS	- Former Eccleston Park Golf Club
4HS	- Land East of Newlands Grange
5HS	- Land West of Winwick Road
6HS	- Land East of Chapel Lane
7HS	- Land South of Elton Head Road
8HS	- Land South of A580

Legend	
	Deliverable 0-5 years
	Developable 6-10 years
	Developable 11-15 years
	Custom timescale within 0-15 years
	Not developable
	Borough boundary

Additions to Map Key	
	Allocated Green Belt Housing Sites in Draft
	Safeguarded Green Belt Housing Sites in Draft

PO0758

Sinc: Former LPA0 HS23 ELO290

ELO290B.1.pdf



Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8

Rebecca Dennis

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planningpolicy@sthelens.gov.uk

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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

⑧ LPA02- PARA 4

⑨ LPA03



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑩ LPA04

Dear Sir/Madam,

⑪ LPA05 - PARA 3

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

Many thanks and kind regards,

㉑ LPA07-PARA 3c) ㉒ LPD07

㉓ LPA07-PARA 9 ㉔ LPD02

Rebecca Dennis

Principal Planner

Pegasus Group

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㉕ LPC10

㉖ LPD03



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4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

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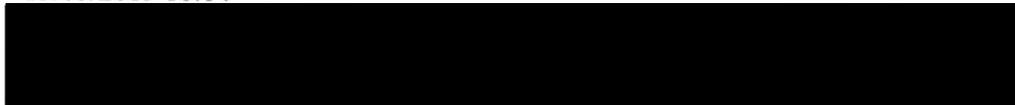
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1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

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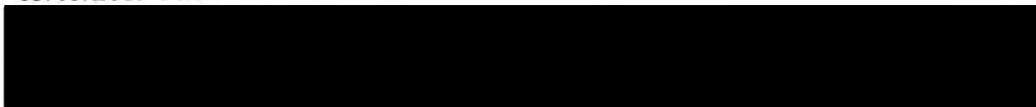
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2 Attachments



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

Email 4 of 8 of Wallace representations.

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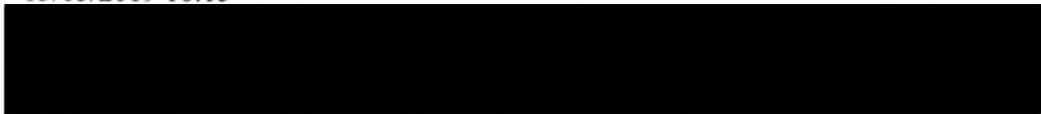
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1 Attachment



Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

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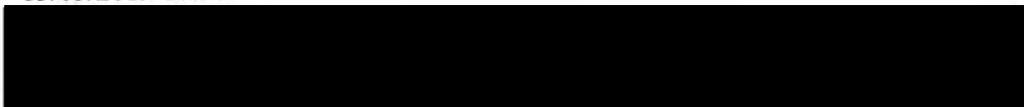
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Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

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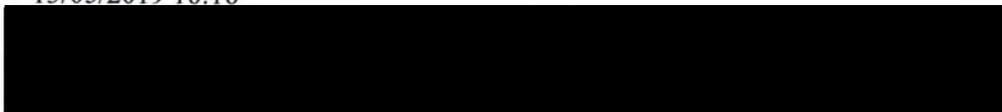
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7 Attachments



Appendix 4-Detailed Site Pro Formas-Wallace.pdf



Appendix 5-Council's Stage 3 Green Belt Assessment-Wallace.pdf



Appendix 7-Council's Housing Trajectory-Wallace.pdf



Appendix 8b-Pegasus Trajectory Worst Case Scenario-Wallace.pdf



Appendix 8c-Summary Supply Trajectory-Wallace.pdf



Appendix 8a-Pegasus trajectory Best Case Scenario-Wallace.pdf



Appendix 6-Review of Employment-Led Local Plan Housing Requirement-Wallace.pdf

Email 7 of 8 of Wallace representations.

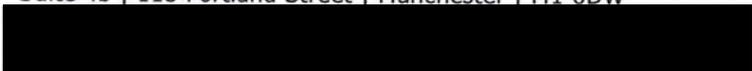
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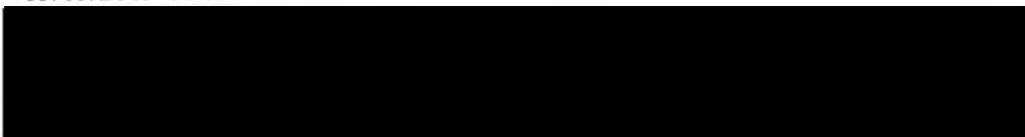
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1 Attachment



Appendix 9-Spatial Distribution of Sites-Wallace.pdf

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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Sebastian
Last Name:	Last Name: Tibenham
Organisation/company: Wallace Land Investments (c/o Agent)	Organisation/company: Pegasus Group
Address:	Address: Suite 4b, 113 Portland Street, Manchester
Postcode:	Postcode: M1 6DW



Signature:	Date: <input type="text" value="13/05/2019"/>
------------	---

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

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

Yes (Via Email) No

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

RETURN DETAILS

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

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

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

or by e-mail to: planningpolicy@sthelens.gov.uk

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

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

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	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: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

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

WHILST WE ARE SUPPORTIVE OF THE GENERAL WORDING OF THE SPATIAL STRATEGY, WE OBJECT TO THE CURRENT SPATIAL DISTRIBUTION OF SITES IN THE SUBMISISON VERSION OF THE PLAN. THE PLAN FAILS TO DISTRIBUTE DEVELOPMENT TO A NUMBER OF HIGH PERFORMING SETTLEMENTS, INCLUDING RAINHILL WHICH IS HIGHLY SUSTAINABLE KEY SERVICE SETTLEMENT. THE CURRENTLY SUGGESTED SPATIAL DISTRIBUTION THEREFORE FAILS TO ACHIEVE THE SPATIAL STRATEGY SET OUT IN THIS POLICY.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

THE SPATIAL DISTRIBUTION OF ALLOCATED SITES NEEDS TO BE RE-LOOKED AT, TO BE MORE DISPERSED IN NATURE, IN ORDER FOR THE PLAN TO BE SOUND.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

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

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

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

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

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

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

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

Please keep a copy for future reference.



**ST HELENS BOROUGH LOCAL PLAN 2020-2035:
SUBMISSION DRAFT**

**REPRESENTATION BY
WALLACE LAND INVESTMENTS**

Date: 13th May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

Pegasus Group

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



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PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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Live: 45457800 v 3

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

16

Site Selection Methodology

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

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

7.28 This text supports an approach where allocated sites will be evenly distributed amongst the key settlements, where practicable, guided by the Green Belt Review and SHLAA. To clarify the key settlements are as follows:

- St Helens Core Area- including St Helens Central Spatial Area, Moss Bank in the North, Clock Face to the South, Eccleston to the West and Parr and Sutton to the East (also includes Bold and Thatto Heath).
- Blackbrook and Haydock,
- Newton-le-Willows and Earlestown,
- Rainford,
- Billinge,
- Garswood, and
- Rainhill.

7.29 We fully support the need for a robust Green Belt Review, as this is clearly important to demonstrate the exceptional circumstances required to amend Green Belt boundaries and identify sites.

7.30 That said, the 2019 NPPF is clear that when 'reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account' (para 138) and that 'when defining Green Belt boundaries plans should - ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development' (para 139).

