



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

PLAN ORDER

PO1201 – PO1400

SEPTEMBER 2020

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PO1201



St Helens
Council

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

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Wesley

Last Name: Smellshaw

Organisation/company: _____

Address: 214 Liverpool rd

Pewfall Haydock

St Helens

Postcode: WA11 9 SB

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 13-03-19

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

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

☐ Yes (via email)

☒ No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy	LP104 sites sea + bea.	Paragraph/ diagram table Liverpool Road		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

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

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

To build more warehouses on this site is just NOT common sense. What will be gained?? A few low paid jobs and total destruction of the area and even more congestion on our already overloaded Roads.

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

This land should be withdrawn from the local plan, and left as green belt land.

This is common sense.

Do not be swayed by big Bucks from elsewhere. (not from this area)

Please continue on a separate sheet if necessary

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

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

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

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

--

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

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

Please keep a copy for future reference.

PO1202

840

13 MAR 2019

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 - 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: JOAN MARY

Last Name: SMITH

Organisation/company: _____

Address: 214 LIVERPOOL RD
NEWFALL ROAD ST. HELENS

Postcode: WA11 9SB

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 13th March 2019

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

Would you like to be kept updated of future stages of the St Helens Borough 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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**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA04 FOR THE SITES 2EA, 5EA and 6EA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

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

Please tick as appropriate

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

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

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

There are no special circumstances important enough to justify totally ruining this area [REDACTED] [REDACTED] [REDACTED] Building more warehouses will just increase the decline of the retail trade particularly St Helens town Centre which is a total embarrassment with so many boarded up premises - due to people shopping online.

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

I think that this land - i.e. sites 5EA and 6EA should be removed from the draft-proposal and left for the farmer to grow his crops on.

Please continue on a separate sheet if necessary

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

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

✓

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

Yes, I wish to participate at the oral examination

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

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PO1203



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

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>ZONATHAN</u>	First name: _____
Last Name: <u>SMITHSNAW</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>214 LIVERPOOL ROAD</u>	Address: _____
<u>POWFAU</u>	_____
<u>NATODON ST. HELENS</u>	_____
Postcode: <u>WA 11 9SB</u>	Postcode: _____
[Redacted]	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: [Redacted]	Date: <u>12/03/19</u>
-----------------------	-----------------------

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

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

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

PART B - YOUR REPRESENTATION

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

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

Policy LPA04 SITES 5EA x 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)			WAREHOUSES ON LIVERPOOL ROAD.					

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

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

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

Please tick as appropriate

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

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

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

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

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

**WATER MAIN APELINE (4FT DIAMETER - HIGH PRESSURE)
JUST 6FT BELOW THE SOIL PASSES THROUGH TILLS
FIELD.
WAREHOUSE ARE SIMPLY NOT REQUIRED. MORE
WOULD SIMPLY BE SATURATING THE AREA.
MUST HAVE A BALANCE OF BUILDINGS + OPEN SPACE**

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

REMOVE THIS AREA / AREAS FROM THE PROPOSAL
AND LEAVE THESE FIELDS AS GREEN FIELDS.
THE 2 WAREHOUSES CURRENTLY UNDER CONSTRUCTION
GIVE AN INDICATION AS TO THE IMPACT ON THIS
PLEASANT AREA AND ONE HAS NO END USER
LINED UP. QUITE RIDICULOUS.

Please continue on a separate sheet if necessary

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

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

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

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

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

I HAVE LIVED IN THIS AREA [REDACTED]
[REDACTED] THIS IS A
WONDERFUL AREA. THE PROPOSALS YOU ARE PUTTING
FORWARD WILL TOTALLY RUIN THIS AREA ON SO
MANY LEVELS - POLLUTION - AIR, LIGHT & SOUND INCREASE
IN TRAFFIC, VISUAL, FOR NO BENEFIT

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.

PO1204

① - LPA05

② - LPA04

859

PF0792

18 MAR 2019



St. Helens
Council

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

Ref: LPSD

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details

(we will correspond via your agent)

Title: MR.

First Name: ALAN

Last Name: MAKIN.

Organisation/company: _____

Address: THE BUNGALOW, 33 NEWBOLD ROAD
BOLD ST HELENS

Postcode: WA9 4SY

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 13/3/2019

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

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

☒ Yes (via email)

☐ No

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

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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	LP A02	Paragraph/ diagram table	4.5 ↓ 4.6	Policies Map	4.1	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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

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

Please keep a copy for future reference.

PO1205



St. Helens
Council

①-LPA04

③-LPA02

⑤-LPC05

②-LPC12

④-LPA07

⑥-LPA03

Ref: LPSD

(For official use only)

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

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Please ensure the form is returned to us **by no later than 5pm on 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.

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.

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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PO1206

PF1350

BOLD & CLOCK FACE VILLAGE ACTION GROUP PART B REPRESENTATION

① - LPA01

② - LPA02

③ - Gen. Selt Review

④ - LPA04

⑤ - LPA05

⑥ - LPA05.1

⑦ - IDP

⑧ - LPA07

⑨ - LPA09

⑩ - LPC05

⑪ - LPC06

⑫ - LPC07

⑬ - LPC08

⑭ - LPC09

This Representation is submitted on behalf of Bold and Clock Face Village Action Group in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.

The representation is supported by **427 signed Part A forms** in support and agreement of the representation made.

The representation 14 Part B forms as listed in the table of contents below.

1. Legally Compliant.....	3 Pages
2. Policy LPA01: Sustainable Development.....	3 Pages
3. Policy LPA02: Spatial Strategy.....	12 Pages
4. Policy LPA04: A Strong and Sustainable Economy.....	4 Pages
5. Policy LPA05: Meeting Housing Needs.....	3 Pages
6. Policy LPA05.1: Strategic Housing Sites.....	3 Pages
7. Policy LPA07: Transport and Travel.....	7 Pages
8. Policy LPA08 Infrastructure Delivery Funding.....	3 Pages
9. Policy LPA09: Green Infrastructure.....	6 Pages
10. Policy LPC05: Open Space.....	3 Pages
11. Policy LPC06: Biodiversity and Geological Conservation.....	6 Pages
12. Policy LPC07: Greenways.....	3 Pages
13. Policy LPC08: Ecological Network.....	4 Pages
14. Policy PLC09: Landscape Protection and Enhancement.....	2 Pages
15. Appendix	
a. Local Development Scheme 2018-2021	
b. Bold Forest Park Area Action Plan, Adopted 2017	
c. Bold Forest Park Area Action Plan Supporting Technical Document	
d. Bold Forest Park Ecological Network Development	
e. Burtonwood Development	
f. Partial Phase 1 Habitat Survey and 3 Bat Transects	
g. Assessment of the Local Plan and Green Belt Review	

The Group trust this document will be submitted, in its entirety as part of the public consultation.

