



**ST HELENS**  
BOROUGH COUNCIL

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

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

**PLAN ORDER**

**PO0901 – PO1000**

**SEPTEMBER 2020**

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PO0901



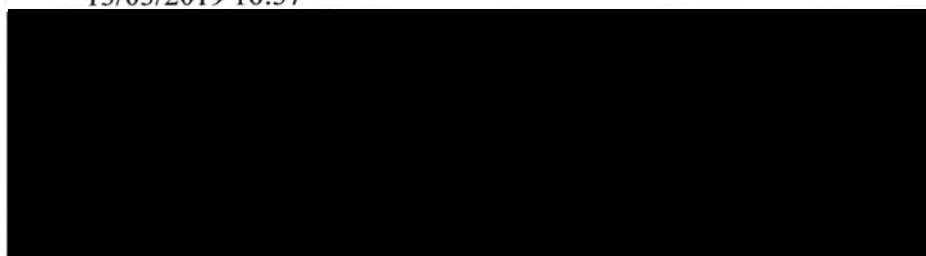
St Helens Local Plan 2020-2035 Submission

Michael Wellock

to:

planningpolicy

13/03/2019 16:37



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

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**Michael Wellock**  
**Managing Director**

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



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

① - LPA02

② - GEN

③ - LPA04

④ - LPA04 (PARA 4.12.1)

⑤ - LPA05 4.12.1

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

**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**

### 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.

PO0902

**Representor Details**

Web Reference Number	WF0212
Type of Submission	Web submission
Full Name	Mr Christopher McGowan
Organisation	
Address	64 Coronation Road Windle St Helens WA10 6BG
Agent Details	

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

No

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

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

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

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

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

Positively prepared, Justified, Effective

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

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

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

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

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

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan

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

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

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

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

The Plan is not effective.

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

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

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone.

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

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

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

Response Date	3/11/2019 7:45:47 PM
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PO0903

**Representor Details**

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

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

No

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

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

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

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

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

Positively prepared, Justified, Effective

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

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

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

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

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

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

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

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

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/11/2019 7:13:49 PM
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PO0904

**Representor Details**

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

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

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

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

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/11/2019 7:04:41 PM
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PO0905

**Representor Details**

Web Reference Number	WF0450
Type of Submission	Web submission
Full Name	Mrs Alice Donnellan
Organisation	Private householder
Address	23 Oak Tree Road Eccleston St. Helens Merseyside WA10 5LJ
Agent Details	

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

Yes (via e-mail)

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

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

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Complies with the duty to cooperate?	Yes

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The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared. 01

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective. 02

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

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

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

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

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

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

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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.

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

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The Plan is not effective.

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

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

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites. NB I submitted this form on 22nd Feb, but did not receive an automated reply so have re-submitted, in case the first one was not received.

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

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

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

Response Date	2/23/2019 9:59:21 AM
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PO0906

**Representor Details**

Web Reference Number	WF0003
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey Warrington WA5 3RH
Agent Details	Colin Morgan

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

Yes (via e-mail)

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

Policy	
Paragraph / diagram / table	Table 4.1: Allocations for Employment Development, Area 1EA, proposed Omega West Extension
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified

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

Publication of the 'Warrington Draft Local Plan – Proposed Submission Version' in April 2019, coupled with the extension to the comment period for this St Helens Borough Local Plan, allows a further representation to be made concerning opposition to the proposal to extend the extensive Warrington-based Omega development area across the secure and well-screened Borough and County boundary into St Helens onto productive Green Belt farm land (Area designed 1EA, 30 hectares). Justification for removal of land from the Green Belt is acknowledged in the St Helens and Warrington reports as requiring 'exceptional circumstances' and it is stated in the Warrington draft report that such exceptional circumstances do exist in their need for additional employment land over the period of the Plan to support this proposal. (St Helens Borough Council are considering this proposed change under their duty to cooperate with Warrington, which I understand is subject to the same controls and level of justification as proposals from the St Helens Council itself.) However, I disagree that the assessment provides the required justification and do not think there are sufficient grounds to justify the proposed development of this parcel of land because of the amount of harm that will result to this Bold Forest Park locality when weighed against the anticipated

benefit, particularly as this benefit from additional warehousing for Warrington could be achieved elsewhere and by other means within Warrington itself, or even elsewhere within the region. 01

Firstly, the overall thrust of the Warrington Local Plan has been based on a high level of growth in Warrington – described as ‘aspirational’ in the report – that its authors say is ambitious. This level of ambition for high growth seemed to have arisen a few years ago when Warrington was hoping to become one of the ‘Northern Powerhouse’ cities. This idea now appears to have been abandoned as unrealistic and not in keeping with the wishes of those that reside in the town. However, elements of this ambition seem to have been carried forward into this latest Local Plan. Whilst it is good that Warrington is being developed to exploit its excellent position on the crossroads between Manchester and Liverpool, it is hoped that this will be balanced with the effect on the quality of life of those that live and work here. The infrastructure in Warrington is being progressively developed but is always struggling to cope as a result of the inherent geography e.g. the Ship Canal, such that the population already suffers inconvenience, delays and high levels of traffic pollution. There is the danger that there is a cycle of higher residential growth feeding the need for additional employment, which in turn requires further housing in an impractical never-ending upward spiral. Hopefully, after hearing feedback from the consultation process, the Warrington Local Plan expansion aspirations will be kept to a reasonable level.

However, the main argument against the justification for removing this parcel of land (1EA) from the St Helens Green Belt comes from the information in the Warrington report on the amount of land that they say they need for future employment purposes over the life of their plan. In the report, based on the ‘aspirational’ high level of growth as discussed above, the estimated employment land required is an additional 200 hectares over the plan period. In the report it states that there is a 20% margin on this figure. Since 20% of 200 hectares is 40 hectares, the proposed extension of Omega into St Helens Green Belt of 30 hectares is less than this quoted margin. Surely, this means that any argument of ‘exceptional circumstances’ for this change cannot be made as the area of this Green Belt farmland is less than the included margin on the quoted figure and therefore cannot be said to be vital to the overall future Plan? 02

A further argument against there being ‘exceptional circumstances’ for the levels of additional employment land for Warrington over the period of the Plan is that there is currently a net in-flow of 14,000 commuters per day – people who travel into the Borough of Warrington to work from surrounding areas. From this, it appears, that there is more than sufficient employment in Warrington at present, and even a buffer into the future.

In addition, the Warrington report says that any development of 1EA would be subject to meeting the transport limitations imposed by the M62 Jn 8 capacity. This junction has already been extensively modified to cope with the currently projected increases in traffic resulting from on-going development of the Warrington Omega site and other congestion such as that from the nearby Gemini retail park. The surrounding local roads are already under strain from current and proposed further Omega development on Warrington land. This expansion is far from completed, despite what it says in the report, as there are about a thousand more houses yet to be occupied plus other employment development – presumably more warehouses – at the eastern end of the site. Any traffic from this proposed development on the St Helens side would add to both the traffic burden both locally and at the motorway junction on the Warrington side. 03

A further argument against the justification of the proposed development of Omega west into St Helens is that, if ‘extreme circumstances’ prevail for the creation of employment land within Warrington, why has so much of the potential employment development land at Omega been given over to housing development? This seemed a non-ideal location for housing because of its isolation from public transport, proximity to traffic pollution and noise from the warehousing and the M62, and because the houses are being built right up against massive warehouses without a buffer zone of smaller buildings such as offices in between. Recent development has taken place very rapidly, both of warehousing and the vast tracts of Omega land being set aside for housing, rather than a more measured approach being taken that could have allowed a higher density and quality of

employment for the people of Warrington. This was a vast site with the potential to be another area in Warrington like the successful Birchwood Science Park on the other side of the town. Therefore, the justification for the proposal to develop the Green Belt farmland 1EA site is surely further weakened by its intended use for warehousing?

Another consideration is that the Warrington report, as it stands, does not include the vast Fiddler's Ferry site within its future potential employment land allocation. This is despite the fact that power generation there is likely to come to an end by 2025 at the latest. The power station already operating only intermittently and it seems likely that parts of this site could readily be utilised in the near future for additional employment within Warrington. The site has the significant advantages of direct connection to the National Grid network and a bespoke railway line. It is hard to understand how it can be justified not to include this site at all in the future Warrington employment land allocation and yet to propose the need to take over Green Belt farmland from the Bold Forest Park for an extension to lorry-serviced warehousing?

The Warrington Local Plan makes it clear that pollution in the town is already a serious problem, with air pollution from vehicles contributing significantly to deaths. It therefore seems intolerable that the Council's aim is to significantly increase traffic in the town, including the Great Sankey area, as an inevitable result of proposed further development. Having three young grandchildren growing up in the existing houses adjacent to the Omega development, I am concerned about traffic pollution levels from the ever-increasing diesel traffic.

Turning now to the harm that would result from development following removal of the area 1EA from Green Belt: This farmland is currently part of the Bold Forest Park area and consists of two fields behind a solid and effective Green Belt boundary. The boundary that would be breached consists of an effective belt of tall trees that hide the recently constructed Omega warehouses from the surrounding St Helens countryside. If warehouses were to be built on these 30 hectares, they would be visible for miles around as the suggested new Green Belt boundary would consist of a drainage ditch that provides no visual barrier. The land towards the southern end of the 1Ea parcel is slightly above the surrounding Bold Forest Park field level and this would make an development more even prominent in the landscape. 04

In addition, the two fields that comprise the parcel of land 1EA currently act as a buffer between the Omega warehousing and the boundary of the ancient deer park that is in the central area of Bold Forest Park. This designated area was the subject of extensive work by St Helens Council and the subject of an Area Action Plan (AAP) to help the local population to gain additional benefits from its environmental features and parkland and to protect and further enhance the area to the south of St Helens town. This AAP was signed off only in 2017, where the intentions for future protection and environmental enhancement were set out in detail. This area of farmland is superior in appearance to that usually found in this area - the landscape consists of a mixture of farmland, patches of tall woodland (protected by TPOs), and ponds. It seems that these areas of woodland have been present for at least two hundred years as they were probably set out as part of the Bold New Hall driveway in the 1740s. The farmland in this part of Bold Forest Park is of good quality - the fields adjacent to the 1EA parcel are currently growing potatoes and are farmed to provide a variety of crops. In terms of wildlife in the area, I am not an expert bird-watcher but have counted over forty different types of birds, and have also seen hares and foxes on the land and bats flying over at night.

The noise, light pollution, and disturbance caused by this proposed development would blight this landscape and disturb the remainder of Bold Forest Park to the west. If development of the area were allowed, there would be no going back, and this rural edge of St Helens would be lost forever. 04

The future employment land area numbers proposed in the Warrington Local Plan are based on an increased level of activity that appears to be unsupported by the residents of the town. In addition, this proposed area could only provide a small benefit to Warrington as the total area of 30 hectares is smaller than the contingency on the calculated employment land requirement given out in the current version of the plan. Also, the Warrington plan does not take into account the net influx of workers into Warrington each day or currently include a contribution to future employment land

allocation from the vast Fiddler's Ferry power station site. Set against this is the loss of a strong, sound and effective Green Belt boundary, loss of good farmland, loss of a buffer to established woodland, and the blighting with warehousing of a landscape picked out for special environmental consideration and recreational potential. Therefore, I feel that the case for 'exceptional circumstances', as required by the NFPA for the change to go ahead, appears not to have been made and, on the basis of the losses that would be incurred, the proposal to remove these 30 hectares from Green Belt does not seem justified.

05

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

Necessary amendments to the report and appendices to remove reference to the proposed removal of parcel 1EA (Omega West Extension) from the Green Belt from the report.

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

Yes, I wish to participate at the oral examination

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

I am prepared to respond, if required, to any questions the Inspector may have regarding my submission on the Plan.

Response Date	5/13/2019 4:04:11 PM
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PO0907

PF 1347



St Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Jodie	First name:
Last Name: Goulbourn	Last Name:
Organisation/company: Self-builder	Organisation/company:
Address: The Lantern House 9 Frenchfields Crescent Clock Face St Helen's Postcode: WA9 4FZ	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 13/05/19

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

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

Yes ☒ (Via Email)

No ☐

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

### **RETURN DETAILS**

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

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

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

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

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

### **NEXT STEPS**

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

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

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

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

## PART B – YOUR REPRESENTATION

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

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

Policy	LPA02	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)					

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

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

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

Please tick as appropriate

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

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

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

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

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

Please 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.

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the concerns.  
We wish to put forward arguments against the removal of green belt of land parcel HA4/GBP 074 and its allocation for housing as we believe the council's position is flawed, all the arguments we wish to put forward are within the attached document. Which is an assessment of the St Helens local plan and green belt review and phase one objections.

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.**

## Foreword and additions for the May 2019 representation:

The following report was submitted as part of one or more representations to the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016 during the consultation process in January 2017.

It was written on behalf of the then owners, now mostly residents of, the ground-breaking and major self-build project, known as French Fields, of 18 homes built on brownfield, derelict, industrial land (old coal mine buildings) within the Green Belt.

**The proposed Local Area Plan 2020-2035 and Green Belt Review 2018 have fundamentally and substantially changed, since the publication drafts put forward in January 2017, in particular to the detriment of the land allocations once known collectively as Location 21 or HS03/HA4, but now (with some modification) as HA4 - and are in conflict with the Bold Forest Park AAP (adopted July 2017).**

Therefore, the contents of and arguments in this report are even more relevant and it is re-submitted with maps incorporated as land parcel labels have also changed significantly since the Council's 2016/2017 drafts.

### **For the May 2019 representation it should be noted that:**

1. The National Planning Policy Framework (February 2019) Paragraph 177 states:  
*"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."*
  - 1.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:  
*"Likely to generate **negative effects**" for*
    - SA1. To protect and enhance biodiversity
    - SA2. To protect and improve land quality in St Helens
  - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citronella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.  
**These species are a material consideration for planning.**
  - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3<sup>rd</sup> edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
  - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.

- 
- 1.5. Removing HA4 and its mosaic habitat of grade 3 agricultural land and areas of broadleaved woodland from the Green Belt, let alone allowing housing allocation, will remove the protection of these habitats and make the Priority Species more vulnerable. It would also impact plant communities, reptiles and amphibians as well as invertebrates, which are not covered in this document. 02
- 

- 1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS\_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat. 03  
**This is significant.**
- 

- 1.7. It is extremely misleading that the maps for HA4 in the LAP appear to show buildings AND the Local Wildlife Site adjacent to HA4 as not being in the Green Belt. This is NOT the case, these buildings and LWS are still in the Green Belt, and planning applications are still being dealt with under that premise. 04
- 

2. The National Planning Policy Framework (February 2019) Paragraph 137 (part) states:

*"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. ..."*

- 2.1. In January 2017, the original report did not put forward arguments to include purpose 5 as part of the representation against removing HA4 from Green Belt, the score was High+ without. However, that now seems to be an oversight due to the following points:
- 2.2. St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017). 05
- 2.3. On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
- 2.4. There is no substantive evidence to suggest that there is a need to remove such a large site as HA4 from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised.
- 2.5. It could be argued that the regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.
- 

3. The National Planning Policy Framework sets out obligations when considering flood risk and the effects of climate change. Concerns on these issues are highlighted in the original report, but the effects will be far worse under the new proposals;

- 3.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:

***"Likely to promote positive effects "***

SA5. To mitigate and adapt to the impacts of climate change.

SA6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.

*reasoning that: "Site overlaps with Bold Forest Park (0m) and the site presents opportunities for enhancement of GI network."*

It also scores SA5 using similar designations at several other land parcels for similar reasons.

**However:**

3.2. There are no recommendations as to how this could be achieved.

3.3. It is well documented that adding to the built environment increases flood risk – and mitigation is required.

3.4. Any mitigation to flood risk on HA4 – particularly to the west side of the land parcel will severely impact the marshy grassland in LWS108, thus reducing its valuable contribution to the important habitats of the region and its retention as a LWS. 06

3.5. A similar position applies to the scattered ponds with their surrounding mature trees – leaving these isolated (and their occupants at risk) or removed in the scheme of housing development.

3.6. Developers (in general) promote any form of mitigation to be off their development sites. This point is illustrated by a representation to St Helens council during the Bold Forest Park AAP consultation on behalf of Taylor Wimpey in March 2016 (St Helens Council website).

3.7. Land parcel HA4 is INSIDE the Bold Forest Park Green Infrastructure (GI) and an integral part of it, therefore: 07

- Removing HA4 from Green Belt increases risk to its GI;
- Developing the land will dramatically detract from the GI of HA4 and that of Bold Forest Park as a whole 08
- The remaining Bold Forest Park GI does not have infinite capacity.

3.8. In May 2019, the United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) released its Global Assessment Summary for Policymakers report. It highlights (among many other relevant items) the importance of maintaining soil integrity to combat climate change - and that a significant part of that is retaining permanent grassland to hold carbon dioxide deposits rather than releasing them into the atmosphere. It would appear that the Council's proposals for HA4 (at least) do not comply with any recommendations therein. 09

3.9. The issues raised above are significant issues for existing properties in the area, the character of the land parcel, any new build proposals and the impact of climate change.

4. The National Planning Policy Framework sets out many other obligations in relation to traffic; pollution and noise. Concerns on these issues were also highlighted in the original report. Again, the effects will be far worse under the new proposals;

4.1. Traffic on the existing narrow, poor quality, local access roads is already at high volume and speed.

4.2. Traffic is set to increase significantly as the development of the recreation hubs in the approved Bold Forest Park AAP progresses, with traffic actively encouraged onto Gorsey Lane to utilise the parking at Clock Face Country Park for equestrian pursuits and the cycling hub.

4.3. Further increases in traffic from a built environment would also affect the Health and Safety of all visitors when crossing these already busy roads to progress along the bridleways, cycle ways and footpaths that make up the Bold Forest Park. 10

4.4. Noise pollution would increase significantly with traffic noise (motorway and local) bouncing off hard structures in the built environment.

5. The Bold Forest Park AAP (adopted July 2017) states that:

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St.Helens  
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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**Part A – Personal Details**

**Part B – Your Representation(s).**

1429  
13 MAY 2019

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John	First name:
Last Name: Goulbourn	Last Name:
Organisation/company: Self-builder	Organisation/company:
Address: The Lantern House 9 Frenchfields Crescent Clock Face St Helen's Postcode: WA9 4FZ	Address:  Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: 13/5/19
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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

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

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

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

Please tick as appropriate

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

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

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

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

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

Please 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.

Unfortunately we do not know which policies to target as our representation, but hope we have addressed the correct ones.  
We wish to put forward arguments against the removal of green belt of land parcel HA4/GBP 074 and its allocation for housing as we believe the correct position is flawed, all the arguments we wish to put forward are within the attached document. Which is a assessment of the St Helens local plan and green belt review and phase one habitats survey.  
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.

## Foreword and additions for the May 2019 representation:

The following report was submitted as part of one or more representations to the St Helens Local Area Plan (LAP) 2018-2033 Preferred Options, December 2016, and the St Helens Local Plan Draft Green Belt Review (GBR,) 2016 during the consultation process in January 2017.

It was written on behalf of the then owners, now mostly residents of, the ground-breaking and major self-build project, known as French Fields, of 18 homes built on brownfield, derelict, industrial land (old coal mine buildings) within the Green Belt.

***The proposed Local Area Plan 2020-2035 and Green Belt Review 2018 have fundamentally and substantially changed, since the publication drafts put forward in January 2017, in particular to the detriment of the land allocations once known collectively as Location 21 or HS03/HA4, but now (with some modification) as HA4 - and are in conflict with the Bold Forest Park AAP (adopted July 2017).***

Therefore, the contents of and arguments in this report are even more relevant and it is re-submitted with maps incorporated as land parcel labels have also changed significantly since the Council's 2016/2017 drafts.

### **For the May 2019 representation it should be noted that:**

1. The National Planning Policy Framework (February 2019) Paragraph 177 states:  
*"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."*
  - 1.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:  
***"Likely to generate negative effects"*** for  
 SA1. To protect and enhance biodiversity  
 SA2. To protect and improve land quality in St Helens
  - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citrinella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.  
**These species are a material consideration for planning.**
  - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3<sup>rd</sup> edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
  - 1.4. Records for points 1.2 and 1.3 were obtained from Merseyside Bio-Bank (March 2019) and through a partial phase 1 habitat and bat transect surveys during an eight week period from March to May 2019 (Appendix 2) – records to be submitted to the Merseyside Bio-Bank.

- 
- 1.5. Removing HA4 and its mosaic habitat of grade 3 agricultural land and areas of broadleaved woodland from the Green Belt, let alone allowing housing allocation, will remove the protection of these habitats and make the Priority Species more vulnerable. It would also impact plant communities, reptiles and amphibians as well as invertebrates, which are not covered in this document. 02

- 
- 1.6. If HA4 is removed from Green Belt, and thus development allowed, the green space connecting the LWS to Bold Forest Park at Clock Face Country Park will be lost. In addition, the connectivity plan shows there are no alternative green routes for species to get from LWS\_108 (or other LWS to the west of the land parcel) to the Clock Face country park and its LWS and habitat. 03  
**This is significant.**

- 
- 1.7. It is extremely misleading that the maps for HA4 in the LAP appear to show buildings AND the Local Wildlife Site adjacent to HA4 as not being in the Green Belt. This is NOT the case, these buildings and LWS are still in the Green Belt, and planning applications are still being dealt with under that premise. 04
- 

2. The National Planning Policy Framework (February 2019) Paragraph 137 (part) states:

*"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. ..."*

- 2.1. In January 2017, the original report did not put forward arguments to include purpose 5 as part of the representation against removing HA4 from Green Belt, the score was High+ without. However, that now seems to be an oversight due to the following points:
- 2.2. St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
- 2.3. On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use. 05
- 2.4. There is no substantive evidence to suggest that there is a need to remove such a large site as HA4 from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised.
- 2.5. It could be argued that the regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.
- 

3. The National Planning Policy Framework sets out obligations when considering flood risk and the effects of climate change. Concerns on these issues are highlighted in the original report, but the effects will be far worse under the new proposals;

- 3.1. The Sustainability Appraisal (SA) site assessment for HA4 scores:

***"Likely to promote positive effects "***

SA5. To mitigate and adapt to the impacts of climate change.

SA6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.

*reasoning that: "Site overlaps with Bold Forest Park (0m) and the site presents opportunities for enhancement of GI network."*

It also scores SA5 using similar designations at several other land parcels for similar reasons.

However:

- 
- 3.2. There are no recommendations as to how this could be achieved.
- 
- 3.3. It is well documented that adding to the built environment increases flood risk – and mitigation is required.
- 3.4. Any mitigation to flood risk on HA4 – particularly to the west side of the land parcel will severely impact the marshy grassland in LWS108, thus reducing its valuable contribution to the important habitats of the region and its retention as a LWS. 06
- 3.5. A similar position applies to the scattered ponds with their surrounding mature trees – leaving these isolated (and their occupants at risk) or removed in the scheme of housing development.
- 
- 3.6. Developers (in general) promote any form of mitigation to be off their development sites. This point is illustrated by a representation to St Helens council during the Bold Forest Park AAP consultation on behalf of Taylor Wimpey in March 2016 (St Helens Council website).
- 
- 3.7. Land parcel HA4 is INSIDE the Bold Forest Park Green Infrastructure (GI) and an integral part of it, therefore: 07
- Removing HA4 from Green Belt increases risk to its GI;
  - Developing the land will dramatically detract from the GI of HA4 and that of Bold Forest Park as a whole 08
  - The remaining Bold Forest Park GI does not have infinite capacity.
- 
- 3.8. In May 2019, the United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) released its Global Assessment Summary for Policymakers report. It highlights (among many other relevant items) the importance of maintaining soil integrity to combat climate change - and that a significant part of that is retaining permanent grassland to hold carbon dioxide deposits rather than releasing them into the atmosphere. It would appear that the Council's proposals for HA4 (at least) do not comply with any recommendations therein. 09
- 
- 3.9. The issues raised above are significant issues for existing properties in the area, the character of the land parcel, any new build proposals and the impact of climate change.
- 
4. The National Planning Policy Framework sets out many other obligations in relation to traffic; pollution and noise. Concerns on these issues were also highlighted in the original report. Again, the effects will be far worse under the new proposals;
- 
- 4.1. Traffic on the existing narrow, poor quality, local access roads is already at high volume and speed.
- 4.2. Traffic is set to increase significantly as the development of the recreation hubs in the approved Bold Forest Park AAP progresses, with traffic actively encouraged onto Gorsey Lane to utilise the parking at Clock Face Country Park for equestrian pursuits and the cycling hub. 10
- 4.3. Further increases in traffic from a built environment would also affect the Health and Safety of all visitors when crossing these already busy roads to progress along the bridleways, cycle ways and footpaths that make up the Bold Forest Park.
- 4.4. Noise pollution would increase significantly with traffic noise (motorway and local) bouncing off hard structures in the built environment.
- 
5. The Bold Forest Park AAP (adopted July 2017) states that:

PO0909

**Representor Details**

Web Reference Number	WF0002
Type of Submission	Web submission
Full Name	Mr Francis Williams
Organisation	St Helens Green Party
Address	7 Parkside Avenue Sutton Manor St. Helens WA9 4DT
Agent Details	

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

No

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

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

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

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

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

Consistent with national policy

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

Green Party SHLP response

There must be exceptional circumstances for removing land from the Green Belt. The Borough has failed to base its future needs in terms of trends established from previous demand data, instead it has based its needs on an aspirational view of future needs which intends to stimulate development by making land available for building, rather than responding to actual need: the exceptional circumstances are not fully evidenced and justified in accordance with para. 136 National Planning Policy Framework, nor is aspirational assessment of future need objectively assessed as required by para. 11(b) NPPF.

The Borough contains a large proportion of previously-developed land and has suffered much despoliation since the start of the industrial revolution, and whilst the borough has policies for gradual assessment of contaminated and unsuitable sites, it does not have a policy for remediating these sites and making them available for development. In view of the large amount of previously developed land that is not available for development, policy that fails to make such land available, yet consigns large areas of virgin land for development, cannot be viewed as sustainable. It fails to preserve land for future generations, whilst not bringing land currently unavailable through contamination or other current unavailability forward for development. Using Green Belt land will have deleterious effects on food production, wildlife, recreation and the ecosystem.

01

02

03

As there has been such extensive scarring of the local landscape historically by industry, virgin land, whether or not in agricultural production, should be conserved at all costs, and all realistic alternatives should be considered. Land that is taken for development, particularly on the urban fringe, reduces access to the countryside, with its health and recreational benefits.

03

Land used for warehousing has an ever-shrinking capacity for employment as technology introduces more and more labour-saving devices to reduce employment costs. The same is likely to apply with freight transport when driverless vehicles are introduced. A policy sacrificing large tracts of productive agricultural land for a rapidly-diminishing yield in employment is neither a sustainable use of land, nor does it provide sustainable employment. Furthermore, large warehousing has a commensurately large take of land, so under the plan, large tracts of land would be urbanized and taken out of food production at a time when the UK has a growing population.

04

Land has been Safeguarded for future development. St Helens Green Party believes that the SHLPSD does not accord with the principles of sustainability, that is, it earmarks agricultural land that is currently Green Belt land development, not under the new plan but the one following it. We suggest that the land in question should remain in the Green Belt, and periodic reviews of the local plan should consider needs current at the time. Safeguarding large areas does not accord with para. 11(a), which states: "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;". A plan that designates large areas of land as being for future development cannot be deemed flexible. What, for example, if food production becomes a priority in the next few years? The plan has to be reviewed every five years, there is no need to safeguard any land. Decisions can thus be taken nearer the time, with more accurate data available.

05

To accord with the principles of sustainability, new housing development should be close to centres of employment or as close as possible to existing transport hubs. Housing development should be within easy reach of the employment centres or close to transport hubs.

As the borough's policy seems to be to promote warehousing, the bulk of such employment being low-skill with corresponding remuneration, housing development on greenfield sites distant from employment centres is unlikely to be predominantly of a type which is affordable for those on low incomes, nor is it sustainable from a transport perspective, making travel by bus lengthy or motor-transport dependent. The optimal locations for housing development are close to the town centre.

06

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

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

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

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

Response Date

5/13/2019 4:10:28 PM

PO0910

EF0008



St Helens Local Plan - Representations OBO Parkside Regeneration LLP  
 William Mulvany  
 to:  
 planningpolicy@sthelens.gov.uk  
 04/03/2019 12:14

①-LPA02

②-Figure 4.1

③-Figure 4.2

④-LPA04.1

⑤-LPA10

⑥-Appendix 5

## 9 Attachments



lpsd-representation-form Policy LPA02.pdf



lpsd-representation-form Policy LPA04.1.pdf



lpsd-representation-form Policy LPA04.pdf



lpsd-representation-form Policy LPA10.pdf



lpsd-representation-form Appendix 5.pdf



Parkside Masterplan red.pdf



Parkside Rail Safeguarding red.pdf



FPC-ARP-XX-XX-FN-RX-00001 red.pdf



2018-09-14 Arup Feedback on AECOM Rail Technical Note.pdf

Dear Planning Policy

Please find attached representations to the Submission Draft Local Plan that are submitted on behalf of our client Parkside Regeneration LLP.

Please acknowledge safe receipt.

Kind regards

WILL MULVANY

Associate: Chartered Town Planner

BSc (Hons), MA, MRTPI



Junction 41 Business Court, East Ardsley, Leeds, WF3 2AB



RTPI

Chartered Town Planner



RIBA

Chartered Practice

THE ACADEMY  
OF URBANISMSMARTER  
PLANNING  
CHAMPION

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Will
Last Name:	Last Name: Mulvany
Organisation/company: Parkside Regeneration LLP	Organisation/company: Spawforths
Address: C/O Agent	Address: Junction 41 Business Court, East Ardsley, Leeds
Postcode:	Postcode: WF3 2AB

Signature:

Date:

4 March 2019

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

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

Yes ☒ (Via Email)

No ☐

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

## RETURN DETAILS

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

post to:

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

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

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

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

## FURTHER INFORMATION

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

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

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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

## PART B – YOUR REPRESENTATION

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

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

Policy	LPA02	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

It is considered that the Local Plan is sound and legally compliant in principle in respect of the Spatial Strategy as set out at Policy LPA02. In particular, our client **supports** development at the former Parkside Colliery as a transformational employment opportunity that will make a major contribution to the economic development of St.Helens Borough, the Liverpool City Region and beyond.

However, our client **conditionally objects** to the supporting Figures 4.1 Key Settlements Plan and 4.2 Key Diagram in respect of the Parkside East site area, specifically the rail safeguarding area on the Parkside West allocation. The alignment is incorrect and needs to reflect the alignment identified in the live planning application for Phase 1 of redevelopment of the former Parkside Colliery.

Please continue on a separate sheet if necessary

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

Amend the rail safeguarding area for Parkside East on Figures 4.1 and 4.2, alongside the Policies Map to reflect that promoted by the site owners and attached to these representations.

Please continue on a separate sheet if necessary

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

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

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

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

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

Our client is the owner of the former Parkside Colliery (Allocation 8EA). It is allocated for employment development in the Local Plan as a key transformational employment site. It is one of the key allocations within the Local Plan and it is important that any considerations in respect of the spatial strategy, particularly where these may impact on delivery of the Parkside scheme, provide an opportunity for discussion and response through the Inspector.

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

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

PO0911

ELOOS 6



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
 Dan Ingram  
 to:  
 planningpolicy@sthelens.gov.uk  
 11/03/2019 13:18

1 Attachment



26800.A3.DI.DM - St Helens LP Submission Draft Reps - Travers Farm, Bold 190311 with Appendices.pdf

To whom it may concern,

Please find attached a copy of representations, including Vision Statement, prepared by Barton Willmore on behalf of our Client, Andrew Cotton and Family, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan Ingram  
 Senior Planner

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

The information contained in this e-mail (and any attachments) is confidential and may be privileged. It may be read, copied and used only by the addressee, Barton Willmore accepts no liability for any subsequent alterations or additions incorporated by the addressee or a third party to the body text of this e-mail or any attachments. Barton Willmore accepts no responsibility for staff non-compliance with our IT Acceptable Use Policy.