7.31 Therefore, it is our strong view that the Green Belt Review should support rather than constrain the Council's ability to deliver growth to the key settlements.

3

Site Distribution

7.32 In the case of St Helens the findings of the Green Belt Review and SHLAA have led to an uneven distribution of sites, with very little proposed development in Rainhill and Billinge, and only moderate development within Rainford. Furthermore, whilst the Core Area will receive a large amount of development this is again unevenly distributed within the different sub areas within it, with Eccleston, Sutton and Parr in particular receiving very low growth; with the Town Centre and Thatto Heath wards attracting over 50% of the development.

3

7.33 This uneven distribution is shown on the plans and table below (with a full version of the main plan contained at **Appendix 9**):

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

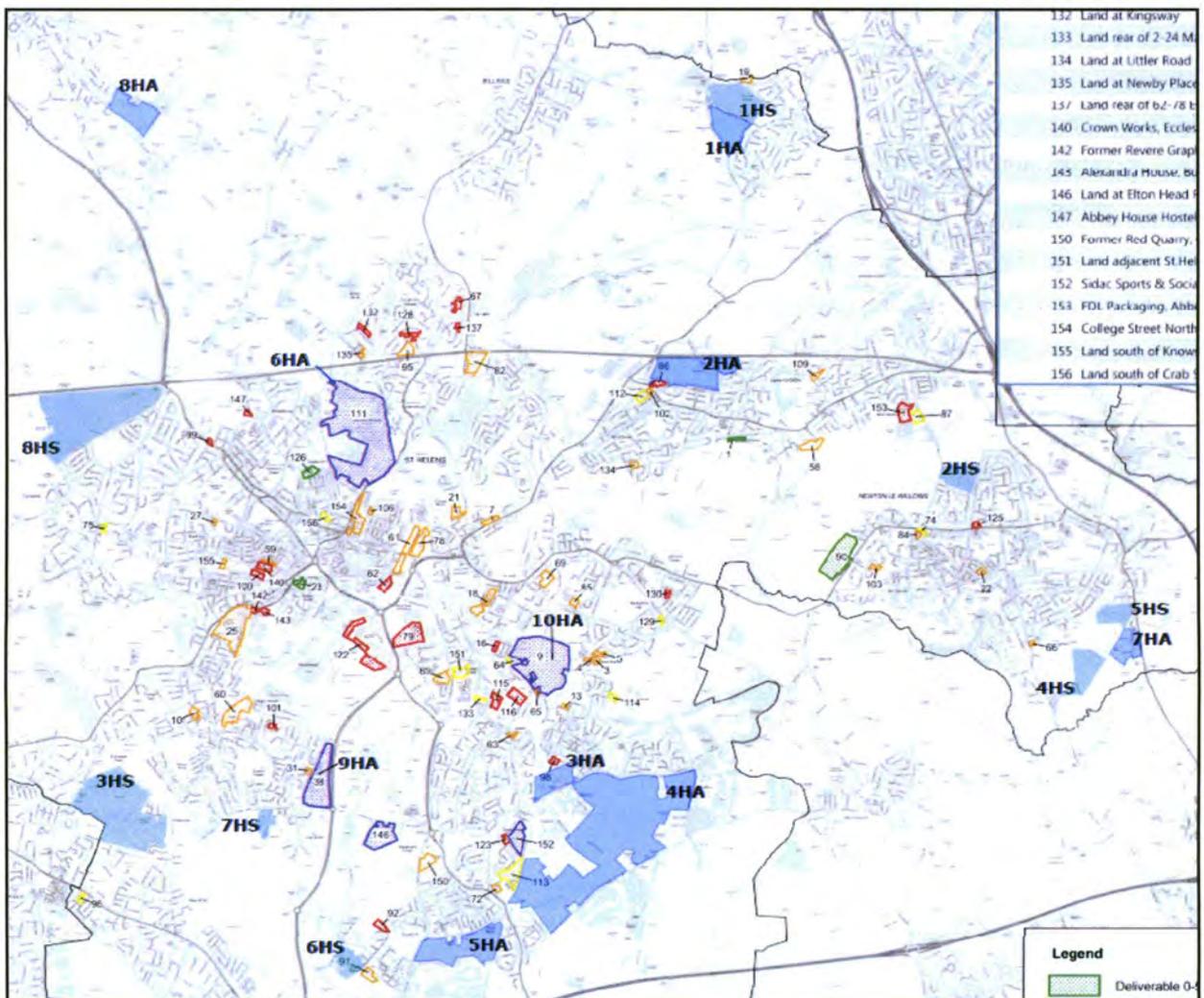


Figure 7.3 – Key Settlements Plan

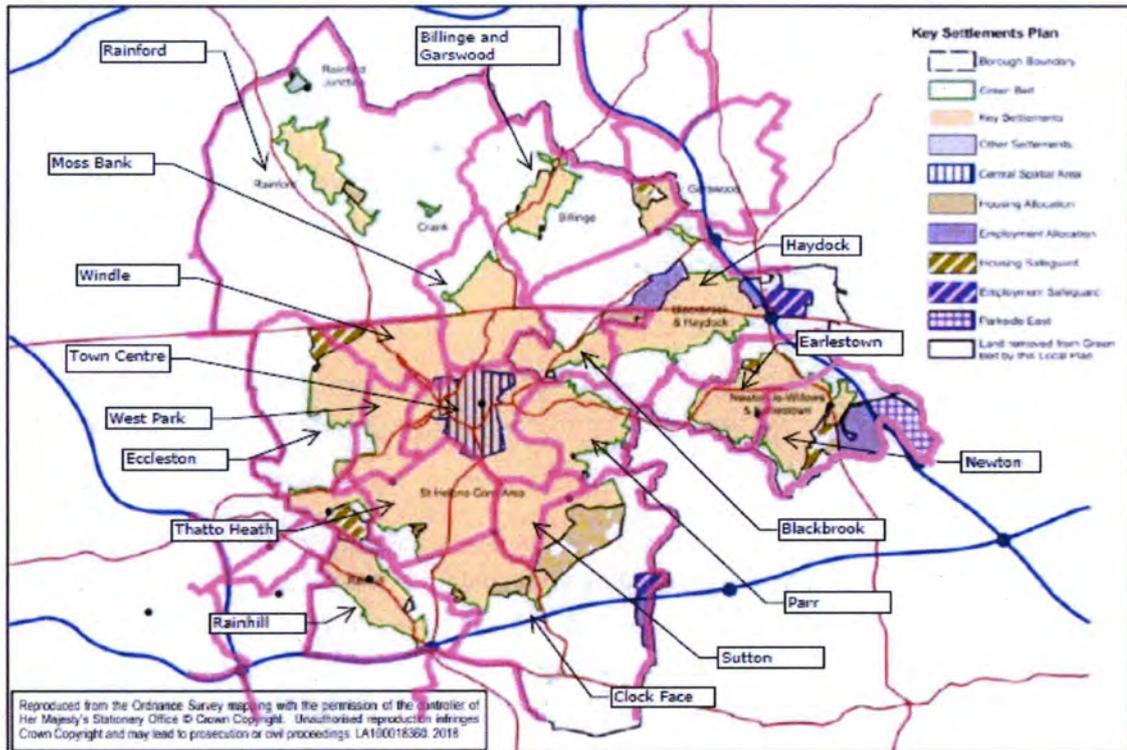


Figure 7.4 – Table showing Local Plan Distribution

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

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

2

Representations on the Local Plan

Wallace's representations on the Preferred Options Local Plan, including comments on the Green Belt Study and other sites proposed in the Local Plan, are summarised below. They can be found in full in Wallace's *Comments Form* on the Local Plan.