Bold and Clock Face Village Action Group.

12 MAY 2019



St.Helens
Council

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

Ref: LPSD

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SARAH	First name:
Last Name: HUGHES	Last Name:
Organisation/company: Bold & Clock Face Village Action Group	Organisation/company:
Address: 3 Frenchfields Cr St Helens	Address:
Postcode: WA9 4FZ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:		Date:	13.05.19
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Yes ☒ (Via Email)

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <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 not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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

Please see attached representation made on behalf of Bold and Clock Face Village Action Group with regards to Policy LPA04: A Strong and Sustainable Economy.

Please continue on a separate sheet if necessary

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

Please see attached representation made on behalf of Bold and Clock Face Village Action Group.

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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:

The community of Bold feel like they have been excluded from the St Helens Local Plan process and have not had a voice. The community need an opportunity to have their voice heard and concerns raised.

The area of Bold has a unique offering within the Borough of the Bold Forest Park and the associated Action Plan, which has been largely ignored.

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

This representation is submitted on behalf of Bold and Clock Face Village Action Group in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey lane/Crawford Street, Bold (Bold Forest Garden Suburb) and 5HA Gartons Lane.

Bold and Clock Face Village Action Group have formed in response to what it perceives as the exclusion of the community from the Local Plan process. The Bold & Clock Face Village Action Group (the Group) recognise the efforts of St Helens Local Council in the desire to develop a workable Local Plan for the area. It is hoped that a Local Plan is adopted to ensure Green Belt land is protected and development is steered towards the most suitable areas. However, the Group consider the proposed plans in some areas are not legally compliant and fail to meet the test of soundness, as set out in Paragraph 35 of the National Planning Policy Framework (Feb 2019), for the reasons which have been set out below and therefore requires modification specifically in relation to proposed development within the Bold Forest Park boundary. The Group have aimed to address each of the Policy concerns in turn and have submitted a representation for each.

I trust this document will be submitted, in its entirety as part of the public consultation.

Policy LPA04: A Strong and Sustainable Economy

The Group believes the Local Plan fails to meet legal compliance and fails in the test of soundness in relation to Policy LPA04 and sites 4HA and 5HA within the Bold Forest Park and is not consistent with national policy, paragraph 82 and 83 of the NPPF. The Bold Forest Park Area Action Plan, as adopted by St Helens Council July 2017, and listed in the Local Development Scheme 2018-2021¹ as an adopted development plan document should play a key role in guiding decisions.

The Group believes The Local Plan fails to consider the aims and objectives of The Bold Forest Park Area Action Plan, **Policy BFP ECON1: Supporting Economic Growth** in conjunction with Policy LPA04, NPPF Paragraph 82 and 83 in relation to the allocation of sites 4HA and 5HA, situated within the boundary of Bold Forest Park.

The vision for the Forest Park, as set out in the Area Action Plan, is for it to be, *'at the heart of a thriving and diverse economy..... The natural environment and cultural environment will be rich and diverse. A network of open spaces and routes accessible to all connects the Forest Park to the wider countryside.'*²

The Bold Forest Park Area Action Plan Policy BFP ECON1: Supporting Economic Growth states, 'Any proposal which would reduce the range and quality of businesses or tourism attractions and facilities will be resisted unless it can be demonstrated that there will be no

¹ St Helens Council Local Development Scheme 2018-2021, Section 2.1

² Bold Forest Area Action Plan, Adopted 2017, Page 23, 7.1

adverse impacts upon the local economy, the environment or on the quality of visitors' experience.'

This is in line with the **NPPF Paragraph 83** which states: '*Planning policies and decisions should enable:*

- a) the sustainable growth and expansion of all types of business in rural areas.*
- b) the development and diversification of agricultural and other land-based rural businesses.*
- c) sustainable rural tourism and leisure developments which respect the character of the countryside'.*

The **LPSD Policy LPA04 Section 9**, in principal supports this and states that it, '*will prevent the unjustified loss of existing tourism, cultural and visitor resources and assets.*'³

The objectives of the Forest Park have been set out as follows:

1. Create new economic opportunities through sustainable development within Bold Forest Park.
2. Create opportunities for tourism and leisure related businesses, supported by the natural economy.
3. Create an easily understood and accessible network of linked open spaces within Bold Forest park and the surrounding areas.
4. Promote the provision and positive use of green space for the benefit of the local community and visitors; and
5. Enhance the natural environment through targeted delivery of green infrastructure programmes that improve and expand the biodiversity and landscape quality of the Bold Forest Park area.

Supplemented with:

6. Create quality outdoor space with opportunities for physical activities and positive use of green space to improve mental health and wellbeing of the local community and visitors.

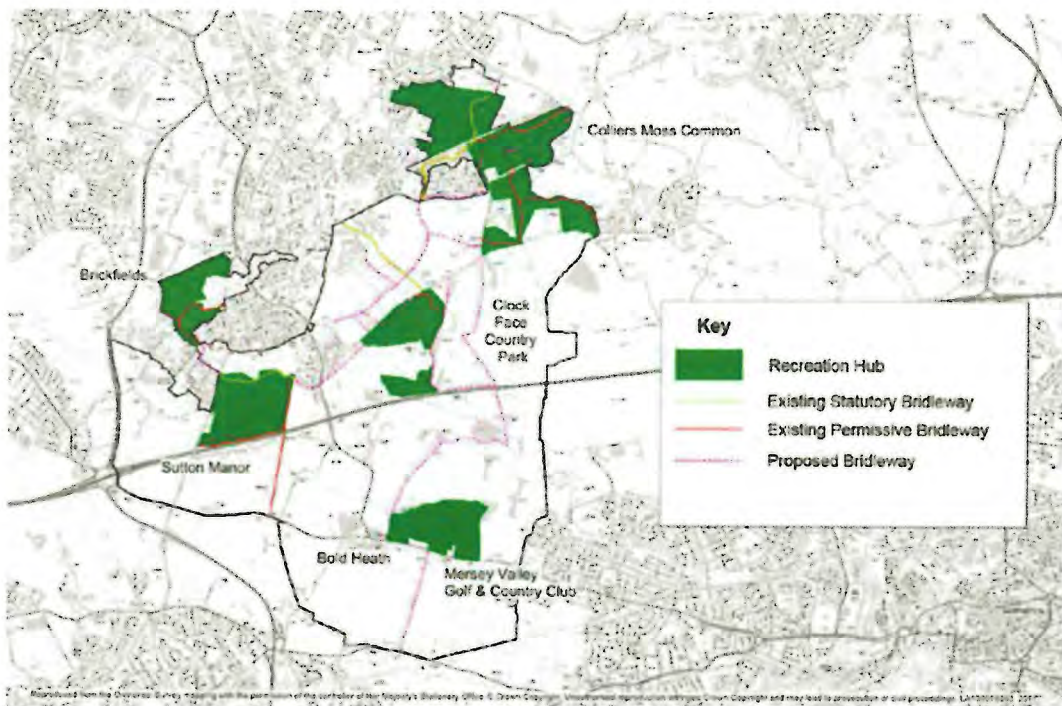
The vision, aims, objectives and Policies for the Forest Park demonstrate that the rural economy, that the Park promotes, principally the visitor economy and the natural environment and open spaces in which it resides are intrinsically linked. One example of this is the development of the equestrian sector within the Bold Forest Park. Evidence gathered to support the Bold Forest Park Area Action Plan, '*strongly suggests that the initial focus for the Forest Park Economy should be to develop facilities and infrastructure which.... Develop the local equestrian businesses.*'⁴ The equestrian business within the Forest Park falls within both category b. of the **NPPF Paragraph 83**, as a land based rural business and category c. as a rural