① - GEN

② - Spatial Vision

③ - Objective 4

④ - key Diagram

⑤ - LPA01

⑥ - LPA02

⑦ - LPA03

⑧ - LPA04

⑨ - LPA04.1

⑩ - LPA05

⑪ - LPA05.1

⑫ - LPA06

⑬ - LPA08

⑭ - LPA09

⑮ - LPC01

⑯ - LPC02

⑰ - LPC07

⑱ - LPC09

⑲ - Appendix 5



St. Helens  
Council

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

EF0176

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: ANDREW	First name: DAN
Last Name: COTTON	Last Name: INGRAM
Organisation/company:	Organisation/company: BARTON WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

Signature: [Redacted]	Date: 13/03/19
-----------------------	----------------

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

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

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

## PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

PLEASE REFER TO SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

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

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

---

# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on Behalf of Andrew Cotton and Family

March 2019

### Strategic Aims and Objectives

- 2.5 Our Client is generally supportive of the objectives of the New Local Plan. Objectives seeking the population growth, together with the provision of sufficient land to meet local employment needs and support the implementation of sub-regional growth strategies are both welcomed by our Client. As too are the objectives aimed at the delivery of sustainable communities and the delivery of a range of new dwellings, both market and affordable. In this respect however our Client considers that reference should be made within Objective 4 to aspirational housing given that the plan recognises at paragraph 2.5.1 that the provision of detached houses in the Borough is significantly lower than the regional and national averages. The delivery of aspirational, detached family dwellings would address a clear deficit in the Borough and should be coupled with the Vision of creating good quality housing stock. (3)
- 2.6 In addition to the above, our Client considers that the delivery of Bold Forest Garden Suburb should be added in as a strategic aim in its own right, given that its delivery underpins the New Local Plan. The New Local Plan should identify from the outset the significance of the allocation, highlighting the opportunity it offers to deliver the overall vision of the Plan. In the absence of this, our Client considers that presently the Plan is unsound in this regard, as it fails to address this key ambition of the Borough.
- 2.7 In the event that the Council do not consider that the delivery of the Bold Forest Garden Suburb warrants being a strategic aim in its own right then our Client considers that at the very least it should be identified as a new strategic objective at 4.2.

### Key Diagram

- 2.8 Our Client recognises the importance of the Key Diagram (Figure 4.2) in illustrating areas of growth and areas where land is to be protected from development. Furthermore, our Client welcomes the inclusion of their land interest at Travers Farm on the Key Diagram.
- 2.9 Notwithstanding this our Client considers that the Key Diagram should provide greater clarity through clearer labelling with key site allocations, including our Client's land interest being clearly labelled. Greater detail on the Key Diagram would also assist in reducing misinterpretation when locating land parcels. The current Key Diagram is vague in terms of boundaries (for example settlement boundaries and Green Belt). Key Sites, as outlined within the Plan should be highlighted differently to other new housing sites on the diagram, reflecting their status and prioritisation within the Plan. (4)

- 2.10 Moreover, our Client notes that Parkside East, which is identified within the New Local Plan as being suitable for a new strategic rail freight interchange is treated differently to other allocations within the Plan. It has its own category on the key diagram and is clearly labelled differently in recognition of its significance within the Plan.
- 2.11 Whilst our Client considers that the Bold Forest Garden Suburb should receive similar treatment within the Key Diagram. Our Client considers that it should have its own entry within the Key, with a clear differentiation between the Garden Suburb and the rest of the housing allocations. This would serve to make the key diagram clearer but would also emphasise the status of the Garden Suburb as a key allocation within the plan and would accord with the Vision and Strategic Aims detailed previously. It is noted that locations such as Dream and Haydock Racecourse have their own entries within the Key Diagram and yet the main housing allocation, and the exciting prospect that is a new Garden Suburb does not. Our Client considers that the Council should seek to amend the Key Diagram in this regard.

(4)

## 5.0 CONCLUSIONS

5.1 These representations have been prepared and submitted by ~~Barton Willmore on behalf of our Client, Andrew Cotton and Family.~~

5.2 Reflecting on the comments made in these representations, our Client is supportive of the approach applied by the Council to the following:

- The Vision and Plan objectives, in our Client's view broadly reflect national planning policy, and provide for a commitment to the fulfilment of deliverable yet aspirational social and economic goals, our Client does however consider that the delivery of Bold Forest Garden Suburb should be included both within the Vision and as a Strategic Aim in its own right; ①
- The Key Diagram, subject to the Bold Forest Garden Suburb being identified in its own right; ②
- Policy LPA03, establishing the broad development principles for the Borough; ③
- The decision by the Council to pursue the delivery of a minimum of 215 hectares of employment land during the Plan Period; ④
- The decision by the Council to include our Client's land interest in the key housing allocation within the Plan; ⑤
- The decision by the Council to identify land for release from the Green Belt for housing and employment and additional safeguarded land to meet future needs; and ⑥
- The provision of flexibility within housing policies to allow for lower provision than policy requirements if necessary on account of viability. ⑦

5.3 Despite these observations, our Client cannot at this stage provide their full endorsement of the New Local Plan as providing a sound planning document. There are a number of areas, as outlined below, which remain a cause of concern for our Client:

- Our Client considers that policy LPA01 should be removed from the Plan in its entirety as it only replicates National Planning Policy; ⑧

PO0912



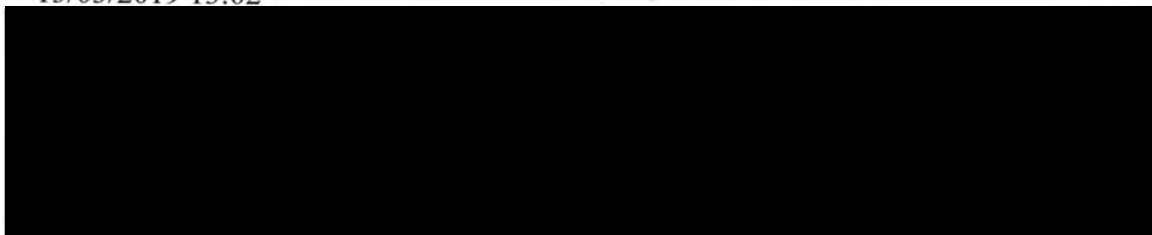
St Helens Submission Draft Local Plan: Representations on behalf of Bericote Properties Ltd [NLP-DMS.FID586504]

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.

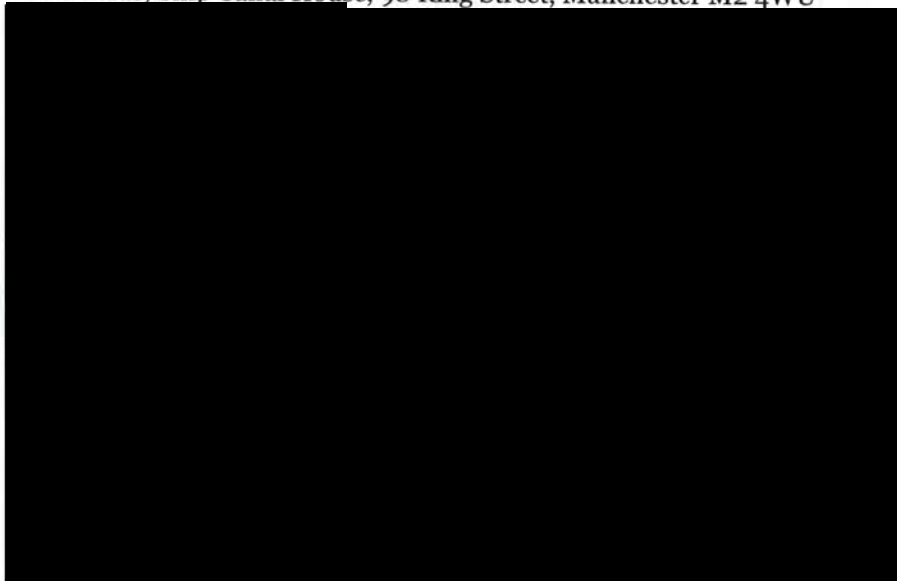
It would be much appreciated if you could confirm receipt of this response by return.

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: 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:	
Mobile No:	
Email:	

Signature:

[Redacted Signature]

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 13<sup>th</sup> March 2019** by:

post to:

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

**or** by hand delivery to:

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

**or** by e-mail to:

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

### **PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
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: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/> X	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/> X	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 checked="" type="checkbox"/> X
Consistent with National Policy?	<input checked="" type="checkbox"/> X

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

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

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)

			<b>Yes, I wish to participate at the oral examination</b>
--	--	--	---

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

To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

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

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

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

**Date:** 7 March 2019

**Our ref:** 41575/09/SPM/MWL/17228140v1

**Your ref:**

Dear Sir/Madam

### **St Helens Submission Draft Local Plan Representations: Land at M6Major.com, Haydock**

On behalf of Bericote Properties Ltd [Bericote], Lichfields is pleased to submit representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Bericote is one of the most active developers of large scale distribution space in the UK.

These representations are made in the context of Bericote's land interest at Florida Farm, St. Helens (or M6Major.com) in relation to land to the north of the A580 East Lancashire Road at Haydock, abutting the Haydock Industrial Estate.

St Helens Borough Council [the Council] published the SDLP for consultation on the 16<sup>th</sup> January 2019 for 8 weeks and Bericote welcomes the opportunity to comment. Bericote looks forward to working with the Council as it progresses towards adoption of the Local Plan and trusts that the comments contained within this letter will assist the Council in this regard.

### **Background to M6Major.com**

As the Council is aware, the M6Major.com site is the subject of Hybrid Planning Permission ref. P/2016/0608/HYBR which was granted on the 27th April 2017 for the following development:

- 1 Full planning permission for the provision of a new access to the A580 East Lancashire Road, internal site access roads, regrading works and the formation of development platforms and strategic boundary landscaping (including bund details).
- 2 Outline planning permission (with all matters other than access reserved for approval), for the erection of 2no. commercial/industrial buildings providing up to 135,000 square metres. of employment floorspace (B2/B8 uses with up to 10,000 square metres of office accommodation); and the provision of associated infrastructure (including roads, parking, footpaths, internal landscaping, noise mitigation measures and Sustainable Urban Drainage Systems).

Reserved matters approval for Unit 1 for the erection of 1 no 34,114 sq. m commercial/industrial building comprising B8 unit with ancillary office, office hubs and the provision of associated infrastructure (including roads, parking, internal landscaping, noise mitigation measures and SuDS. On land north of East Lancashire

to help create conditions in which business can invest, expand and adapt<sup>3</sup> as well as efficiently using land<sup>4</sup>.

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.

<sup>3</sup> The Framework 2019 - §80

<sup>4</sup> The Framework 2019 - §117

PO0913



CPRE Lancashire response  
jackie.copley  
to:  
planningpolicy  
13/03/2019 09:20



# 1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

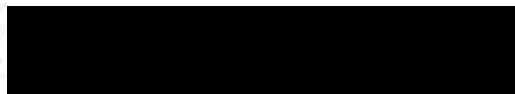
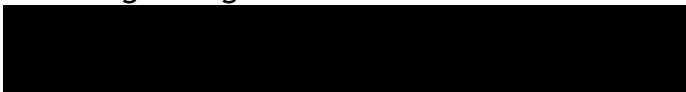
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

**Jackie Copley MRTPI MA BA(Hons) PgCert**  
Planning Manager



## Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

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Registered Charity Number: 1107376

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St. Helens  
Council

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Ref: LPSD

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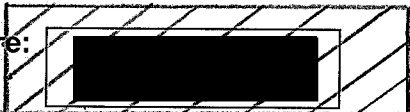
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
--	--

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

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

Yes ☒ (Via Email)

No ☐

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

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

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

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

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**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, setting out your representation/comment.**

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

## **PART B – YOUR REPRESENTATION**

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments</p> <p>CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.</p> <p>We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.</p> <p>That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):</p> <p>a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;</p>

## Policy LPA02: Spatial Strategy

We are pleased to read the re-use of previously developed land in Key Settlements will remain a key Priority in local plan Policy LPA02: Spatial Strategy, as we too strongly advocate a brownfield preference approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. We acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." However, observe that the use of the phrase "as far as practicable" will make LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future. Therefore we strongly urge for this phrase to be deleted, or LPA02 will remain ineffective, if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

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

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

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer has an interest in low value farmland being consented for residential use and having responded to the call for sites. Many developers chase land value rises from farmland being allowed for residential use, and they aren't in the least bit bothered about issues such as sustainability, ecology, rural economic sectors. If the developer's land is in a 'sustainable' location and it would constitute 'sustainable development' this would be mutually beneficial to both developer and wider society, but if the land is in a place that is 'unsustainable' then it would be at a cost to society and it should not be allowed.

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

CPRE Lancashire supports the policy intention that says: "The quality of life, health and wellbeing of St Helens Borough's residents, workers and visitors and the quality of the natural environment will be supported by:" and we applaud the text in the five supporting bullet points.

## Policy LPA03: Development Principles

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

## Policy LPA04 Strategic Employment Sites

CPRE Lancashire is strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St Helens, which we regard as unjustly excessive. We believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of

PO0914



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
 Hannah Payne  
 to:  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
 13/03/2019 16:22



# 1 Attachment



Representation Form.pdf

Dear Sir/Madam,

Please see attached completed Representation Form and accompanying representations submitted on behalf of Barratt Homes to be taken into consideration as part of the consultation on the St. Helens Local Plan Submission Draft.

Note that we would like to be informed of future progress on the Local Plan and request the opportunity to attend Examination in Public.

We would be grateful if you could confirm receipt by way of a return email.

Kind regards,

Hannah

**Hannah Payne** | Senior Planner



**indigo.**



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Hannah
Last Name:	Last Name: Payne
Organisation/company: Barratt Homes	Organisation/company: Indigo Planning Ltd
Address:	Address: St James' Tower, 7 Charlotte Street, Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	

Signature:	Date: <input type="text" value="13/03/2019"/>
------------	---

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

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

Yes ☐ (Via Email)

No ☐

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



## **PART B – YOUR REPRESENTATION**

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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Please see enclosed representation.

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

# indigo.

St James' Tower,  
7 Charlotte Street,  
Manchester, M1 4DZ

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

By email

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

let.001.NF..21450010

13 March 2019

Dear Sirs

## ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

### Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

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We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

### Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

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Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E1 1DT  
Registered number 2078863 VAT number 849246134



# indigo.

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02

However, the priority placed on the re-use of previously development land over other allocated sites is not considered appropriate. We question the rationale for lowering the threshold for developer contributions for developers of brownfield sites given it is incorrect to assume developers on greenfield sites have less constraints. As such, each site should be taken on its own merits with developers' contributions subject to viability considerations.

03

At LPA02(4), further clarity should be provided on when a full review of the Plan will be triggered.

04

The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included in LPA02 as health and wellbeing of St. Helens' residents is covered within Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. This part of the policy should therefore be removed.

05

## **Policy LPA03: Development Principles**

On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined.

06

Nonetheless, the development of the Florida Farm South draft allocation supports the development principles identified within this policy. It will provide circa 600 homes; contributing not only towards the boroughs housing target and a sustainable mix and tenures of quality homes but also through direct and indirect investment in the local area. This in turn will contribute towards the borough's regeneration objectives.

07

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The employment target of a minimum of 215.4ha up to 2035 has been reduced from the minimum of 306ha up to 2033 outlined in the Preferred Options Local Plan.

Although this target appears sufficient to meet anticipated need, this figure does not reflect the Spatial Vision and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general.

08

The allocation of employment sites within the Green Belt particularly those along

09

PO0915



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes  
 Hannah Payne  
 to:  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
 13/03/2019 16:22



# 1 Attachment



Representation Form.pdf

Dear Sir/Madam,

Please see attached completed Representation Form and accompanying representations submitted on behalf of Barratt Homes to be taken into consideration as part of the consultation on the St. Helens Local Plan Submission Draft.

Note that we would like to be informed of future progress on the Local Plan and request the opportunity to attend Examination in Public.

We would be grateful if you could confirm receipt by way of a return email.

Kind regards,

Hannah

**Hannah Payne** | Senior Planner



**indigo.**



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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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)

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Yes ☐ (Via Email)

No ☐

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## RETURN DETAILS

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

post to:

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

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

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

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

## FURTHER INFORMATION

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

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

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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

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Effective?	<input type="checkbox"/>
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# indigo.

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WA10 1HP

By email

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let.001.NF..21450010

13 March 2019

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Registered number 2078863 VAT number 849246134



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08

The allocation of employment sites within the Green Belt particularly those along

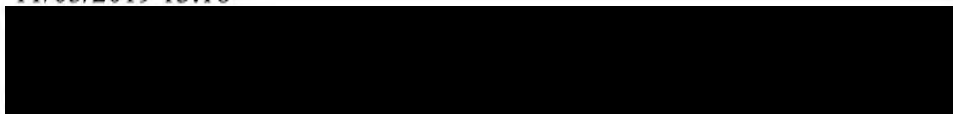
09

PO0916

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)

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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: ANDREW	First name: DAN
Last Name: COTTON	Last Name: INGRAM
Organisation/company:	Organisation/company: BARTON WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

Signature: [Redacted]	Date: 13/03/19
-----------------------	----------------

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

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

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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"/>
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PLEASE REFER TO SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

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**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

- 3.10 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.

## 5.0 CONCLUSIONS

5.1 These representations have been prepared and submitted by Barton Willmore on behalf of our Client, Andrew Cotton and Family.

5.2 Reflecting on the comments made in these representations, our Client is supportive of the approach applied by the Council to the following:

- The Vision and Plan objectives, in our Client's view broadly reflect national planning policy, and provide for a commitment to the fulfilment of deliverable yet aspirational social and economic goals, our Client does however consider that the delivery of Bold Forest Garden Suburb should be included both within the Vision and as a Strategic Aim in its own right; ①
- The Key Diagram, subject to the Bold Forest Garden Suburb being identified in its own right; ②
- Policy LPA03, establishing the broad development principles for the Borough; ③
- The decision by the Council to pursue the delivery of a minimum of 215 hectares of employment land during the Plan Period; ④
- The decision by the Council to include our Client's land interest in the key housing allocation within the Plan; ⑤
- The decision by the Council to identify land for release from the Green Belt for housing and employment and additional safeguarded land to meet future needs; and ⑥
- The provision of flexibility within housing policies to allow for lower provision than policy requirements if necessary on account of viability. ⑦

5.3 Despite these observations, our Client cannot at this stage provide their full endorsement of the New Local Plan as providing a sound planning document. There are a number of areas, as outlined below, which remain a cause of concern for our Client:

- Our Client considers that policy LPA01 should be removed from the Plan in its entirety as it only replicates National Planning Policy; ⑧

PO0917

ELO117



Representations concerning the St Helens Borough Local Plan 2020-2035

Greg Leyland

to:

planningpolicy

12/03/2019 17:43

Cc:

① GBR

④ LPA04

⑦ LPA09

⑩ LPA09

② LPA06

⑤ LPA05

⑧ LPA01

⑪ S.A.

⑬ SUS. TIA  
REDS.

③ LPA03

⑥ LPA07

⑨ LPA09

⑫ TIA

STIC 4HS

1 Attachment



St Helens Local Plan 2019 Review - Greg Leyland - 120319.pdf

Dear Sir

I have a number of comments concerning the Council's proposed 'Local Plan 2020 – 2035'.

I wish to object to the land referred to as Eccleston Park Golf Club (EPGC) having its 'Green Belt' status being changed to 'Safeguarded'.

'Safeguarding' the land will only *potentially* stop housing development for up to 15 years (to 2035), after which time it would likely be developed into a housing estate.

Below, I have cut and pasted various paragraphs from the documentation held on the St Helens Council website (accessible via <https://www.sthelens.gov.uk/localplan>), highlighted in yellow the aspect I wish to comment on, and provided my comments in red italics. I have also attached a pdf version to this email.

I trust you will give my objections consideration and take them into account as you continue to make plans.

Could you please acknowledge this email by return.

Yours faithfully

G Leyland  
6 Central Avenue  
Eccleston Park  
Prescot  
Merseyside  
L34 2QP

## Extracted from: 'Greenbelt Review December 2018'

### THE PURPOSES OF GREEN BELT

1.9 The NPPF establishes that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

*I have lived in or around Eccleston Park all my life and have always considered the fields now referred to as Eccleston Park Golf Club as the buffer and separator between Eccleston Park and Rainhill. I was bemused when the Golf Club was named 'Eccleston Park' since the land had always been considered to be in Rainhill.*

10

indication of the potential location of future development and associated infrastructure needs.

*For clarity, an explanation / definition of the use of the word 'safeguarded' should be included in the Glossary (Appendix 1). As it is, the term is vague and could be construed as misleading.*

*I do not understand any benefit of changing the status of land from Green Belt to 'safeguarded'. Similarly, the benefit of "avoiding the need for another Green Belt Review for a substantial period, and giving a clear indication of the potential location of future development and associated infrastructure needs". No one can predict development requirements so far into the future, or account for factors such as immigration and migration, environmental & climate change, government legislation, the local & global economies etc. etc. I would propose that the current status should be retained until another Green Belt review post 2035.*

Notes - This  
Has been  
Added

2

### Policy LPA03: Development Principles

New development in St. Helens Borough will be required to support the following development principles where relevant:

1. Create sustainable communities with a strong sense of place.

*Eccleston Park and Rainhill communities already have a 'strong sense of place'. Should a housing development occur on the EPGC land, this will be lost. Consequently, any plans to do this – and I consider changing the status of the land to 'safeguarded' simply a delay tactic – will fly in the face of this principle.*

3

5. c) Protecting, conserving, and / or enhancing the Borough's natural, built and historic environments;

*Developing the EPGC land, which is a natural environment for a host of wildlife and flora, for housing will not be in support of this principle.*

3

- d) Protecting and enhancing the quality of the Borough's natural resources including water, air, land and biodiversity; and...

*Given that United Utilities has various underground facilities at EPGC, our water supplies and those further afield could be put at risk.*

*With regards to cars, most households today have at least one car and many, two or three. Should the EPGC land be used for a housing development, with between 500 and 950 homes (as per the plan), this could result in an additional c.1800 cars on our roads. This increase in road traffic will have a significant detrimental effect on pollution due to traffic fumes and noise. Portico Lane, Delph Lane, St Helens Road, Rainhill Road and many other surrounding roads will be affected by this. I feel that the public has already been misled over many issues surrounding fuel emissions (diesel was cleaner, now it isn't; VW lied) and steps should be taken to properly understand the real impact. To add to this, the national press has reported, regarding dementia, that "Scientists found people exposed to traffic fumes and noise were up to 12 per cent more likely to develop the disease." (Please see*

3

<http://www.dailymail.co.uk/health/article-4088310/Live-busy-road-SIGNIFICANTLY-likely-develop-dementia-shock-study-finds.html>). Other studies now claim similar results.

*Furthermore, whilst on the subject of air pollution, I am also extremely concerned that St Helens Council is basing significant emphasis on improving the local economy by encouraging storage, distribution, warehousing, transport and logistics, all of which tend to rely heavily on lorries and road-based transport. These are exactly the type of industries St Helens can well do without, given the already poor state of pollution and air quality in the area.*

③

7. Promote healthy communities by improving access and opportunities for formal and informal recreation (including through the use of green infrastructure), improving cycling and walking routes, and minimising air, soil and water pollution.

*Clearly the closure of the Eccleston Park Golf Club and the potential for it to be replaced sometime in the future by a housing estate does not support this principle.*

4.12.5 The Council's Employment Land Needs Study (ELNS) 2015 and the ELNS Addendum Report (2017) indicate that the Borough, due to its location on the M6 and M62 motorways, is ideally positioned to provide a critical role in the North West large-scale logistics and distribution sector. The ELNS suggests that whilst traditionally St. Helens Borough has been a manufacturing centre, with the largest land uses including class B2 (general industrial) operations, a strong shift to B8 (storage and distribution) uses is expected to occur during the Plan period.

*As stated above I am extremely concerned that St Helens Council is basing significant emphasis on improving the local economy by encouraging storage, distribution, warehousing, transport and logistics, all of which tend to rely heavily on lorries and road-based transport. These are exactly the type of industries St Helens can well do without, given the already poor state of pollution and air quality in the area.*

④

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

1. In the period from 1 April 2016 to 31 March 2035 a minimum of 9,234 net additional dwellings should be provided in the Borough of St. Helens, at an average of at least 486 dwellings per annum.

*The housing requirements are not made clear in the plan since the figures quoted through the documentation are not consistent and do not now seem to be aligned with the latest central government recommendations. Also, the figures above are now 3 years out of date. What are the latest position & figures for housing provision and requirements?*

⑤

4.18.5 A key disadvantage of relying on the standard method to identify housing need is that it does not take into account the increased employment growth that is likely to result from the development of the sites that are allocated for employment development in Policy LPA04. This is very vague and needs to be quantified. This employment growth is likely to lead to increased housing need. This is also very vague and needs to be quantified. In addition, the long term trend of declining affordability is likely, if continued in the future, to present an upward pressure on the outputs of the standard method.

⑤

PO0918



St Helens LP 2020-2035 (Submission Draft)  
Tony McAteer  
to:  
planningpolicy  
13/03/2019 08:46



2 Attachments



Local Plan Reps Form.pdf Local Plan Reps.pdf

Dear Sirs

Please see attached representations to the above draft LP on behalf of Eccleston Homes Ltd. We would be grateful if you could acknowledge receipt.

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)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Mark	First name: Tony
Last Name: Fillingham	Last Name: McAteer
Organisation/company: EcclestonHomes Ltd	Organisation/company: McAteer Associates Ltd
Address: Suite 114 Newton House Bichwood House Warrington	Address: 4 St Johns Wood Lostock Bolton
Postcode: WA3 6FW	Postcode: BL6 4FA



Signature:

Date:

12 March 2019

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

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

Yes ☒ (Via Email)

No ☐

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

## **RETURN DETAILS**

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

### **PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?									
Policy LPA02 LPA03 LPA05 LPA06 LPA07		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					

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input 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 continue on a separate sheet if necessary

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

**See Attached Representations**

Please continue on a separate sheet if necessary

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

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

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

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

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

**To ensure the representations are fully understood by 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.**



**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**

### 3 Policy LPA03

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- 3.1 Eccleston Homes support the Council's objectives in Policy LPA03 of retaining and growing the borough's population through providing for a mix of housing types and tenures in sustainable locations. However, they are concerned that the Council's reliance on inner area development will not provide the choice of location and housing mix required by national planning policy. Eccleston Homes support the objections put forward by Nexus Planning on their behalf in respect of the failings in the Council's housing land supply and the need to release other sites, such as their land at Station Road, Haydock, to meet housing need.
- 

05

PO0919



St Helens Local Plan Submission Draft Representations - Torus 62 Limited  
Ian Gilbert  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

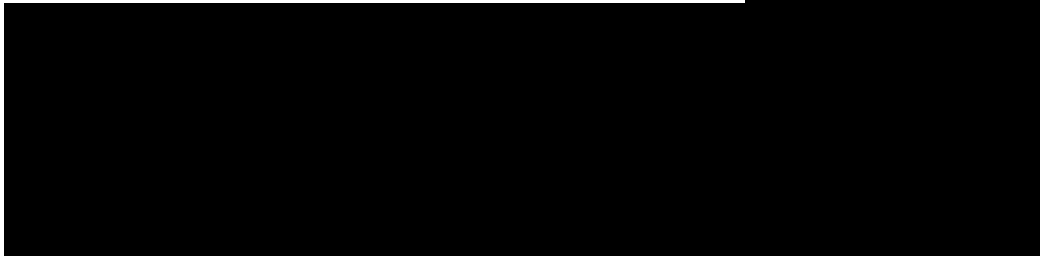
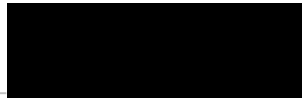
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

**Ian Gilbert**  
Planning Associate



**Representor Details**

Web Reference Number	WF0114
Type of Submission	Web submission
Full Name	Mr Adam Smith
Organisation	Torus 62 Limited
Address	co agent co agent
Agent Details	Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ

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

Yes (via e-mail)

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

Policy	Please see accompanying representations
Paragraph / diagram / table	Please see accompanying representations
Policies Map	Please see accompanying representations
Sustainability Appraisal / Strategic Environmental Assessment	Please see accompanying representations
Habitats Regulation Assessment	No
Other documents	Please see accompanying representations

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

# St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

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

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communities; contribution to high quality and built environment; minimising the need to travel; and lowering St Helen's carbon footprint.

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25

3.17 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.

26

3.18 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.

---

3.19 We do consider that both Parts 2, 3 and 4 of Policy LPA03 should specify the need to deliver affordable housing to meet both the demands of population retention and to improve the economic well-being of the borough's residents. The lack of available housing for those in need of affordable housing and worsening affordability through the borough have both been highlighted as key issues to be addressed earlier in the Plan.

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27

#### **Policy LPA04 – A Strong and Sustainable Economy**

3.20 We support the aims of Policy LPA04 in seeking to achieve a strong economy. However, with regard to our comments above in relation to meeting the needs of the wider City Region we question the meaningfulness of Part 1(a) which states that the Council will help meeting the needs of the LCR for economic growth, job creation and skills development. As set out above, and within the LCR SHELMA, an economic growth scenario for the LCR must be supported by a level of housing growth far in excess of the proposed housing requirement within the Submission Draft of the Local Plan.

28

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3.21 We agree with the Council at paragraph 4.12.3 of the Local Plan that the borough's economy is "inextricably linked" to that of the wider LCR. The Council notes that it 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". We consider that, without a step change in proposed housing delivery to reflect the

29

PO0920



St Helens Local Plan Submission Draft Representations - Torus 62 Limited  
Ian Gilbert  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 08:54



1 Attachment



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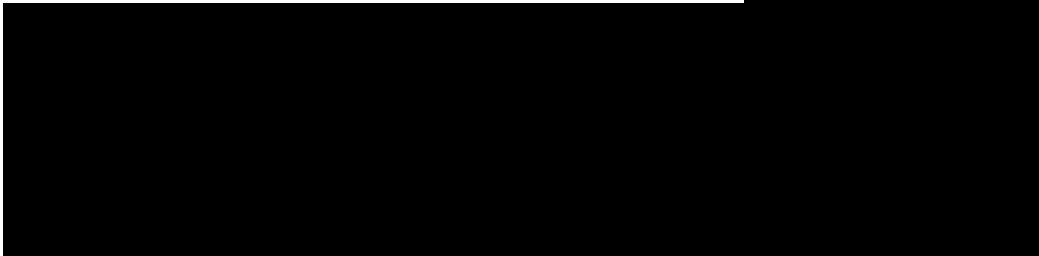
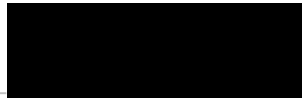
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Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

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PO0921



St Helens Local Plan Submission Draft Representations - Torus 62 Limited  
Ian Gilbert  
to:  
planningpolicy@sthelens.gov.uk  
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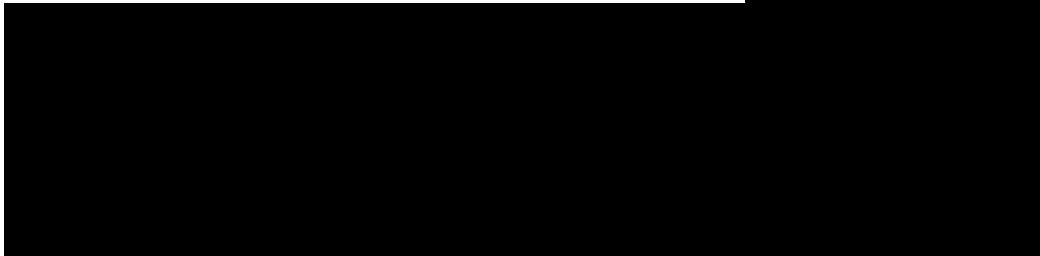
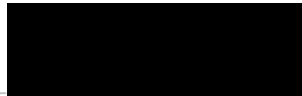
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**Ian Gilbert**  
Planning Associate



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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

# St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

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

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communities; contribution to high quality and built environment; minimising the need to travel; and lowering St Helen's carbon footprint.

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3.17 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.

26

3.18 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.

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3.19 We do consider that both Parts 2, 3 and 4 of Policy LPA03 should specify the need to deliver affordable housing to meet both the demands of population retention and to improve the economic well-being of the borough's residents. The lack of available housing for those in need of affordable housing and worsening affordability through the borough have both been highlighted as key issues to be addressed earlier in the Plan.

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27

#### **Policy LPA04 – A Strong and Sustainable Economy**

3.20 We support the aims of Policy LPA04 in seeking to achieve a strong economy. However, with regard to our comments above in relation to meeting the needs of the wider City Region we question the meaningfulness of Part 1(a) which states that the Council will help meeting the needs of the LCR for economic growth, job creation and skills development. As set out above, and within the LCR SHELMA, an economic growth scenario for the LCR must be supported by a level of housing growth far in excess of the proposed housing requirement within the Submission Draft of the Local Plan.