The housing requirement

Wallace considers the housing requirement to be too low, and support Alternative Option 2 for a housing target of 712 dwellings for the following reasons:

- To meet national planning policy's requirements to take account of market signals and economic growth;
- To face up to long term housing undersupply and the chronic housing crisis facing the next generation;
- To reduce commuting into the borough;
- To ensure the Borough is attractive to inward investment in competition with major sites in Knowsley and Warrington;
- To support the borough's economy, including strengthening the vitality of its town centres.

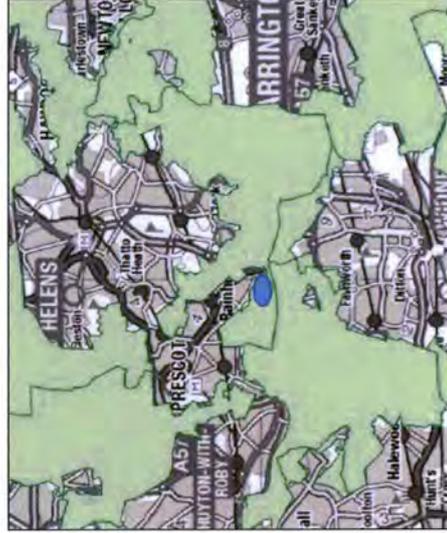
Distribution of development

Policy LPA02 should list all the key settlements in part 1 of the policy, including Rainhill.

Removal of land from the Green Belt

Wallace support the release of sufficient land from the Green Belt to meet the needs of St. Helens for two plan periods, in accordance with national planning policy.

Wallace support the removal of the Mill Lane site from the Green Belt. It has a lesser role in separating neighbouring towns, relative to other sites. Adequate separation will remain with Widnes in Halton Borough and Huyton in Knowsley Borough.



The site's position in the Green Belt

Eccleston Park

Wallace have concerns about some of the sites identified in the Plan. In particular, the Eccleston Park Golf Course site HA8 contributes strongly to the role of the Green Belt as a 'green lung' for recreation and separation of urban areas, and should be dropped as a proposed allocation.

Green Belt Boundary

The M62 motorway forms a strong, defensible boundary for the re-drawing of the Green Belt boundary. The proposed boundary of site HS23 should be redrawn to reflect this.

Over-reliance on too few sites

Policy LPA05's focus of 73% of allocations on 6 strategic sites is an over-reliance on a small number of sites that puts the Plan at risk.

If the Council is serious about avoiding under-delivery during the plan period, it is imperative that it takes market signals more seriously and identifies more sites that have strong market demand for all tenures of housing.

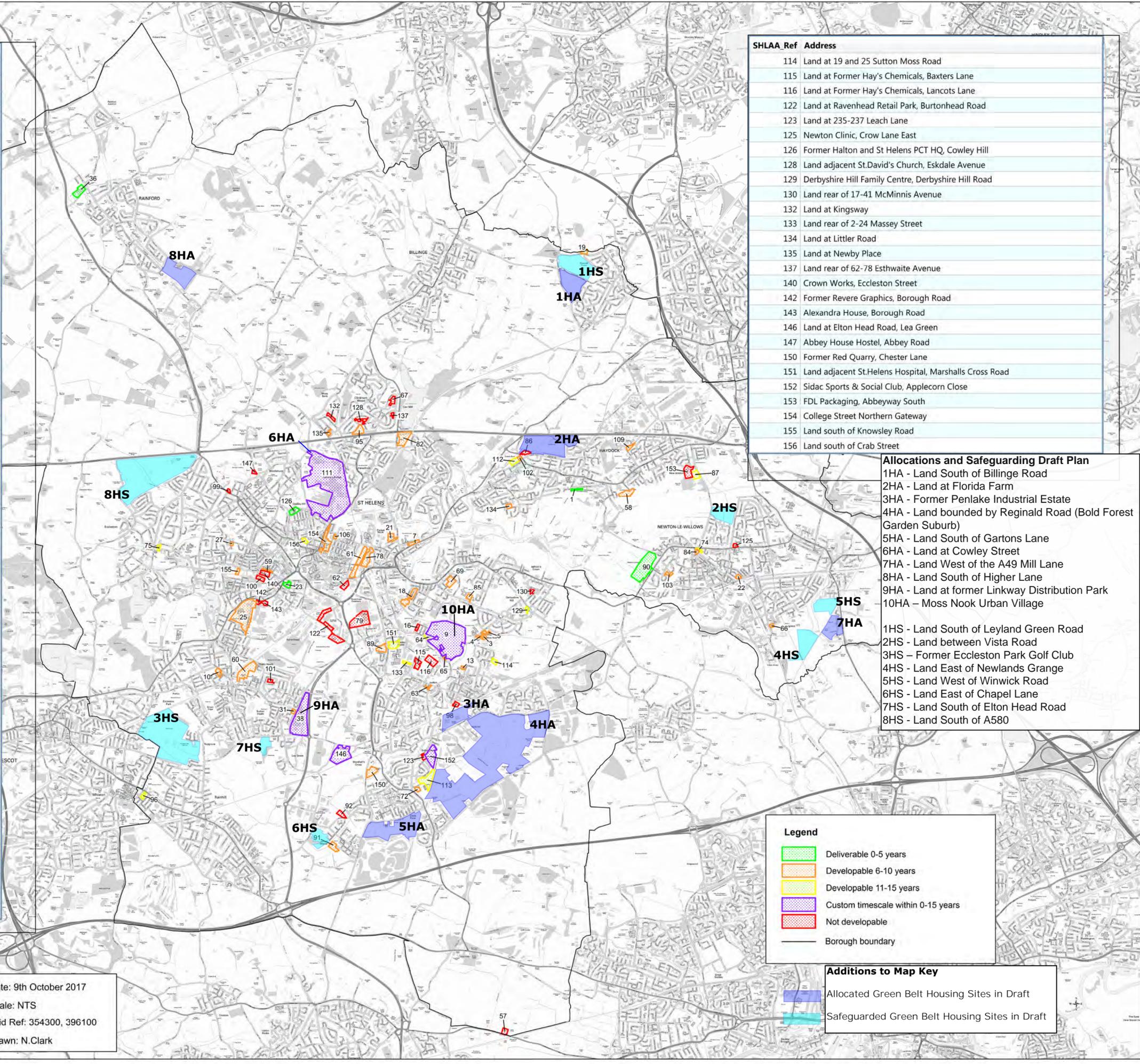
Allocation for development

Site HS23 at Mill Lane is able to come forward quickly, with potential to deliver housing completions by 2019. It would make a suitable allocation for inclusion under policy LPA05.