³ St. Helens Borough Local Plan 2020-2035 Submission Draft January 2019, Page 30

⁴ Bold Forest Area Action Plan, Adopted 2017, Page 13

tourism and leisure development that respects the character of the countryside. The sector relies heavily on the natural environment and open spaces both as a natural resource for stabling, horse pasture and hay cropping but also as an environment for the physical leisure pursuit of off road riding, potential eventing and the riding school. The open space where these activities take place is sufficiently separated from other areas so as not to compromise the safety of visitors through the clash of other planned activity routes such as mountain biking. In this instance Paragraph 82 of the NPPF should apply due to the specific locational requirements of the different sectors. The British Horse Society in 2014 estimated the annual expenditure at £33 million⁵ and suggested businesses in St Helens and the Bold Forest Park in particular, were best placed to benefit from the development of a three day “Mersey Circular” event. The proposed development site 4HA, entirely covers the open space that supports and will allow this key sector to further expand and develop. To allow this site to be removed from Green Belt protection and be allocated for housing development will directly result in the closure of at least one large business within this sector and have a significant effect on the viability of a second. The visitor numbers that this sector attracts will be impeded not only by the closure of these businesses but the loss of the open space allowing for the safe pursuit of this activity. The reduction in visitor numbers will have a detrimental secondary impact on many supporting businesses within the area including a local independent public house and restaurant.

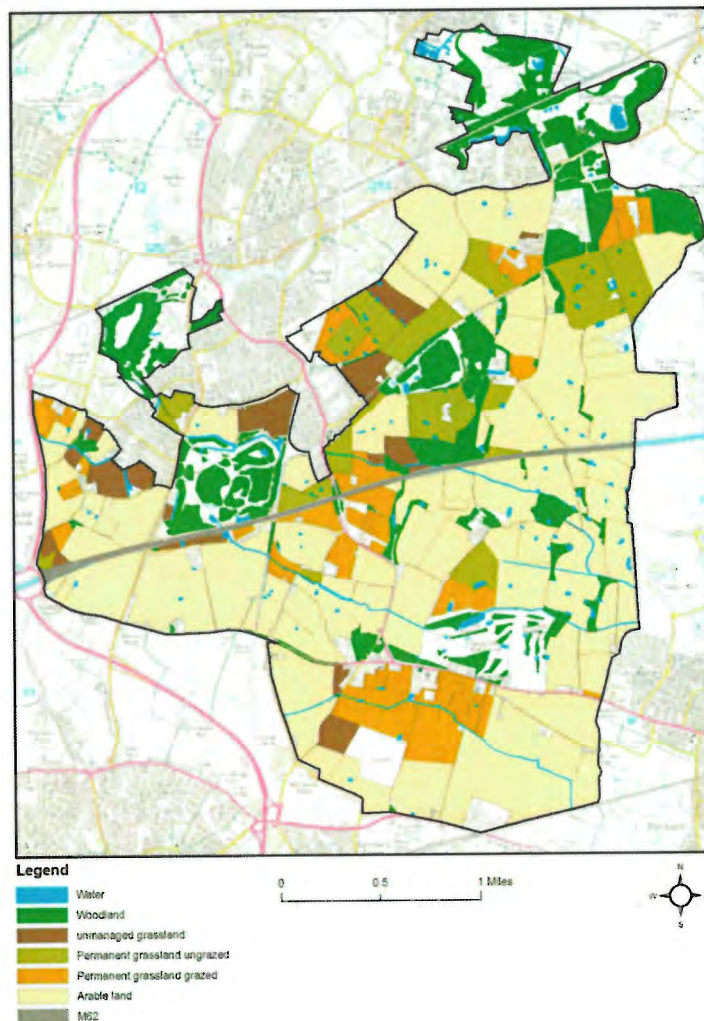
Figure 1. Existing and Proposed Bridleway Network⁶



⁵ The Equine Economy of the Mersey City Region, Hackett K., British Horse Society, 2014

⁶ Bold Forest Park Area Action Plan, Adopted 2017, Page 42

Figure 2. Overview of the land use in the Bold Forest Park, showing pasture land at 4HA ⁷



*'The environmental quality of the area is of fundamental importance to the success of the Forest Park.'*⁸ One of the key benefits of the Forest Park in attracting visitors to the area is its character of openness and abundance of wildlife. Visitors feel like they are visiting the countryside, removed from urbanisation. The completed development in itself, will have a significant impact on the character of large areas of The Park, leading to a more built up environment and a reduced feeling of ambience and a flourishing wildlife environment. In addition to this the development of 4HA is expected to take decades to complete, starting in 2020 and continuing beyond the life of the plan in 2035. The subsequent disruption to and congestion on the local road network, increased levels of noise, dust and people associated with a building site is likely to have a further detrimental effect on attracting visitors to The Park stretching for many years. This will threaten the success of BFPAAP and jeopardise the delivery of the action plan.

⁷ Bold Forest Park Area Action Plan, Adopted 2017, Page 42

⁸ Bold Forest Park Ecological Network Development, Page 24

PO1207



Local Plan
St Helens Council
Town Hall
Victoria Square St
St Helens
WA101HP

08 MAR 2019

05/03/2019

We write to object to your draft local plan.

We have grave concerns over the amount of greenbelt land you are proposing to use for industrial use at both Haydock and Parkside East Newton le willows.

All the land in question is excellent farming land and has produced crops for many years.

It is noticeable that you are placing all this industry on your borders, it will have little effect on the bulk of your area but cripple Newton le Willows, Golborne, Ashton, and Lowton.

I wish to represent our organisation at the oral part of the examination to discuss this with the government inspector.