28

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3.21 We agree with the Council at paragraph 4.12.3 of the Local Plan that the borough's economy is "inextricably linked" to that of the wider LCR. The Council notes that it 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". We consider that, without a step change in proposed housing delivery to reflect the

29

PO0922

ELO167



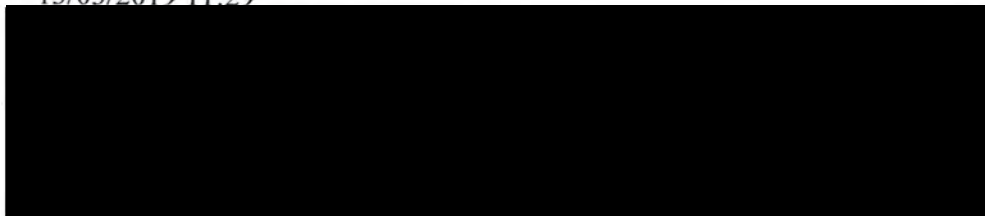
Highways England Response to the St Helens Borough Local Plan 2020-2035 Submission Draft

Johnson, Adam

to:

planningpolicy@sthelens.gov.uk

13/03/2019 11:29



- ① - PARA 4.27-8
- ② - LPA04-1
- ③ - LPA05
- ④ - LPA03
- ⑤ - LPA07 - Criteria
- ⑥ - TIA
- ⑦ - IDP
- ⑧ - APPENDIX 5
- ⑨ - LPA07 - Criteria
- ⑩ - Green ⑥

1 Attachment



St Helens Borough Local Plan 2020-2035 Submission Draft - Highways England Response - 13 March 2019.pdf

Good morning

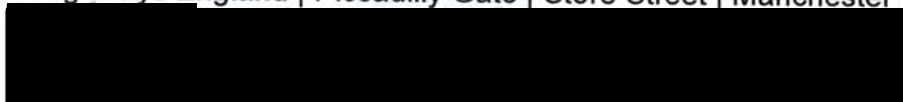
Please find attached Highways England's response to the St Helens Borough Local Plan 2020-2035 Submission Draft.

Kind regards

Adam

**Adam Johnson, Assistant Asset Manager (Liverpool City Region)**

Highways England | Piccadilly Gate | Store Street | Manchester | M1 2WD



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**Highways England Company Limited | [Redacted] | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |**



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Our ref:  
Your ref:

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

Adam Johnson  
Highways England  
Piccadilly Gate  
Store Street  
Manchester  
M1 2WD

13 March 2019

Dear Sir / Madam

### **ST HELENS BOROUGH LOCAL PLAN 2020-2035 (SUBMISSION DRAFT)**

Thank you for consulting Highways England regarding the submission draft of your Local Plan. We very much welcome the opportunity to review your plans and provide advice that I trust will be helpful to you as the plans proceed.

Highways England is responsible for the Strategic Road Network (SRN) in England. Within St Helens this includes parts of the M62 and M6 motorways and, to the north and west, the M58 and M57 motorways. The comments I make here relate to the potential impacts of your plans on that network.

On the whole, we are supportive of the methodology used and the outcomes shown within the Plan. Significant work has clearly been undertaken regarding both the Local Plan itself and the supporting transport evidence base. That notwithstanding, there are gaps in the information that has been published as part of the consultation process, and as such there are a number of points and recommendations we wish to make resulting from our review. These areas are listed below.

#### **Major Road Network**

We would expect to see reference to the emerging Major Road Network within the Local Plan Submission Draft, and the possible inclusion of the A58, A570 and A580 highway links. The Local Plan should set out how a Major Road Network is likely to impact the Borough and the approach it will take with regards to its management with Highways England and the wider Liverpool City Region.

#### **Strategic Employment Sites**

The policy criteria of creating masterplans, development phasing, site access arrangements and encouraging sustainable travel for Strategic Employment Sites is supported by Highways England. This approach should ensure that the delivery of employment land-use is managed appropriately. To that end, site-specific analysis should be undertaken for each of the proposed allocated development sites within the Local Plan

## Sustainability

Policies that promote sustainable methods of transport are welcomed by Highways England in that they offer both environmental benefits and help in the reduction of congestion on the SRN. We would therefore recommend that the Local Plan sets out specific detail in Policy LPA03 regarding how the local authority will guide development to be focussed in sustainable and accessible locations. The following observations have also been made regarding sustainability:

- A number of sites within the Plan have limited sustainable access to St Helens railway stations, being further than the recommended walking distance. Accessibility increases significantly if cycling is included, however significant infrastructure improvements and behaviour changes will be required to make this viable.
- Three-quarters of employment allocations, and just under a third of housing allocations, were identified as having Average or worse accessibility by bus. (4)
- Whilst it is noted that a number of sites are rated as being within a Good or Excellent distance from cycle routes, the rating does not take into account the ease of the access to the route, or quality of the route and its connectivity to key origins and destinations.
- With regards to the Core Accessibility Indicators, it was found that the housing allocations were, in the main, well located in terms of major food stores, healthcare facilities, local centres and primary schools, while secondary schools are more dispersed which decreases accessibility by foot. The assessment recommends potential improvements to pedestrian facilities to encourage more travel by foot to local facilities.

The assessment of the issues in terms of current sustainable transport accessibility to the proposed Local Plan site allocations is comprehensive. However, overall it is considered that the measures proposed are light-touch, placing a strong emphasis on future documents such as the LCR LCWIP, Transport Assessments / Statements and Travel Plans to establish appropriate measures on a more localised site-by-site basis rather than offering more strategic measures that impact across the Borough. With this in mind, it is difficult to assess to what extent the investment into non-car modes throughout the Borough in the Local Plan period will impact the SRN. That notwithstanding, we support the implementation of the LCR LCWIP as a means of providing a policy framework which encourages walking and cycling. (8)

## Transport and Travel Plans

To assist in the promotion of sustainable methods of transport, it is usually recommended that development sites adopt a Travel Plan in order to limit the number of car journeys in favour of public transport or non-motorised forms of travel. Policy LPA07 states that developments which generates significant amounts of traffic should be supported by a Transport Assessment or Transport Statement, however the implementation of Travel (5)

PO0923



St Helens Local Plan 2020 - 2035, Submission Draft - Representations  
Dan Ingram  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 14:20



2 Attachments



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



Representation Form.pdf

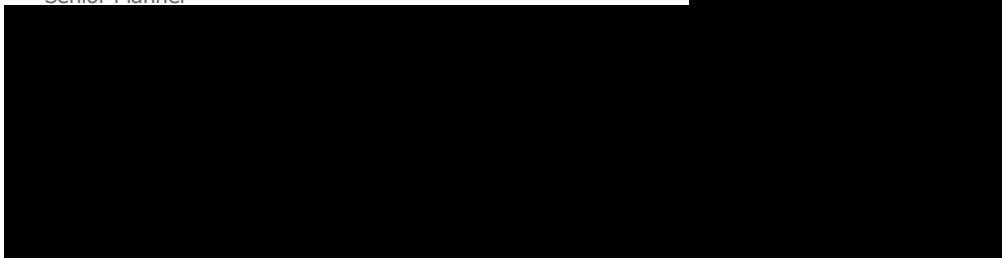
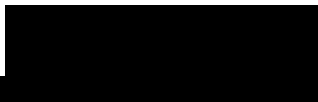
To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.  
**Dan Ingram**  
Senior Planner





St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: DAVID	First name: DAN
Last Name: MORRIS	Last Name: INGRAM
Organisation/company: MILLER HOMES	Organisation/company: BARTON WILLMORIS
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ

Signature

Date:

13 / 03 / 19

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

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

Yes ☒ (Via Email)

No ☐

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

## **RETURN DETAILS**

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

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

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

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

### **PART B – YOUR REPRESENTATION**

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

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

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

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

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

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

Please tick as appropriate

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

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

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

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

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

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

PLEASE REFER TO REPRESENTATION DOCUMENT  
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

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

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

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

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

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

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO  
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER  
SITES.

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

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

# **St Helens Borough Local Plan 2020 - 2035**

## **Submission Draft**

Representations on behalf of Miller Homes

March 2019

Town Centre, and other local centres; support the wellbeing and health of residents, workers and visitors; and protect and develop existing transport infrastructure.

9.7 Our Client has a number of concerns with this Policy. Firstly, Point 1 of the Policy identifies that regeneration and growth will be focussed on the key settlements. However, on review of the proposed allocations identified on the Key Diagram, 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 some of the allocations within the Plan do not accord with this point and fail from the outset to meet the sustainability aspirations otherwise 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. 19

9.8 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 contained within the Plan. 20

9.9 Our Client also has concerns over 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 in line with national planning policy, and that the provisions of Point 3 as currently written within the New Local Plan should be removed. 21

9.10 Our Client is overall supportive of the positive move by the Council to review and identify land within the Green Belt for housing and employment uses, including the identification of land as safeguarded to meet future needs. However, the Council should ensure that adequate land is allocated for housing in order to accommodate the population growth that will result from the provision of additional employment land which is promoted by Point 5. As per our earlier comment within this representation, our Client is concerned that insufficient land is being allocated to meet the Borough's needs, current and future. 22 23

### **Policy LPA03: Development Principles**

9.11 Policy LPA 03 moves on from the spatial approach and sustainable approach established through Policies 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.

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

24

#### **Policy LPA04: A Strong and Sustainable Economy**

- 9.13 Our Client is supportive of the employment land requirements which are set out in this Policy (a minimum of 215.4 hectares between April 2018 and March 2035) and wholeheartedly supports its inclusion within the New Local Plan.
- 

25

- 9.14 However, our Client notes that whilst the Council states that it will aim to deliver 215.4 hectares of employment land, the actual allocation of land for employment equates to 265.3 hectares.

- 9.15 Table 4.2 within the Plan identifies that the employment land needs between 2012 – 2037 equate to between 190 and 239 hectares whilst the Objectively assessed Needs for employment land at Table 4.3 indicate a requirement of 227.4 hectares between 2012 and 2035.
- 

26

- 9.16 Notwithstanding the unnecessary confusion caused by the evidence base documents (as outlined within Section 2), it is clear that the Council has allocated more land for employment than the evidence suggests that they need. The Council are clearly being ambitious and planning for growth, something which our Client supports. However, at the same time the Council must ensure that enough land is allocated for housing to take account of the over-provision of employment land and should consider allocating further sites for housing in order to support the population increase generated by this employment growth.
- 

#### **Policy LPA04.1: Strategic Employment Sites**

- 9.17 Our Client welcomes the inclusion of strategic employment sites within the New Local Plan and the clear benefits these will bring to the Borough.
- 

27

PO0924



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

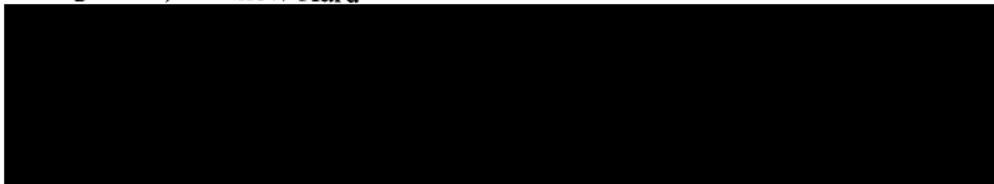
to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:02

Cc:

Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

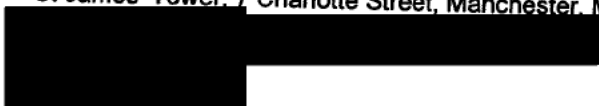
Emer Cunningham | Planner

**indigo.**



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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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)

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**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	Address: St James' Tower 7 Charlotte Street Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	
Signature	Date: 13/03/2019

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

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

Yes ☒ (Via Email)

No ☐

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

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post to:

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

**or** by hand delivery to:

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

**or** by e-mail to:

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

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

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

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

## **PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?							
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<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)

☐ **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

- 4.9. Nonetheless, the development of the Leyland Green Farm site will support the development principles identified within this policy. It could provide the indicative 291 homes highlighted; contributing not only towards the borough's housing target (providing market and affordable units), but also providing a sustainable mix and tenures of quality homes but and create direct and indirect investment in the local area. This in turn will contribute towards the borough's regeneration objectives. The upgrading of the draft safeguarded for development allocation to a housing allocation will mean the benefits outlined will be realised sooner and delivered within the plan period. 12

### Policy LPA04: A Strong and Sustainable Economy

- 4.10. The employment target of a minimum of 215.4ha up to 2035 has been reduced from the minimum of 306ha up to 2033 outlined in the Preferred Options Local Plan. 13
- 4.11. Although this target appears sufficient to meet anticipated need, this figure does not reflect the borough's stated Spatial Vision and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general. Therefore, we object to this policy in its current form.
- 4.12. We support the allocation of employment sites within the Green Belt particularly those along the M6 and A580 corridor that will help ensure that St Helens can take advantage of its strategic location for logistic development. We also support the policy's aim to support the creation of and expansion of small businesses. 14

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

- 4.13. We object to the housing requirement set out by Policy LPA05 suggests a minimum of 9,234 net additional dwellings to be provided in the plan period, equating to 486 dwellings per annum (dpa). The housing requirement is calculated and set out within the St Helens Borough Council Strategic Housing Market Assessment Update (January 2019). It is based on the 2014 based Household Projections and the latest affordability ratio the Objectively Assessed Need (OAN). Whilst this number has increased from the initial figure of 451dpa suggested in the Scoping Consultation, it has been significantly reduced from the figure suggested within the Preferred Options Plan (ie 570dpa). 15
- 4.14. We support St Helens Council's decision to not rely on the standard methodology to identify housing need for the Borough (383 dpa). We agree that it does not take into account the increased employment growth or the long-term trend of declining affordability which would continue to put pressure housing. 16
- 4.15. Despite this however, the housing requirement as suggested in the Proposed Submission Draft is too conservative and means that the Council is only just planning to meet its identified OAN for new housing in the Borough. The currently proposed housing requirement does not plan for boosting growth. 15
- 4.16. The Liverpool City Region places emphasis on a commitment to jobs-led growth but housing targets in St Helens have reduced which is inconsistent with the wider vision for the region. To reflect the ambitions for growth, the housing requirement should be increased to provide for a degree of flexibility in the event that allocated brownfield sites do not deliver as anticipated.
- 4.17. This policy reiterates that a key priority is to maximise housing delivery on previously developed land within existing urban areas. We do not support this policy as the requirement is only just meeting its identified housing needs with too much reliance placed on the questionable deliverability of brownfield sites. This is contrary to the provisions of the NPPF which requires plans to be 'positively prepared' (paragraph 26) and to support the Government's objective of 'significantly boosting the supply of homes' (paragraph 59). 17

PO0925



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)  
Emer Cunningham

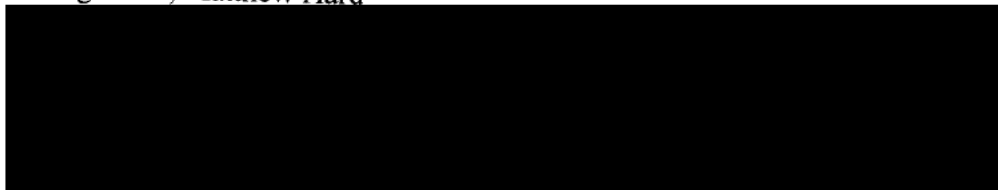
to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:02

Cc:

Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner



**indigo.**



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



This e-mail (including any attachments) is intended only for the recipient(s) named above.  
It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person.  
If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	Address: St James' Tower 7 Charlotte Street Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	
Signature <span style="background-color: black; color: black;">[Redacted Signature]</span>	Date: 13/03/2019

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

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

Yes ☒ (Via Email)

No ☐

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

## **RETURN DETAILS**

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

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

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

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

## **PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?							
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: 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 <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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Thank you for taking the time to complete and return this response form.  
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# 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
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### Policy LPA03: Development Principles

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- 4.11. Although this target appears sufficient to meet anticipated need, this figure does not reflect the borough's stated Spatial Vision and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general. Therefore, we object to this policy in its current form.
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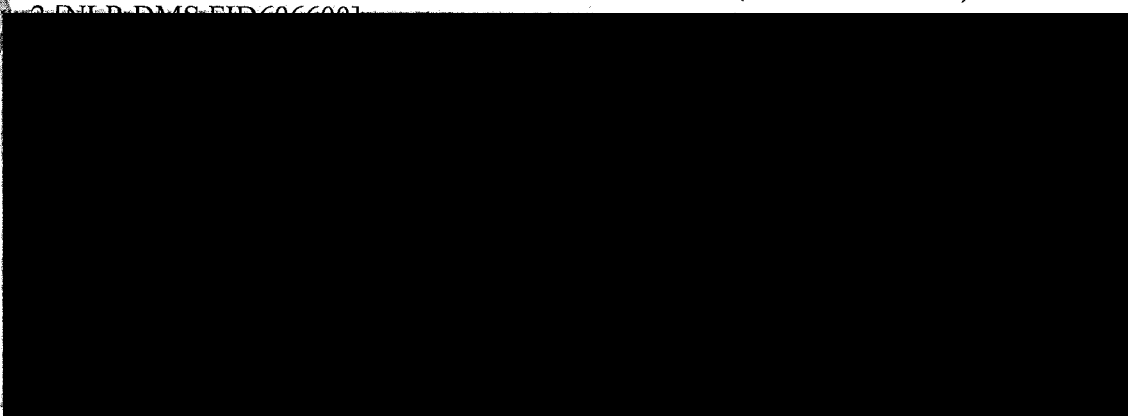
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PO0926

ELO211


 RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2


 1 Attachment


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

Sir/Madam,

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

Kind regards,  
Melissa
**Melissa Wilson**  
**Senior Planner**

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

(10) LPA07

(11) LPA08

(12) LPA09

(13) LPA11

(22) LPC17

(23) LPD01

(24) LPD01

(25) LPD01

(31) GBR

(32) EVA

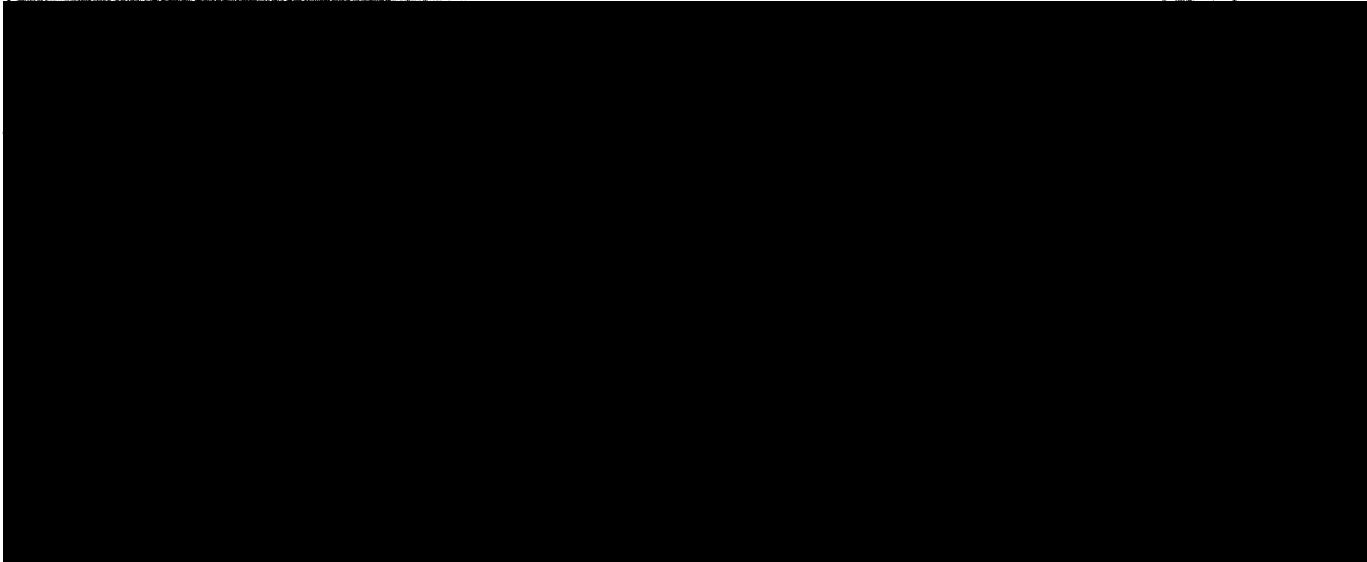
(26) LPD01

(27) LPD02

(28) LPD03

(29) LPD07

(30) SHMA


 Sir/Madam,

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

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

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

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

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

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

**lichfields.uk**

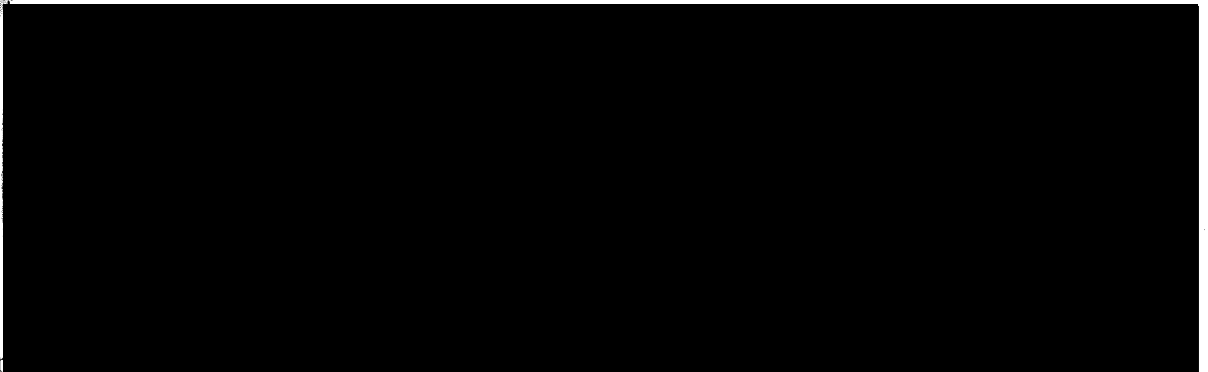
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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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



1 Attachment



SPLIT 41874\_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19\_Part\_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

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

<https://we.tl/t-yDseY9rPfO>

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

Kind regards  
Brian

**Brian O'Connor**  
**Associate Director**

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

**lichfields.uk**

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

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

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title: Mr
First Name: Kate	First name: Brian
Last Name: McClean	Last Name: O'Connor
Organisation/company: Taylor Wimpey UK Limited	Organisation/company: Lichfields
Address: Ground Floor, Washington House Birchwood	Address: Ship Canal House 98 King Street Manchester
Postcode: WA3 6GR	Postcode: M2 4WU
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

<b>Signature:</b> [REDACTED]	<b>Date:</b> 13/03/2019
------------------------------	-------------------------

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

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

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

### **PART B – YOUR REPRESENTATION**

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

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

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

Please tick as appropriate

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

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

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

See supporting Representations and Appendices

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

**See supporting Representations and Appendices**

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

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

			<b>Yes, I wish to participate at the oral examination</b>
--	--	--	---

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

To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

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

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

EL0211

# **St Helens Local Plan Soundness Representations**

Taylor Wimpey UK Limited

13 March 2019

**LICHFIELDS**

41874/03/SPM/MWI  
17081285v8  
17081285v8

## 4.0 **Policy LPA03: Development Principles**

### **Introduction**

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

### **Consideration of Policy**

- 4.2 TW broadly supports the principles of Policy LPA03 and the need for new developments to contribute towards the sustainable growth of the Borough. TW welcomes the requirement as Part 2a seeks to provide for a mix of types and tenures of quality homes. TW requests that the proposed mix and tenure is justified and based on sound evidence with appropriate viability testing. TW's comments on this further in response to Policy LPC01 Housing Mix.
- 4.3 Part 3 includes for improving the economic well-being of the Borough's residents; TW would stress that the provision of high quality housing and communities will support these aspirations. TW has concerns over the misalignment between St Helens economic growth aspirations and housing provisions which are further addressed as part of its response Policies LPA04 and LPA05.
- 4.4 As a responsible developer, TW is committed to provide housing for inclusive communities (Part 4) and well-design developments (Part 5) and supports these provisions as part of this policy.
- 4.5 TW acknowledges the importance of reducing its carbon footprint and adapting to the effects of climate change [Part 8], however, TW would note that parts (a) to (f) would need to be factored into any viability work; and appropriately evidenced as part of any further viability assessment. Taylor Wimpey has concerns that the Viability Assessment prepared by Keppie Massie is flawed and underestimates the actual viability of schemes in St Helens. Further detail on Taylor Wimpey's concerns is included at Appendix 4.

### **Tests of Soundness**

- 4.6 TW considers Policy LPA03 to be sound provided the requirements of Part 8 of the policy are fully considered and justified as part of the viability appraisal exercise.

### **Recommended Change**

- 4.7 TW considers that no further change to the policy wording is required but the accompanying evidence base needs to be updated to robustly demonstrate that the requirements of part 8 do not undermine the viability of development.

PO0927



St Helens Local plan - Pre-Submission Draft - Response by Revelan  
John Pearce  
to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 15:53



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



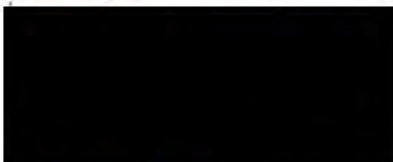
lpsd-representation-form Policy LPA02.pdf Proposals Map Extract Newton-le-Willows.pdf

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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15/02/19

① - LPA02

② - LPA04

③ - SPATIAL VISION

④ - LPC 05

⑤ - LPA03

⑥ - STRATEGIC AIMS  
+ OBJECTIVE



St.Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: John
Last Name:	Last Name: Pearce
Organisation/company: Revelan Developments Ltd.	Organisation/company: Harris Lamb Planning Consultancy
Address: c/o Agent	Address: Grosvenor House 75 – 76 Francis Road Edgbaston Birmingham
Postcode:	Postcode: B16 8SP
Tel No:	Tel No: [REDACTED]
Mobile No:	Mobile No: [REDACTED]
Email:	Email: [REDACTED]

Signature: [REDACTED]	Date: 13 <sup>th</sup> March 2019
-----------------------	-----------------------------------

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

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

Yes ☒ (Via Email)

No ☐

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

## **RETURN DETAILS**

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

post to:

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

**or** by hand delivery to:

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

**or** by e-mail to:

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

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

## **FURTHER INFORMATION**

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

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

**Telephone:** 01744 676190

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

**PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA03	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

**6. Please give details of why you consider the Local Plan is 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.

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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.**

Our Ref: P1635/JP  
Date: 13<sup>th</sup> March 2019

Grosvenor House  
75-76 Francis Road  
Edgbaston  
Birmingham B16 8SP

[REDACTED]  
Head of Local Plans  
St. Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP

BY EMAIL ONLY  
planningpolicy@sthelens.gov.uk

Dear [REDACTED]

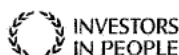
**St Helens Pre-Submission Draft Local Plan  
Response by Revelan Developments Ltd.**

We are instructed by Revelan Developments Ltd. to submit representations to the St Helens Pre-Submission Draft Local Plan. Revelan have let and sold a number of industrial premises on the Sankey Valley Industrial Estate, Newton-le-Willows. These units have been successfully let and the location has proved very attractive to occupiers, which affords convenient access to the strategic motorway network and major conurbations of Liverpool and Manchester. The area has proved very attractive to potential occupiers and a number of enquiries have been received by Revelan's agent from a wide variety of B Class users looking to locate in the Borough.

The representations submitted below relate principally to an area of unused land within Revelan's ownership at Junction Lane, Newton-le-Willows. Please see site location attached. The area of land is currently identified as open space in the Pre-Submission Draft Local Plan, although it has not performed this function for more than 10 years and is not publicly accessible. Revelan have never been approached by another other user seeking to purchase the site for sports or recreation use. Revelan are, therefore, seeking the removal of the open space designation and for the site to be allocated for employment use instead. Our detailed comments are set out below.

**Spatial Vision**

We support the vision of creating a range of high quality employment development within the Borough, which makes use of the excellent transport links that benefit the Borough. Similarly, we agree that established employment areas will continue to provide affordable accommodation for a wide range of employers, thereby helping to facilitate local employment and job growth, whilst attracting inward investment.



### **Strategic Aims and Objectives**

✓ In light of the Council's vision, we specifically support the strategic aims and objectives that relate to ensuring a strong and sustainable economy.

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

✓ We support the Council's spatial strategy of directing sustainable regeneration and growth of St Helens to the main settlements, which includes Newton-le-Willows. Similarly, we support the intention to retain existing employment areas where they are suitable and viable to maintain a diverse portfolio of accessible employment opportunities across the Borough. The Sankey Valley Industrial Estate is one such employment area that successfully attracts a range of both local and national occupiers. In light of the success of the estate to attract occupiers, we consider it wholly appropriate to direct further development to it, particularly where there is market demand for new accommodation in this location. This aspect of the spatial strategy will assist with delivering economic growth objectives and job creation in the Borough.

✓ The spatial strategy also seeks to take steps to maintain and enhance the Borough's network of ecological, open space and recreation sites in accordance with Policy LPA09. Whilst we do not object to this in principle, we return to this point below in the context of Revelan's land at Junction Lane, Newton-le-Willows.

✓ The policy is, therefore, considered sound as it positively prepared and consistent with national policy.

### **Policy LPA03: Development Principles**

✓ We generally support the development principles set out in the Policy, specifically, those that relate to improving the economic well-being of the Borough. The objective of creating and retaining a range of employment and training opportunities that are readily accessible by non-car modes is seen as particularly important and, therefore, supported.

The policy is, therefore, considered sound as it positively prepared and consistent with national policy.

### **Policy LPA04: A Strong and Sustainable Economy**

✓ We support the Council's aim to deliver a minimum of 215.4 hectares of land for development over the Plan Period. We have no specific comments on any of the sites that are identified as draft allocations for employment development. Whilst the policy focuses on the protection and retention of sites in employment use, it could usefully include a reference to supporting new employment development on sites that are not currently, or have previously been, used for employment purposes, which subject to adherence with other policies of the Plan, will contribute to the pool of employment land and premises in the Borough.

✓ As drafted, the policy is not positively prepared. To make the policy sound, we suggest that a further criteria is added, that states that new employment development will be supported on sites that are not currently employment sites, where the proposal would not conflict with other policies of the Plan.

PO0928



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

EL0245

SITE 8LEA

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



now  
part of



**Stantec**

PBA has joined the Stantec family, find out more at [peterbrett.com](http://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

## Policy LPA03: Development Principles

- 3.7 Policy LPA03 at point 5 identifies that new development in St Helens will *'contribute to a high quality built and natural environment by...c) Protecting, conserving, and / or enhancing the Borough's natural, built and historic environments.'*
- 3.8 Our client's site off Newton Park Drive lies within the boundary of draft allocation 8EA Parkside West, which comprises 79.57ha of land proposed for B2 and B8 uses. Whilst our client's land is within this proposed allocation, it is clearly identified within the evidence base for the plan (Figures 8.1, 8.2, 8.3 and 8.4 Parkside Study, Aecom 2016), and subsequent planning applications, that it is not required to deliver the envisaged rail linked employment development.
- 3.9 Our client's land will effectively be surrounded by employment development with limited thought given to the encroachment and potential loss of the two nationally important Grade II listed buildings. A Heritage Assessment which forms part of our client's current planning application identifies that the buildings are clearly at risk and, without intervention, will ultimately be lost. Enabling development is required in order to prevent the loss of these two buildings from total loss which would need to meet the test identified in Policy LPA03.
- 3.10 Whilst draft Policy LPA03 is generally considered sound, we question how the employment allocation 8EA can effectively be brought forward in compliance with Policy LPA03 when no consideration has been given to the negative impact of the employment allocations upon designated heritage assets which will in effect need to meet the policy test identified in LPA03. The extant planning policy in relation to development at Parkside, CAS3.2, acknowledged the desirability of preserving the Listed Buildings at Newton Park Farm.
- 3.11 The matter referred to above links to the consideration of whether draft Policies LPA04 and LPA04.01 are justified, effective and consistent with national planning policy. In this regard, we draw particular attention to NPPF paragraph 185 which identifies that *'plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.'*

## Policy LPA04: A Strong and Sustainable Economy

- 3.12 Draft Policy LPA04 of the emerging Local Plan identifies sites allocated for employment development use. The sites are shown in Table 4.1. Parkside West is identified as Policies Map Site Reference Number 8EA with appropriate land uses identified as B2 and B8. ✓
- 3.13 St Helens Council has an expectation that Parkside West will come forward in two phases, with an application for Phase 1 currently in the planning system. Application ref. P/2018/0048/OUP was validated on 16 January 2018 and a decision is awaited. ✓  
The application is described as follows:

**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)

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This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: 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: 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**

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post to:

**Local Plan  
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)

**or** by e-mail to:

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

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## **FURTHER INFORMATION**

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

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

**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

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

**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:

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

PO0929



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.