APPENDIX 9- SPATIAL DISTRIBUTION OF SITES

SHLAA Ref	Address
1	Land rear of 1-27 Station Road
3	Land rear of 14 to 20 Weymouth Avenue
4	Land Between 8 & 34 Portland Way and 161 & 123 Berry's Lane
5	Land Between Weymouth Avenue & Berry's Lane
7	Land at Park Road
9	Moss Nook Urban Village, Watery Lane
10	Land at junction of Sunbury Street and Fir Street
13	Land rear of Carnegie Crescent and Goodban Street
16	Land opposite 2 to 28 Egerton Street
18	Land at Somerset Street and Sussex Grove
19	Leyland Green Road
21	Land at Holly Bank Street
22	Land at corner of Fairclough Street and Wargrave Road
23	Liverpool Arms and Former Sacred Heart RC Church and School, Borough Road
25	Alexandra Park - Former Pilkington HQ
27	Former Bethell Mission Bowling Green, Marsden Avenue
31	Former Sutton Arms PH, Elephant Lane
36	Land & Premises at Lords Fold
38	Land north of Elton Head Road
57	Former Poultry Farm, South Lane
58	Former Central Works, Church Road
59	Site of former 56-120 Eccleston Street
60	Vacant land adjacent to Rail Line, Elephant Lane
61	Land North and South of Corporation Street
62	Former British Lead Mill Works, Salisbury Street
63	Land at Waterdale Crescent
64	BT Depot, Sutton Road
65	Former Pumping Station, Sutton Road
66	Land off Wargrave Road
67	Land to the rear of Carr Mill Community Centre, Kentmere Avenue
69	Site of former Parr Community High School, Fleet Lane
72	Site of former St.Marks Primary School, Willow Tree Avenue
74	Site of former 119-133 Crow Lane West
75	Christ Church Parish Hall, Chapel Lane
78	Atlas Street
79	Former United Glass (Phase 2), Peasley Cross Lane
82	Land adjacent Laffak Road and Carr Mill Road
84	Land adjacent Church of Christ, Heather Brae
85	Site of former Our Lady's Primary School, Fleet Lane
86	Land north of Vicarage Road
87	Land west of Vista Road
89	Land rear of 64-94 Marshalls Cross Road
90	Land to the West of Common Road
91	Milton Street
92	Land adjacent Allotments, Walkers Lane
95	Site of former Carr Mill Infants School, Ullswater Ave
96	Land rear of 350 Warrington Road
98	Industrial Estate, Station Road and Peckers Hill Road
99	18 Rainford Road
100	Farmfoods, Boundary Road
101	Land rear of 13-33 Adelaide Avenue
102	Auto Safety Centre, Vicarage Road
103	Land rear of 39-67 Valentine Road
106	Site of former 126-154 Birchley Street and 107-125 Brynn Street
109	Land adjacent Piele Road
111	Land east of City Road, Cowley Hill
112	Land to the rear of Juddfield Street
113	Land at Willow Tree Avenue

SHLAA Ref	Address
114	Land at 19 and 25 Sutton Moss Road
115	Land at Former Hay's Chemicals, Baxters Lane
116	Land at Former Hay's Chemicals, Lancots Lane
122	Land at Ravenhead Retail Park, Burtonhead Road
123	Land at 235-237 Leach Lane
125	Newton Clinic, Crow Lane East
126	Former Halton and St Helens PCT HQ, Cowley Hill
128	Land adjacent St.David's Church, Eskdale Avenue
129	Derbyshire Hill Family Centre, Derbyshire Hill Road
130	Land rear of 17-41 McMinnis Avenue
132	Land at Kingsway
133	Land rear of 2-24 Massey Street
134	Land at Littler Road
135	Land at Newby Place
137	Land rear of 62-78 Esthwaite Avenue
140	Crown Works, Eccleston Street
142	Former Revere Graphics, Borough Road
143	Alexandra House, Borough Road
146	Land at Elton Head Road, Lea Green
147	Abbey House Hostel, Abbey Road
150	Former Red Quarry, Chester Lane
151	Land adjacent St.Helens Hospital, Marshalls Cross Road
152	Sidac Sports & Social Club, Applecorn Close
153	FDL Packaging, Abbeyway South
154	College Street Northern Gateway
155	Land south of Knowsley Road
156	Land south of Crab Street



Allocations and Safeguarding Draft Plan	
1HA	- Land South of Billinge Road
2HA	- Land at Florida Farm
3HA	- Former Penlake Industrial Estate
4HA	- Land bounded by Reginald Road (Bold Forest Garden Suburb)
5HA	- Land South of Gartons Lane
6HA	- Land at Cowley Street
7HA	- Land West of the A49 Mill Lane
8HA	- Land South of Higher Lane
9HA	- Land at former Linkway Distribution Park
10HA	- Moss Nook Urban Village
1HS	- Land South of Leyland Green Road
2HS	- Land between Vista Road
3HS	- Former Eccleston Park Golf Club
4HS	- Land East of Newlands Grange
5HS	- Land West of Winwick Road
6HS	- Land East of Chapel Lane
7HS	- Land South of Elton Head Road
8HS	- Land South of A580

Legend	
	Deliverable 0-5 years
	Developable 6-10 years
	Developable 11-15 years
	Custom timescale within 0-15 years
	Not developable
	Borough boundary

Additions to Map Key	
	Allocated Green Belt Housing Sites in Draft
	Safeguarded Green Belt Housing Sites in Draft

PO0759

ELO320

SITE SHS

① LPA02

② LPA06

③ LPA05

④ IDP.



{In Archive} Representations on the Local Plan
MARION CROSBY
to:
planningpolicy@sthelens.gov.uk
05/02/2019 15:20



1 Attachment



REVISED PROPOSED GREEN BELT DEVELOPMENT WINDLE.docx

FTAO Development Plans Manager.

Attached please find my Representations on the St Helens Borough Local Plan.

Marion Crosby

Mrs Marion Crosby, 18 Fistril Drive, Windle, WA10 6EF

[REDACTED]

[REDACTED] I would like to hear by email of updates on the future stages of the Local Plan process.

**REPRESENTATIONS ON ST HELENS BOROUGH LOCAL PLAN:
SUBMISSION DRAFT**

Here are my representations in respect of the above, and particularly my comments in respect of the proposed Green Belt Development (8HS) with particular reference to the Safeguarded land South of the A580 at Crantock Grove/Lynton Way, Windle.

Population

There is no shortage of housing for the people of St. Helens. St. Helens population has been steadily declining over the past 20 years. There are at least 1500 empty properties for sale in St. Helens. Over the past 5 years there have been several housing developments within the Windle/Eccleston areas, i.e. former Rugby League site, Knowsley Road; former Triplex site, Millfields; former Pilkington site, City Road; former Polar Ford site, City Road; former Pilkington land at Washway Lane (to be developed); Housing off Rainford Road on the St. Thomas of Canterbury school site. There are no facilities in St. Helens Town Centre. There are very few shops. Local residents already have to shop at nearby towns such as Warrington, Wigan and Widnes, as well as Liverpool and Manchester. Whilst there are shops on the 2 St. Helens retail parks, it is very difficult for residents without cars to shop there.

①

In addition, the Local Plan includes for building a further 5,000 homes from 2035 onwards made up of currently allocated sites and the development of safeguarded sites. This equates to about a further 10 years supply at 486 homes per annum. Why is it therefore necessary to have 'safeguarded' sites at all.?

②

Safeguarded Land

Safeguarded sites will be removed from the Green Belt, this also removes the protection that comes from being in the Green Belt. It is not safeguarded for protection from development, it is in fact safeguarded for housing development.