Ed Thwaite


Chairman

PO1208

13, Park Road North,
Newton-le-Willows.
Merseyside
WA12 9TF.

30 APR 2019

The Officer in Charge,
Local Plan,
St Helens MBC
WA10 1HP.

888

Dear Sir/Madam,

St. Helens Borough Local Plan

I wish to object to
the proposed removal of the Partridge East
area from the green belt. This is largely
good quality, highly productive arable land.
As the population grows there is an
increasing need for Britain to produce
its own food, particularly if we leave
the European Union. It would therefore

be folly to concrete over this land
and put it to something other than
agricultural use.

Yours faithfully,

David H. Pitt.

PO1209

933

44 The Parchments
Newton-le-Willows
WA12 0DY

10 MAY 2019

May 2019

Dear Sirs

Re: Objections to Revised Local Plan, Revised Parkside Link Road (PLR) Planning Application and Parkside Phase 1 Planning Application

Please find enclosed our comments on the above, which has been the subject of public consultation.

Our comments remain pretty much as those submitted to you on the draft local plan in January 2017 and therefore we reattach our comments plus those which relate to the Parkside planning application. Would you please regard these objectives to also relate to the Revised Parkside Link Road Planning Application.

Although some housing land has been deleted and other housing and industrial sites have been put into the medium term, the council still seems to be removing land from the green belt, not concentrating sufficiently on a brownfield first strategy and has in no way adequately take into account the cumulative effects of all these developments on the borough, its residents, their wellbeing and the environment.

By way of example, since 2017 the traffic congestion and increase in lorries along the A49 has been most noticeable; local roads are already very congested. There must be increased pollution and detriment to our rightful expectation of enjoying a safe and sustainable living environment. The identification of greenfield and other sites in the medium term has opened the door for landowners and developers to push and continue to press for development on productive agricultural and green belt land.

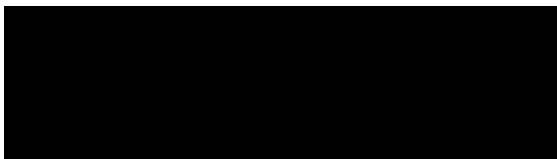
Junction 23 of the M6 where the A580 and A49 feed in to and out from the motorway and into the local road network, has been identified nationally as one of the locations where traffic problems have become worse since so called improvements have taken place in recent years. The prospects of not only more and more lorries pouring onto the A580 from Florida Farm and land at Haydock adjacent to the M6, is going to make Haydock Island at J23 even more congested. Lorries will seek to find alternative routes on local roads including the A49 through Newton. This, combined with Parkside proposals for warehousing and increased residential development, will make the situation unsustainable.

The plan is predicated on increased rates to the council's coffers rather than the wellbeing of the residents of St Helens.

If the world push is to reduce the environmental impact of new development, St Helens seems to be going in the opposite direction. The local paper cites the council as saying there are 3 new major logistics developments proposed for the borough, these will bring low level jobs, high levels of traffic generation adding to local congestion and increased pollution.

Warehouses are not positive icons for the borough or the way to achieve a sustainable St Helens. This local plan is a bad plan

Yours Faithfully



Mr & Mrs Richard Tully
2 encs

44 The Parchments
Newton-le-Willows
WA12 0DY

5th February 2019

Dear Sirs

Re: Parkside Planning Application P/2018/0048/OUP

We write as residents of Newton-le-Willows to object to the current planning application for warehousing and distribution at Parkside.

The application flies in the face of the original rationale put forward for development of the site as the location for a strategic rail freight facility designed to take lorry traffic off the roads locally and nationally.

The current application for warehousing is of a scale and scope that will create significant and harmful large vehicular movements into and out of the site, adversely affecting the local roads, environment, air quality and safety of residents of Newton-le-Willows. It will also throw large amounts of traffic onto the M6 motorway at junction 22 and up to junction 23 where major congestion already exists and many accidents occur. It impacts on traffic generation on local roads including and especially the A49 through Newton-le-Willows and surrounding lanes.

One only has to look at the scale and dominance of the recent warehousing developments permitted by St Helens council at Florida Farm and just north of junction 23 of the M6, to see how inappropriate the current proposals are at Parkside.

Florida Farm development (currently advertising over 500,000 sq ft of space available from June) and the junction 23 scheme demonstrate what an overwhelming impact such a development will have on local roads environment air quality and safety of borough residents, let alone the scale of additional traffic that they will generate to further clog up the A580, Haydock island, M6 and local roads, when seeking the easiest and quickest way out of the area. There is also extensive warehousing and further development at the nearby Omega site just south of Parkside; is it a coincidence that St Helens council have raised no objections to further development at North Omega when seeking to facilitate developments at Parkside?

The current planning application at Parkside, and the others mentioned above, seem to be being considered in isolation to each other, unfortunately without any consideration as to the cumulative effect they will all have on traffic congestion, environmental degradation, air quality and safety.

There is also the question of St Helens involvement with the Parkside site, financially and as a partner to prospective development. The council cannot be impartial as the local planning authority in considering the application whilst it is a linked partner.

The council is also promoting a link road to and from the site, including access from the A49 across to Winwick Lane and on to junction 22 of the M6. The council must be aware of the weight restriction on Winwick Lane of 7.5 tonnes for vehicles, so where will the traffic go? When it needs to it will go onto the A49 through Newton, Southworth Road and surrounding Winwick roads.

The link road promoted by the council is a Trojan horse for unwanted and unwarranted warehousing, rather than the strategic objective of creating a rail freight depot designed to minimise or eradicate most of the adverse impact and effects that the current application under consideration delivers in spades.

Finally, where are the aspirational jobs and careers to which our young people can aspire? Where will their futures lead? Certainly nowhere in St Helens if this fixation with warehousing as the way to improve our borough carries on. Technology is outstripping jobs, even warehouse ones, computer tagged items, along with computer operated fork lift trucks is already here and a large company in Wigan requires only 2 people per shift to run it. Our bright young residents will leave the borough to find satisfying and well paid work elsewhere and those who are unable to do this will be left in a town with little prospect of a good life with good pay and good chances of promotion, not to mention our ignored 'sickest town' label. We moved 30 years ago to a town that was going to build itself into a place where people wanted to come, live and work but somewhere along the way someone lost the plot and now we have the prospect of a borough full of tin sheds and pollution.

Warehousing is hardly a cultural icon for the future.

Please register our 2 further objections to this current planning application.

Yours faithfully

Richard and Christine Tully

44 The Parchments
Newton-le-Willows
WA12 0DY

05/03/2018

Dear Mr Kilroe

Re: Planning Application - P/2018/0048/OUP Parkside Planning Application

We make our objections as residents of Newton-le-Willows, living just off the A49.