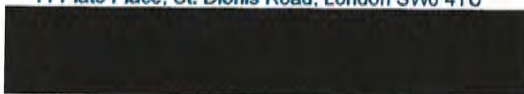
Regards,

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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13 March 2019

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Victoria Square  
St Helens  
Merseyside  
WA10 1HP

510246  
**MICHAEL  
SPARKS  
ASSOCIATES**

CHARTERED ARCHITECTS

11 PLATO PLACE  
ST. DIONIS ROAD  
LONDON SW6 4TU

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

Michael Sparks Associates LLP is a limited liability partnership, registered in England and Wales (registered number OC407290)

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.

PO0930

E10254



Planning Policy

Sue Williams

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:50

Sinc 8HA

- All LPA05

[REDACTED]

From Mr & Mrs A Williams, 7 Henderson Drive, Rainford. WA118PH. [REDACTED]

I would like you to take into account the following re building on green belt in Rainford. — Sinc 8HA

- 1) There should be no building on green belt until all brownfield sites have been utilised. We need these fields for growing food.
  - 2) We have not got the necessary infra structure to accommodate the numbers of houses planned.
  - 3) The waiting list for a Dr appointment is unacceptable now, it would be far worse with so many more people.
  - 4) There is no NHS dentist in Rainford
  - 5) Before any more houses are built, new schools would be an absolute necessity. Children from outside Rainford may not be able to be accommodated in schools here.
  - 6) After the amount of rain we have had over the last few days, there is already flooding on the fields and on Higher Lane. Where will this rain go if fields are concreted over.
  - 7) There are very few jobs in Rainford. The bus and train services are wholly inadequate for commuting, so there will be far more traffic from Rainford along the by pass to either, St Helens, ( where there are no jobs) the East Lancs Road, which is already a nightmare, or the M58.
  - 8) There are supposed to be "lungs" between towns to prevent urban sprawl.
  - 9) Is St Helens taking seriously The Year of Environment 2019?
- "Have you taken part in the #GreenspaceChallenge yet? Visit one of our parks or open spaces, keep your eyes peeled for any wildlife that you may find living there and submit any sightings you may come across"
- LPA05

I would like to be informed of any decisions you make affecting Rainford please.

Mrs S Williams. Mr A Williams

PO0931

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 - Reps to Submission Local Plan.pdf Appendix 3- Agricultural Land Report.pdf



Appendix 4- Comprehensive Reps to Submission Local Plan.pdf



Appendix 4a- Interim Housing Needs Assessment.pdf

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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

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- |                  |                  |
|------------------|------------------|
| ① LPA05          | ⑥ S.O.5.1        |
| ② LPA02          | ⑦ LPA02 - PARA 3 |
| ③ GBR            | ⑧ LPA02 - PARA 4 |
| ④ S.A.           | ⑨ LPA03          |
| ⑤ S.O.4.1        | ⑩ LPA04          |
| ⑪ LPA05 - PARA 3 | ⑬ APPENDIX 4     |
| ⑫ LPA05 - PARA 4 | ⑭ TABLE 4.6      |
| ⑮ LPA05.1        | ⑯ LPA07, PARA 9  |
| ⑰ LPC02          | ⑲ LPC10 - PARA 6 |
| ⑱ LPC04          | ⑳ LPC13 - PARA 4 |
| ㉑ LPA06          | ㉒ LPD07          |
| ㉓ LPC01          | ㉔ LPD02          |
| ㉕ LPD03          |                  |

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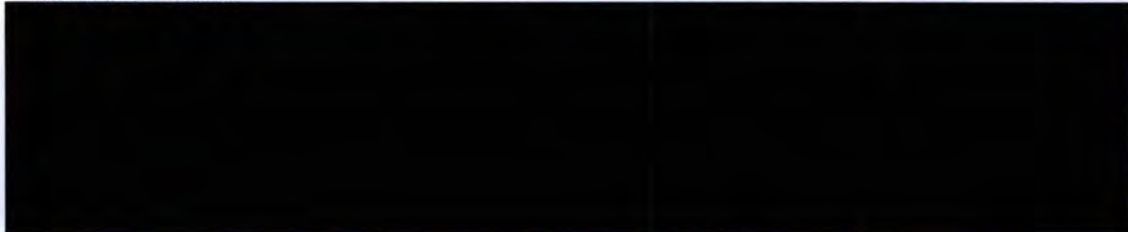
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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o  
P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston  
Park, St Helens (EMAIL 2)  
Graham Lamb  
to:  
planningpolicy@sthelens.gov.uk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



1 Attachment



Appendix 1- Delivery Statement.pdf

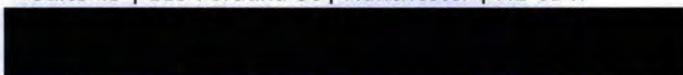
## Email 2

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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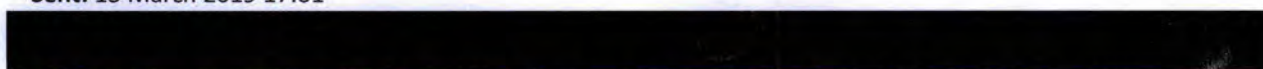
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**From:** Graham Lamb

**Sent:** 13 March 2019 17:01



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

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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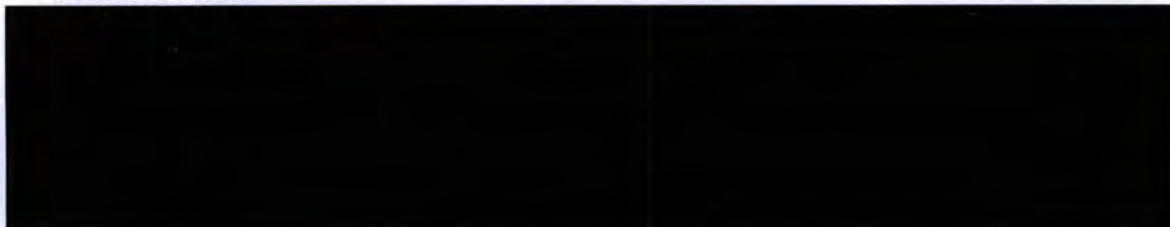
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 <https://i.imgur.com/iHEt88g.jpg>



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



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

### Email 3

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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**From:** Graham Lamb

**Sent:** 13 March 2019 17:01

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

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

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

**Graham Lamb**  
Associate Planner

**Pegasus Group**

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KW/GL/P17-0098/L004



13 March 2019

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

**Sent via email to:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Dear Sir/Madam,

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

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

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

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

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

**The need to allocate additional sites**

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

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

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

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

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

Yours sincerely,

Graham Lamb  
**Associate Planner**

Encs.



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

**REPRESENTATION BY  
REDROW HOMES NORTH WEST**

Date: 13<sup>th</sup> March 2019

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

**Pegasus Group**

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

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insufficient land within the existing urban area to meet their needs for housing and employment land going forward. ✓

4.8 We fully support this position; however, the policy and text does not fully explain how this generates the 'exceptional circumstances' required to alter Green Belt boundaries, in line with paragraph 136 of the 2019 NPPF; although this is addressed within paragraphs 1.11-1.21 of the Green Belt Review.

4.9 In our view, it is harm that will occur from failing to meet their housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances required for Green Belt release in St Helens, and we would ask that the text is strengthened to reflect this. ✓

4.10 We also support the principle of safeguarded land but do have concerns with the quantum of proposed, which we address within section 7. ✓

**Policy LPA03 – Development Principles**

4.11 Redrow fully support the development principles set out in this policy, as they promote sustainable development in line with the NPPF but with sufficient flexibility to allow for proposals to be considered on a site by site basis, to ensure that they don't restrict or frustrate development. 9

**Policy LPA04 – A Strong and Sustainable Economy**

4.12 We are generally supportive of this policy but would reiterate our comments above (in respect of Strategic Objective 5.1) on role that boosting housing supply can play in meeting economic growth aspirations and suggest that the wording in this policy is updated to acknowledge this. 10

PO0932



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 Forms
- Appendix 7 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 8 - Council's Housing Trajectory
- Appendix 9 - Pegasus Housing Trajectory
- Appendix 10 - Spatial Distribution of Sites

⑪ - LPA05 - PARA 3

⑫ - LPA05 - PARA 4

⑬ - APPENDIX 4

⑭ - TABLE 4.6

⑮ - LPA05.1

⑯ - LPA06

We will follow up this submission by sending a CD in the post which contains the entirety of Redrow's submission to the Local Plan consultation.

⑰ - LPC01

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

⑱ - LPC02

Many thanks and kind regards,

⑲ - LPC03 - PARA 4

⑳ - LPD07

㉑ - LPD02

㉒ - LPD03

㉓ - LPC04

㉔ - LPA07 - PARA 3d

㉕ - LPA07 - PARA 9

㉖ - LPC10

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

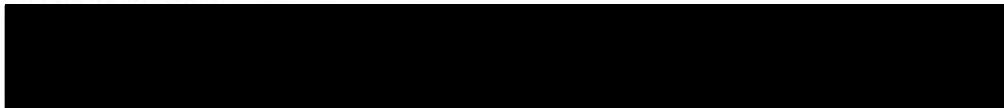
Email 2 of 4

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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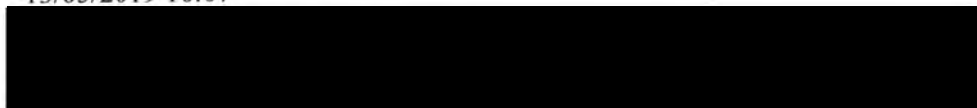
Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 3 of 4

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.

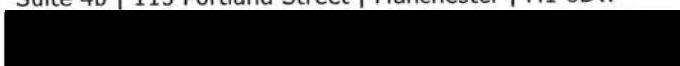
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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<https://i.imgur.com/iHEt88g.jpg>



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-  
Email 4 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:07



1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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



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



<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>



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

### **REPRESENTATION BY REDROW HOMES NORTH WEST**

Date: 13<sup>th</sup> May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

### **Pegasus Group**

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



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insufficient land within the existing urban area to meet their needs for housing and employment land going forward.

- 4.8 We fully support this position; however, the policy and text does not fully explain how this generates the 'exceptional circumstances' required to alter Green Belt boundaries, in line with paragraph 136 of the 2019 NPPF; although this is addressed within paragraphs 1.11-1.21 of the Green Belt Review.
- 4.9 In our view, it is harm that will occur from failing to meet their housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances required for Green Belt release in St Helens, and we would ask that the text is strengthened to reflect this.
- 4.10 We also support the principle of safeguarded land but do have concerns with the quantum of proposed, which we address within Section 7.

**Policy LPA03 – Development Principles**

- 4.11 Redrow fully support the development principles set out in this policy, as they promote sustainable development in line with the NPPF but with sufficient flexibility to allow for proposals to be considered on a site by site basis, to ensure that they don't restrict or frustrate development.

**Policy LPA04 – A Strong and Sustainable Economy**

- 4.12 We are generally supportive of this policy but would reiterate our comments above (in respect of Strategic Objective 5.1) on role that boosting housing supply can play in meeting economic growth aspirations and suggest that the wording in this policy is updated to acknowledge this.

PO0933

Sinc: Formex LPA0 HS23 ELO290

ELO290B.1.pdf



Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:13

① LPA05

② LPA02

③ GBR

④ SA

⑤ S.O.4.1

⑥ S.O.5.1

⑦ LPA02-PARA 3

### 3 Attachments



Representation Form-Wallace-May 19.pdf R001v7- Reps to Submission Local Plan-Wallace.pdf



Appendix 1-Illustrative Masterplan-Wallace.pdf

Dear Sir/Madam,

We are instructed on behalf of our client, Wallace Land Investments, to submit the attached form and representation (R001) to the Local Plan Submission Draft Consultation. Wallace have land interests in relation to the Mill Lane, Rainhill site, which is discussed in detail in the attached representation.

⑧ LPA02-PARA 4

⑨ LPA03

⑩ LPA04

⑪ LPA05-PARA 3

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

⑫ LPA05-PARA 4

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.

Many thanks and kind regards,

⑲ LPC04

⑳ LPC03-PARA 4

㉑ LPA07-PARA 3c

㉒ LPA07

㉓ LPA07-PARA 9

㉔ LPA02

㉕ LPC10

㉖ LPA03

**Rebecca Dennis**  
Principal Planner

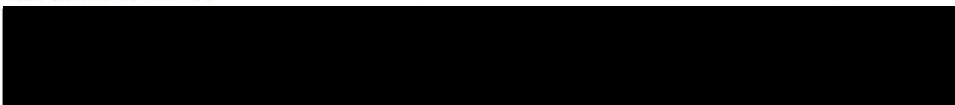
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Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
13/05/2019 16:13



4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

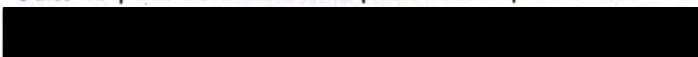
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 3 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:14

1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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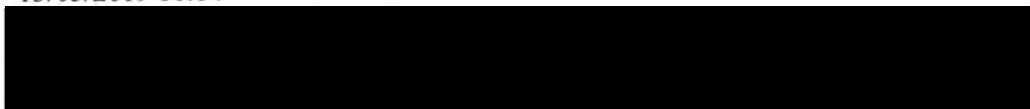
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 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>



Representations to Local Plan Submission Draft Consultation-Wallace-Email 4 of 8  
Rebecca Dennis  
to:  
planningpolicy@sthelens.gov.uk  
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2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

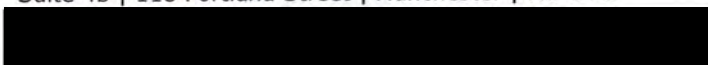
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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



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mailto:rebecca.dennis@pegasusgroup.co.uk

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:15

1 Attachment



Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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

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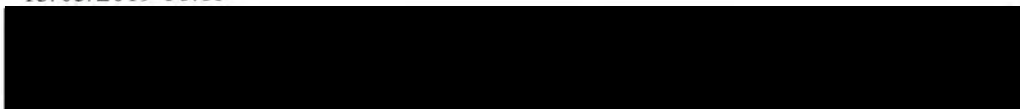
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 <https://i.imgur.com/ZuAcceY.jpg>

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Representations to Local Plan Submission Draft Consultation-Wallace-Email 6 of 8  
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to:  
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13/05/2019 16:15



1 Attachment



Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

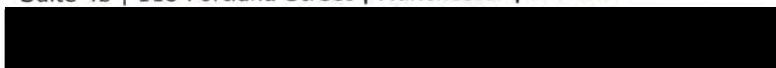
Email 6 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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



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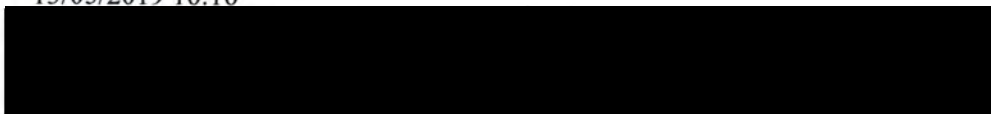
Representations to Local Plan Submission Draft Consultation-Wallace-Email 7 of 8

Rebecca Dennis

to:

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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.

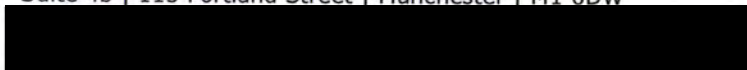
**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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planningpolicy@sthelens.gov.uk  
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1 Attachment



Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

**Rebecca Dennis**

Principal Planner

**Pegasus Group**

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



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

### **REPRESENTATION BY WALLACE LAND INVESTMENTS**

Date: 13<sup>th</sup> May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

#### **Pegasus Group**

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

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**Live: 45457800 v 3**

insufficient land within the existing urban area to meet their needs for housing and employment land going forward.

- 4.8 We fully agree with the Council's Assessment and conclusions on this point. However, the policy and text does not fully explain how this generates the 'exceptional circumstances' required to alter Green Belt boundaries, in line with paragraph 136 of the 2019 NPPF; although this is addressed within paragraphs 1.11-1.21 of the Green Belt Review.
- 4.9 In our view, it is harm that will occur from failing to meet their housing and employment needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances required for Green Belt release in St Helens. We would recommend that this is made clear in the text to properly reflect the basis of releasing land from the Green Belt.
- 4.10 The principle of safeguarded land is also supported, however the quantum of land proposed for safeguarding is not accepted, and this is addressed in section 7.

#### **Policy LPA03 – Development Principles**

- 4.11 Wallace fully support the development principles set out in this policy, as they promote sustainable development in line with the NPPF but with sufficient flexibility to allow for proposals to be considered on a site by site basis, to ensure that they don't restrict or frustrate development.

#### **Policy LPA04 – A Strong and Sustainable Economy**

- 4.12 Wallace are generally supportive of this policy but would reiterate our comments above (in respect of Strategic Objective 5.1) on the role that boosting housing supply can play in meeting economic growth aspirations and suggest that the wording in this policy is updated to acknowledge this.

PO0934

LP0040

EF0087

SITES - 8HS - 3HS



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

13/05/2019 14:20

2 attachments



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

Dear Planning Policy Unit

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

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

Please confirm receipt.

kind regards

Ken Marr

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



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

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

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

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

Yes ☒ (Via Email)

No ☐

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

## RETURN DETAILS

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

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

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

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

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

## FURTHER INFORMATION

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

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

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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

## PART B – YOUR REPRESENTATION

### B1 SPATIAL STRATEGY (LPA01 & 2)

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

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

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

Please tick as appropriate

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

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

#### INTRODUCTION

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

## GREEN BELT

### Background and History

10. St Helens has 8,844 hectares of designated Green Belt Land, 65% of the 13,600 hectare St Helens Borough Area. ✓
11. The 2012 St Helens Core Strategy (SHCS) proposal envisaged no Green Belt development for housing or employment until the later years of the plan period. The Core Strategy covers a period from 2012 to 2027. By the time of the first 5-year Local Plan review in 2017 the position has changed significantly.
12. The St Helens Local Plan Preferred Options (SHLPPO) 2016 stated that St Helens could no longer meet its Housing and Employment Land Need from Brownfield or Previously Developed Land (PDL) alone and proposed significant development of the Green Belt. It was proposed to release 1,187 hectares of Green Belt for development reducing the Green Belt area to 7,657 hectares or 56% of the St Helens Borough Area. ✓
13. The St Helens Local Plan Submission Draft (SHLPSD) 2019 has removed many of the SHLPPO 2016 housing allocations on Green Belt Land. It is now proposed that 24 sites totalling 695 Hectares are needed for Employment and Housing Land need reducing the Green Belt to 8,149 hectares or 60% of the borough area. ✓
14. The SHLPPO 2016 and the SHLPSD 2019 argue that St Helens can reasonably release more Green Belt land because at 65% it has more Green Belt Land than other neighbouring City Regional Authorities. Having more Green Belt Land is a valuable asset not to be sacrificed needlessly. The release and erosion of Green Belt Land is not sustainable in the long term. A higher percentage of Green Belt land is clearly a positive and should be considered as such for promoting St Helens as an agreeable and healthier place to live. A policy of promoting parity with other authorities on Green Belt area is not justified. ] ③
15. As well as reducing the Green Belt development area during the Plan Period to 2035, the SHLPSD 2019 proposes safeguarding Green Belt sites to ensure they can meet their housing targets. Eight sites, including 8HS on the East Lancs and the 3HS Eccleston Park Golf Club totalling 148 hectares are proposed as safeguarded sites for housing development beyond 2035 in addition to two safeguarded employment sites totalling 86 hectares. ✓

### NPPF 2018 -Protecting Green Belt Land

16. Section 13 of the NPPF 2018 relates to Green Belt protection. Para 136 states that
17. *"Once established, Green Belt boundaries should only be altered where **exceptional circumstances** are fully evidenced and justified, through the preparation or updating of plans"*
18. Para 137 states that
  - Before concluding that **exceptional circumstances** exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate **that it has examined fully all other reasonable options for meeting its identified need for development**. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:
    - a) **makes as much use as possible of suitable brownfield sites and underutilised land;**
    - b) **optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and**

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

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

### Safeguarding

20. The NPPF 2018 para 139 states

*When defining Green Belt boundaries, plans should:*

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

### Conclusion

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

#### The Submission Draft

- does not make effective use of Unsuitable Brownfield and Underutilised land outside of the Brownfield Register.
  - does not make effective use of the land nor optimises housing densities.
  - accelerated Growth Scenario predictions for aspirational employment growth are not robust enough to justify the housing targets proposed and
  - the Green Belt and safeguarded sites are not sustainable development.
- ] 3

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

### Agricultural Policy

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

24. The SHLPPO 2016 also makes no mention

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

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

## PART B – YOUR REPRESENTATION

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

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

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

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

Please tick as appropriate

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

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

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

PO0935



St. Helens  
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683  
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Representation (i.e. Comment) Form**

Ref: LPSD

**13 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: Mrs	Title:
First Name: Sharon	First name:
Last Name: Railton	Last Name:
Organisation/company:	Organisation/company:
Address: 29 Rookery Lane Rainford, St Helens Merseyside	Address:
Postcode: WA11 8EF	Postcode:
Tel No:	Tel No:
	Mobile No:
	Email:

Signature:

Date:

12.03.2019

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

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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"/>

**6. Please give details of why 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.

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- 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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PO0936



St. Helens  
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684

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

Ref: LPSD

13 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: Jemma	First name:
Last Name: Jones.	Last Name:
Organisation/company:	Organisation/company:
Address: 6, ORWELL CLOSE STANDISH LOWER CROSSLAND, WIGAN.	Address:
Postcode: WN6 8JH	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:



Date:

13-03-19.

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No ☐

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

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

Please tick as appropriate

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

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

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

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3

### Policy LPA04 Strategic Employment Sites

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

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

4

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

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

### Policy LPA04.1: Strategic Employment Sites

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

5

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

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

6

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St. Helens  
Council

685  
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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name <u>CRAIG</u>	First name:
Last Name: <u>JONES</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>6. ORWELL CLOSE</u> <u>STANDISH LOUGHRAN CROFT.</u>	Address:
Postcode: <u>WN6 8SH. WIGAN.</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 

Date: 12/3/19.

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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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6

PO0938



St. Helens  
Council

686

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Representation (i.e. Comment) Form**

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: <u>MRS</u>	Title:
First Name <u>MARGARET</u>	First name:
Last Name: <u>AINSCOUGH.</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>13, ECCLES ROAD.</u> <u>KITT GREEN, WIGAN</u>	Address:
Postcode: <u>WNS 04R.</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

12/3/19.

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St. Helens  
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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: WN5 0HR.	Postcode:
	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

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Title: <u>MRS</u>	Title:
First Name: <u>HAZEL</u>	First name:
Last Name: <u>ROBY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>50 CLAREMONT AVE, BILLINGE</u>	Address:
Postcode: <u>WN5 7LT</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

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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 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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### Policy LPA04.1: Strategic Employment Sites

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PO0942



St. Helens  
Council

690

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

Ref: LPSD

13 MAR 2019

(For official use only)

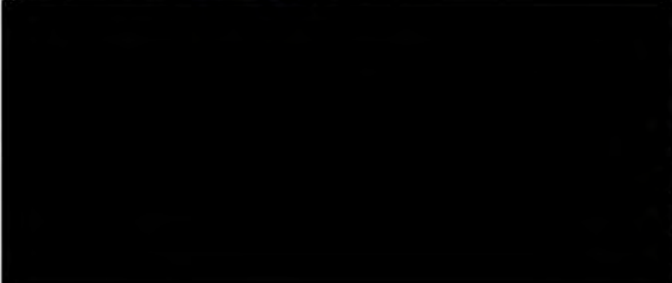
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**PART A – YOUR DETAILS**

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: <i>MRS</i>	Title:
First Name <i>JULIE</i>	First name:
Last Name: <i>LOMAX</i>	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date: *26/02/19*

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

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Yes ☒ (Via Email)

No ☐

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6

PO0943



St. Helens  
Council

691  
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Ref: LPSD

**13 MAR 2019**

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Last Name: <i>HUGHES</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>WHITEGATES BILLINGE</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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⑥

PO0944



St. Helens  
Council

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Ref: LPSPD

**13 MAR 2019**

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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:

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

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6

PO0945



St. Helens  
Council

693

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

Ref: LPSD

13 MAR 2019

(For official use only)

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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: MRS	Title:
First Name LINDSEY	First name:
Last Name: CAREY.	Last Name:
Organisation/company:	Organisation/company:
Address: 2 SHELBOURNE DRIVE HINDLEY UGAY	Address:
Postcode: WN2 3NE	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

3/3/19.

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

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Yes ☒ (Via Email)

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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"/>
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Please tick as appropriate

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PO0946



St. Helens  
Council

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Title: <i>MR</i>	Title:
First Name <i>THOMAS</i>	First name:
Last Name: <i>IRWIN</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>132 GREENLAW ROAD, STOLVEAVON</i>	Address:
Postcode: <i>AB39 8AL</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

*11/03/19*

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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:
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5

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6

PO0948



St. Helens  
Council

698

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Representation (i.e. Comment) Form**

Ref: LPSD

**13 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: <i>MISS</i>	Title:
First Name: <i>WENDY</i>	First name:
Last Name: <i>SINGLETON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>3 FAIRWAYS DRIVE, WALMET ISLAND</i>	Address:
Postcode: <i>LA14 3HT</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

*07/03/19*

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Yes ☒ (Via Email)

No ☐

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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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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 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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PO0949



St. Helens  
Council

699

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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: <i>MR</i>	Title:
First Name: <i>ROBERT</i>	First name:
Last Name: <i>ATHERTON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>2 HOWFORD MILL COTTAGE SELKIRK</i>	Address:
Postcode: <i>TD7 5JH</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

*21/02/19*

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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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PO0950



St. Helens  
Council

701  
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**13 MAR 2019**

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Title: MISS	Title:
First Name SODIE	First name:
Last Name: TUNSTALL	Last Name:
Organisation/company:	Organisation/company:
Address: 23, PARKFIELD ST WIGAN	Address:
Postcode: WN6 7ED.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature



Date:

01/03/19

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4

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

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

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

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

6

PO0952



St. Helens  
Council

704

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

Ref: LPSD

13 MAR 2019

(For official use only)

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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: <i>Mrs</i>	Title:
First Name: <i>HEATHER</i>	First name:
Last Name: <i>MARCM</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>1 LEAFIELD CLOSE, BIRTLEY, DURHAM</i>	Address:
Postcode: <i>DH3 1RX</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

*01/03/19*

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

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

Yes ☒ (Via Email)

No ☐

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## RETURN DETAILS

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

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

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

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

Please tick as appropriate

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

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

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

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

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

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

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### 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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PO0953



St. Helens  
Council

705

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**13 MAR 2019**

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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</u> <u>HINDLEY, LIVERPOOL.</u>	Address:
Postcode: <u>WN2 3NE</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature

Date:

4/3/19.

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PO0954



St.Helens  
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706

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Title: <u>MR</u>	Title:
First Name <u>HOWARD</u>	First name:
Last Name: <u>RAILTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>50 CLAREMONT ROAD, BILLINGE</u>	Address:
Postcode: <u>WN5 7LT</u>	Postcode:
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]

Date: 10/03/19

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6

PO0955



St. Helens  
Council

707

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

Ref: LPSD

**13 MAR 2019**

(For official use only)

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>STUART</u>	First name:
Last Name: <u>ALDRIDGE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>637 GASTANG ROAD, PRESTON</u>	Address:
Postcode: <u>PR3 5DQ</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

08/03/19

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

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

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

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PO0956



St. Helens  
Council

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Ref: LPSD

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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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Organisation/company:	Organisation/company:
Address: <u>26 COLERIDGE AV.</u> <u>DONTONS GREEN,</u>	Address:
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6

PO0958



St. Helens  
Council

724

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

Ref: LPSD

**13 MAR 2019**

(For official use only)

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**Part A** – Personal Details  
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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>LEWIS</u>	First name:
Last Name: <u>RAILTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>26 COLERIDGE AV.</u> <u>PONTONS GLEEN</u>	Address:
Postcode: <u>WA10 6RN</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

02/03/19

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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 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"/>
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PO0959



St. Helens  
Council

725  
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Last Name: <u>ROBY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>50 CLAREMONT ROAD,</u>	Address:
<u>BILLINGE,</u>	
Postcode: <u>WN5 7LT</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

09/03/19

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PO0960



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729

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Last Name: <u>LYON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>5 TRURO CLOSE, ST. HELENS</u>	Address:
Postcode: <u>WA11 9EL</u>	Postcode:
	Tel No:
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	Email:

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4

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6

PO0961



St. Helens  
Council

730  
St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

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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: <i>MRS</i>	Title:
First Name <i>EMMA</i>	First name:
Last Name: <i>ROBY</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>50 CLAREMONT ROAD, BILLINGE</i>	Address:
Postcode: <i>WN5 7LT</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

*10/03/19*

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

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

Yes ☒ (Via Email)

No ☐

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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"/>
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PO0963



St. Helens  
Council

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Title: <i>MR</i>	Title:
First Name: <i>JOHN</i>	First name:
Last Name: <i>GASKELL</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>2A ROCKOLY LANE</i>	Address:
Postcode: <i>WALL 8ER</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

*11/02/19*

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PO0964



St. Helens  
Council

734

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Title: MR	Title:
First Name CRAIG	First name:
Last Name AINSCOUGH.	Last Name:
Organisation/company:	Organisation/company:
Address: 23, PACEFIELD ST WIGAN	Address:
Postcode: WN6 7ED.	Postcode:
	Tel No:
	Mobile No:
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4

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6

PO0965



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

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This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name <i>BILLY</i>	First name:
Last Name: <i>RICHARDSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>9A VILLAGES TERR NEWTHORP,</i>	Address:
Postcode: <i>CA9 3PL</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

*06/03/19*

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

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Yes ☒ (Via Email)

No ☐

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## **RETURN DETAILS**

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post to:

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

**or** by hand delivery to:

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

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

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):

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### 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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WF0037

① LPA01

④ LPA04

⑦ LPA05.1

② LPA02

⑤ LPA04.1

⑧ LPA06

③ LPA03

⑥ LPA05

⑨ LPA07

**Representor Details**

Web Reference Number	WF0037
Type of Submission	Web submission
Full Name	mr mark railton
Organisation	
Address	The old poultry farm, 29 Rookery Lane, Rainford, St helens WA11 8EF
Agent Details	

⑩ PARA

1.7.2 DCL

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

Yes (via e-mail)

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

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

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

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There are no exceptional circumstances to justify not using the standard method to calculate housing need

The economic analysis is flawed and based on over-optimistic assumptions

②

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

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

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

#### Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "as far as practicable" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes. I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

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

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

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

#### Policy LPA03: Development Principles

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

#### Policy LPA04 Strategic Employment Sites

PO0967

SIR SHA

WF0068

① LPA01

④ LPA04

⑦ LPA05.1

⑩ LPA07

② LPA02

⑤ LPA04.1

⑧ S.A.

⑪ PAR 1.7.2

③ LPA03

⑥ LPA05

⑨ LPA06

DEC.

**Representor Details**

Web Reference Number	WF0068
Type of Submission	Web submission
Full Name	Mr Mark Railton
Organisation	
Address	29 Rookery lane Rainford, St helens WA11 8EF
Agent Details	

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- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed for housing and employment is therefore not as high as set out in the Plan
- There are therefore no exceptional circumstances to change Green belt boundaries

②

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PO0968



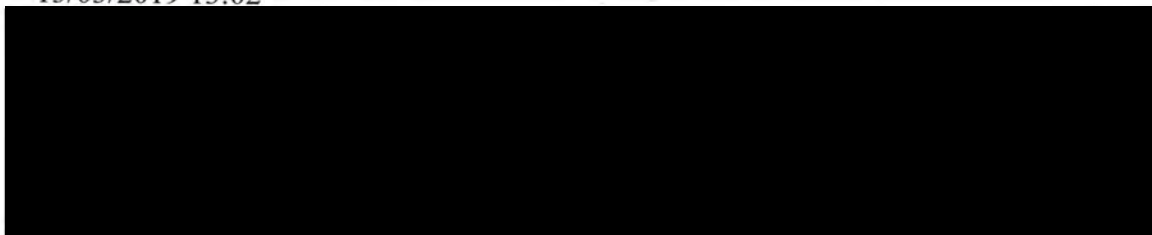
St Helens Submission Draft Local Plan: Representations on behalf of Bericote Properties Ltd [NLP-DMS.FID586504]

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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Think of the environment. Please avoid printing this email unnecessarily.



St. Helens  
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: 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:	
Mobile No:	
Email:	

Signature:

[Redacted Signature]

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.