②

The Local Plan

I consider that the Local Plan is neither justified nor effective and it is not consistent with National policy. ✓

Particular requirements of **NPPF 2018 protect the Green Belt – Section 13 paragraph 137**. This states that the local authority (a) must demonstrate that it has examined fully all other reasonable options for meeting its identified need for development before changing the Green Belt; (b) must demonstrate Sustainable Development; (c) must make effective use of Land with appropriate housing densities; (d) promote sustainable transport; (e) conserve and enhance the natural environment. I understand that Sustainable Development is “a state of society where living conditions and resource use continue to meet human needs without undermining the integrity and stability of the natural system.” ✓

I believe that the plan is flawed and deficient as it does not satisfy the requirement for (a) sustainable development; (b) the criteria for sustainable transport as the plan promotes increased car dependency, remote from transport hubs; (c) sustainable housing, targets proposed are based on aspirational employment growth predictions; (d) effective land use by concentrating on Green Space development over town centre development with higher densities; (e) food security by ignoring Agricultural Land Quality.] ①, ②

Housing Proposals

St. Helens Council Preferred Options plan of December 2016 was to build 570 houses per year for 30 years, a whopping 17,000 extra houses, potentially a 22% increase in population. This has been revised downwards in the SHMBC LP Proposed submission version to 480, equivalent to 7,290 extra homes and a population increase of nearly 10% over the 15 year plan period. ✓

The latest Office for National Statistics (ONS) (2016) predicts St. Helens will need 383 houses based on the latest statistical research. SHMBC sought clarification on what figures to use from Central Government, they were advised to use the higher 486 determined from the previous data. That is equivalent to $486 - 383 = 103$ extra homes per year, equivalent to 1545 extra homes over 15 years or 3,090 homes over 30 years. Should not SHMBC be challenging the use of the higher figure – Wirral are?] ③

Brownfield & Unsuitable Land

To be included on the Brownfield Register, sites **MUST** be available for development in the Plan period. Unsuitable land with underutilisation, contamination, ownership, legal or access issues cannot be included on the Register until they are available for

development. I believe there is enough Brownfield availability to meet the housing needs. ✓

The Council argues Central Government will not fund the cleaning up of contaminated sites and so have excluded them as being unavailable for development. There appears to be no policy or intent from SHMBC, or indeed Liverpool City Region Combined Authority to make unattractive town centre and industrial sites available for development. It has to be questioned whether they are doing enough to promote a local and regional policy for cleaning up sites and making a case to Central Government for funding where this is necessary. Not all sites will need central or regional funding. I consider that SHMBC are not doing enough to make unsuitable sites available for development and transfer to the Brownfield Register. (i)

Green Belt Land for Leisure Usage – Crantock Grove/Lynton Way

Windle, will have no green land for residents to enjoy other than Ecclesfield, which is not a park but is set aside as a sports facility and, incidentally, which floods.

Highways

Windle Island is an accident hot spot as are other local junctions. New junctions would be required if 8HS goes ahead. The huge increase in warehouse distribution at Haydock, and the additional lorries, **plus**, the extra traffic from Eccleston, Windle and St. Helens will cause more chaos. The proposed submission is light on infrastructure improvements. More congestion leads to queues with idling engines increasing pollution, poor air quality and health issues. More houses = more traffic and pollution.

Windle area has far too much traffic to cope with as it is. The impact of additional housing in the Windle area will make the roads more congested and more dangerous. The junction of Bleak Hill Road and Rainford Road is a hazard and an accident waiting to happen every day. At rush hour, which extends beyond 2 hours, twice a day, traffic trying to get onto Rainford Road from Bleak Hill Road backs up to the top of Bleak Hill Road and down the other side. Anyone trying to turn right from Bleak Hill Road onto Rainford Road takes their life into their hands because of the traffic emerging from 3 directions, the A580, the Tesco/Starbucks site, and from the right along Rainford Road. Traffic needing to get onto the East Lancs Road Eastbound from Bleak Hill Road have to try to get across 2 lanes of traffic to get into the turn right lane. If I have to go to Crank, which I do frequently, I don't attempt to join Rainford Road from Bleak Hill Road, instead I turn right out of Fistril Drive and go down Kiln Lane and then turn left past the crematorium to get to the traffic lights at the A580. The traffic problems at the Bleak Hill Road/Rainford Road junction were exacerbated when the Starbucks was built on the Tesco site. I understand the Highways Officers have said there is no solution to this problem. At the Rainford Road end of Kiln Lane there is frequently traffic backing up

down Kiln Lane because of cars parked at the side of the kerb, blocking access to the turn left and the straight ahead areas. Also travelling down Kiln Lane, there are cars parked which make it a hazard at the bend near Alder Hey Road as cars have to get onto the wrong side of the road to progress and cannot see what is coming round the bend from the opposite direction. There is also the difficulty of dealing with the school traffic going to Cowley School, traffic going to the school arrive from Kiln Lane, Hard Lane, Dentons Green Lane and Rainford Road. Also the children attending Bleak Hill school and Rivington school from Hard Lane, use Hard Lane to progress to their destination, increasing the volume at this road junction. Turning right into Greenfield Road from Kiln Lane is also very difficult because of traffic approaching from Dentons Green Lane, traffic approaching from Rainford Road, traffic approaching from Hard Lane, and on top of that the pedestrian lights immediately to the right of the junction. Drivers are watching traffic from the left rather than the traffic lights on red to the right. Also I know that for a long time Henderson was not permitted to develop the small parcel of land on Bleak Hill Road to the rear of Lynton Way shops as it was deemed too dangerous to have access/egress onto Bleak Hill Road because of the volume of traffic. Henderson's plan was to bring his traffic onto Lynton Way then onto Bleak Hill Road, but that was certainly no solution because it would cause even more of a problem with congestion on Lynton Way.

Millbrook Lane/Bleak Hill Road used to be quiet roads, now they are not only busy with cars but with many more lorries. Traffic turning right from Kiln Lane into Bleak Hill Road do so with great difficulty because of the volume of traffic on Bleak Hill Road/Millbrook Lane.

When the new container port in Liverpool is up and running to full capacity much of its traffic will travel down the A580 to reach areas to the east. That will make the A580 and in particular the junction at Windle Island even busier. Already there are long tail backs on Rainford Road (both ways) of traffic waiting to access this junction. No doubt some of this additional traffic (which will most likely be heavy goods vehicles) will travel up and down Rainford Road, Greenfield Road/Dentons Green Lane, increasing the volume of traffic in these areas.

What is the plan for how the residents of the new development at Eccleston/Windle will access the proposed new green belt development?

I live in Fistril Drive, very frequently, in fact almost daily, I hear police/ambulance sirens as they attend to traffic accidents in the area.

There is no railway station nor rail link within Windle. There is only 1 bus per hour from Bleak Hill into St. Helens which means residents either have a very long walk to Eccleston to catch a bus, or have to use a car or taxi to get about.

②

Henderson
&
Trafford

Borough wide residential traffic is forecast to increase by the period of the plan and beyond by around 35% over the 15 year plan and beyond (population increases by 16% over the same period). The super-port is forecast to increase Heavy Goods vehicle (HGV) traffic four fold over the next 10 years. Light Goods vehicle traffic will increase significantly due to the logistics warehousing delivery traffic. Manchester and Liverpool have the most traffic congestion outside of London. Congestion is experienced daily by those using the M6/13 and the M6/12-26. Locally the Bleak Hill Road/St Helens Road junction and the Rainhill Road/Warrington Road have long term intractable problems. Current roadworks are independent of any traffic increases resulting from all regional Local Plans. 8HS/Eccleston Park Golf club sites are remote from public transport hubs and so promote car dependency.