The planning application as submitted is for another warehouse development, it cannot be judged in isolation to other developments such as warehousing at Florida Farm North, now under construction, plans mooted by Peels Holdings at Haydock Island, existing warehousing and other industrial developments in the local area, producing evermore traffic, pollution and congestion in the locality. Proposed housing developments will add to levels of congestion to be endured by local residents and the totality of all such proposals as set out in the local plan do not seem to have been considered in full.

The current proposal for warehousing at Parkside is not the strategic rail freight scheme that has been subject to scrutiny in the past and which was the justification for the Parkside site to be taken out of the greenbelt. It is for a further 92900 m2 of traffic generating development covering the greenbelt.

The A49 is already congested and often comes to a standstill. Existing traffic levels require air pollution monitoring on the High Street and at Southworth Road. Many borough residents already suffer health problems; increased traffic levels, pollution and fumes will only add to those problems. Logistic jobs are not high quality or aspirational and the borough's secondary education provision serves students poorly. The jobs in prospect from warehousing will not help further aspiration in the next generation. Indeed, Parkside is at the edge of the borough and people will travel in from elsewhere, adding to traffic congestion in the surrounding area.

From the public consultations and planning application the prospect of alternative routes to and from the site seem not to be conjoined. The local authority would appear to be seeking to produce an alternative route and not the developer, it is clear that if the development goes ahead for 92900 m2 of warehousing, it is the A49 that will be the primary route for vehicles until or unless the council can procure an alternative. The council is however a joint partner of the Parkside site and as such cannot be seen as divorced from the planning application, let alone the cost of providing such a route when it is proposing cuts across the board and increasing council tax.

In addition, two articles in The St Helens Star - 01/03/2018 - caught our attention. The first provides an example of how construction traffic and large lorries disrupt residential areas by doing u-turns in residential streets. The second with new jobs to Haydock is actually for a company to occupy existing vacant space, not new build. The relevance is that traffic congestion on the A49 and local roads will increase; construction and HGV traffic pleases itself not local people or plans. There exists vacant industrial space and locations in the borough which should be occupied to give new jobs rather than speculative, new, large sheds built in the green belt. It does not add positively to the health and wellbeing of the borough and its residents.

Will you please register our objections to the planning application as submitted

Yours sincerely

Mr and Mrs Tully

10 MAY 2019

We are residents of Newton-le-Willow and will therefore make our site specific comments on the range of sites identified locally to us for employment and housing.

We do, however, have some more general comments about the plan which, overall, questions its soundness of approach to the conclusions it reaches about identifying sites in Newton and elsewhere across the borough and for taking large areas of the greenbelt out of productive agricultural use.

The plan is predicated on growth but doesn't take into any account the cost of growth. There is no impact assessment for any site which generates housing, traffic, noise, pollution and/or large tin sheds employing very few people. The infrastructure requirements are not addressed, nor the ability of the local areas to absorb, deal or sustain them. There are not traffic plans, no road improvements, no air quality or other environmental impact assessments. The council seems to expect these all to be done on a site by site basis without an assessment - or prediction - of the cumulative impacts of such a scale of new development. No cost / benefits are examined by the council who are already facing further cuts financially and who are already telling its population that it will have to cut services further and/or not provide them at all. - See St Helens Star advert taken out by the council in the paper 25th January 2017 and St Helens First magazine delivered to our house yesterday (29th January 2017). If the council can't provide the services needed to the existing population into the future, how will it provide them to 8000 plus new homes and families and how will the vast amount of warehousing actually deliver more income than is needed to sustain the costs of such an increase in needs?

The take of Greenbelt land has no consideration of current agricultural, food producing use and value previously, now and into the future. The need to have productive farming land for an ever increasing population cannot be assisted by taking out swathes of farming greenbelt across St Helens, or elsewhere for that matter.

The whole plan is, it would appear, based on the council's economic needs to generate new funding for services it admits it cannot provide sufficiently well or long enough for its current population and overall wellbeing of the borough. Having to generate funding locally to provide services impacts on St Helens Council and council's elsewhere. The cost of providing such services to 177000 people is already known, but the plan doesn't demonstrate that taking such large amounts of productive land out of the greenbelt and covering it with houses and warehouses generates less future demand for the council than it creates for the current and future needs of the existing and future population. The cost of maintaining the roads, providing new infrastructure including schools, gp surgeries etc and sustaining them is not even considered in the plan.

The recent Strategic Housing Land Availability Assessment suggested there is sufficient housing land available up until 2022, so why take out and safeguard so much land to 2033 now? It is understood that developers will seek the easiest sites to develop so what is to stop them from swooping in on the greenbelt opposed to the councils successful policy of dealing with the ongoing amount of brownfield sites and derelict land. There are many good examples of this success across the borough, there remain many brownfield sites still to deal with. It is not sufficient in land use planning to replace difficult to develop sites with the cheaper greenbelt land provision1 and not address what needs to be done with the existing (and with this plan continuing) derelict and despoiled land. The current approach diminishes the former novel and creative ways by which St Helens has improved its land and the land owned by the private sector.

It needs a fresh approach, clearly it does, if it is to attain the 2020 Vision for a prosperous borough. Taking out the greenbelt and filling it up with acres of tin sheds that join one area with another and letting houses be built which spread one local area into the next will not bring lasting prosperity to St Helens.

Our site specific comments relate to Newton-le-Willows and the local area.

Parkside proposals as set out by Langtree are for warehousing on one part of the site only. There is no rail freight provision as set out in the Core Strategy and as examined and reported on by the inspector. The Draft Local Plan now shows and Langtree are promoting, a warehousing scheme that relies on lorry borne traffic using the A49. This was never the plan, so why is it now acceptable when previously it was not? The A49 is already congested and often comes to a standstill through the High Street and as far as Winwick traffic lights, which are outside the borough's control. The Winwick/Junction 22 of the M6 and link to the M62 north of Warrington is already at capacity in the morning/evening rush hours. How can more lorry traffic help to reduce the problem on the A49 and surrounding junction? Do neighbouring areas and Warrington in particular want lorries from Parkside making things worse, even allowing for the junction improvements to which Langtree will obviously have to contribute.

If diesel fumes from idling vehicles is the problem we are told it is, it will only get worse with lorries from Parkside on the A49 and through the High Street - where we already have an air pollution measurement in place. The justification for taking Parkside out of the greenbelt was that it provide the solution to help take vehicles off the road when it was developed. This proposal from Langtree (and one suspects the council as joint owners of the site) does the complete opposite. Langtree doesn't own the remaining Parkside land on the east of the M6. It cannot deliver the larger, previously mooted scheme any more than the former owners who walked away from the development. It is faced now with trying to get the site fronting onto the A49 out of the greenbelt at the same time as Peel Holdings want to develop land at Haydock and the council has permitted warehousing at Florida Farm North. Both these other sites will impact the road system dramatically; both will put lorries onto the A580, the Haydock island, the M6 and the A49, as they seek the shortest 'sat nav' route and avoid the motorway congestion through Newton. It already happens when the motorway is at a standstill and the Langtree proposal will be putting more traffic directly onto the A49.