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St.Helens  
Merseyside  
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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: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/> X	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/> X	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 checked="" type="checkbox"/> X
Consistent with National Policy?	<input checked="" type="checkbox"/> X

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

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

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

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

			<b>Yes, I wish to participate at the oral examination</b>
--	--	--	---

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

To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

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

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

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

**Date:** 7 March 2019

**Our ref:** 41575/09/SPM/MWL/17228140v1

**Your ref:**

Dear Sir/Madam

### **St Helens Submission Draft Local Plan Representations: Land at M6Major.com, Haydock**

On behalf of Bericote Properties Ltd [Bericote], Lichfields is pleased to submit representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Bericote is one of the most active developers of large scale distribution space in the UK.

These representations are made in the context of Bericote's land interest at Florida Farm, St. Helens (or M6Major.com) in relation to land to the north of the A580 East Lancashire Road at Haydock, abutting the Haydock Industrial Estate.

St Helens Borough Council [the Council] published the SDLP for consultation on the 16<sup>th</sup> January 2019 for 8 weeks and Bericote welcomes the opportunity to comment. Bericote looks forward to working with the Council as it progresses towards adoption of the Local Plan and trusts that the comments contained within this letter will assist the Council in this regard.

### **Background to M6Major.com**

As the Council is aware, the M6Major.com site is the subject of Hybrid Planning Permission ref. P/2016/0608/HYBR which was granted on the 27th April 2017 for the following development:

- 1 Full planning permission for the provision of a new access to the A580 East Lancashire Road, internal site access roads, regrading works and the formation of development platforms and strategic boundary landscaping (including bund details).
- 2 Outline planning permission (with all matters other than access reserved for approval), for the erection of 2no. commercial/industrial buildings providing up to 135,000 square metres. of employment floorspace (B2/B8 uses with up to 10,000 square metres of office accommodation); and the provision of associated infrastructure (including roads, parking, footpaths, internal landscaping, noise mitigation measures and Sustainable Urban Drainage Systems).

Reserved matters approval for Unit 1 for the erection of 1 no 34,114 sq. m commercial/industrial building comprising B8 unit with ancillary office, office hubs and the provision of associated infrastructure (including roads, parking, internal landscaping, noise mitigation measures and SuDS. On land north of East Lancashire

to help create conditions in which business can invest, expand and adapt<sup>3</sup> as well as efficiently using land<sup>4</sup>.

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.

<sup>3</sup> The Framework 2019 - §80

<sup>4</sup> The Framework 2019 - §117

PO0969

EF0043



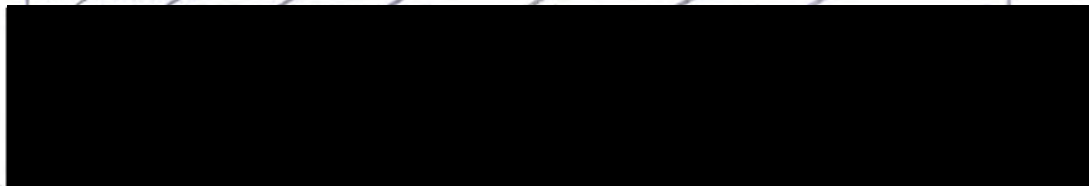
St.Helens Borough Local Plan 2020-2035: Submission Draft  
Victoria Vernon

to:

planningpolicy@sthelens.gov.uk

12/03/2019 15:37

Hide Details



1 Attachment



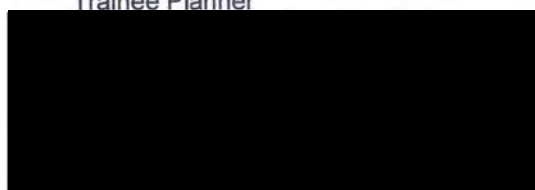
SP\_19\_00000483\_St Helens LP\_lpsd-representation-form..doc

Dear [REDACTED]

Please find attached Sport England's comments to the above consultation,

Kind regards,

**Victoria Vernon BSc (Hons) MA**  
Trainee Planner



- ① - LPA05.1
- ② - LPA09
- ③ - LPC05
- ④ - LPD03
- ⑤ - LPA03



☒ This girl can

Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

☒ ☒ ☒ ☒ ☒

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Erin Stephens](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Erin Stephens, Sport England's Data Protection Officer directly by emailing [DPO@sportengland.org](mailto:DPO@sportengland.org)



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Victoria	First name:
Last Name: Vernon	Last Name:
Organisation/company: Sport England	Organisation/company:
Address: Sport Park, 3 Oakwood Drive, Loughborough, Leicester,	Address:
Postcode: LE11 3QF	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11/03/19

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

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

Yes ☐ (Via Email)

No ☐

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

## **RETURN DETAILS**

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

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

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

## **FURTHER INFORMATION**

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

## **NEXT STEPS**

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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)									

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

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

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No 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 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?	X
Effective?	<input type="checkbox"/>
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

LAP05.1 – Sport England supports the removal of 7HA & 13HA from the Local Plan. However, it has also come to light that further sites allocated are not policy compliant. Both 2HA and 10HA include land that is defined as playing field.

An objection is made to these allocations as they would involve the permanent loss of community playing fields and outdoor sports facilities that are in active use. While the Council may have plans to relocate the facilities on both

①

LPD03 - Outdoor sport is a typology of open space but Sport England would be extremely concerned if this policy included a requirement for onsite sports provision. A quantitative standard is not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if a tennis court to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

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.

LPA03: Part 5 – Sport England suggest strengthening of the policy to include physical activity opportunities within the design of new developments. Sport England has produced guidance in partnership with Public Health England that sets out ten principles to incorporate into design to promote physical activity. The Active Design Guidance can be found on Sport England's website.  
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

The recent change in Government thinking has led to the emergence of DCMS Strategy "Sporting Future: A New Strategy for an Active Nation". In response to this strategy Sport England has published 'Towards an Active Nation' which sets out how Sport England will work in partnership with a range of organisations, including Local Planning Authorities, to implement the Strategy.  
<https://www.sportengland.org/news-and-features/news/2016/may/19/sport-england-triples-investment-in-tackling-inactivity/>

LAP05.1 – Whilst the protection of these sites and the removal of the proposed allocations from the Plan would be an acceptable solution, as an alternative potential may exist for this objection to be addressed in accordance with paragraph 97 of the NPPF and Sport England's playing fields policy if the playing fields were acceptably replaced as a requirement of the site allocation policy.

LPA09 - Sport England suggest removing the reference to sufficient quantity of provision from this policy and amending para 4.33.5 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

LPC05 - Sport England suggest providing a new point within policy LPC05 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

Sport England also suggests strengthening para 7.10 to say "Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. In addition, the catchment area for sports range from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want

to participate in sport. The Playing Pitch Strategy and Action Plan, informed by a comprehensive Playing Pitch Assessment, has established the supply and demand for playing pitch facilities across the Borough in terms of usage and provision. The accompanying Playing Pitch Strategy and Action Plan identifies a series of sport by sport recommendations which provide a strategic framework for the protection, enhancement and provision of outdoor sports facilities."

LDP03 - It is suggested it is made clear within this policy that the onsite open space requirement does not include outdoor sport but that offsite contributions will be sought where the Playing Pitch Strategy identifies shortfalls in provision that would be exacerbated by the additional demand for sport generated by housing growth.

Please continue on a separate sheet if necessary

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

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

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

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Please keep a copy for future reference.**

PO0970



St. Helens  
Council

①-LPA04    ③-LPA02    ⑤-LPC05  
②-LPC12    ④-LPA07    ⑥-LPA03

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

Ref: LPSD

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**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

13 MAY 2019  
1380

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: David	First name:
Last Name: Almond	Last Name:
Organisation/company:	Organisation/company:
Address: 33 Millbrook Lane Eccleston, St. Helens, Merseyside	Address:
Postcode: WA10 4QX	Postcode:
	el No:
	obile No:
	mail:

Signature: [Redacted]	Date: 11th May 2019
-----------------------	---------------------

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

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Yes ☒ (Via Email)

No ☐

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St.Helens  
Merseyside  
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**or by hand delivery to:**

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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 checked="" type="checkbox"/> <input checked="" type="checkbox"/> No
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> <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"/> <input checked="" type="checkbox"/> No
Justified?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No
Effective?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No
Consistent with National Policy?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No

6. Please give details of why 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

Because Greenbelt meant protected. The council is lifting Greenbelt when it suits them. St Helens hasn't provided lots of jobs that need housing. The site would be an area that floods. There is lots of brown field sites that need cleaning up and using first. Someone will have to clean the land up eventually. There is already too much traffic on the roads without additional pressure. The land is needed for food growing near to residential areas especially if food transport becomes more expensive. More of the natural environment is being lost.

Please continue on a separate sheet if necessary

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

Build on brownfield first. Encourage good companies to the area such as aerospace jobs, light engineering. wind turbine factories. Then if they come and need employees, the council would be able to justify the need for housing in the area.

Please continue on a separate sheet if necessary

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

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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 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.

PO0971

**Representor Details**

Web Reference Number	WF0066
Type of Submission	Web submission
Full Name	Mr Tom Clarke MRTPI
Organisation	Theatres Trust
Address	22 Charing Cross Road London WC2H 0QL
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy LPA03: Development Principles
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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

We are supportive of part 6.d of this policy, which sets the positive principle of supporting and retaining community spaces and other valued services. These types of facilities help enhance social and cultural well-being, as well as helping to provide liveable communities which provide the services and opportunities required to function.

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

N/A

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

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

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

Response Date	3/13/2019 2:04:14 PM
---------------	----------------------

PO0972

EF00009



St.Helens Local Plan 2020-35 - Representation / Comment Form - 8HA Rainford

Swift, Susan M

to:

planningpolicy@sthelens.gov.uk

07/03/2019 13:07



1 Attachment



Mrs M MORGAN - Comments form for 8HA - St Helens Local Plan - March19.pdf

Dear sir / madam

please find enclosed by comments form in response to the development proposal for 8HA Rainford

Regards

Marian Morgan

Site 8HA

① - LPA02

② - LPA04

③ - LPA07

④ - LPA01



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

This form has two parts;

**Part A – Personal Details**

**Part B – Your Representation(s).**

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: MARIAN	First name:
Last Name: MORGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 101 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

08/03/2019

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

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

Yes ☐ (Via Email)

No ☐

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

## **RETURN DETAILS**

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

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

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

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

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**Telephone:** 01744 676190

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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	LPA04	Paragraph	4.10	Policies		Sustainability	3.5.7	Habitats	
	LPA02	/ diagram	3.2	Map		Appraisal/	4.10	Regulation	
		/ table				Strategic	4.4	Assessment	
						Environmental	4.3		
						Assessment	3.3.30		
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 <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

This Local Plan is not sound or justified as the proposed 8HA development is contrary to the statements within the Strategic Aims & Objectives of the Plan and Policy LPA04

8HA is essential for food production in the local economy, producing 2-3 crop rotations per year and contributes to food production in this area, demonstrating that the local plan & sustainability report are not sound or justified in their selection of site 8HA, as residents can confirm this land is regularly used for farming and employment.

8HA site is Grade A1 Agricultural land & should be removed from plan to safeguard this Green Belt for future farming and employment in the Rainford rural economy.

Farming is a key industry & employer within the local economy & these proposed plans would damage this local industry for ever, as farmers rely on the volume of land these days to make the industry viable.

2

Please continue on a separate sheet if necessary

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

Remove 8HA from the Local Plan as it currently breaches NFFP policy.

There are no very special circumstances under which St.Helens Council have the authority to release this A1 Agricultural land from the Green Belt in Rainford, and this specific policy item would not hold up in a court of law if challenged on this point.

Please continue on a separate sheet if necessary

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

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

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

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

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

PO0973

EF0021



Submission to Draft Local Plan

Peter Astles

to:

11/03/2019 16:03

Cc:

"Peter Astles"



① - LPC06

② - GEN

③ - LPA04

2 Attachments



PBA representation Draft Local Plan 2019.pdf



PBA representation form - St Helens MBC Draft Local Plan 2019.pdf

Please find attached my submission to local plan and response form.

I have ticked on the response form to orally present at the hearing if possible I would like to raise a point about specific biodiversity planning

Peter Astles



Virus-free. [www.avast.com](http://www.avast.com)



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;

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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:
First Name: Peter	First name:
Last Name: Astles	Last Name:
Organisation/company: Our Local Voice	Organisation/company:
Address: 81 The Parchments Newton-le-Willows	Address:
	Postcode:
Postcode: WA12 0DX	
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

11th 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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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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[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

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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 LPA 10		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 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 my document response to St Helens Local Plan Submission Draft January 2019 Final sent via email.

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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Please continue on a separate sheet if necessary

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

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

I wish to present the proposal for more effective biodiversity protection via improved planning as set out in my document response

***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.**

**RESPONSE BY**

**PETER BRIAN ASTLES**

**COMMUNITY GROUP OUR LOCAL VOICE**

**81 THE PARCHMENTS**

**NEWTON-LE-WILLOWS**

**MERSEYSIDE, WA120DX**

**THE RESPONSE IS IN TWO PARTS**

**1 – BIODIVERSITY ACTION PLAN – SECTION A**

**2 – GENERAL COMMENTS – SECTION B**

**SECTION A – BIODIVERSITY ACTION PLAN**

**Refers to**

Policy LPA03 Development Principles

Policy LPA04 A Strong and Sustainable Economy

Policy LPA04.1: Strategic Employment Sites

Policy LPA09m Green Infrastructure

Policy LPA11 Health and Wellbeing

Policy LPA10 Parkside East

**NPPF Statement**

*“The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature”*

**The Issue**

The approach has been one of confrontation with the public leading many members of the local public to believe largely their input will be ignored

The following supports this perception

A very febrile relationship has developed with the council over the local with senior councillors trading insults with the public over social media.

One example of many below this one from the then leader of St Helens Council

<https://www.sthelensstar.co.uk/news/15257511.star-readers-react-to-nimby-comments-by-council-leader-towards-green-belt-group/>

There have also been cases of senior councillors have been subject to council internal disciplinary hearings ostensibly within the context of the local plan.

The following council meeting approving the draft local plan 19th December 2018 gives some insight into this confrontation. Whereas it is accepted politics is a passionate environment between competing parties but rarely are the electorate under such attack as is witnessed in this council meeting. Local countryside referred as "concrete coffin" deliberately provocative in the knowledge the public may have an opposing view. Other comments that it was the government that drove the changes. Implying the record 5,625 responses of the public had no effect. Interspersed with insults to the public and childish references to online confrontations.

From St Helens Council Webcast Portal – Full Council Meeting

[https://sthelens.public-i.tv/core/portal/webcast\\_interactive/390498](https://sthelens.public-i.tv/core/portal/webcast_interactive/390498)

Whilst this has no relevance to the content of the plan this does reflect very badly on the core strand of public engagement.

It is necessary and unprofessional

I wish this aspect to be directly brought to the attention of the inspector

**ST HELENS COUNCIL DIRECT FINANCIAL INTEREST IN CORE  
LOCAL PLAN COMMERCIAL STRATEGIES**

The Parkside development is managed via a joint venture partnership Parkside Regeneration LLP. The funding for this is largely provided by St Helens MBC

The Parkside Development is a very large part of the draft local plan commercial development. The draft local plan is a facilitator of this, the local plan is also the councils own document.

The NPPF prescribes that developments are planning led. It naturally follows that such plans should have the confidence of the local public that they are objectively assessed.

Given the council would lose substantial investment in the several millions if the venture was not approved and the matters rose in the previous point.

It's hard not to conclude public confidence in the integrity of the process is almost nonexistent and is "failure to co-operate

#### **PARKSIDE WEST REMOVAL FROM DRAFT LOCAL PLAN**

There is no provision for Parkside West in the local plan. Despite this being in the preferred options stages and despite no planning hearing or examination of local plan by inspector. Parkside west is in the existing 2012 local plan and the protections within CAS3.2 and the inspector's recommendations have been removed.

These were hard won protections by the local public and approved by the inspector and now removed without explanation

#### **LOCAL EMPLOYMENT INSUFFICIENT POSITIVE PREPARATION**

Future employment and growth in the borough is largely dependent on Logistics. A sector the St Helens Authority will be in direct competition with nearby authorities, particularly Warrington. There is little in the draft local plan in any other sector despite the regeneration of the North West and the growth of Liverpool and Manchester conurbations. The future St Helens is to be a backwater with little other than warehouses providing employment and multiplier growth. The plan has the hallmarks of the easy option and even that supported by public funds.

Given the councils own financial interest in these warehouse developments there is concern the plan is insufficiently positively prepared.

③

## **NEWTON-LE-WILLOWS INFRASTRUTURE AND PRESSURE ON GREEN BELT**

Newton-Le-Willows are in the local plan taking large areas of green belt for both new housing and vast warehouse complexes. The latter almost as big as the town itself. There is little or no road infrastructure being put in place to mitigate this. The area already suffers from high congestion and much of the town is in Air Quality management measures. It is recognised thanks to the efforts of local councillors the housing growth has been reduced from that in the preferred options. Whilst this is very welcome the town of Newton-Le-Willows is in a very precarious situation having similar housing to other areas of the borough yet also being future home to one of the biggest logistics complexes in the country.

This is ineffective preparation and this aspect should be subject to further examination.

3

PO0974



Representation Forms  
Barbara  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 16:53  
Hide Details

EF0022  
SITE 2EA

① - LPA04  
② - PARA 1.7.2  
DEC

3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse BT.pdf

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Regards  
Barbara

Sent from Mail for Windows 10



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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs	Title: .....
First Name: Barbara	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive Garswood	Address: .....
Postcode: WN4 0SJ	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: .....	Date: 20 Feb 2019
------------------	-------------------

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

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

☒ Yes (via email)

☐ No

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St Helens  
WA10 1HP**

or by hand delivery to:

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

or by email to:

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

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for each separate comment/representation.**

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?</p> <p>The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.</p> <p>There is no statement of common ground with other Authorities</p> <p>The release of Greenbelt will cause significant harm to the purpose of Greenbelt</p> <p>There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook</p>	

①  
②  
①

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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

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

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

PO0975

EFO023

Site KEA

① - LPA04

② - PARA 1.7.2

DEC



Representation Forms

Barbara

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:53

Hide Details



### 3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse BT.pdf

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Regards

Barbara

Sent from Mail for Windows 10



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Ref: LPSD

(For official use only)

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

## PART A - YOUR DETAILS

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

### 1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Barbara

Last Name: Traynor

Organisation/company:

Address: 24 Oban Drive

Garswood

Postcode: WN4 0SJ

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

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

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

Date: 20 Feb 2019

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

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☒ Yes (via email)

☐ No

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## **RETURN DETAILS**

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

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

or by hand delivery to:

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

or by email to:

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

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Telephone: **01744 676190**

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**Now please complete PART B of this form,  
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**Please use a separate copy of Part B  
for each separate comment/representation.**

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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	LPA04 SEA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?</p> <p>The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.</p> <p>There is no statement of common ground with other Authorities</p> <p>The release of Greenbelt will cause significant harm to the purpose of Greenbelt</p> <p>There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook</p>	

①  
②  
①

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt

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✓	No, 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.**

PO0976

EF0024

SITE 6EA

① - LPA04

② - PARA 1-7.2  
DEC



Representation Forms

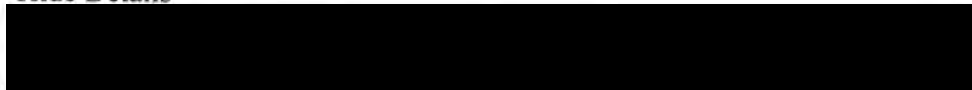
Barbara

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:53

Hide Details



3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards

Barbara

Sent from Mail for Windows 10

① - LPA04

EFO024

② - PARA 1.7.2  
DEC

SITE 6EA



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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

### 1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Barbara

Last Name: Traynor

Organisation/company:

Address: 24 Oban Drive

Garswood

Postcode: WN4 0SJ

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

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 20 Feb 2019

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

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

☒ Yes (via email)

☐ No

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

## **RETURN DETAILS**

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St Helens  
WA10 1HP**

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

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

Please tick as appropriate

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

<p><b>6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</b></p> <p><b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b></p> <p>Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?</p> <p>The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.</p> <p>There is no statement of common ground with other Authorities</p> <p>The release of Greenbelt will cause significant harm to the purpose of Greenbelt</p> <p>There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook</p>
--

Please continue on a separate sheet if necessary

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

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

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

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

PO0977



**Emailing: St Helens Local Plan response 2019**

**Mark Lewis** to: 'planningpolicy@sthelens.gov.uk'

12/03/2019 16:02

From: Mark Lewis [REDACTED]  
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

1 attachment



St Helens Local Plan response 2019.docx

EF0045

Hi,

My response to the St Helens 2019 local plan. Thanks. Mark Lewis.

Your message is ready to be sent with the following file or link attachments:

St Helens Local Plan response 2019

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled. This email is from Imagine Act and Succeed. The contents of this email and any attachments are confidential to the intended recipient. They may not be disclosed to, or used in any way by anyone other than the intended recipient. Any review, forwarding, dissemination or other use of this information by persons or entities other than the intended recipient is prohibited. If you received this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender immediately.



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 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: Mark	First name:
Last Name: Lewis	Last Name:
Organisation/company:	Organisation/company:
Address: 16 Cleveland Drive, Lowton.	Address:
Postcode: WA3 2EQ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

12/3/19

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 ☐

ie - e-mail is the Council's preferred method  
e  
is provided, we will contact you by your post.

-mail

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Town Hall  
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St.Helens  
Merseyside  
WA10 1HP**

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

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

7EA  
+ 8EA

①

### Concern over the removal from Green Belt

Barn Owl is regulars on both Parkside East and West due to the grassland habitat which contains their food source, mice and voles. There has been for some years a protection scheme with the assistance of local farmers. Once very rare this beautiful and iconic species has gained a foothold in the area.

All five species of UK owls can be found on Parkside East and West along with approximately 120 species of bird, many mammals such as Roe Deer, Brown Hare, Foxes, Weasels, Stoats and

Evidence of badger is in the area with a dead badger found killed on Winwick Lane in 2015 in addition to sets found in nearby croft.

There are many species of insect including the rare black darter dragonfly and a number of rare plant species including the Marsh Gentian found in only two other places in the UK.

The area is popular with local wildlife enthusiasts and the public alike with much of the area public footpaths.

The area forms part of the greater Manchester bird recording area

(RODIS- Greater Manchester Local Record Centre) Particularly Barrow Lane and Highfield Moss which are within the greater Manchester recording area. The very popular Manchester Birding Website a regional website where rare bird sightings are posted every day by enthusiasts and county recorders has sections on both Barrow Lane and Highfield Moss in addition

To the Winwick area around the site.

### BIODIVERSITY PARKSIDE WEST AND EAST

Other than a brief period 1957 – 1992 where a small area of the land was used for mining for centuries the land on Parkside East and West has been either farmed or wild countryside.

It is protected green belt status and is alongside Highfield Moss SSSI one of the last mire marshlands in Lancashire. Highfield Moss SSSI is managed by natural England and Lancashire

Wildlife trust and in recent years both have undertaken substantial development to preserve the moss land by which drainage and hydrology is critical.

Parkside East and West effectively cover most of the green belt between Newton-Le-Willows, Kenyon and Winwick an area between three boroughs Warrington, Wigan and St Helens.

Endangered Brown Hare – Parkside East and West of the very few local areas where these can be found due to habitat loss in the region. Brown Hares are nationally protected.

**RECOGNITION WITHIN LOCAL PLAN 2019** – effectively the local plan treats this as wasteland (concentrating on the relatively small area of what remains of the 1957 colliery) the rest an absolutely

Vast area several miles in circumference of woodland, scrub, marshland and grassland. The nature and scale of is not reflected in the local plan rendering the plan "ineffective" and not

"Positively prepared".

① LPA04

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.

### Recommendations

- 1 – The draft local plan should be amended to reflection recognition of the area of Parkside East and West and its habitat and scope for local biodiversity. From context of “net gains for nature” and local Health and wellbeing.
- 2 – The adjusted local plan should have formal provision for future Biodiversity Planning in areas such as Parkside East and West where very large scale development is planned on sensitive countryside.

Please continue on a separate sheet if necessary

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

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

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

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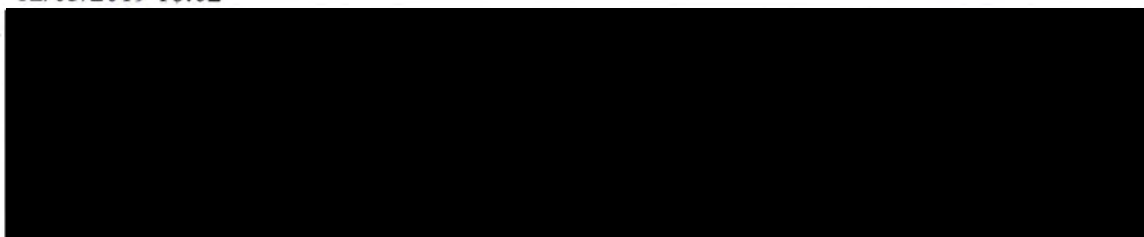
**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

PO0978



St Helens Local Plan - Representations OBO Network Space Developments Ltd  
William Mulvany  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 16:02

EF0047



2 Attachments



lpsd-representation-form Policy LPB01.pdf lpsd-representation-form Policy LPA04 and Appendix 5.pdf

Dear Planning Policy

Please find attached representations to the Local Plan made on behalf of our client Network Space Developments Ltd.

Please acknowledge safe receipt.

Kind regards

**WILL MULVANY**

Associate: Chartered Town Planner  
BSc (Hons), MA, MRTPI



**LAUNCH OF LEEDS PLANNING PROTOCOL**  
**19TH MARCH 2019**

As Chair of Leeds Chamber Housing Forum and also of Spawforths, David Rolinson has been working with Leeds City Council to develop a new planning protocol to guide all future planning applications within Leeds. David will be launching the Planning Protocol jointly with Tim Hill, Chief Planning Officer of Leeds City Council on the 19th March

**PLEASE CLICK HERE TO FIND OUT MORE!**



**West & North  
Yorkshire Chamber  
of Commerce**  
British Chambers of Commerce  
Accredited

Junction 41 Business Court, East Ardsley, Leeds, WF3 2AB





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St. Helens  
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Will
Last Name:	Last Name: Mulvany
Organisation/company: Network Space Developments Ltd	Organisation/company: Spawforths
Address: C/O Agent	Address: Junction 41 Business Court, East Ardsley, Leeds
Postcode:	Postcode: WF3 2AB
<div style="background-color: black; height: 50px; width: 100%;"></div>	

Signature:

Date:

12 March 2019

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

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

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

Policy	LPA04 ①	Paragraph / diagram / table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Appendix 5					

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

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

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

Please tick as appropriate

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

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

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

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

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

It is considered that the Local Plan is sound and legally compliant in principle in respect of the approach to allocating land at Lea Green Farm (Mere Grange) for employment uses under Policy LPA04 (Site 10EA) 10EA

Network Space is the owner of land which is subject to detailed planning across the allocation and the site is at an advanced stage of construction.

At Appendix 5, reference is made to the site and that, "Key site requirements are addressed in the approved plans and conditions attached to planning permission reference P/2016/0567/HYBR, granted in November 2016." For completeness and accuracy reference should also be made to subsequent planning applications under which the site is being brought forward.

Please continue on a separate sheet if necessary

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

**Amend Appendix 5 to refer to the 2016 application, adding:**

**“...and subsequent planning applications”.**

Please continue on a separate sheet if necessary

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

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

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

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

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

Our client is the owner of land in key locations in St Helens and are based within the Borough. They would like the opportunity to discuss their representations where this is appropriate and 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.**

PO0979



CPRE Lancashire response  
jackie.copley  
to:  
planningpolicy  
13/03/2019 09:20



# 1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

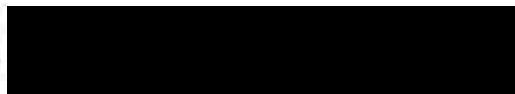
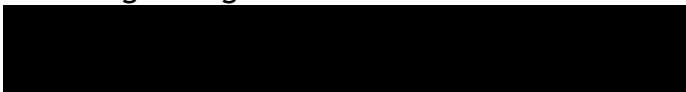
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

**Jackie Copley MRTPI MA BA(Hons) PgCert**  
Planning Manager



## Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

CPRE Lancashire is a Company Limited By Guarantee registered in England, No. 5291461

Registered Charity Number: 1107376

*This email and any files transmitted with it are confidential and intended for the addressee(s) only. If you are not the intended recipient any disclosure, distribution, copying or printing is strictly prohibited. If you have received this email in error please notify the sender. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of CPRE Lancashire. Finally, this email and its attachments have been checked for viruses before submission, however the recipient should also check for the presence of viruses. CPRE Lancashire accepts no responsibility for any damage caused by any virus transmitted by this email.*



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

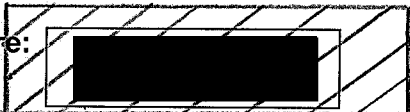
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
--	--

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

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

Yes ☒ (Via Email)

No ☐

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



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

## **PART B – YOUR REPRESENTATION**

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <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>CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.</p> <p>We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.</p> <p>That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):</p> <p>a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;</p>

**Policy LPA02: Spatial Strategy**

We are pleased to read the re-use of previously developed land in Key Settlements will remain a key Priority in local plan Policy LPA02: Spatial Strategy, as we too strongly advocate a brownfield preference approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. We acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." However, observe that the use of the phrase "as far as practicable" will make LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future. Therefore we strongly urge for this phrase to be deleted, or LPA02 will remain ineffective, if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

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

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

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer has an interest in low value farmland being consented for residential use and having responded to the call for sites. Many developers chase land value rises from farmland being allowed for residential use, and they aren't in the least bit bothered about issues such as sustainability, ecology, rural economic sectors. If the developer's land is in a 'sustainable' location and it would constitute 'sustainable development' this would be mutually beneficial to both developer and wider society, but if the land is in a place that is 'unsustainable' then it would be at a cost to society and it should not be allowed.

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

CPRE Lancashire supports the policy intention that says: "The quality of life, health and wellbeing of St Helens Borough's residents, workers and visitors and the quality of the natural environment will be supported by:" and we applaud the text in the five supporting bullet points.

**Policy LPA03: Development Principles**

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

**Policy LPA04 Strategic Employment Sites**

CPRE Lancashire is strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St Helens, which we regard as unjustly excessive. We believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of

employment property and have an adverse effect on the property market. It would lead to widespread vacancy. We think the data in Tables 4.2, 4.3 and 4.4 is inaccurate.

Our view is supported by the expert opinion of economist Dr. Glenn Athey, who was commissioned by St Helens Green Belt Association (an umbrella residents group opposed to Green Belt loss). In his report, Dr Athey concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts has used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with a number of other assumptions underpinning employment land policies, including forecasts of port freight. In light of Dr Athey's expert opinion, CPRE Lancashire calls for the Council to review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. CPRE Lancashire calls for the economic data, analysis to be corrected.

This is particularly the case when considering the fact that all surrounding geography in Liverpool City Region, Greater Manchester, Cheshire and West Lancashire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

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

In any case, what is the local benefit of B8 Warehousing formats with new technology replacing human resources resulting in very low density employment formats, causing great harm to Green Belt purpose? We think there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, and question the need for such an excessive amount in the countryside. The duty to cooperate has not been complied with on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities, resulting in sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. CPRE Lancashire believes local planning of large warehousing formats should be in accordance with promises by Government to protect Green Belt.

#### **Policy LPA04.1: Strategic Employment Sites**

CPRE Lancashire is opposed to needless release of Green Belt land for employment uses. Previously we raised concern over 2EA, 4EA, 7EA, and 8EA (LPA10), but we reserve the right to comment on other employment sites included in LPA04.1 at the examination.

It is supported that planning applications for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

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

In recent years, CPRE has undertaken considerable research to show that housing assessments

PO0980



PAG Response to Local Plan Draft Submission

Dave Tyas

to:

planningpolicy@sthelens.gov.uk

13/03/2019 09:30

Cc:

[Redacted]

Hide Details

From: Dave Tyas

To: [Redacted]

Cc: [Redacted]

[Redacted]

EF0058/

01-11

3 Attachments



lpsd-representation-form (PAG Signed Front Page Feb 2019).pdf



PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary).pdf



lpsd-representation-form PAG March 2019.pdf

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas

Co-Chair PAG.