②

I believe the Local Plan proposals will lead to more congestion, car dependency and eventual grid lock and is therefore not sustainable.

① ②

Infrastructure Issues, Transport and Traffic

The plan proposals will, I believe, have a 'severe impact' on traffic across the borough and the region. The Infrastructure Delivery Plan appears not to consider traffic for the borough as a whole. Individual Development Infrastructure funding will not cover highway improvements on existing roads across the borough, necessary to meet the predicted increase in traffic on the main arterial routes through the town.

②

I believe any shortfall in Highway improvement funding resulting from the cumulative effect of the Local Plan should not fall on the public purse.

Infrastructure Issues – borough wide.

Education Infrastructure

Similar developer contributions generally relate only to the local impact of individual developments and ignore the cumulative impact on the wider community as a whole. The Infrastructure Delivery Plan again appears deficient in predicting school demands across the borough and how education needs will be provided and funded.

Since Windlehurst school closed and was demolished children from the Hard Lane/City Road area now attend Bleak Hill or Rivington schools. Bleak Hill Junior School is about to build a third Reception Class for the increased number of pupils, as things are at the moment. There are also likely to be many more children in this area now because of the new and proposed development here. Where will all the children go to school? There is also a shortage of secondary school places.

②

PO0761



St.Helens
Council

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

341

Ref: LPSD

08 MAR 2019

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Stephen	First name:
Last Name: Wright	Last Name:
Organisation/company:	Organisation/company:
Address: 7 Crantock Grove Windle	Address:
Postcode: WA10 6EJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 4th 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)

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?		No ✓
Sound?		No ✓
Complies with the Duty to Cooperate		No ✓

Please tick as appropriate

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

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments</p> <p>Green belt land should only be released for development in EXCEPTIONAL circumstances, this is the central part of planning laws in this country. There are no exceptional circumstances in St.Helens with a declining population, significant empty houses and a good acreage of brown field sites where there is sufficient space for 5818 houses according to the Council's own register. The green belt was created over 30 years ago to prevent urban sprawl and to help create a pleasant, healthy and stress relieving environment for humans, animals and mother nature in general. The green belt has served us well and should continue to do so</p>

now, and in the years to come. If it was so important 30 years ago, then it is still important today, tomorrow, next year and for generations beyond 2035. St.Helens is a borough with few other physical assets to enhance the quality of life for humans and mother nature, it is therefore doubly important the green belt remains.

The Council's plan to downgrade the green belt and subsequently build large housing estates would cause a massive increase in local road traffic with very significant increases in atmospheric and noise pollution and traffic congestion further degrading the quality of life for local people.

There would be further pressure on already over stretched local schools, medical and dental centres.

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.

Building new houses on brown field sites and renovating empty and derelict houses would smarten up the town something that is desperately needed.

Green belt land provides a healthy environment for all. Considering the general health of St.Helens population is below the national average with significant health problems such as childhood obesity, high rates of heart and lung problems. The Council would be well advised to protect the present population of St.Helens and the green belt, reopen council owned gyms and stop the massive expansion of fast food outlets and bars.

In short its time to smarten up the town and look after the wellbeing of the present population.

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

PO0762



St.Helens
Council

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

342

Ref: LPSD

08 MAR 2019

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Mary J.	First name:
Last Name: Wright	Last Name:
Organisation/company:	Organisation/company:
Address: 7 Crantock Grove Windle	Address:
Postcode: WA10 6EJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 5th 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)

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?		No
Sound?		No
Complies with the Duty to Cooperate		No

Please tick as appropriate

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

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 land should only be released for development in EXCEPTIONAL circumstances, this is the central part of planning laws in this country. There are no exceptional circumstances in St.Helens with a declining population, significant empty houses and a good acreage of brown field sites where there is sufficient space for 5818 houses according to the Council's own register. The green belt was created over 30 years ago to prevent urban sprawl and to help create a pleasant, healthy and stress relieving environment for humans, animals and mother nature in general. The green belt has served us well and should continue to do so</p>

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The Council's plan to downgrade the green belt and subsequently build large housing estates would cause a massive increase in local road traffic with very significant increases in atmospheric and noise pollution and traffic congestion further degrading the quality of life for local people.

There would be further pressure on already over stretched local schools, medical and dental centres.

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.

Building new houses on brown field sites and renovating empty and derelict houses would smarten up the town something that is desperately needed.

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In short its time to smarten up the town and look after the wellbeing of the present population.

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

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

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

PO0763



St. Helens
Council

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

343

Ref: LPSD

08 MAR 2019

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Elizabeth	First name:
Last Name: Sharples	Last Name:
Organisation/company:	Organisation/company:
Address: 34 Calderhurst Drive Windle	Address:
Postcode: WA10 6ED	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)

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)								

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?		No
Sound?		No
Complies with the Duty to Cooperate		No

Please tick as appropriate

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

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

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.**

PO0764

346

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



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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MS</u>	Title:
First Name: <u>JULIE</u>	First name:
Last Name: <u>ROBERTS</u>	Last Name:
Organisation/company: <u>HOME OWNER</u>	Organisation/company:
Address: <u>16, ECCLESFIELD RD ECCLESTON, ST. HELENS MERSEYSIDE</u>	Address:
Postcode: <u>WA10 5NB</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 6/3/19

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

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

Yes (via email) No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	<input checked="" type="checkbox"/>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> No the plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> No the plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> No it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>Unhappy residents . why have things changed now after the opposition for over 20 years . Already with Wirral Island works the traffic down Houghtons lane is horrendous with people taking short cuts. This "lane" was not designed to take this volume of traffic. This is a snapshot of road congestion were houses to be built.</p>

(see over) *

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.

No modification - totally opposed to Green Belt label being removed.
 This ^{plan} needs to be removed as unworkable. There are plenty of other sites in St. H which can be used i.e. old factory when any contamination removed. These sites are also not Green Belt - why does a Green Belt place need to be removed when this is totally unneeded.

Please continue on a separate sheet if necessary

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

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

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

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

There will be more than enough people who will represent and participate due to the high levels of annoyed residents locally. The 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

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.

- * effective land use by concentrating on Green Space development over town centre development with higher densities
- * food security by ignoring Agricultural land quality.

PO0765



St. Helens
Council

①-LPA02 ②-LPA05
③-LPA07 ④-LPC01

384

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

Ref: LPSD

11 MAR 2019

(For official use only)

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Part B – Your Representation(s).

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

Signature:

[Redacted Signature]

Date:

8/3/2019

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

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

Yes (Via Email)

No

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

RETURN DETAILS

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

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

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

or by e-mail to: planningpolicy@sthelens.gov.uk

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

Please tick as appropriate

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

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

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

This Local Plan is not 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.

①

②

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

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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

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

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

PO0766

PA0354

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

385



St. Helens
Council

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

Ref: LPSD

11 MAR 2019

(For official use only)

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SUSAN	First name:
Last Name: SWIFT	Last Name:
Organisation/company:	Organisation/company:
Address: 103 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] 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

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

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

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FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

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

Please tick as appropriate

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

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

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

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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.

1

2

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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.

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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

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

PO0767



St. Helens
Council

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

375

Ref: LPSD

11 MAR 2019

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PART A – YOUR DETAILS

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

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

Signature: [REDACTED] Date: 08/03/2019

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St.Helens
Merseyside
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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
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PO0768

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



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

Ref: LPSD
11 MAR 2019
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Please note that you must complete Parts A and B of this form.