The £2.2 million contribution annually to the business rates St Helens can keep has not been measured against the impact the development will have on Newton and the surrounding roads and communities. The development is at the edge of the borough and people will travel in to work at it from outside the St Helens. They certainly won't want to travel by bus into the centre of St Helens and then out again to Newton, they will come by car. The jobs that will be created will be low grade, shift work and transient. They will not be jobs created by St Helens businesses and will therefore be at the whim of the large national concerns who will use the space as, and until, it is no longer needed. The jobs will go but the shed will remain. If sustainable economic development is a requirement for and by St Helens, then this proposal isn't it, as currently in the Draft Local Plan.

The housing site allocation has no real justification.

The land take at Lawsons Farm and then The Elms Farm and behind the Parchments to Castle Hill and down to the Lake follows the line set by the Hope Academy development. The school had to be set back because of pollution levels from the M6. The motorway is busier now than ever and other developments in the draft local plan will make it even worse. Has anyone looked into the predicted pollution levels from development elsewhere to accurately predict such a line on a map, let alone considered the visual effect of taking land at Castle Hill, which currently provides the open view of the lake and its setting, including the Conservation Area? The housing takes currently productive farmland out of use and it puts more traffic onto the A49 and Rob Lane and the stub of road at Castle Hill. It is difficult at times to get off the Parchments onto the High Street because of the current volume of traffic. It is also already congested with commuter parking with people who leave their cars all day and travel by train.

The same can be said for the housing proposed west of Ashton Road. This site goes right up to the A580. It puts more traffic onto the A49 and A580/Haydock Island. It takes farming land out of productive use. There is no impact assessment as to the need and the provision of infrastructure, including GP surgeries and primary schools, although it is convenient for the Hope Academy should people want to send their children to that particular school. As you are no doubt aware, many Newton children go out of the borough for secondary education into Wigan

The housing proposed south of the Wayfarers estate and at Red Bank are all directly opposite the proposed Parkside development, with further traffic generation directly onto the A49. Chomley Drive housing was originally refused by St Helens Council, we understand, because it was opposite the entrance to the Parkside Development site. The housing was won on appeal. If St Helens council didn't believe the area was suitable for housing previously, why does it now? The land south of Wayfarers is productive agricultural land so there is loss of land that is currently in good use to houses and homes requiring council services and local infrastructure including schools and GP's etc. Does the council tax gain offset the cost of service provision to the families housed?

The same can be said for the land around Vulcan Village and at the back of the cemetery and the ongoing Jones Homes/Persimmon housing, on the former Vulcan Works. It takes out productive agricultural land and will put further strain on the local area with the traffic generation, loss of amenities, requirement for schools, GP's etc. There is still brownfield and derelict land in and around Earlestown which should be developed first. The central area of Earlestown is part of the Local plan but will be hollowed out if the housing goes on greenbelt elsewhere in Newton. Also, if this amount of housing (1700 plus) goes ahead on the edge of the borough at Newton there is no demonstration in the plan as to what, if any, positive contribution will be made to Newton and St Helens.

People who live in Newton tend to work outside of the Borough and shop elsewhere. Indeed they are encouraged to travel by the improved rail provision at the new station that attracts commuters from outside the borough into the local area already to 'park and ride'. 1700 new houses will have 1700 plus new cars on the roads. They will travel out of the borough and spend their money elsewhere. It happens now and it will in the future, so where is the economic gain for St Helens over and above the collection of council tax. If each new home paid say, £1500 a year in council tax, the gain from the 1700 houses would only be £2.5 million per year. New council tax seems to be the council's justification for such a level of development, without any costs being taken into account.

The houses proposed seem to be justified in the plan by the amount of warehousing proposed and the amount of warehousing by the number of homes built locally to support them. This is tin pot economics and not land use planning. The impact on Newton of such levels of development proposed for both housing and warehousing appears to be more negative than positive. It produces more detrimental impacts than the plan acknowledges or addresses. Locally for us it is nothing other than a plan for the ruination of Newton.

Please acknowledge receipt of our comments on the Draft Local Plan and your review of the greenbelt, to which we have responded within the time limits you have set and the constructive way you say you wish to engage with the residents of the borough.

27th January 2017.

Addition 30th January 2017

This morning on the Today programme they ran an article which outlined a study that had linked the effects of diesel emissions to both heart disease and dementia as well as the already known lung diseases. It stated by breathing in these emissions the damaging particles and gasses can be absorbed straight into the brain as well as travelling to the lungs. How would this plan deal with any increase in the poor health that may be caused by the damaging emissions from diesel lorries and how does this fit with the plan to increase the wellbeing of the residents of St Helens.

PO1210

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

PO1211

Representor Details

Web Reference Number	WF0030
Type of Submission	Web submission
Full Name	Mrs Carol Cain
Organisation	
Address	
Agent Details	

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

No

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

Policy	LPA04
Paragraph / diagram / table	Warehousing Liverpool Road/Millfield Lane sites 2EA, 5EA and 6EA
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

No more Warehouses needed in Haydock, too many HG and LG traffic movements affecting congestion and air quality affecting health

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

Go elsewhere, Brownfield sites, existing industrial facility can be re-utilised.

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

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

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

Response Date	3/13/2019 4:49:56 PM
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PO1212

Representor Details

Web Reference Number	WF0032
Type of Submission	Web submission
Full Name	Mr David Cain
Organisation	
Address	
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA04
Paragraph / diagram / table	Warehousing Liverpool Road/Millfield Lane sites 2EA, 5EA and 6EA
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Haydock does not need any additional stress on infrastructure caused by industrial development. There is little enough room for more HG or LG traffic, congestion and air quality are severely affected by existing facility. The J23, M6 is not fit for purpose and needs to be re-addressed, Highways England are aware of issues pertaining.

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

Logistically, Haydock is a spent force. Consider other options, utilise existing industrial facility including Brownfield sites elsewhere. The use of Greenbelt is against the National policy.

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 be present to hear all comments.