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Dave	First name:
Last Name: Tyas	Last Name:
Organisation/company: Parkside Action Group	Organisation/company:
Address: 4 Holford Way Newton-le-Willows WA12 0BZ	Address:
Postcode:	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 23-FEB-2019
-----------------------	-------------------

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

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



St. Helens  
Council

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

Ref: LPSD

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Please ensure the form is returned to us **by no later than 5pm on 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: Dave	First name:
Last Name: Tyas	Last Name:
Organisation/company: Parkside Action Group	Organisation/company:
Address: 4 Holford Way Newton-le-Willows	Address:
Postcode: WA12 0BZ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: [REDACTED]

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

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

Yes ☒ (Via Email)

No ☐

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

## RETURN DETAILS

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

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

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

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

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

## FURTHER INFORMATION

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

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

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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

### **PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041			

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

1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)
3. PAG Response to St Helens Local Plan Submission Draft January 2019 (Biodiversity Report)

Please continue on a separate sheet if necessary

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

Please see documents:

1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
2. *R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)*
3. PAG Response to St Helens Local Plan Submission Draft January 2019 (Biodiversity Report)

Please continue on a separate sheet if necessary

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

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

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

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

PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Mr Richard Ward's (PAG) article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield.

We reserve the right to bring with us, others who we will identify nearer to the time, to make the case for the "Local People" before the inspector.

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

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

EF0058/

01-11

Policies:-

LPA10

LPA04

Sites 7EA &

8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Non-Technical Summary, March 2019



02	Local roads pass through AQMA. Some key routes have high foot fall and are used by parents and children to get schools and shops. Increased traffic caused by road freight developments will have negative impacts on air quality and people's health, hence the need to place some protection in the plan for this.	02
07	3. Do the ELNS employment demand calculations actually stack up?  The employment demand should be just enough to meet the needs of the borough and not artificially inflated to purely to generate higher revenues whilst producing significant environmental impacts and loss of Green Belt.	LPA 04 07 Sites 7EA 8EA
08	4. Have the Council properly considered the views of the local community?  Many thousands of objections have been raised over the last 20 years concerning loss of Green Belt and inappropriate development proposals. These appear to have been largely ignored by the Council.	08 LPA 10 Sites 7EA 8EA
03	4.1 PAG would ascertain that the Local Plan is unsound for the following reasons:  • The strategic nature of the Parkside site has been compromised by over focussing on warehouse development and reducing the potential capacity and flexibility for a freight terminal. [Not consistent with National Policy – protection of Strategic Sites]	03
07	• Over-inflated employment demand calculations distort the true requirement for employment land and therefore the need to release the amount of Green Belt proposed is inappropriate. [Not consistent with National Policy – Green Belt Protection]	07
09	• Building road distribution facilities adjacent to large areas of residential areas and making use of routes which pass through areas of high footfall, AQMA and close to an SSSI is not acceptable in terms of impacts to people's health and the environment. [Not positively prepared – not sustainable, unacceptably high environmental & health impacts for what is proposed]	09 LPA 10 Sites 7EA 8EA
10	• Too much development is focussed near motorways and major trunk roads in the borough causing a disproportionate impact to certain communities such as Haydock, Newton-le-Willows, Lowton, Golborne and Winwick. [Not positively prepared – not sustainable, unacceptably high environmental & health impacts]	10 LPA 10 Sites 7EA 8EA
08	• Objections to inappropriate development at Parkside by a number of public bodies including PAG have largely been ignored by the Council. [fails duty to cooperate]	08
11	The Plan should be modified to be more aligned with CAS 3.2 in the adopted Core Strategy which protects Parkside for nationally strategic use whilst at the same time including conditions to reduce impacts to the local community and the environment.	11 LPA 10 Sites 7EA 8EA

PO0981

EF0059/  
01-25



R.Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to:  
planningpolicy SHC Local Plan  
13/03/2019 10:29

Sing

Cc:  
Dave Tyas, Mark Lewis  
Hide Details

From: [REDACTED]  
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>  
Cc: [REDACTED]  
[REDACTED]

3 Attachments



lpsd-representation-form R.Ward PAG Response.pdf



R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R.Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm  
Wednesday 13 March 2019

1, Richard Ward, a member of the Parkside Action Group (PAG), submit the following Representation documents as a part of the above local plan public consultation.

As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

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Yours faithfully,

Richard Ward

EF0059

01-25



Re: PAG Response to Local Plan Draft Submission

to:  
planningpolicy@sthelens.gov.uk  
13/03/2019 10:21

Cc:

Hide Details

From: [REDACTED]  
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>  
Cc: [REDACTED]

3 Attachments



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Co-Chair PAG.



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Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 13/03/2019
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No ☐

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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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## 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 LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041			

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
Please see documents:	
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2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)	

Please continue on a separate sheet if necessary

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

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

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

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

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

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

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

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

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

EF0059/01-25  
Policies:- LPA10, LPA04,  
LPA04.1, LPC09, LPC10,  
LPA02, LPC11, LPC12,  
LPC06, LPD09, ~~LPD09~~.  
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



c. iv. Employment Types - B8

Table 8 – Employment Capacities within key St Helens Local Plan Preferred Options allocated Employment Sites

LPPO site ref	LPSD site ref	Employment Site	Site Area	Jobs (FTE)	Employment Types
EA2	2EA	Florida Farm North, Haydock	35.17	1,487	B8
EA12	11EA	Gerards Park, St. Helens Town Centre	0.95	91	B1(c); B2
EA11	10EA	Land at Lea Green Farm West, Thatto Heath	3.84	321	B1, B2, B8
EA7	6EA	Land at Millfield Lane and Liverpool Road, Haydock	20.58	1,399	B2, B8
EA3	3EA	Land North of Penny Lane, Haydock	11.05	516	B8
EA4	2ES	Land North East of Junction 23 M6, Haydock	42.34	2,666	B2, B8
EA5	4EA	Land South of Penny Lane, Haydock	2.16	177	B2, B8
EA6	5EA	Land to the West of Haydock Industrial Estate, Haydock	7.75	462	B2, B8
EA1	1EA	Omega South Extension, Bold	31.2	1,240	B2, B8
EA10	9EA	Land to the West of Sandwash Close, Rainford	6.96	681	B2, B8
EA9	8EA	Parkside West (Non-SRFI)	79.57	2,351	B8
EA8	7EA	Parkside Rail Terminal		40	Rail uses
EA8	7EA	Parkside East (SRFI)	64.55	2,737	B8
		<b>Total</b>	<b>306.12</b>	<b>14,167</b>	

Source: St Helens Council, BE Group analysis, 2017

From document "Employment Land Needs Study– Addendum Report St Helens Council"  
The concept that St Helens Council and the Local People who live in the borough that the only employment is B8 warehousing to the extent that there are approximately 14,000 jobs

05-09  
LPA04  
Site 7EA  
SEA

LPA101  
LPC09  
LPC10

05-09

05-09

05-09 at 70m<sup>2</sup> per job, equates to approx 14,000 x 70 = 980,000m<sup>2</sup> of warehousing floor space. Where Phase 1 and Phase 2 accommodate approximately 244,000m<sup>2</sup>.

But it is stated that between 7,700 and 9,800 jobs are available for Phase 1, Phase 2, Phase 3 and Phase SRFI from the SIF application documentation. But the above table shows 2351 + 40 + 2737 = 5128 jobs available.

But what is more of the concern of the Local People is:

The amount of B8 warehousing and SHC has stating their requirement for large warehousing:

*"4.6.5 The Borough is, however, well placed to provide new employment, including helping to address the sub-regional need for large scale logistics development,"*

The associated requirement of commercial vehicles (for example: HGVs) that have to serve the function of the B8 warehousing as shown in the table 8 above. With the calculation of the expected size of B8 warehousing at an estimate size of 14,000 x 70 = 980,000m<sup>2</sup> envisaged. The expected pollution from the commercial vehicles expected to serve these large scale logistics developments will affect the health of the Local People, and against the Clean Air Strategy 2019 and current news on air pollution in the news article 11 March 2019, by Paul Cosford, Medical Director, Public Health England at:

<http://www.envirolink.org/2019/03/11/air-pollution-cars-should-be-banned-near-schools-says-public-health-chief/>

and

<https://www.bbc.co.uk/news/uk-47520848>

Air Pollutants means those that do not affect their (local people) surroundings and must include those that seriously comply with the recently published the government document 'Clean Air Strategy 2019': The pollutants with ambient air quality standards in the UK: Nitrogen dioxide (NO<sub>2</sub>) / NO<sub>x</sub> (vegetation); Particulate Matter (PM<sub>10</sub>), Fine Particulate Matter (PM<sub>2.5</sub>); Ozone (O<sub>3</sub>); Sulphur dioxide (SO<sub>2</sub>)/SO<sub>x</sub>; Benzene; Lead (Pb); Carbon monoxide (CO); Carbon dioxide (CO<sub>2</sub>); Nickel (Ni); Ammonia (NH<sub>3</sub>); Non-methane volatile organic compounds (NMVOCs); Polycyclic aromatic hydrocarbons (PAH), Benzo[a]pyrene (B[a]P). The government will ensure industrial sector roadmaps for reducing air pollution are well aligned with those for decarbonisation. Where tensions exist, the government will ensure that a balanced approach is taken which supports clean growth as a whole.

05-09 Together with the associated air pollution eCO<sub>2</sub> produced just from the construction of 980,000m<sup>2</sup>

The eCO<sub>2</sub> of constructing 980,000m<sup>2</sup>: each 1m<sup>3</sup> of concrete used equates to 2.38 tonnes eCO<sub>2</sub>, where 1 tonne of concrete produces 1 tonne of eCO<sub>2</sub>; and 1m<sup>3</sup> of steel equates to 7.9 Tonnes of eCO<sub>2</sub>, where 1 tonne of steel produces 1 tonne of eCO<sub>2</sub>. The estimate for construction of eCO<sub>2</sub> of the size of warehousing envisaged of size 980,000m<sup>2</sup> at a height of 22m to 30m of a steel and concrete construction with a concrete base of at least 1m thick with support piles plus the steel of the internal racking and the surrounding concrete hard-stands and road infrastructure the eCO<sub>2</sub> is in the millions of tonnes.

05-09 If the concrete used was 1m in depth and the steel used was 0.5m in depth, the B8 construction eCO<sub>2</sub> value will be:

Concrete: 980,000m<sup>2</sup> x 1m x 2.38 tonnes x 1 tonne eCO<sub>2</sub> = 2,332,400 tonnes eCO<sub>2</sub>

Steel: 980,000m<sup>2</sup> x 0.5m x 7.9 tonnes x 1 tonne eCO<sub>2</sub> = 3,871,000 tonnes eCO<sub>2</sub>

Totalling **6,203,400 tonnes eCO<sub>2</sub>** just to construct the B8 warehousing proposed by SHC to justify the 14,000 jobs. SHC need to seriously look again at the employment requirements as the Local People will reject this amount of B8 warehousing.

This eCO<sub>2</sub> figure does not include the thousands of HGV container movements per year to satisfy the 980,000m<sup>2</sup> of B8 warehousing envisaged: Containers having an average weight (from full of cornflakes to full of potatoes) is 14 tonnes per container at 68g eCO<sub>2</sub>/tonne/kilometre for HGV. The resultant carbon emissions eCO<sub>2</sub> will never meet government climate change targets.

The impact on the air quality on the local road network and the effect this will have on the local people and their children breathing in these pollutants due to SHC proposal for B8 warehousing in large scale logistics development is impossible to calculate. Therefore the Local People see the B8 SHC proposal for B8 warehousing not a platform for the local people to shape their surroundings. Therefore the B8 warehousing has to be drastically reduced to meet the Clean Air Strategy 2019. The resultant Commercial vehicle movements required to satisfy SHC B8 employment proposal will cause congestion throughout the borough of St Helens and the wider boroughs of Warrington and Wigan. To which the Local People will reject the duty to cooperate agreement if Warrington Borough Council and Wigan Council agree to SHC B warehousing proposals as the duty to cooperate will not shape the local people's surroundings.

The B8 warehousing reasoning above applies to Parkside east and Parkside west.

05-09 The B8 warehousing proposal by SHC shown above due to the air quality impacts also apply to the Policies LPA04; Policy LPA 04.1; Policy LPA10; Policy LPC09, Policy LPC10; LPSD7EA; LPSD8EA Which all need to be altered, changed or removed for a better series of policies that can be said to be a platform for the local people to shape their surroundings.

PO0982

EF0059/  
01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to:  
planningpolicy SHC Local Plan  
13/03/2019 10:29

Sing

Cc:  
Dave Tyas, Mark Lewis  
Hide Details

From: [REDACTED]  
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St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to:

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
Please see documents:	
1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)	
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)	

Please continue on a separate sheet if necessary

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

Please see documents:

3. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
4. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)

Please continue on a separate sheet if necessary

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

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

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

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

I, Richard Ward as a member of PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Also, my article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield, which qualifies me to participate in the oral examination.

I reserve the right to bring with me, others to whom I will identify at the time, to make the case for the "Local People" before the inspector.

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

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

EF0059/01-25  
Policies:- LPA10, LPA04,  
LPA04.1, LPC09, LPC10,  
LPA02, LPC11, LPC12,  
LPC06, LPD09, ~~LPD09~~.  
Sites 7EA & 8EA

Parkside Action Group

PAG Response to St Helens Local Plan Submission Draft

January 2019

Planning Context, March 2019



4.6.5 The Borough is, however, well placed to provide new employment, including helping to address the sub-regional need for large scale logistics development, due to its location close to the M6, M62 and A580 and to major north-south and trans-Pennine rail routes. There is also a unique opportunity to develop land at Parkside for rail-enabled and other employment development. The needs for employment development are set out in further detail in Policy LPA04.

11  
LPA04  
Site 7EA  
8EA

#### Comments

The sentence "There is also a unique opportunity to develop land at Parkside for rail-enabled and other employment development." needs to be changed to

"There is also a unique opportunity to develop land as shown in 7EA at Parkside East for rail-enabled and other employment development."

Policy LPA 04 needs to be changed with regards to B8 employment, where it states B8 change to "*Educational type employment on 8EA Parkside west*".

4.6.12 The interconnected sites of Parkside West and East benefit from a location at the heart of the north-west motorway network and access to the national rail freight network, presenting an opportunity to provide an employment development that will act as a link to the Southern English ports and Europe, as well as supporting the growth of the Liverpool SuperPort. Policies LPA04, LPA04.1 and LPA10 set out details of the proposed development of these sites. The Council will also support steps to improve transport linkages between Parkside, the rest of the Borough and surrounding areas to facilitate sustainable access for the workforce.

#### Comments

References to 8EA as a B8 employment zone need to be removed: Paragraph 4.6.12, (where strikethrough shows text removed and text underlined added indicates text added) to read as:

~~The interconnected sites of Parkside West and East~~ benefits from a location at the heart of the north-west motorway network and access to the national rail freight network, presenting an opportunity to provide an employment development that will act as a link to the Southern English ports and Europe, as well as supporting the growth of the Liverpool SuperPort. Policies LPA04 (B8 changed to Educational workforce for Parkside West), LPA04.1 (with all references to 8EA removed) and LPA10 (with all references to 8EA removed) set out details of the proposed development of these sites. The Council with approval from the local people will also support steps to improve transport linkages between Parkside, the rest of the Borough and surrounding areas to facilitate sustainable access for the workforce.

## 4.10 Policy LPA04: A Strong and Sustainable Economy

Table 4.1: Allocations for Employment Development

Policies Map Site Reference Number <sup>15</sup>	Site Name	Indicative Site Area (hectares)	Appropriate Use(s) <sup>16</sup>
1EA	Omega South Western Extension, Land north of Finches Plantation, Bold (to meet employment land needs arising in Warrington)	31.22	B2, B8
2EA	Florida Farm North, Slag Lane, Haydock	36.67	B2, B8
3EA	Land North of Penny Lane, Haydock	11.05	B2, B8
4EA	Land South of Penny Lane, Haydock	2.16	B2, B8
5EA	Land to the West of Haydock Industrial Estate, Haydock	7.75	B2, B8
6EA	Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock	20.58	B2, B8
7EA	Parkside East, Newton-le-Willows	64.55 <sup>17</sup>	See Policy LPA10
8EA	Parkside West, Newton-le-Willows	79.57 <sup>18</sup>	B2, B8
9EA	Land to the West of Sandwash Close, Rainford	6.96	B2, B8
10EA	Land at Lea Green Farm West, Thatto Heath	3.84	B1, B2, B8
11EA	Gerards Park, College Street, St.Helens Town Centre	0.95	B1, B2, B8
<b>TOTAL</b>		<b>265.3</b>	

<sup>15</sup> Sites 2EA and 6EA are subject to existing planning permissions for employment development.

<sup>16</sup> The phrases B1, B2 and B8 in Policy LPA04 refer to use classes in the Town and Country Planning (Use Classes) Order 1987 (as amended).

<sup>17</sup> The Parkside East site has a gross area of approximately 124.55ha, of which at least 60 ha is reserved for development of a Strategic Rail Freight Interchange or other rail enabled use (see Policy LPA10). The indicative site area of 64.55 ha represents the remainder of the site which may be developed for a wider range of employment uses subject to compliance with Policy LPA10. A further 5.58ha of land is included (to the west of the M6) to facilitate the provision of rail access to the site from the north.

<sup>18</sup> 79.57ha of land is allocated for employment use at the Parkside West site. This area excludes the 5.58ha of land which is required to facilitate rail access to site 7EA and a further 12.1 ha that is occupied by a spoil heap which is not considered developable.

Comments

Entry 8EA B8 changed to Educational workforce for Parkside West

4.12.6 The ELNS Addendum Report identified employment land OAN on the basis of historic trends, the need for a 5 year buffer to ensure choice and flexibility, and the potential for SuperPort<sup>19</sup> and a future Strategic Rail Freight Interchange (SRFI) at the former Parkside Colliery to increase demand for employment land in the Borough, particularly in the large-scale logistics sector. It identifies an employment land OAN of up to 239ha from 2012<sup>20</sup> to 2037. It also splits this overall need indicatively into individual use types, based on sectoral forecasts from Cambridge Econometrics and Oxford Economics and the market drivers underpinning local employment land demand, as set out in Table 4.2.

#### Comments

The phrase “and a future Strategic Rail Freight Interchange (SRFI) at the former Parkside Colliery to increase demand for employment land in the Borough” needs to be changed to:

“and a future Strategic Rail Freight Interchange (SRFI) at Parkside east 7EA at ~~the former Parkside Colliery~~ to increase demand for employment land in the Borough”

This removes 8EA Parkside west as B8 employment to Educational workforce for Parkside West

**Table 4.2: St.Helens Borough Estimated Employment Land Needs 2012-2037**

Employment Type	Hectares
B1(a) Office	10-15
B1(b) Research and development	1-4
B1(c) Light Industry	15-20
B2 General industrial	55-70
B8 Storage and Distribution	110-155
<b>Total employment needs</b>	<b>190-239</b>

#### Comments

Re calculate B8 Storage and Distribution due to Parkside west as employment to Educational workforce for Parkside West

4.12.7 Based on the OAN identified in the ELNS Addendum Report up to 2037, the OAN requirement for 2012-2035 has been calculated as a minimum of 227.4ha as shown in Table 4.3. This figure has been calculated by projecting forward the historic 5.8ha per annum growth scenario for the 1997-2012 period (referred to in the ELNS Addendum Report) from the base date of 2012 to the end date of the Plan (2035), and then adding a 5 year buffer to the baseline OAN (to ensure adequate choice and flexibility) and the recommended allowance for SuperPort and Parkside SRFI of 65ha from the ELNS Addendum Report.

**Table 4.3: Objectively Assessed Need for new employment land - 2012-2035**

<b>Local Plan Objectively Assessed Needs Requirement 2012-2035</b>	<b>Hectares</b>
Baseline OAN 2012 to 2035 (based on ELNS Period 1997-2012, 5.8ha per annum growth scenario)	133.4
5 year Flexibility Buffer	29
Allowance for SuperPort and Parkside SRFI	65
<b>Total</b>	<b>227.4</b>

4.12.8 The residual requirement for employment land (i.e., the minimum supply from new sites that must be provided for in the Plan) has then been calculated by allowing for take-up of employment land since 2012 against the OAN (227.4ha) and the existing supply of developable employment land in the Borough as shown in Table 4.4. Once an allowance of 2.7ha for take up and 9.34ha for the existing developable employment land supply in the Borough has been applied the residual requirement is 215.4ha.

**Table 4.4: Residual Employment Land Requirement - 2018-2035**

<b>Local Plan Employment Land Residual Requirement</b>	<b>Hectares</b>
Local Plan OAN 2012-2035 including 5 year buffer and allowance for Parkside SRFI and SuperPort	227.4
Take-up between 1 Apr 2012 and 31 Mar 2018	2.7
Existing Supply of Developable Employment Land (31 Mar 2018)	9.3
<b>Total Residual Requirement (2018 – 2035)</b>	<b>215.4</b>

4.12.9 The above residual requirement figure includes no allowance for replacing employment land lost to other uses between 2012 and 2035. This approach is in line with the ELNS Addendum Report and is because the land take-up scenarios (from which the OAN is derived) are based on employment land gains only. It also cannot be assumed that losses of, for example, employment land that is not readily developable for employment uses and / or that has been vacant for a long time, need to be replaced.

The Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA)

4.12.10 The draft Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA) - published for stakeholder consultation in October 2017 - considers the need for employment development across 7 local authorities in the Liverpool City Region and West Lancashire. Together these authority areas are identified as the Functional Economic Market Area (FEMA).

Comments

See 4.12.12

4.12.11 The draft SHELMA identifies that, across the FEMA as a whole, at least 397ha of land is required for large scale B8 development (capable of accommodating units of over 9,000m<sup>2</sup>) between 2012 and 2037. However, it does not apportion this need between local authority areas as it states that such apportionment should be guided by the distribution of suitable sites. The draft SHELMA also assesses the need for B1, B2 and for smaller scale B8 development (of less than 9,000m<sup>2</sup>). Unlike those for large scale B8 uses these needs are apportioned at a district level, and for St. Helens Borough are identified as totalling at least 61.4ha of land between 2012 and 2037.

Comments

See 4.12.12

4.12.12 Following the finalisation of the SHELMA, the Council will continue to work collaboratively with the Liverpool City Region and West Lancashire authorities in order to progress the matters addressed within it including the required distribution of land for large scale B8 warehousing. Whilst the residual employment land needs in the Borough identified in Table 4.4 (totalling 215.4ha) cover a different time period to the SHELMA they will be sufficient to both meet the Borough's needs for B1, B2 and small scale B8 uses and a substantial proportion of the subregional need for large scale B8 uses identified to date in the FEMA as a whole.

Comments

SHC has stated "required distribution of land for large scale B8 warehousing", this to the Local People means Warehousing of Height of 22m to 30m which comprises of floor to roof Pallet sized racking where forklift movements within for storing white goods and/or dry food products and/or clothing. This has to be questioned as the need with the current population satisfied with the current warehousing. So this additional B8 large scale warehousing can only satisfy the future population of the Northwest. Statistical forecasts show that the 20 year growth of the Northwest of 6.9 Million People from Carlisle to Chester Liverpool to Manchester will increase by 500,000 over the whole Northwest region over the 20 year forecast. With the number of Local Authorities in the Northwest region this breaks down to a population growth of about 20,000 people over the 20 year period. This is what SHC has as their growth in population, to which not all will be of an employable age. The figure from the Employment documentation of 14,000 jobs complies with the statistical forecasts.

So this means the B8 that SHC is proposing in the St Helens area is for the statistical forecast growth in the Northwest, in particular in St Helens (as all other local authorities will be facing the same growth forecast).

This means the SHC B8 warehousing shown the businesses that occupy these B8 warehouses, their products will be bought by the 20,000 statistical growth in the borough of St Helens. But the growth in St Helens will be working in these B8 warehouses. Therefore shows the B8 warehousing SHC stated has a flawed assumption and expectation. This also applies to the 7EA and 8EA and associated policies

This platform for the local people can not shape their surroundings therefore the B8 strategy proposed by SHC must be drastically rethought and a more realistic approach shown to the Local People. So the B8 warehousing is not sound or justified.

#### Employment Land Allocations

4.12.13 To strengthen the local economy, St.Helens Borough needs to build on those sectors where the Borough enjoys a competitive advantage. As identified above one such sector is logistics and distribution, where the Borough's location in relation to the M6 and M62 motorways and the rail network makes it particularly attractive for development. Market needs for the large scale distribution sector (for units of above 9,000m<sup>2</sup>) generally focus on sites of 5ha or above and this has been reflected in the size of sites selected for release from the Green Belt and allocation for employment use in this Plan.

#### Overall comments Policy LPA04:

Remove, re calculate or change all references to B8 at Parkside west employment to Educational workforce for Parkside West.

Also see 4.12.12

#### 4.13 Policy LPA04.1: Strategic Employment Sites

##### **Policy LPA04.1: Strategic Employment Sites**

1. The following sites allocated under Policy LPA04 shall constitute Strategic Employment Sites<sup>21</sup>:
  - 1EA: Omega South Western Extension, Land north of Finches Plantation, Bold;
  - 2EA: Land at Florida Farm North, Slag Lane, Haydock<sup>22</sup>;
  - 6EA: Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock;
  - 7EA: Parkside East, Newton-le-Willows; and
  - 8EA: Parkside West, Newton-le-Willows.
2. Any planning application for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least:
  - a) amount of development and proposed uses;
  - b) phasing of development across the whole site;
  - c) indicative layout and design details for the whole site, that must provide for an attractive built form with high quality landscaping when viewed from within the development and elsewhere;
  - d) measures to provide good levels of accessibility to the whole site by public transport, pedestrian and cycling links;
  - e) indicative layout promoting permeability and accessibility by public transport, cycling and walking;
  - f) a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage issues in a holistic and integrated way;
  - g) measures to address any potential flood risk and surface water drainage issues in accordance with Policy LPC12;
  - h) measures to promote energy efficiency and generation of renewable or low carbon energy in accordance with Policy LPC13;

- i) a comprehensive strategy for the provision of all new, expanded and / or enhanced infrastructure that is required to serve the development of the whole site; and
  - j) how development of the site as a whole would comply with other relevant policies of the Local Plan.
3. Detailed development proposals within a Strategic Employment Site must be accompanied by a comprehensive package of training schemes and / or other measures to enable local residents (including unemployed and disadvantaged people) to access and benefit fully from the employment opportunities provided at the Site.
4. Development within Strategic Employment Sites will be required to, subject to compliance with Policy LPA08, provide or make financial contributions towards the provision, expansion and / or enhancement of transport infrastructure (including road, public transport, cycling and pedestrian infrastructure) and / or other infrastructure to serve the needs of the development. Such provision may be either on-site or off-site and must be provided in time to meet the needs of the development. Where the specific development proposal would only cover part of the Strategic Employment Site, the provision and / or contributions must be in accordance with the comprehensive masterplan for the whole site referred to in paragraph 2 of this Policy.
5. The masterplans for each Strategic Employment Site, and any planning application for development within any other allocated employment site, must address the site specific requirements set out in Appendix 5 (in the case of sites 1EA,6EA,2EA and 8EA) and Policy LPA10 (in the case of site 7EA).

#### Comments

The Policy LPA04.1: Strategic Employment Sites to have all references to 8EA Parkside west removed

Also see 4.12.12

PO0983



{In Archive} LOCAL PLAN

roughley pamela

to:

planningpolicy

20/02/2019 20:24



1 Attachment



formECRA.doc

SITE 8HS

① LPA05

② LPA02

③ LPA04

④ LPA06

⑤ IDP

Please find attached a completed Representation Form - my apologies if I have now sent this twice - finger-trouble.

P. ROUGHLEY



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name: P	First name:
Last Name: ROUGHLEY	Last Name:
Organisation/company:	Organisation/company:
Address: 24 MILLFIELDS ECCLESTON	Address:
Postcode: WA10 5NS	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

20/02/2019

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

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

Yes **YES** ☒ (Via Email)

No ☐

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

## **RETURN DETAILS**

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

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

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

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

### **PART B – YOUR REPRESENTATION**

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

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

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

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

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

Legally Compliant?	Yes <input type="checkbox"/>	No <b>X (NO)</b>
Sound?	Yes <input type="checkbox"/>	No <b>X (NO)</b> <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <b>X (NO)</b> <input type="checkbox"/>

Please tick as appropriate

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

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

Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> <b>X (NO) the plan is based on flawed methodology and out-of-date information</b>
Effective?	<input type="checkbox"/> <b>X (NO) the plan is unrealistic and not deliverable</b>
Consistent with National Policy?	<input type="checkbox"/> <b>X (NO) the plan does not comply with NPPF 2018</b>

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

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

The housing needs assessment does not use Standard Methodology and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS(2016) predicts that 383 houses/yr will be required to meet housing needs in St.helens. The council are using an older forecast(2014) of 486.

The plan does not mention Brownfield and Previously Developed Land that is not (yet)

①  
 ①  
 ②

available or included on the Brownfield Register.

Economic growth predictions are based on flawed historical information and do not justify the targets included in the plan. There are very few employment opportunities in St.Helens, town centre shops are closing at an alarming rate, even market stall in the various markets are sporting as many empty as used stalls.

The St.helens council statement of "Contaminated Land sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St.helens.

Two Green Belt sites of 56.6 and 148 ha are being reclassified as safeguarded and included in the plan to fulfil housing need – this is less than 7% of the 3,170 ha available, if it were to be remediated. By cleaning up this 7% two Green Belt sites could be released from the "safeguarded" register, thus saving part of the Green Belt. \*\*\*

The St.helens council in conjunction with LCRCA have no policy for bringing unsuitable sites outside the Brownfield register back into use.

It is NOT reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period and are, thus, not being considered.

**THE LOSS OF GRADE 1 AND 2 AGRICULTURAL LAND THAT COMPRISES MOST ALLOCATED AND SAFEGUARDED SITES IS NOT MENTIONED. THIS IS DISGRACEFUL WHEN SUCH LAND IS PLANNED TO BE USED FOR HOUSING WHEN OTHER ALTERNATIVES ARE POSSIBLE – SEE \*\*\* ABOVE.**

Also the negative impact on farming and distribution jobs in a town with high unemployment should be considered as a priority.

The borough has long term intractable problems at Windle Island, Bleak Hill, Skew Bridge, M6 to name a few, and the IDP has not outlined how local and borough-wide road improvements are to be made and funded.

**Indeed, the plan promotes unsustainable traffic growth causing severe traffic problems that will not satisfy the NPPF(2016).**

The IDP fails to explain the impact on HEALTHCARE, EDUCATION, AIR QUALITY AND POLLUTION.

There is no indication or reference that collaboration with the Hospital Trust, local GPs, Dentists, CCGs or education authorities has taken place to obtain their views on the additional loads they will all have to absorb if this plan goes ahead, or how such additional demands will be managed and funded.

The new medical centre at Millfields is almost complete but this has been built to service existing local needs, has extremely limited car parking facilities, and has an inadequate bus service for non-driving residents. Bus services in the area will, therefore, be impacted and need to be reviewed as things now stand, and more so with a future possible influx of thousands of new residents

The IDP acknowledges that there is a high proportion of GPs now over 55. Given that the population increase expected from the Plan requires between 10-16 new GPs plus replacements, how does the IDP propose they will be provided and funded?

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

**A urgent review of the housing requirements in St.Helens needs to be completed based on reasonable and up-to-date information, giving full consideration to the current infrastructure and to the steps needed to ensure it is adequate to service the additional housing which is being planned. This should also be supported by plans to enhance the infrastructure where required and a Finance Plan to support the enhancements**

**In addition, a thorough examination of the brownfield and contaminated sites needs to be undertaken, and plans put in place to clean up these sites in the future which could then release green belt sites from the "safeguarded for future development" plan. This would be a more realistic approach to the use of "cleaned-up" contaminated sites instead of simply ignoring the problem.**

**Why use good agricultural land when the town comprises a number of "eye sores" which will never be addressed if the Council ignores these "eye sores" and simply uses up the Green Belt.**

**The Plan as outlined seems not to have been thought through properly, leaving many issued unaddressed and unplanned for – a case of build now and pick up the pieces later – a very unattractive and unsatisfactory proposition for the residents of Eccleston and Windle, and some potentially massive headaches for St.Helens Council in the future.**

**IN SUMMARY, ECRA WITH WINDLE BELIEVE THAT THIS VERSION DOES NOT SATISFY:**

- The requirement for sustainable development
- The criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs
- Sustainable housing, targets proposed are based on aspirational employment growth predictions i.e. unrealistic
- Effective land use by concentrating on Green Space development over town centre development with higher densities
- Food security by ignoring Agricultural Land Quality

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

<b>NO</b>	<b>No</b> , I do not wish to participate at the oral examination	<b>Yes</b> , I wish to participate at the oral examination
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this to be necessary.