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

Signature: _____ Date: 8 March 2019

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

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Yes (via email) No

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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"/>

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

PO0769

~~07/19~~ SITE 8HS



St.Helens
Council

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

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

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Part B – Your Representation(s).

- ① - LPA02
- ② - LPA06
- ③ - IDP
- ④ - LPA05

PART A – YOUR DETAILS

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

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

Signature: [Redacted] Date:

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

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

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA05 LPA06		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"/> X(No)
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> X(No)
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> X(No)

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/> X(No) - brownfield not considered
Justified?	<input type="checkbox"/> X(No) - the methodology used is unsound
Effective?	<input type="checkbox"/> X(No) - the plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> X(No) - it doesn't support objectives in NPPF 2018

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

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

In particular it doesn't support;

Point 2 - Achieving Sustainable Development

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

Point 3 - Planning system should be plan-led

1

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

Point 7 – Ensuring the vitality of town centres

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

Point 8 – Promoting healthy and safe communities

Removing green belt is in direct conflict with this aspiration.

Point 9- Promoting sustainable transport

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

The plan promotes an increase in car numbers and dependency.

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

Point 11 – Making effective use of land

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

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

A quote from The Local Plan:

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

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

Please continue on a separate sheet if necessary

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

✓
SUG.
MOD.

there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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

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

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

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

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

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

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

PO0770

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



St. Helens Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>JAMES</u>	First name: _____
Last Name: <u>FERRIS</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>129 BROADWAY</u>	Address: _____
<u>ECCLESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5PB</u>	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

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FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> <i>NO - Based on flawed methodology</i>
Effective?	<input checked="" type="checkbox"/> <i>NO - not deliverable</i>
Consistent with National Policy?	<input checked="" type="checkbox"/> <i>NO - does not comply with NPPF 2018</i>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>The plan is unsatisfactory in the following aspects: -</i></p> <ol style="list-style-type: none"> 1. Increased car usage will cause higher pollution and noise with effects on the entire population of the area. 2. Seriously effect the school and hospital requirements of the area, and other medical facilities. 3. Recently 66 housing accommodation at Gillars Green is being demolished. We were told the housing demand in St Helens was too low to continue financial support for these apartments. So why now plan to build further housing units on a green field site. 4. The current I D P. does not state how local road improvements are to be made and funded. 5. Council records indicate that less than 7% of our Brownfield sites would be adequate to fulfill the area required in the plan. 	

Please continue on a separate sheet if necessary

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

Please continue on a separate sheet if necessary

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

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

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

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

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

Please keep a copy for future reference.

PO0771

445

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



St. Helens Council

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

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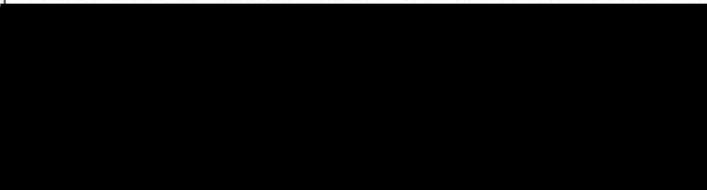
This form has two parts;

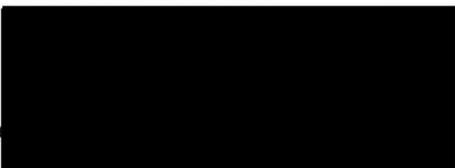
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>KATHLEEN</u>	First name:
Last Name: <u>WHITESIDE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>3, Avery Square</u> <u>Haydock</u>	Address:
Postcode: <u>WA11 0XB</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>4-3-2019</u>
--	-----------------------

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

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

Yes (via email) No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support the legal compliance or soundness of the Local Plan</u>, please also use this box to set out your comments.</p> <p>Council should be put to strict proof for this type of development using greenbelt fails to encourage recycling of derelict and other urban land. Significant harm caused to greenbelt. Rise of flooding on Ainsley Brook increased. Higher volumes of traffic to already over capacitated highways.</p>

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal of Green belt.

Please continue on a separate sheet if necessary

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

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

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

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

Please keep a copy for future reference.

PO0772

447

12 MAR 2019

Ref: LPSD

(For official use only)



St. Helens Council

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

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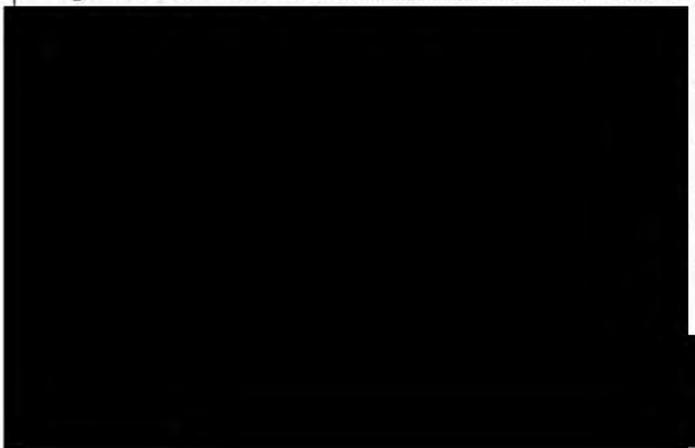
This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title:
First Name: <u>DAVE</u>	First name:
Last Name: <u>HARRISON</u>	Last Name:
Organisation/company: <u>✓</u>	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: 	Date:

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

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

Yes (via email) No

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RETURN DETAILS

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St.Helens Council
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Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
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planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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

**Now please complete PART B of this form,
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**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy	<input checked="" type="checkbox"/>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	<input checked="" type="checkbox"/>	
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>* THE PLAN HAS NOT BEEN REVIEWED WITH EFFECTIVE PUBLIC CONSULTATION</p> <p>* THE COUNCIL HAVE ALREADY DECIDED TO IMPLEMENT THE PLAN & WILL IGNORE ANY OPPOSITION.</p> <p>* IT HAS NOT BEEN FULLY TRANSPARENT</p>

Please continue on a separate sheet if necessary

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

There are NONE -

Please continue on a separate sheet if necessary

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

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

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

Pointless: I will be 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

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

Please keep a copy for future reference.

PO0773



St. Helens Council

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

Ref: LPSD

(For official use only)

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: AIMA	First name:
Last Name: HEINTHORN	Last Name:
Organisation/company:	Organisation/company:
[Redacted]	Address:
	Postcode:
	Mobile No:
	Email:

Signature: [Redacted] Date: 10-3-2019

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

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

Yes (Via Email) No

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

I Object to Prime Agricultural land For building houses, the Village has problems already without more houses, regarding, Doctors, Schools, Police, Congestion on roads, parking, Shops, no Banks .etc.

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.