Response Date	3/13/2019 4:44:26 PM
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PO1213

WF0037

① LPA01

④ LPA04

⑦ LPA05.1

② LPA02

⑤ LPA04.1

⑧ LPA06

③ LPA03

⑥ LPA05

⑨ LPA07

Representor Details

Web Reference Number	WF0037
Type of Submission	Web submission
Full Name	mr mark railton
Organisation	
Address	The old poultry farm, 29 Rookery Lane, Rainford, St helens WA11 8EF
Agent Details	

⑩ PARA

1.7.2 DHC

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

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

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

- 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.

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 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.

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).

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.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the

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PO1214

Representor Details

Web Reference Number	WF0064
Type of Submission	Web submission
Full Name	Mr Tom Clarke MRTPI
Organisation	
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 LPA04: A Strong and Sustainable Economy
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.

Parts 8 and 9 support the protection, creation, enhancement and expansion of cultural facilities, and seeks to prevent their unjustified loss. We support this strong approach, which we consider to accord with paragraph 92 of the NPPF (2019).

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

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

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

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

Response Date	3/13/2019 2:08:11 PM
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PO1215

SIR SHA

WF0068

① LPA01

④ LPA04

⑦ LPA05.1

⑩ LPA07

② LPA02

⑤ LPA04.1

⑧ S.A.

⑪ PAR 1.7.2

③ LPA03

⑥ LPA05

⑨ LPA06

DEC.

Representor Details

Web Reference Number	WF0068
Type of Submission	Web submission
Full Name	Mr Mark Railton
Organisation	
Address	29 Rookery lane Rainford, St helens WA11 8EF
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

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

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

- Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.
- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed for housing and employment is therefore not as high as set out in the Plan
- There are therefore no exceptional circumstances to change Green belt boundaries

②

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).

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.

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

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers. The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035.

The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35

PO1216

①-LPA05 ②-LPA06, 3HS ③-LPA06, 8HS

④-LPA04 ⑤-10P

Representor Details

Web Reference Number	WF0073
Type of Submission	Web submission
Full Name	mrs Maureen Daly
Organisation	
Address	48 Springfield Lane Eccleston St, Helens wa10 5ha
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA05 - LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I wish to object to the current St Helens Local Plan, (LPA05 and LPA06) The plan fails on several key issues.

The Councils statement of Contaminated Land, in 2015, was 3,170 hectares, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is 204.6 hectares. This is 6% of the contaminated land available to the council. The Council should adopt a Brownfield first policy and use all the available brownfield land for development before considering the use of greenfield land. Developers prefer to use greenfield sites, using the argument that it enables them to deliver "affordable housing". This argument is not delivering any exceptional circumstance that would be required to remove the greenbelt projection to the land stated in the plan, (3HS and 8 HS)

The Council has no policy for bringing previously Used land that is not on the Brownfield Register on to the register. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan, this is an oversight that needs to be rectified immediately,

The Council claim that they need to safeguard land for development, that will enough to satisfy the requirements for 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use. The time taken to execute 2 or 3 local plans, would be more than adequate to clean the contaminated land and make it ready for use.

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So, there can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology. The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years. This shows that, the economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).

The plan proposes to build houses in an area that are already over congested. The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework.

Such and increase in traffic would also lead to increases in health issues caused by the emissions of such are large amount of traffic on narrow roads in a small built up areas.

The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe". Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car.

The Schools in Eccleston and Windle are already oversubscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. There is no crossing assistance for St Julies School, where most children must cross Springfield Lane, which is a main road that leads to the A580. There have been a number of accidents here over the years. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring.

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PO1217

Representor Details

Web Reference Number	WF0103
Type of Submission	Web submission
Full Name	Mr Philip Young
Organisation	
Address	5 Avery Square Haydock WA11 0XB
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 and 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

One of the purposes of Greenbelt is to assist in the 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 Council has already granted permission in the Greenbelt in respect of site 2EA - Florida Farm North.

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

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

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/13/2019 11:01:58 AM
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PO1218

Representor Details

Web Reference Number	WF0113
Type of Submission	Web submission
Full Name	Mr Paul Bevan
Organisation	
Address	193 Liverpool Road Haydock WA11 9RX
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Not Justified -

The council should prove there is a requirement for this type of development in this location and of this scale as FFN has reduced in size.

This is destroying agricultural land which we require more than warehouses.

The local area cannot cope with the current levels of traffic let alone more.

There is no statement of common ground with neighbouring authorities.

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

Keep this land Greenbelt and remove these sections from the plan.

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

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

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

Response Date	3/13/2019 8:52:38 AM
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PO1219

Representor Details

Web Reference Number	WF0119
Type of Submission	Web submission
Full Name	Mrs Jeanette Bailey
Organisation	
Address	13 Peebles Close Garswood Wigan Lancs WN4 0SP
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The council has already granted planning permission in the Greenbelt in respect of Site 2EA, Florida Farm North. An absolute blot on one of the beautiful areas of the borough and all involved should be ashamed of themselves!

Greenbelt has many purposes, one of which is to encourage the recycling of derelict land. This must take place as a priority and preserve the Greenbelt.

The council must be put to strict proof of the population estimates. Figures have fallen consistently since 1981, where is the increase in people coming from?

The risk of flooding in Clipseley Brook will increase if this development is allowed.

The high volumes of predicted increase in traffic will add to the already over capacity on the roads in the area. Any improvements necessary must be paid for by the developer and not the Council Tax payers.

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

Delete this land from the proposed removal from the Greenbelt

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

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

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

Response Date	3/12/2019 11:08:45 PM
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PO1220

Representor Details

Web Reference Number	WF0122
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	-----
Address	37 Springfield Park Haydock Lancashire WA11 OXP
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	LPA0 Site 4EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

①
LPA05

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them. The Council has today, 12 March 2019, announced that it has extended the consultation period for the residents of Bold and Clock Face for a further eight weeks because of the problem outlined in the above paragraph. Can the Council now be satisfied that all persons throughout the Borough who live within 200 metres of the boundary of a site which is affected by the proposals have been written to. If they aren't satisfied then they should abort the process and re-commence the consultation after making sure that all appropriate properties have received the same correspondence.

② LPA04

This comment is in respect of LPA04 Site 4EA, land south of Penny Lane. On page 221 of the Local Plan there is a Plan showing the location of the site and underneath there are the requirements of

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the Council. One of these is that the design and layout of the development must integrate well with that of the surrounding area.

The site is immediately adjacent to the 4 star Haydock Mercure Hotel, a Georgian style building opened in 1992 or thereabouts. To add a warehouse to the adjacent site will detract from the setting of this hotel, a setting that has already been compromised by the Council having granted planning permission for a plant hire company to the rear and side of the hotel.