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

PO0984

EF0092



{In Archive} Representation Form  
David Traynor  
to:  
planningpolicy  
21/02/2019 10:59

SHKS 2EA, 5EA, 6EA

① LPA04

② para 1.7.2.

3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse DT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse DT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse DT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
D Traynor



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mr	Title: .....
First Name: David	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive Garswood	Address: .....
Postcode: WN4 0SJ	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: [Redacted]	Date: 20 Feb 2019
-----------------------	-------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

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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.

<b>3. To which part of the Local Plan does this representation relate?</b>									
Policy	LPA04 2EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

<b>4. Do you consider the St Helens Borough Local Plan 2020-2035 is:</b>		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

<b>5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:</b>	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

<b>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u></b>	
<b>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
<p>Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?</p> <p>The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.</p> <p>There is no statement of common ground with other Authorities</p> <p>The release of Greenbelt will cause significant harm to the purpose of Greenbelt</p> <p>There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook</p>	

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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Other documents (please name document and relevant part/section)									

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Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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Consistent with National Policy?	<input type="checkbox"/>

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---	--	--	--

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

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Please continue on a separate sheet if 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.**

PO0985

EF0094



{In Archive} Representation

Ken Roughley

to:

planningpolicy

21/02/2019 16:27



1 Attachment



lpsd-representation-form (3).mht

Dear Sirs,

Please find attached my representation form.

Thank You

KenR

Sine 8145

① - LPA02

② - LPA04

③ - LPA05

④ - LPA06

⑤ - IDP



St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

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**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: 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 13<sup>th</sup> March 2019** by:

post to:

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St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

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**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

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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 <u>not legally compliant or is unsound or fails to comply with the duty to cooperate</u> . Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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

agn  
infra  
→ traffic → health + wellbeing aq noise

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

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<b>X</b> <b>NO</b>	<b>No</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
-----------------------	--	--	--

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**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

PO0986

EF0095

Sites - 2EA, 5EA, 6EA  
1HA, 1HS + 2HA



{In Archive} Representation forms  
Luke Traynor  
to:  
planningpolicy@sthelens.gov.uk  
21/02/2019 20:27



- ① LPA04
- ② PARA 1.7.2
- ③ LPA05
- ④ LPA06

3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse LT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse LT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse LT.pdf

Please find attached 3 of 6 representation forms

Luke Traynor

Sent from Mail for Windows 10



{In Archive} Representation forms  
Luke Traynor  
to:  
planningpolicy@sthelens.gov.uk  
21/02/2019 20:28



3 Attachments



St Helens Comment form LPA05-1HA safeguarded LT.pdf



St Helens Comment form LPA05-1HS smocklane LT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing LT.pdf

Please find attached 3 of 6 representation forms

Regards Luke Traynor

Sent from Mail for Windows 10



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**Part B - Your Representation(s)**

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### 1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Luke

Last Name: Traynor

Organisation/company:

Address: 192 Victoria Road  
Garswood

Postcode: WN4 0RG

### 2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 20 Feb 2019

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☒ Yes (via email)

☐ No

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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Please tick as appropriate

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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>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?</p> <p>The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.</p> <p>There is no statement of common ground with other Authorities</p> <p>The release of Greenbelt will cause significant harm to the purpose of Greenbelt</p> <p>There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook</p>	

①  
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⑥

Please continue on a separate sheet if necessary

Delete this land from the proposed removal from the Greenbelt

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

\_\_\_\_\_

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA04 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?</p> <p>The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.</p> <p>There is no statement of common ground with other Authorities</p> <p>The release of Greenbelt will cause significant harm to the purpose of Greenbelt</p> <p>There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook</p>	

①

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①

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	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.**

PO0987



{In Archive} St. Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation Form  
paul.johnson  
to:  
planningpolicy  
22/02/2019 12:37



1 Attachment



image001.jpg image006.jpg image007.jpg St. Helens Representation Form - Worthington Land Settlement.pdf

We attach herewith a completed representation form and plan for your attention.

Paul Johnson FRICS FAAV  
Director,  
Frank Marshall & Co.,  
121 Billinge Road,  
Garswood,  
Ashton-in-Makerfield,  
Wigan. WN4 0XD



CHARTERED SURVEYORS  
AUCTIONEERS & ESTATE AGENTS



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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](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr.
First Name:	First name: Paul
Last Name:	Last Name: Johnson
Organisation/company: Worthington Land Settlement	Organisation/company: Frank Marshall & Co.
Address: C/o Frank Marshall & Co. 121 Billinge Road, Garswood, A-in-M, Wigan.	Address: 121 Billinge Road, Garswood, A-in-M, Wigan.
Postcode: WN4 0XD	Postcode: WN4 0XD

Signature: <div style="background-color: black; width: 250px; height: 30px; display: inline-block;"></div>	Date: <div style="border: 1px solid black; padding: 2px;">22nd February 2019</div>
--	--

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
LPA02				Page 7			
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 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

#### **1. Introduction**

- 1.1 Frank Marshall & Co. is instructed to submit representations to the Draft St. Helens Local Plan on behalf of the Trustees of the Worthington Land Settlement the owner of the land edged in red on the attached plan which amounts to about 0.21 acres.

#### **2. Planning Context**

- 2.1 The land is allocated as Green Belt in the Local Plan for the Borough adopted on 2nd July 1998.
- 2.2 An evaluation of the site against the principles relating to Green Belt is necessary to justify its removal with regard to the principles outlined in the assessment of the purposes of the Green Belt contained in the Council's Green Belt Review (December 2018).

2.2.a *To check the unrestricted spread of large built-up areas.*

The land lies within the boundary of a haulage yard as bounded to the North/West by a concrete panel fence. This use as a haulage yard has been continuous since 2005. As such this Green Belt objective would not be compromised.

2.2.b *To prevent neighbouring towns merging into one another.*

The removal of the land from the Green Belt would have no material effect on this Green Belt objective.

2.2.c *To assist in safeguarding the countryside from encroachment.*

Encroachment took place over 13 years ago and is immune from enforcement action as such.

2.2.d *To preserve the setting and special character of historic towns.*

This is not a relevant consideration in this case.

2.2.e *To assist in urban regeneration by encouraging the recycling of derelict and other urban land.*

This objective would be achieved by the removal of the land from the Green Belt.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Modification of the Policies Map (January 2019) to exclude the area edged red on the attached plan from the Green Belt and its allocation/designation as employment land with the Park Industrial Estate.**

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested**

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

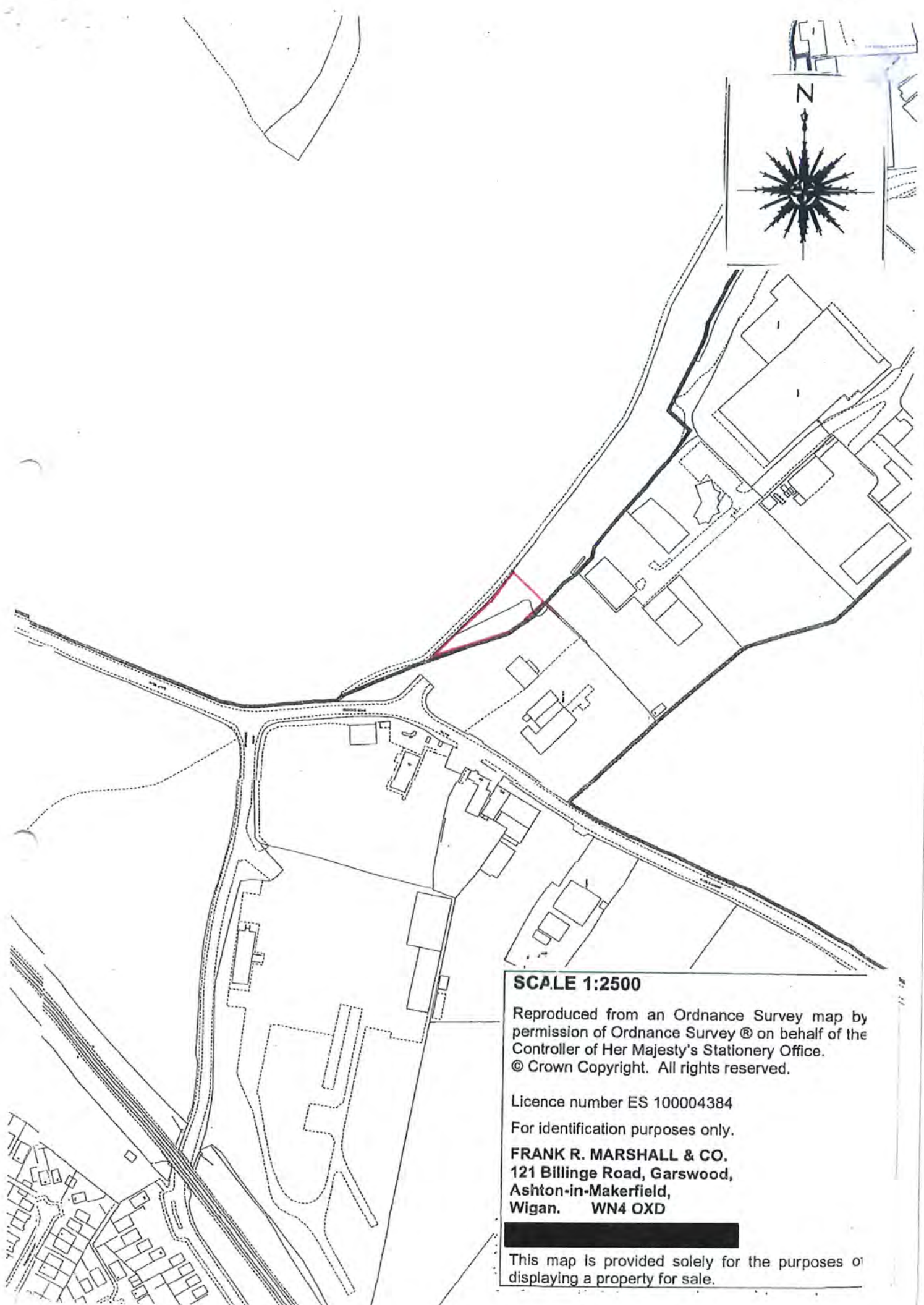
✓ **No, I do not wish to participate at the oral examination**

**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.**



**SCALE 1:2500**

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For identification purposes only.

**FRANK R. MARSHALL & CO.**  
121 Billinge Road, Garswood,  
Ashton-in-Makerfield,  
Wigan. WN4 0XD

This map is provided solely for the purposes of displaying a property for sale.

PO0988

SINS 7CA  
SEA

EL0008

① LPA04



## Comments on Proposed Local Plan

**A Hopkins** to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

27/02/2019 20:45

From: A Hopkins [REDACTED]  
To: "planningpolicy@sthelens.gov.uk" <[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)>

From: Mrs. Annie Hopkins  
7. Willow Road  
Newton-le-Willows  
WA12 9SX  
[REDACTED]

I wish to state my objections against the proposed Local Plan in the areas which I personally feel will affect me and other residents of Newton-le-Willows. As a layperson trying to understand the complexities of the documents, I am highlighting points of particular relevance to me.

I refer to the maps GBP 039 and GBP 041 Summary sheets which illustrate how much green belt land is to be sacrificed in the name of Parkside regeneration. (The Parkside footprint is a minuscule portion of the swathes of land to be stolen, and as such it is a misnomer to call this development 'Parkside').

Question: other collieries in the Borough have been sympathetically improved, re-designed and landscaped to bring them up to a standard of visual and recreational use by residents. Why not Parkside?

This development of a gigantic warehouse hub and eventual rail freight interchange in very close proximity to residential areas in a small market town is not appropriate or acceptable. Some houses on the A49 even form part of the boundary of the site. Other residential sites are just a road-width away. The takeover of 92,900 square metres is just the beginning! And how many more of the warehousing sites will we be expected to accommodate in the future? Haydock is another small town being used for these vast developments.

There has been strong public opposition to this development from its inception several years ago. How are all these acres of green belt to be re-allocated - are we going to be told there are 'Special Circumstances'? Policy LPA 09 Green Infrastructure seeks to protect Green infrastructure from undue harm from development, and ensure that new developments, where justified, support Green infrastructure. Policy LPC 05 Open Space seeks to ensure the protection and management of the Borough's existing open spaces in the most effective way by supporting implementation of programmes and strategies that manage and enhance open spaces and resist development proposals that would result in the unjustified loss of open space. ✓

The impact of this development on Newton-le-Willows will be have serious impacts on this area, viz:

1. Traffic overload on local roads already at certain times of the day gridlocked. There will be thousands of extra HGVs, Vans and cars using the A 49 the main road in and out of Newton - this is a single carriageway leading traffic along Newton High Street to the A580/M6 or turning into Southworth Road leading to Lowton, Leigh, Wigan Bolton.

2. Air Quality: consequence of increased traffic. Residents will be living in an atmosphere harmful to health. Policy LPD 09 Air Quality. There will be a significant deterioration in local air quality. Particularly vulnerable will be the elderly, residents with chronic

pulmonary problems and school children who will be walking along the same route as the increased traffic when going to schools. The two roads mentioned in 1. above are the subject of air quality monitoring at the present time, as current pollution levels are considered high. ] ①

3. Protecting and enhancing our natural environment. The paragraph in the local paper under this heading in St Helens' Local Plan feature I am afraid does not totally apply to this development which proposes the concreting over of what is currently a haven for wild life and green space. And at this point I would like to include the historical connections of Newton-le-Willows. The green belt land has I believe been designated a Registered Battlefield for its connection to the English Civil War. The loss of so much open space and green belt between Newton and Winwick will create urban sprawl the opposite of what green open spaces were created for between villages and towns. ] ①

4. Employment: I would applaud the day when we have full employment, but do not believe these automated warehouses are the answer, being that only a very small 'human' workforce is required to keep them running as most of the work is done through computerisation. What type of jobs will be on offer - will they be satisfying and sufficiently well paid? These warehouse developments will provide income for St Helens Council but not the over-inflated numbers of jobs suggested. ] ①

5. Light and Noise Pollution: this will be a 24/7 site and these problems will be a constant nuisance to local residents. I have read some of the appendices which refer to possible problems which may show up and what would be done. It would appear that they will be 'mitigated'. My understanding of the word 'mitigated' is that a problem will be diminished or eased, but not completely solved. Am I correct in my thinking? ] ①

Nothing can mitigate the loss of so much green belt open space - if this development takes place it will be totally lost for ever, no easing or diminishing. Landscape, visual and recreational facilities will be ruined for the community for present residents and those who follow spoiling the neighbourhood of what is a strong local community. ✓

Mrs A Hopkins  
27 February 2019

PO0989

① - LPA05      ③ - IDP      ⑤ - LPA04  
② - LPA06      ④ - GEN

Page 1 of 1  
E0018



# LOCAL PLAN RESPONSE

Maureen B

to:

planningpolicy@sthelens.gov.uk

06/03/2019 08:47



1 Attachment



LOCAL PLAN EMB.docx

PLEASE FIND ATTACHED MY RESPONSE TO LOCAL PLAN 2020-2035 SUBMISSION DRAFT

I have chosen to respond by letter as your online form is not user friendly.

Hard copies of the form do not provide sufficient space for considered response.

ELLEN M BARKER  
1 THE NOOK  
WINDLE  
ST HELENS  
WA10 6EN



6 FEBRUARY 2019

LOCAL PLAN  
ST HELENS COUNCIL  
TOWN HALL  
VICTORIA SQUARE  
ST HELENS  
WA10 1HP

Dear Sir/Madam

Reference: St Helens Local Plan  
Green Belt Review (2018)  
Policy LPA05

I have chosen to respond by letter as your online form is not user friendly. Hard copies of the form do not provide sufficient space for considered response.

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on being realistic or use of the latest figures.

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

The council further then claim the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha for development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required.

①

②

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1<sup>st</sup> April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That doesn't even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The 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 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound.

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.

The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues.

The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities.

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal

document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs!

5

Taking all of the above cumulatively, the Local Plan in its current form when examined by the Planning Inspector cannot be considered to be justified, effective, consistent with National policy or positively prepared. As a consequence it must surely follow that it cannot be considered sound.

YOURS FAITHFULLY

**ELLEN M BARKER (MRS)**

PO0990

EL0027

① - LPA04

② - LPA06

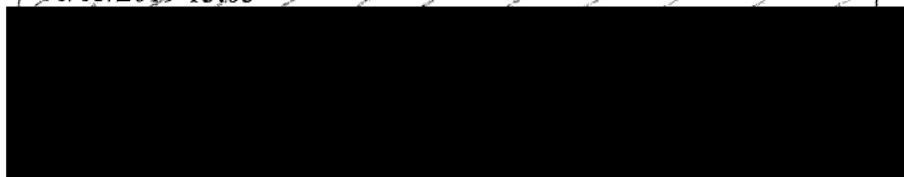


(Case Ref: YF24448) St. Helens Borough Local Plan.  
Yvonne Fovargue

to:

planningpolicy

08/03/2019 15:05



1 Attachment



letter5640.pdf



Development Plans Manager

Dear



Please find attached my comments on St. Helens Borough Local Plan : Submission Draft as it relates to employment development on 4 sites adjoining my constituency of Makerfield.

I would be grateful if you would confirm receipt. Many thanks.

Yours sincerely,

Yvonne Fovargue  
Labour Member for Makerfield

E20027



**Yvonne Fovargue MP**

a: House of Commons  
London  
SW1A 0AA



7 March 2019

Our Ref: LB/YF24448

Dear

**St. Helens Borough Local Plan**

I am contacting you as we have had previous correspondence concerning the proposed Haydock Point development.

You may have recently received notification from St. Helens Council about their Local Plan: Submission Draft. They wrote to some Ashton residents because of proposals to remove the green belt status of a number of sites in Haydock, to allow employment development.

St. Helens advised that residents have until the 13<sup>th</sup> March 2019 at 5.00 pm to submit objections and I enclose for your information a copy of the letter that I have submitted to St. Helens Council objecting to 4 specific sites of concern in the Haydock area in the vicinity of Haydock Island/Junction 23.

I am concerned about the traffic volume/congestion, air quality and green belt implications of these proposals as I believe they will impact on Ashton Businesses and the quality of life of Ashton residents.

You may have received a letter from me in December 2016 when the then MP for Leigh, Andy Burnham and I both objected to a planning application for the development of Haydock Point. This application has still to be determined by St. Helens Council.

As St. Helens advised, the information is available on the Council website at <https://www.sthelens.gov.uk/localplan> and you can submit your views to [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk) or contact the Planning Policy Team on 01744676190 for further information.

1  
2

I will continue to monitor development.

Yours sincerely

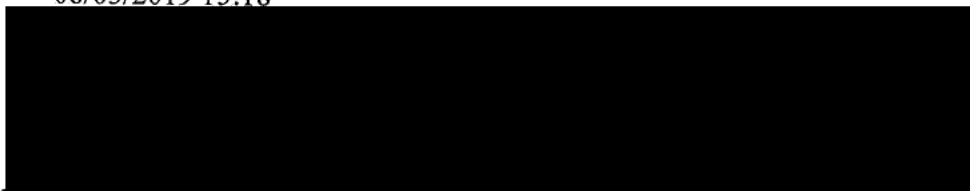
**Yvonne Fovargue MP**  
**Labour Member for Makerfield**

PO0991

ELOO80



(Case Ref: YF24448) St. Helens Borough Local Plan: Submission Draft.  
Yvonne Fovargue  
to:  
planningpolicy  
08/03/2019 15:18



① - LPA 04  
② - LPA 06  
③ - GBR

1 Attachment



letter5620.pdf

FAO [REDACTED]  
Development Plans Manager.

Dear [REDACTED]

Please find attached my comments on St. Helens Borough Local Plan: Submission Draft as it relates to employment development on 4 sites adjoining my constituency of Makerfield.

I would be grateful if you would confirm receipt. Many thanks.

Yours sincerely,

Yvonne Fovargue  
Labour Member for Makerfield

EL0030



**Yvonne Fovargue MP**

a: House of Commons  
London  
SW1A 0AA



[REDACTED]  
Chief Executive  
St Helens Council  
Gamble Building  
Victoria Square  
St. Helens  
WA10 1DY



Our Ref: LB/YF24448

1 March 2019

Dear [REDACTED]

**St. Helens Borough Local Plan**

I wish to object to the St. Helens local plan as it relates to the following proposals:

- a) 2ES Land to the East of M6 Jt. 23 Haydock
- b) 4EA Land South of Penny Lane, Haydock
- c) 6EA Land West of Millfield Lane and South of Liverpool Road.
- d) 5EA Land West of Haydock Estate.

My constituency borders these sites and my constituents living in Ashton will be principally affected by the negative aspects of any development.

**Haydock Point site 2ES**

In December 2016, together with the then MP for Leigh Andy Burnham M.P., I submitted an objection to the planning application (yet to be determined) for a major scheme at 'Haydock Point'. I remain in no doubt that this proposed development would be highly detrimental to the quality of life of my constituents in the Makerfield area and my objection stands.

2

**Sites 6EA, 5EA, and 4EA**

The traffic and air quality points raised in relation to Haydock Point obviously also apply to these three sites. Together with traffic from the Florida Farm development, Junction 23 will struggle to cope with the additional volume of traffic – this must create capacity issues.

You have already approved an employment development application for the currently green belt site 3EA, allowing warehousing/office development and this sits along side the A49. A further adjoining site is proposed, site 4EA, also along side the A49. There is no guarantee that traffic from these two developments will avoid the busy A49 through Ashton and use the A580 for access and egress.

The potential employment development sites adjoining Florida farm, the 5EA and 6EA will also generate a high volume of traffic affecting the East Lancashire Road, junction 23 and the A49.

This additional traffic, together with the traffic from the Haydock Point site, again adjacent the A49, will have an considerable impact on the already poor air quality and traffic congestion at this location.

**Green Belt purposes in respect of all four sites, 2ES, 4EA, 6EA and 5EA :**

The Green Belt status of the land identified, contributes to the divide between out neighbouring communities. It is important that this should be maintained. Without it the communities of Ashton and Haydock will see urban sprawl that denies them the green open space and clean air, a habitat to wildlife, which they currently enjoy. It is just as important and necessary to protect this green space now as it was when the green belt status was first determined.

The removal of Green Belt in these areas to allow employment development will also have the potential to undermine efforts to promote regeneration of brownfield sites elsewhere. Developers will opt for less complex developments that provide a greater return.

I have previously acknowledged that all local authorities desire to maximise their business rates to minimise the impact of the new localisation of business rates which will affect some local authorities adversely but action to address this and ensure economic and employment opportunities should go hand in hand with maintaining the quality of life for all local communities.

ELOOPO

St. Helens Borough Local Plan raises concerns for the quality of life for my constituents living and working in the Ashton area and I do hope you will consider these further observations.

Yours sincerely

**Yvonne Fovargue MP**  
**Labour Member for Makerfield**

PO0992



Eccleston Parish Council Response to Local Plan  
Eccleston Parish Council  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 10:54



1 Attachment



ECCLESTON PARISH COUNCIL RESPONSE.pdf

Hi

Please find the response from Eccleston Parish Council to the Local Plan.

Regards

Janet Anderson  
Clerk to Eccleston Parish Council

# ECCLESTON PARISH COUNCIL

CLERK TO THE COUNCIL  
Janet Anderson

6 Gorsey Croft  
Eccleston Park  
PRESCOT  
L34 2RT

11 March 2019

Local Plan  
St Helens Council  
Town Hall  
Victoria Square  
St Helens  
Merseyside  
WA10 1HP

① - LPA06  
② - LPA04  
③ - LPA05  
④ - IOP  
⑤ - LPA08  
⑥ - Para 17.2 DTC

Please see below comments from Eccleston Parish Council regarding the St Helens Local Plan –  
**PLEASE ACKNOWLEDGE RECEIPT.**

**Section 3: To which part of the Local Plan does this representation relate?**

- LPA05
- LPA06
- LPA07
- LPA08

**Section 4: Do you consider the St Helens Borough Local Plan 2020-2035 is:**

- *Legally Compliant?* **No**
- *Sound?* **No**
- *Complies with the Duty to Cooperate?* **No**

**Section 5: If you consider the Local Plan is unsound, is it because:**

- *Positively Prepared?* **No** – Plan does not consider Brownfield sites
- *Justified?* **No** – Plan based on flawed methodology
- *Effective?* **No** – Plan is not deliverable
- *Consistent with National Policy?* **No** – Plan does not comply with NPPF 2018

**Section 6 and 7: Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments**

**And**

**Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

consistent with national policy or positively prepared and as a consequence, it would surely follow that it is therefore unsound.

#### Policy specific response

##### LPA04 – A Strong and Sustainable Economy

We believe the economic growth scenario outlined in the LPSD is not achievable or sustainable.

St Helens Council's planning policies for the economy are extremely aspirational. These are based on data derived from the Oxford Economics Forecasts. These forecasts are themselves optimistic and contain a circular argument in that they are impacted upon by the input of supply side i.e. land allocations from St Helens Council planners. Assumptions that have not been tested at examination, namely the release of Green Belt land. This is not an objectively assessed need it is a weighted, self-fulfilling circular argument.

#### Modification:

*The economic analysis is flawed and based on over-optimistic assumptions, which mean that 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. As such, St Helens Council should bring forward more realistic economic growth predictions that are line with neighbouring local authorities which in turn will have less impact on the environment, lead to less need for new infrastructure and protect Green Belt land from unnecessary development.*

##### LPA05 - Meeting St. Helens Borough's Housing Needs

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 Housing Need assessment does not use Standard Methodology and therefore there is no case for "exceptional circumstances" for Green Belt land such as land at the Eccleston Park Golf Course (Site 3HS) to be released. The expected growth over the period of this Local Plan seems to be completely removed from reality; it is purely aspirational and not realistic, also it does not use the latest figures available.

Why, for instance, are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15-year plan. When making important decisions the best available data should be used and St Helens Council's decision to use this 2014 based data is fundamentally flawed.

The justification for the Greenbelt Review (2018) is an erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt, such as 8HS and 3HS for so-called "safeguarding". We do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances" for the removal of Green Belt land and the 2016 ONS population projection figures should be applied.

#### Modification:

*St Helens Council should adopt the most up-to-date ONS (2016) projection figures, which set a requirement for 383 new homes to be built per annum. This would remove the need for any Green Belt release during the Local Plan period 2020 – 2035, with development concentrated solely on previously developed brownfield sites, of which there are many across St Helens.*

PO0993

① - LPA04      ② - LPA06

Page 1 of 1

ELOOS4



Objection to the St Helens Local Plan

Anthony Jones

to:

planningpolicy@sthelens.gov.uk

11/03/2019 12:03

Dear Sir,

I wish to object to the St Helens Local Plan as it relates to the following proposals

2ES Land to the east of M6 Junction 23 Haydock ———— ②

4EA Land south of Penny Lane, Haydock

6EA Land West of Millfield Lane and South of Liverpool Road

5EA Land West of Haydock Estate ———— ①

As a resident of Ashton in Makerfield I will be adversely affected by any development of these sites.

I have previously objected to the development at "Haydock Point" and continue to object to the proposal.

Any development will cause grid lock at junction 23 and even more congestion in to Ashton town centre. Also there is a new development being built in Haydock just by the bridge under the M6 where the road is being widened for access to the new development. This is going to increase traffic at Junction 23 of the M6.

① and ②

On Race Days and special events at Haydock Park the already congested roads will made worse, especially when the new traffic from the new development come on stream.

Please take the views of the residents of Ashton in Makerfield into consideration.

Anthony Jones  
23 Weavermill Park  
Ashton in Makerfield  
WN4 9PS

PO0994

①-LPA04 ②-LPA06

ELOO55



**Planning objection re Haydock**

avril littler to: planningpolicy@sthelens.gov.uk

11/03/2019 13:14

I wish to object to the St. Helens local plan as it relates to the following proposals:

- a) 2ES Land to the east of M6 Jt 23 Haydock. ②
- b) 4EA Land south of Penny Lane, Haydock.
- c) 6EA Land west of Millfield Lane and south of Liverpool Road. ①
- d) 5EA Land west of Haydock.

I live in Ashton-in-Makerfield which is going to be severely affected by these proposals. The roads of Ashton are severely congested at peak times now especially the A49, the Haydock island area and Jt 23 M6. If all these developments go ahead these roads are going to be congested all day long. The air quality can only be impacted negatively by queuing traffic. There are two high schools on the A49 close to one of the proposed developments the impact of falling air quality in these areas can only be detrimental to the pupils attending the schools.

It seems to me that the residents of St Helens will not be affected by these developments as they are not in St Helens residential areas but ARE adjacent to residential areas of Ashton-in-Makerfield.

Regards, Avril Littler.

Avril Littler  
54 St Oswalds Road  
Ashton-in-Makerfield  
Wigan  
WN4 9NU

Sent from my iPad

PO0995



Local Plan  
Louise Robinson  
to:  
planningpolicy  
11/03/2019 17:36



Sarah Louise Johnston



ELO062

① - LPA05

② - LPA04

③ - DEL

④ - SA

I am writing to object to the local plan. Namely:

In respect of the overall figures in the Plan;

there are no exceptional circumstances to justify not using the standard method to calculate housing need

the economic analysis is flawed and based on over-optimistic assumptions the level of land needed is therefore not as high as set out in the Local Plan

therefore there are no exceptional circumstances to change Green belt boundaries

other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land

these alternatives will have less impact on the environment and lead to less need for new infrastructure

the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

①

②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

SUGGESTION  
M20

### 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<sup>1</sup>'s own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.

④

This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions,

①

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.

#### **Specific points on site 9EA - Development of Industrial Area**

**I question this on Health and Safety grounds.**

**There are a considerable number of traffic accidents at both ends of Mill Lane. The top of Mill Lane where it meets the Bypass has three blind corners, and makes this stretch of road extremely dangerous for normal car users never mind increased traffic and large volumes are trucks.**

**The roads are narrow and i am not sure they would even accommodate two lorries passing at the same time**

**Quite often lorries park at the top of Mill Lane, meaning drivers have no option but to overtake into incoming traffic directly off the bypass. this happens today and i have photo evidence, this is only going to get worse.**

**The estate is close to housing, there was an explosion last year on the industrial estate and its lucky nobody was injured.**

**The entrance to the industrial estate from Mill Lane is not sufficient, and more traffic will only increase the risk of injury to those using the road**

**If this part of the plan goes ahead, then the committee needs to be accountable for personal injury / fatalities as a result as this in my view is a serious risk. I actually cannot believe the council are considering this development and i warn you as a local resident [REDACTED] what is coming and whilst i hope that i am wrong, i will not shy away from making this email known if ever needed as i feel you have been warned.**

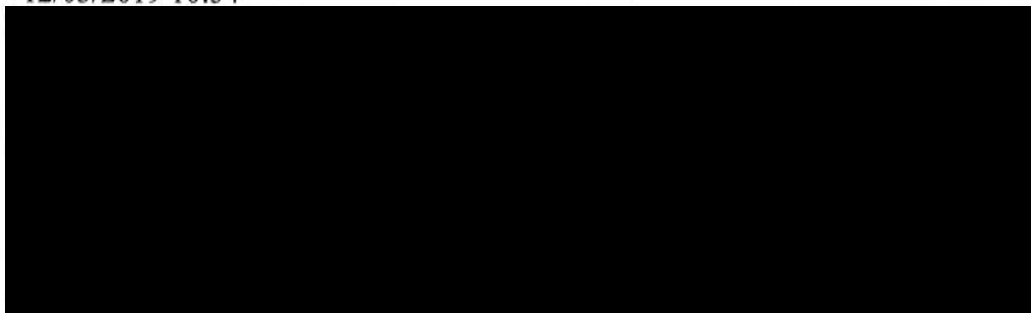
Many thanks

PO0996

E10081



St Helens Borough Local Plan 2020-2035: Submission Draft  
Bannister, Edward  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 10:54



1 Attachment



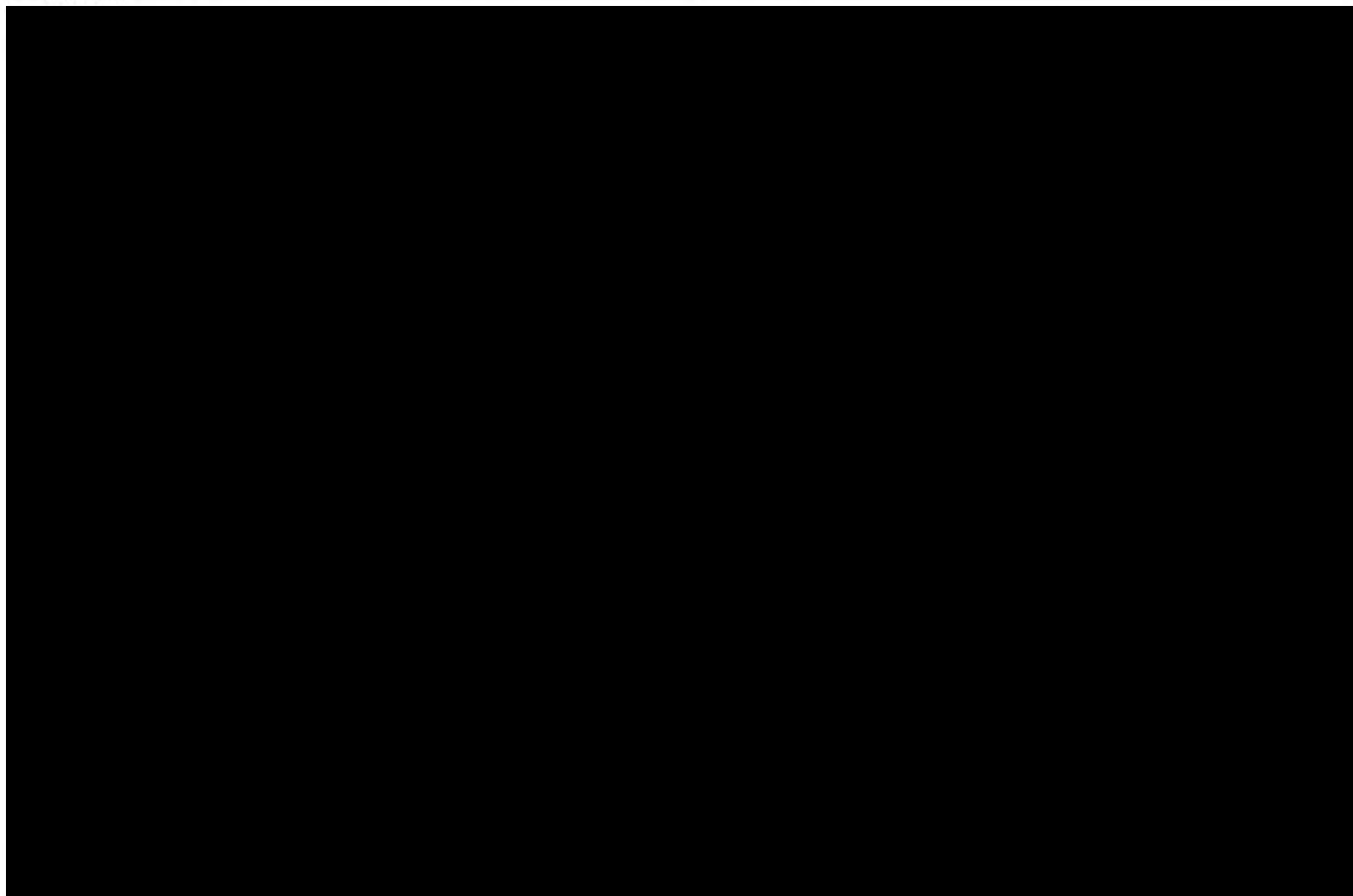
St Helens Draft Submission\_KMBC\_Response.Mar19.docx



Dear 

Please find attached Knowsley Council's representation to the St Helens Borough Local Plan 2020-2035 Submission Draft. I would be grateful if you could confirm safe receipt.