Brown land should be used first,

Please continue on a separate sheet if necessary

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

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

<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:

[Faint handwritten text, likely bleed-through from the reverse side of the page]

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.**

PO0774



St. Helens Council

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>BARBARA</u>	First name: _____
Last Name: <u>WHITE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>32 SELKIRK DRIVE</u>	Address: _____
<u>ECCLESTON</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 5PE</u>	Postcode: _____
_____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

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

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

- Yes (via email)
- No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> THE METHOD IS FLAWED
Effective?	<input checked="" type="checkbox"/> THE PLAN CAN'T BE DELIVERED
Consistent with National Policy?	<input checked="" type="checkbox"/> IT DOES NOT COMPLY WITH NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>As I have said above the plan has not been considered in any a proper manner. as far as I can make out these things have not been taken into consideration. Roads & traffic. Public transport. Schools & shops also if we come out of Europe the land will be need to supply home grown food stuffs. The A580 is already over used by HGV's going to & from Liverpool & Manchester. This will increase with the growth of docks in Liverpool and all the industrial expansion along the A580. more house in the area will also put pressure on the traffic flow. also hospitals & schools in the area are over subscribed.</p>

Please continue on a separate sheet if necessary

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

The plan as it stands can not be used, it will upset the equilibrium of the ~~entire~~ present existing area.
 I cannot think of anything to improve the plan except scrap it.

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.

PO0775



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)

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: 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:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <input type="text" value="12.03.2019"/>
-----------------------	---

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St.Helens
Merseyside
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Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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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.

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.

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PO0776



St. Helens
Council

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>Jemma</u>	First name:
Last Name: <u>Jones.</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>6, ORWELL CLOSE STANDISH LOWER CROFT, WIGAN.</u>	Address:
Postcode: <u>WN6 8JH</u>	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

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

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3. To which part of the Local Plan does this representation relate?										
Policy		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"/>

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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments
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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):
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b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
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"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.

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Policy LPA02: Spatial Strategy

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PO0777



St. Helens
Council

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Ref: LPSD

13 MAR 2019
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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name CRAIG	First name:
Last Name: JONES	Last Name:
Organisation/company:	Organisation/company:
Address: 6. ORWELL CLOSE STANDISH LOUGE GROUNDS.	Address:
Postcode: WN6 8SH. WIGAN.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: 12/3/19.
--	----------------

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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

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Policy LPA02: Spatial Strategy

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PO0778



St. Helens
Council

686

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Ref: LPSD

13 MAR 2019

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Title: <i>MRS</i>	Title:
First Name <i>MARGARET</i>	First name:
Last Name: <i>AINSCOUGH.</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>13, ECCLES ROAD. KITT GREEN, WIGAN</i>	Address:
Postcode: <i>WNS 04R.</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <i>12/3/19.</i>
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Other documents (please name document and relevant part/section)										

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
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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: WNS 0HR.	Postcode:
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: 13/3/19.
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PO0781



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Title: <i>MRS</i>	Title:
First Name: <i>HAZEL</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: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <i>10/03/19</i>
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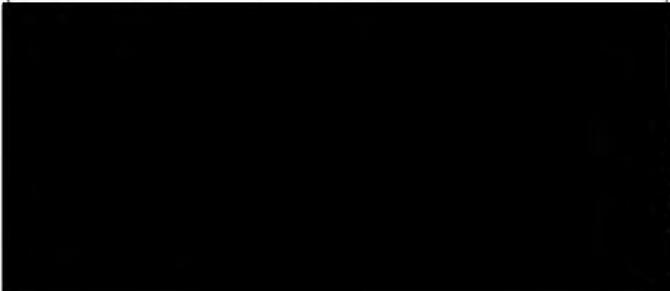
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Title: <i>Mrs</i>	Title:
First Name: <i>JULIE</i>	First name:
Last Name: <i>LOMAX</i>	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:



Date:

26/02/19

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No

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RETURN DETAILS

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

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

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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

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Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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Policy LPA02: Spatial Strategy

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PO0783



St. Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)

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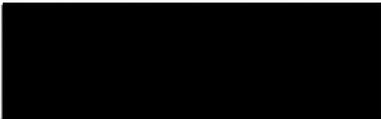
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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>EMMA</i>	First name:
Last Name: <i>HUGHES</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>WHITEGATES BILLINGOE</i>	Address:
Postcode: <i>WN5 7MA</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:  Date: *11/03/19*

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PO0784



St. Helens
Council

692

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

Ref: LPSD

13 MAR 2019

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

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <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: <i>04/03/19</i>
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Other documents (please name document and relevant part/section)									

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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:

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Positively Prepared?	<input type="checkbox"/>
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②

PO0785



St. Helens
Council

693

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Ref: LPSD

13 MAR 2019

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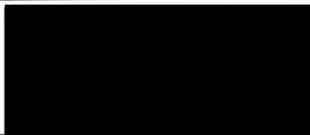
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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: LINDSEY	First name:
Last Name: CAREY.	Last Name:
Organisation/company:	Organisation/company:
Address: 2 SHELBUENE DRIVE MINDLEY VICAR	Address:
Postcode: WN2 3NE	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: 3/3/19.
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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.

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PO0786

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

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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
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Please tick as appropriate

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Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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PO0787



St. Helens
Council

695

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Ref: LPSD

13 MAR 2019

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>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:
-------------------	--------------

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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

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Positively Prepared?	<input type="checkbox"/>
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PO0788



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)

698

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name WENDY	First name:
Last Name: SINGLETON	Last Name:
Organisation/company:	Organisation/company:
Address: 3 FAIRWAYS DRIVE, WALMET ISLAND	Address:
Postcode: LA14 3HT	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.

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PO0789



St. Helens
Council

699

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13 MAR 2019

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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: <i>21/02/19</i>
--	-----------------------

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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

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PO0790

701



St. Helens
Council

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Title: MISS	Title:
First Name SODIE	First name:
Last Name: TUUSTALL	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

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PO0792

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St. Helens Council

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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:

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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
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PO0793



St. Helens
Council

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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 HINDLEY, LIGAN.</u>	Address:
Postcode: <u>WN2 3NE</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:	Date: <u>4/3/19.</u>
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PO0794



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)

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Part B – Your Representation(s).

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <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: <u>10/03/19</u>
-----------------------	-----------------------

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

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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		

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Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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PO0795



St. Helens
Council

707

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13 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: STUART	First name:
Last Name: ALDRIDGE	Last Name:
Organisation/company:	Organisation/company:
Address: 6376 ASTANG ROAD, PRESTON	Address:
Postcode: PR3 5DQ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: 08/03/19
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>
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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
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PO0796

708



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft) 1
Representation (i.e. Comment) Form**

Ref: LPSD

3 MAR 2019
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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*

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PO0797



St. Helens
Council

723

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13 MAR 2019

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

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

1. Your Details	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. DONTONS GREEN,</u>	Address:
Postcode: <u>WA10 6RN</u>	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED]	Date: <u>09/03/19</u>
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Other documents (please name document and relevant part/section)									

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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"/>
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6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments</p>
<p>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>

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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.

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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.

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PO0798



St. Helens
Council

724

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Ref: LPSD

13 MAR 2019

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First Name: <i>LEWIS</i>	First name:
Last Name: <i>RAILTON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>26 COLERIDGE AV. DONTONS GREEN</i>	Address:
Postcode: <i>WA10 6RN</i>	Postcode:
[REDACTED]	Tel No:
	Mobile No:
	Email:

Signature: [REDACTED]	Date: <i>02/03/19</i>
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PO0799

725



St. Helens Council

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

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First Name <i>IAN</i>	First name:
Last Name: <i>ROBY</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>50 CLAREMONT ROAD, BILLINGE,</i>	Address:
Postcode: <i>WV5 7LT</i>	Postcode:
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PO0800



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Council

729

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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:
[REDACTED]	Tel No:
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[REDACTED]	Email:

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PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
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.