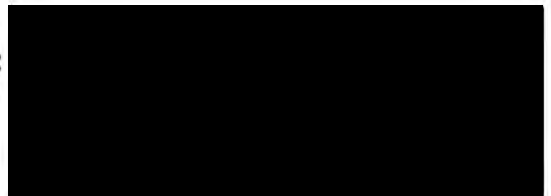
With best regards,  
Edward





**Knowsley Council**

Please ask for:  
Tel No:  
Email:



EL0081

Development Plans Manager  
St Helens MBC  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP

By email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Our Ref: n/a  
Your Ref: n/a

① = LPA 04

② = LPA 06 - EMPLOY

③ = LPA 06 - HOUSING

Date: 13 March 2019

④ = LPA 05 (4HA)

⑤ = GEN

**RE: St Helens Borough Local Plan 2020-2035 Submission Draft**

Thank you for your email of 18 January concerning the above. We are pleased to set out our consultation response in accordance with the Duty to Cooperate.

Knowsley Council's representations on strategic elements of the Plan and other factors are set out below, our comments are mainly centred on housing and employment, since these are the two most important issues facing the production of any Local Plan.

**Strategic matters**

In general, we note the reduction in the overall level of growth proposed since the publication of the Local Plan Preferred Options document in 2016.

Housing

We acknowledge the fact that the status of the former Eccleston Park Golf Club site has been downgraded, having previously been proposed for allocation at the Preferred Options stage.

The proposed development of the Bold Forest site (for housing) is not of particular concern from Knowsley Council's point of view, as we believe that it is unlikely to adversely impact on Knowsley's ability to achieve our own target of delivering 450 homes per annum, and our objective of rebalancing the housing market. The implications of this growth on the strong commuting and migration links between Knowsley and St. Helens, as well as our closely aligned housing markets, will require continued cross border collaboration between the two boroughs which we very much welcome.

Employment

We would agree that the policy to exceed the residual employment land requirement identified seems reasonably necessary, owing to the relative lack of take-up in previous

] LPA 04  
①

years and to provide sufficient flexibility to respond to any need for large-scale logistics (B8) uses arising from the Liverpool City Region.

A key component of the evidence base underlying this proposal - the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHLEMA) Part 2 study (in which both of our authorities are participating) has yet to be completed. The outcome of this study should seek to identify the most suitable areas for future strategic employment locations (taking into account physical needs, market attractiveness, availability, deliverability and infrastructure requirements, and recognising that this will mean looking at areas of the green belt) based on the amount and scale of employment land needed for large-scale B8 uses identified in the SHELMA. As part of this process the case for releasing green belt land for employment development, will need to be carefully addressed, in relation to the exceptional circumstances tests within the NPPF.

The proposed employment allocations will undoubtedly attract interest from the development market due to their prime strategic locations on (or close to) the M6 and M62 motorways, although they will unlikely be in direct competition with similar employment sites in Knowsley, since they are all located towards the eastern side of St Helens borough. This also means that their allocation and development would unlikely have a direct negative impact on Knowsley residents; on the contrary, the roll out of employment land in St Helens could bring positive benefits to some Knowsley residents through increased job opportunities, pending the resolution of poor levels of accessibility by public transport, both from Knowsley and the wider Liverpool City Region.

The roll out of the proposed employment allocations may impact the major road network within Knowsley to some degree. It is acknowledged that a combination of committed and emerging highway infrastructure projects, modest changes in travel behaviour and lower cost improvements across key junctions should help to mitigate some of the highways impacts of the proposed employment growth.

Finally, it is suggested that future safeguarded sites should be aligned to the conclusions which arise ultimately from the SHELMA Part 2 study, which will in itself help to develop the case to satisfy the exceptional circumstances test required to justify any green belt release.

#### Site specific matters

It is encouraging to note that no sites on or near the boundary with Knowsley are proposed for allocation to meet housing or employment needs from 2020-2035. It is further acknowledged that any issues/challenges that may arise in the future should the proposed safeguarding of the Eccleston Park Golf Club site come forward for development then these would need to be considered as part of a future Local Plan review.

The range of potential issues that warrant detailed consideration as part of our statutory "Duty to Cooperate", include:

- The loss of the current use/Green belt role of the site;
- Highways impacts;
- Residential amenity impacts;

PO0997

① - LPA06  
4HS

② - LPA06  
2HS

③ - LPA04  
8EA, 9EA

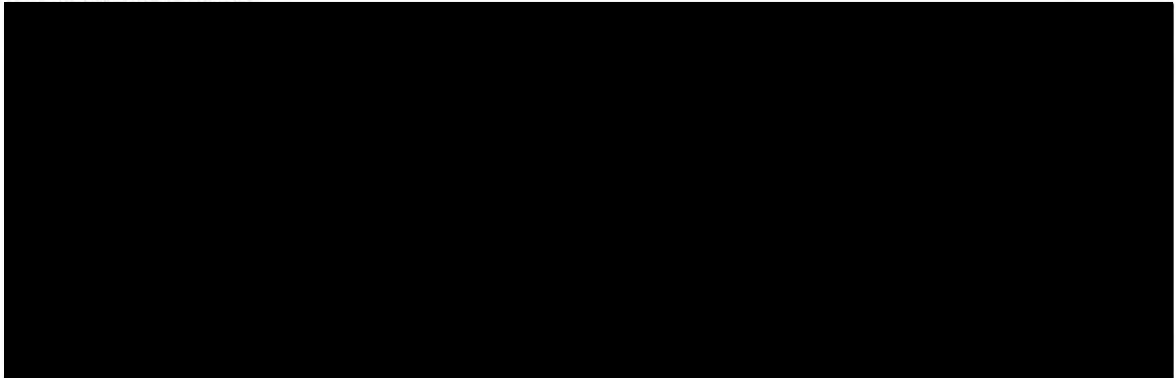
④ - IDP

Page 1 of 1

660083



Local Plan Consultation  
Seve Gomez-Aspron  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 11:22



2 Attachments



Local Plan Feedback final version.pdf ATT00001.htm

Hi,

Please find our local plan consultation input attached.

Thanks

Sev



## St. Helens Borough Council

Newton-le-Willows Ward  
Councillors  
Democratic Services  
Town Hall  
Victoria Square  
St Helens  
Merseyside  
WA10 1HP

Dear Sir/Madam,

Please find attached our representation as Ward Councillors in relation to the latest version of the draft Local Plan which is currently out to consultation.

We feel that most of the points we made in our initial input were carefully considered and listened to, which will make this supplementary correspondence much shorter.

The only points that we feel we need to make are;

### **Safeguarded land 4HS**

As one of the largest developments of brownfield land in the borough, the former Vulcan Works site will accommodate over 600 houses when complete. The indicative capacity of 4HS will increase this by a further 256 houses.

There are only currently 2 ways out of the existing Vulcan site. All traffic must either leave and head along Wargrave Road, through the town centre to join any of the motorways or A580, or the traffic turns south and leaves the town through Alder Root and the Vulcan Village, which causes a backlog due to single bridges and tunnels on the country roads to Warrington.

To remove the need for over 900 houses to clog town centre roads once 4HS is completed, then other access and egress should be considered using existing infrastructure.

Both a tunnel under the West Coast Railway (single width) and a bridge over the West Coast Railway exist already to serve the farm traffic. Any provision to develop 4HS should include the requirement to link the development directly to the A49/Winwick Road over these access routes so that traffic can get more direct access to the motorways and Parkside Link Road without having to pass through the town centre.

*Working together for a better Borough*



### **Safeguarded land 2HS**

There is already a demonstrable requirement to link Vista Road and Ashton Road with a new highway which is shown by the amount of people who currently use the existing landfill road to access Haydock Island.

If a new road across this field was installed, then it could serve as the primary HGV route into Earlestown which would be almost 2 kilometres shorter, reduce pollution around the AQM areas on Newton High Street, pass over a hundred fewer houses, remove the requirement for HGVs to pass Hope Academy and St Mary's Infant School (which has experienced a fatality in the past involving a pupil and a HGV) and would, in reverse, provide direct access to Junction 23 for the whole of Newton-le-Willows west area removing the requirement for them to use local roads.

The business case for this road should be explored much sooner as a piece of key infrastructure for the borough, improving accessibility to Earlestown Town Centre and Sankey Valley Industrial Estate. This should be explicitly stated in the Local Plan.

### **Parkside Development**

No form of access or egress from the Parkside development should be permitted onto the A49 once the new link road is installed for vehicles weighing more than 20 tonnes. This should be explicit in the Local Plan.

There is simply no requirement for this to happen.

Sustainable development is not the same as development at all costs. The High Street, and already congested A49 should be clearly designated as a no access route for HGVs into the Parkside site.

This could be achieved by imposing a weight restriction from the junction of the new Parkside Link Road with the A49 up to the first junction with the first industrial unit on the site. This will prevent the lag between sat navs being updated to include the new road meaning traffic for the site will use the A49 by default.

That way, the road could still be used as a public highway to access Junction 22, no material changes would have to be made to the A49 which would allow it still to operate as a relief route for the M6, no HGV traffic associated with the Parkside development would need to pass through any of the AQM zones along the A49 and HGVs servicing Newton High Street would still have unimpeded access.

If the A49 is still considered a viable access route for the Parkside site, then the viability to develop sites along the A49 such as 7HA and 5HS need to be called into question when considering the cumulative impact on the A49 as a key route.

If Wigan Borough Council and Warrington Borough Council can impose weight restrictions and defensive measures to mitigate the impact of Parkside on their borough's, then our Council can do the same.

### **Infrastructure**

To improve public confidence, it needs to be made much more explicit about when key services such as NHS, Schools, leisure, will be expanded to accommodate growth, even in line with existing policy.

Yours faithfully,

Councillors Bell, Dyer and Gomez-Aspron

*Working together for a better Borough*



PO0998



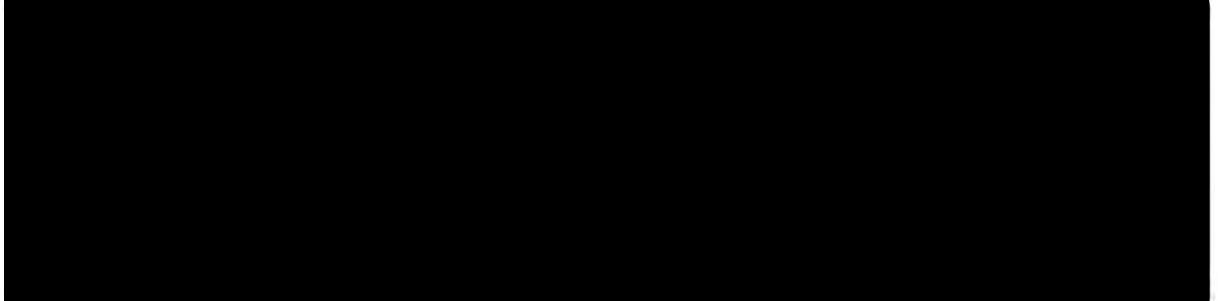
St Helen's Local Plan Submission Draft - Rep on behalf of English Land (submitted 12.3.19)

Andy Frost

to:

planningpolicy@sthelens.gov.uk, [REDACTED]

12/03/2019 12:06



### 3 Attachments



English Land Representations to the St Helen's Local Plan Submission Draft (January 2019).pdf Appendix 2.pdf



Appendix 3.pdf

Dear Sir/Madam

We have completed and submitted the representation form online.

To support our Representation please also see our attached report which is cross-referenced on the form.

Please note I have previously issued Appendix 1 (referred to in the Reps attached) which was our client's Reps to the 2017 consultation. To avoid confusion and duplication I am not re-sending unless you request.

Appendices 2 and 3 are attached.

Please confirm due receipt.

Regards

Andy Frost | Frost Planning Ltd

Frost Planning, Drumlins, 57 Chelford Road, Prestbury, Cheshire SK10 4PT

*A refreshing force in Planning Consultancy*



**FROST  
PLANNING**

Frost Planning Limited is a limited company registered in England and Wales. Registration number: 7877771. Registered office: Drumlins, 57 Chelford Road, Prestbury, Cheshire, SK10 4PT

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- 9EA
- ① - Appendix 5
  - ② - LPA04
  - ③ - EVA
  - ④ - Table 4.1
  - ⑤ - SA

**Representor Details**

Web Reference Number	WF0189
Type of Submission	Web submission
Full Name	Mr G Taylor
Organisation	English Land Ltd
Address	* See Agent * See Agent
Agent Details	Mr Andy Frost Frost Planning Ltd Drumlins 57 Chelford Road Prestbury Cheshire, SK10 4PT

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	Policy LPA04/Site Allocation 9EA (and cross-referenced in Table 4.1 plus Appendix 5)
Paragraph / diagram / table	As above
Policies Map	Pages 5 and 6
Sustainability Appraisal / Strategic Environmental Assessment	Chapter 4.2.13
Habitats Regulation Assessment	n/a
Other documents	Employment Needs Study and Economic Viability Assessment

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Refer to the submitted Representation report as attached/separately forwarded.

**7. Please set out modification(s) you consider are necessary**

Refer to the submitted Representation report as attached/separately forwarded.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

Yes, I wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

To ensure the proposed amendments are fully understood and taken into account.

Response Date	3/12/2019 11:46:09 AM
---------------	-----------------------



**Land to the west of Sandwash Close, Rainford**  
**St Helen's Local Plan 2020-2035 Submission Draft**  
**(January 2019)**

**Representation**

On behalf of English Land Ltd

Prepared in accordance with  
The Town and Country Planning Act 1990

March 2019

## 4 Supporting and Enhancing the Site Allocation

### 4.1 Context

We have reviewed the Submission Draft and the evidence base supporting it, including: the Report of Consultation (St Helen's Council), Economic Viability Assessment (GVA), Employment Land Needs Study (BE Group), and the Sustainability Appraisal.

The Submission Draft allocates the site for employment use. Our client fully supports this in principle. However, we consider there are ways and reasons to enhance the site allocation.

The purpose of this chapter is to reinforce the reasons why the site is allocated for employment uses, and also make the case for inclusive of Class B1 uses and access to Pasture Lane.

### 4.2 Assessment

Accordingly, we have assessed the draft allocation against the key issues below.

Key Issues	Assessment	Net Impacts
Adopted UDP - Existing Site Allocation	The site allocation is allocated for B1/B2/B8 development in the adopted St Helen's UDP (1998). Therefore, the principle of developing the site for employment uses is well-established in planning policy terms. The new Local Plan should simply carry this forward, inclusive of Class B1 (see chapter 5).	Neutral
Submission Draft – Strategic Policy Context	<p>The site allocation is aligned in principle with the strategic planning policies in the Submission Draft. More specifically:</p> <ul style="list-style-type: none"> <li>Policy LPA02: Spatial Strategy – site allocation promotes the sustainable regeneration and growth of St Helen's Borough to 2035 in good proximity to Rainford (identified as the largest village in the borough and train station links to Liverpool and Wigan).</li> <li>Policy LPA04: A Strong and Sustainable Economy – site allocation promotes new development to help meet the Liverpool City Region's needs for economic growth, job creation and skills development; maximise the economic opportunities in proximity to strategic road and rail routes; ensure the necessary infrastructure is provided to support business needs; and facilitate to create/expand small businesses.</li> <li>Policy LPA05: Strategic Aims, Objectives and Key Delivery Mechanisms – the site allocation will strengthen the local business base, and to increase aspiration, skills and employment in the borough. Policy LPA04 explicitly supports the B1 (business), B2 (general industrial) and B8 (storage and distribution) use classes during the Plan period. The NPPF requires the Council to plan for and accommodate all</li> </ul>	Positive

	<p>foreseeable types of economic growth – inclusive of Class B1 uses. Policy LPA04 therefore identifies a range of locations, types and sizes of employment sites to meet the needs of specific sectors of the business community and to protect existing areas where employment continues to be the most appropriate use. This includes site allocation 9EA.</p> <p>To bring this more closely aligned with these strategic policies, the site allocation should be inclusive of Class B1 uses and access from both Sandwash Close/Pasture Lane to improve viability and enhance traffic conditions (see chapter 5).</p>	
Planning History	<p>The site's planning history (i.e. extant planning permission in 1992 and lapsed permission in 2012) supports the site allocation for employment development in principle.</p> <p>For greater consistency the allocation should be inclusive of Class B1 uses and access from both Sandwash Close/Pasture Lane (see chapter 5).</p>	Neutral
Economic Impact & Viability	<p>The site allocation for employment uses is supported in principle due to a range of key factors:</p> <ul style="list-style-type: none"> <li>• Co-location adjacent to the Rainford Industrial Estate. This includes a mix of B1/B2/B8 uses.</li> <li>• Supports large/medium/small business requirements (including existing local occupiers seeking to expand), including B1/B2/B8 uses.</li> <li>• Will accommodate a wide range of occupier-type requirements, especially if Class B1 uses are allowed.</li> <li>• Meets local needs to the north of the borough where there is otherwise little planned growth.</li> <li>• Keppie Massie reports that average industrial land values and headline rents have shown a steady increase over the past 4 years, with strong take-up of 'big shed' manufacturing, third party logistics and non-internet retail sectors. Yields for industrial accommodation have also improved in recent years (linked to improving local market conditions). This site is clearly well located and configured to accommodate demand for employment development over the plan period, especially if access to Pasture Lane is allowed.</li> <li>• According to industrial land agents, Jones Lang LaSalle and Sanderson Weatherall, this is an excellent location for new industrial floorspace given the easy access to the A570 and A580 link roads to the M6. However, both accept the site's deliverability will benefit from access via Pasture Lane. In January 2017 Sanderson Weatherall specifically commented "If the proposed access road from the A570 is implemented then this would significantly increase the level of demand to the site,</li> </ul>	Positive

	<p>enabling better quality occupiers..." They also cited examples of occupier-types who will be interested in the site as including: national and regional logistics/distribution companies (B8); local and regional B1/B2 occupiers; and major national manufacturers.</p> <ul style="list-style-type: none"> <li>The site will significantly improve the supply of employment land in this area to meet demand. The existing industrial offer in Rainford is generally poor with some buildings over 100 years old. There has been some recent development aimed at SME type businesses of c.3,000-5,000 sq. ft. but this is the most significant new build that Rainford has seen for 15 to 20 years. This site will considerably enhance the potential level, choice and quality of industrial accommodation on offer within the Rainford Industrial Estate, especially if Class B1 uses and access to Pasture Lane are also permitted.</li> </ul> <p>For greater relevance and effectiveness, the site allocation should be inclusive of Class B1 uses and access from both Sandwash Close/Pasture Lane (see chapter 5).</p>	
Social Impact	<p>The site allocation (and especially if inclusive of Class B1 uses and access to Pasture Lane) will provide:</p> <ul style="list-style-type: none"> <li>Range of jobs, tackle unemployment, leading to improvements in wellbeing.</li> <li>Good access from housing in Rainford and the wider area to support existing communities, including future new housing proposed on the edge of Rainford.</li> </ul>	Positive
Air / Water Quality	<p>No harm due to the following factors:</p> <ul style="list-style-type: none"> <li>Scale and type of uses will not be significantly pollutant.</li> <li>Employment types of development being targeted are unlikely to produce large amounts of waste water.</li> </ul>	Neutral
Traffic	<p>Likely volume of HGV movements will be acceptable given this is an existing industrial area with existing infrastructure. Conditions will be improved if access is permitted via Pasture Lane. The Pasture Lane access would alleviate traffic on Mill Lane and this would be a considerable planning benefit for residents and the industrial occupiers in the Rainford Industrial Estate.</p>	Neutral/Positive
Landscape	<p>The site is open but not especially sensitive in landscape terms. It is not subject to a designated landscape area. The landscape is surrounded on two sides by well-established industrial development. On remaining boundaries, it is contained by woodland. Therefore, employment development (warehousing, offices, etc.) will blend with the semi-industrial landscape and will be visually screened / well contained by buildings and trees. There will be no sense of erosion/encroachment in the open countryside.</p>	Neutral

Green Belt	The developable area of the site is outside the Green Belt. If access is permitted to Pasture Lane, this will necessitate works within the Green Belt. However, traffic infrastructure and engineering works are compatible with Green Belt policy in the NPPF (i.e. no adverse impact on openness and purposes).	Neutral
Built Design	The new B1/B2/B8 type buildings will be in-keeping with the industrial buildings on two sides.	Neutral
Heritage	There are no listed buildings or conservation areas affected by the development of this site.	Neutral
Recreation	The site is not currently used for recreation and therefore development for employment uses will not have an adverse impact on local recreation provision.	Neutral
Biodiversity	The main developable area of the site contains no protected species or important habitats.	Neutral
Trees	The main developable area of the site will not affect any existing trees. Any new development can plan new trees to improve the landscape and biodiversity value.	Positive
Consultation Responses	<p>Frost Planning made representations to support the allocation (then site reference EA10) for B1/B2/B8 development with access via Sandwash Close and Pasture Lane. This was supported by transport, marketing and ecological evidence.</p> <p>Barton Willmore (on behalf of Miller Homes) supported the allocation for employment development.</p> <p>The only other representation was made by the Wildlife Trust for Lancashire, Manchester &amp; North Merseyside. They raised no objections in principle. They only made comments that the Local Wildlife Site (LWS) ('Rainford Brook') runs to the south of the site boundary and requested new development on the site does have no adverse impact on the LWS. Clearly, the main developable area of the site will not directly affect the LWS and any mitigation/enhancement measures can be secured by planning condition(s) if necessary.</p>	Positive

In summary, the assessment above fully demonstrates the site should be allocated for employment uses in principle. Furthermore, it strongly indicates the need for the site allocation to be all inclusive of Class B1 uses and access to both Sandwash Close/Pasture Lane. This is explained in more detail in chapter 5.

PO0999



ST HELENS BOROUGH LOCAL PLAN 2020-2035

Margaret Edwards

to:

planningpolicy@sthelens.gov.uk

12/03/2019 14:37



1 Attachment



8HS 12.3.2019.docx

Please find attached my comments regarding the above.

Please provide confirmation that my comments have been received.

Mrs Margaret Edwards

E10007

8HS

① GEN

② LPA06

③ LPA04

1

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Mrs Margaret Edwards

22 Lynton Way

Windle

St. Helens WA10 6DZ

12<sup>th</sup> March 2019

I would request to be informed on future stages of the Local Plan process by email. ✓

I am writing to object to, and comment on, the Preferred Options of the New St. Helens Local Plan with particular reference to policy on Green Belt. Any comments I make are as a concerned resident [REDACTED] on the edge of the land to the south of the East Lancs Road and bordered by Houghtons Lane and Crantock Grove (8HS). ✓

I consider that the Local Plan is neither justified, effective or consistent with National policy. ✓

I believe that the Local Plan is neither legally compliant or sound and does not comply with the duty to cooperate. ✓

I consider that the Local Plan is unsound as it is not justified, being based on flawed methodology. It is not effective as it is not deliverable, and is not consistent with National Policy as it does not comply with NPPF 2018. ✓

This version of the Local Plan does not satisfy:

- Effective land use by concentrating on Green Space development over town centre development with higher densities
  - Food security by ignoring Agricultural Land Quality
  - The criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs
  - The requirement for Sustainable development
  - Sustainable housing, as targets proposed are based on aspirational employment growth predictions
- ①

#### **GREEN BELT**

**The area previously referred to as HA16 needs to be kept as Green Belt status and not kept as Safeguarded Land which is not protected from development.** ✓

I believe in the protection of open spaces for the benefit of future generations and in the reasons they were set up initially, and value the unique character of our local area. ✓

Where development is shown to be necessary, first consideration should always be given to regenerating suitable brownfield sites, but while these exist all over St. Helens, along with many unattractive commercial and industrial sites, how do the Council know there are not enough to meet housing needs. Does a comprehensive brownfield register exist in order to add weight to this statement? Unless and until such a survey is carried out, and available to be seen, I question the need to begin phase 1 development on Green Belt land as early as next year.

②

Brownfield

I have no objections in principal to developing a plan for St. Helens, especially with the decline in population of over 12,000 since 1981 and no increase in the population between 2001 and 2011. The town, especially the centre, which is in a disgraceful state, needs to be developed, but, while I applaud the Council's aspirations for development, I cannot support them if the price is at the cost of using Green Belt land before brownfield sites. Indeed, I question the assumption of the need to release the stated quantity of Green Belt land at this present time, given the uncertain political climate of beginning the process of leaving the EU. with little knowledge of any future requirements to grow as much food as required for ourselves and for export, and uncertainty regarding the current government's commitment to the implications of the 'Northern Powerhouse'.

②

population  
town  
centre  
arexit  
Northern  
Powerhouse

In any model for population movement there are strong Push and Pull factors, so to significantly increase the population of our town, there needs to be a good reason for people to move here.

2

While factors including good housing, a pleasant environment to live, work and play in, a large range of facilities etc., the driver in a pull factor generally has to be strong long term, well paid employment. This is most likely to be driven by the creation of manufacturing companies. I have seen nothing in planning to suggest of infrastructure, or development of such employment opportunities, and can see nothing in the plan which is going to have significant and accelerated impact on population growth to warrant new housing on the scale suggested.

③

employment

From figures I have accessed, there are 118 brownfield sites in St. Helens, 60 of which could be developed, with the remainder stated as being too contaminated to be feasible. Referring to the Strategic Housing Availability Assessment 2016, these 60 sites would support the building of 2,270 new homes. In addition, there are a further 1,558 houses which have been vacant for more than six months and St. Helens Empty Homes Strategy 2013-15 show 2,950 homes of all vacant stock. These properties would satisfy any demand for housing in the short term, giving time to gain a more accurate indication of future long term demand. Accordingly I can see no need for additional housing on the scale indicated and certainly not any need to reclaim Green Belt land.

②

additional  
sources

Where land is/has been made available for housing in our area e.g. the Triplex site and the site off City Road, these are by no means complete. In addition, the site on Bleak Hill Road has been derelict for at least 30 years and only fenced off for a couple of years with no sign of being built on – such is the immense need for housing!

On this issue, having contacted my local MP Connor McGinn on this issue, his reply stated 'Like many people in the borough, I want to encourage jobs and investment into our area and to ensure we make St. Helens an attractive place to live, work and visit.' I totally agree, but

PO1000

EL0098



Removal of green belt site IEA  
Keith Gleave  
to:  
planningpolicy  
12/03/2019 14:40

IEA

① - LPA 4

② - LPA 4.1

1 Attachment



St Helens green belt objection.docx

Please find my objection to the removal of this area from the St Helens green belt.  
Please reply to show it has been delivered.

Thanks

Keith

increasing volumes of traffic resulting in gridlock at certain times of the day. This extra traffic will only exacerbate the problems.

The Omega development is suffering from a number of issues relating to HGV's including parking in inappropriate areas, which includes outside the local junior school. Inappropriate actions from HGV drivers as to their toilet habits in both forms, only recently has a discarded pizza box from one HGV been found to contain faeces, in close proximity to the school. In extending Omega with more big sheds all these issues will be multiplied.

①  
②  
Highways  
Pavement

If this were to be taken out of the green belt, then the extra 70 hectares would no longer be a green lung but would add to the pollution in the area. The highest amount of pollutant would be that of heavy diesel particulates because of the amount of HGV's serving these sheds. Airborne pollution does not appear to be taken seriously by Warrington borough council and it seems a paradox to me that the executive board holder for planning also has environmental protection in the role.

Pollution

The land currently forms part of the Bold estate and forest. It would mean the removal of many, and looking at the rest of the Omega development, all the mature trees and remaining flora and fauna. Animals have been completely removed from the existing development with an argument they have the land over the St Helens boundary, they will have no further to go and their habitat destroyed, not to mention the ancient oaks that exist.

Trees  
&  
biodiversity

As mentioned earlier this does not comply with the national planning policy framework in its determination of the green belt. It is there to stop urban sprawl, to prevent one town merging into its neighbours so giving definition to the overall area. To safeguard the countryside from encroachment and encourage the use of derelict and brownfield urban sites.

GB -  
urban  
sprawl

It would appear that the developer along with Warrington borough council is of the belief that this removal of green belt and development of this site is guaranteed due to their future proposals and naming of the area. This shows little thought for local residents and their wellbeing. There is no further green space in the area and taking this land out of green belt is only removing more and making the built environment all encompassing. People have a right to green space and the ability to breathe clean air, which also has an impact on two schools (junior and high school) and also a sixth form college. There have recently been strong suggestions that all engine idling should be banned

air  
pollution

outside schools, the types of emissions emanating from the vehicles detailed here are of the worst kind and would therefore only contribute to illness and early mortality rates among our children.

In conclusion

I contend that this proposal to remove this parcel of land from the green belt should be refused on the grounds below

1. Its lack of compliance with the national planning policy framework
  - To check the sprawl of large urban areas
  - To prevent the merging of towns into one another, therefore non-descript areas
  - Safeguarding the countryside from encroachment and protecting farmland
  - The encouragement to use both derelict and brownfield sites
2. The increase in pollution, particularly heavy diesel particulates
3. The illness levels and early mortality that would ensue from the types of particulate pollution
4. There would no longer be a defined boundary between Warrington and St Helens
5. No sustainable reasons have been put forward for this change
6. The proposal is purely a financial one on behalf of Warrington borough council with little gain to St Helens
7. The loss of habitat and its flora and fauna which once gone is lost forever

① +  
②

I would like to be kept informed by letter and e mail of any meetings or formal hearings. If this passes to the planning inspectorate or other official body, I wish to be informed as I would wish to make representations. I state these wishes as I am not a resident of St Helens so do not see items posted in the local St Helens press etc.

Yours Sincerely

Keith Gleave