That plant hire company has been permitted to cut down the trees and bushes that screened it from the A580, a prominent Gateway Corridor, according to the Council's proposal in Policy LPD06, at page 153 of the Local Plan. At night the site is floodlit and all that can be seen from the A580 Prominent Gateway Corridor is the large plant which is for hire. —

The land at the rear of the Mercure Hotel is known as Empress Park and the advertising brochure for the development features an office building with a round glass tower fronting the A580. The reality is far from the idyll advertised by the brochure.

The Council appears to be obsessed with putting all its employment eggs in the basket of warehousing and a further warehouse on this site cannot be justified.

For these reasons I believe that the Local Plan isn't Legally Compliant or Sound. It isn't positively prepared because it can't justify the need for this type of development and it isn't effective because of the location adjacent to the 4 star hotel.

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

This site should be removed from the list of sites to be deleted from the Greenbelt

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

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

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

Response Date	3/12/2019 10:23:49 PM
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PO1221

Representor Details

Web Reference Number	WF0123
Type of Submission	Web submission
Full Name	Mrs Phillippa Twiss
Organisation	
Address	130 Kiln Lane Eccleston St Helens Merseyside WA10 4RJ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not promote sustainable development due to increased dependency on the car. This is due to the remote transport hubs and no visible changes in the transport hub which would discourage this dependency. The Saturn Traffic model appears to be out of date. The sustainable targets appear aspirational rather than factually based for employment growth predictions which again focuses on the requirements of a car dependency. This congestion will lead to a decrease in air quality around key receptor sites due to the loss in efficiency of vehicles travelling in the area and unreliable journey times.

The proposal will add to the long term problems at key nodes around Windle Island, Bleak Hill Road, Skew Bridge (Rainhill), M6 J1-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline or address how local and borough wide road improvements are to be made and funded. This therefore promotes unsustainable traffic growth causing serious traffic issues that will not satisfy the NPPF (2016).

Increased traffic flows along minor routes and those diversions to avoid congestion will lead to damage to local through routes and further issues with air quality and noise.

Why was a VISSIM Model not used in addition to the SATURN Model? Also why was mobile phone data not used in the modelling?

01
WFA04

02
WFA05

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CP105

The plan does not appear to take account of cross border collaboration and the housing need assessment does not use standard methodology and the estimates on housing are outdated with respect to current ONS information. There is also no attention for detail with regards the use of brownfield sites or the remediation of land when sustainable development relies on the reuse of brownfield sites. This is reflected with respect to other local authorities and it is unreasonable that 'unsuitable sites' can not be remediate and made available for the period considered in the plan. The loss of green belt and grade 1 and 2 agricultural land is also not sustainable and will impact on agriculture and distribution along with loss of habitat, flood plains and retention will also have a negative impact on the environment and area. Has climate change been considered with regards the risk of flooding when developing the area? Local amenities are also inadequate and not covered in suffice to detail to outline what will be undertaken to increase resilience in the services.

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

Review the modelling information around traffic, the housing information, sustainability, farming, Habs Regs and flooding risks plus resilience of the local transport routes, nodes and minor roads used when diverting around traffic congestion, the impact on farming, the failure to use up to date information.

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

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

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

Response Date	3/12/2019 10:16:17 PM
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PO1222

Representor Details

Web Reference Number	WF0126
Type of Submission	Web submission
Full Name	Mr Matthew Twiss
Organisation	
Address	130 Kiln Lane Eccleston St Helens Merseyside WA10 4RJ
Agent Details	

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

Yes (via e-mail)

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

Policy	St Helens Borough Local Plan - Eccleston
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not promote sustainable development due to increased dependency on the car. This is due to the remote transport hubs and no visible changes in the transport hub which would discourage this dependency. The Saturn Traffic model appears to be out of date. The sustainable targets appear aspirational rather than factually based for employment growth predictions which again focuses on the requirements of a car dependency. This congestion will lead to a decrease in air quality around key receptor sites due to the loss in efficiency of vehicles travelling in the area and unreliable journey times.

The proposal will add to the long term problems at key nodes around Windle Island, Bleak Hill Road, Skew Bridge (Rainhill), M6 J1-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline or address how local and borough wide road improvements are to be made and funded. This therefore promotes unsustainable traffic growth causing serious traffic issues that will not satisfy the NPPF (2016).

Increased traffic flows along minor routes and those diversions to avoid congestion will lead to damage to local through routes and further issues with air quality and noise.

Why was a VISSIM Model not used in addition to the SATURN Model? Also why was mobile phone data not used in the modelling?

01
LPA04

02
LPA05

The plan does not appear to take account of cross border collaboration and the housing need assessment does not use standard methodology and the estimates on housing are outdated with respect to current ONS information. There is also no attention for detail with regards the use of brownfield sites or the remediation of land when sustainable development relies on the reuse of brownfield sites. This is reflected with respect to other local authorities and it is unreasonable that 'unsuitable sites' can not be remediate and made available for the period considered in the plan. The loss of green belt and grade 1 and 2 agricultural land is also not sustainable and will impact on agriculture and distribution along with loss of habitat, flood plains and retention will also have a negative impact on the environment and area. Has climate change been considered with regards the risk of flooding when developing the area? Local amenities are also inadequate and not covered in suffice to detail to outline what will be undertaken to increase resilience in the services.

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

Review the modelling information around traffic, the housing information, sustainability, farming, Habs Regs and flooding risks plus resilience of the local transport routes, nodes and minor roads used when diverting around traffic congestion, the impact on farming, the failure to use up to date information.

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

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

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

Response Date	3/12/2019 10:08:39 PM
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PO1223

Representor Details

Web Reference Number	WF0144
Type of Submission	Web submission
Full Name	Mrs. Hannah Miller
Organisation	
Address	47 Birch Grove Garswood Wigan WN4 0QZ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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. There are several identified brownfield sites in St Helens that have not been included anywhere in this local plan. The fact that these sites have not been identified in this local plan means that it is not consistent with national policy.

The plan is not effective because it is not deliverable without significant investment in local infrastructure. The high volumes of predicted traffic will impede on J23 and J24 of the M6 motorway which are already over capacity and have a high number of collisions as a result. The council has also failed to take into consideration the increase in traffic from several other large developments that are proposed on Greenbelt sites in this area (that are also listed in this local plan). By only looking at the impact on infrastructure on a site by site basis would mean they do not see the whole picture when these 5 sites (all within a 2 mile radius) are all up and running.

National policy states that building on Greenbelt should only be granted in exceptional circumstances. St Helens council have already built on several Greenbelt areas with no exceptional circumstances having been proven since "providing jobs" does not count as an exceptional circumstance according to the National Planning Framework. The creation of jobs is how they justified releasing the areas from Greenbelt.

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

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

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

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

Response Date	3/12/2019 8:22:07 PM
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PO1224

Representor Details

Web Reference Number	WF0148
Type of Submission	Web submission
Full Name	Mr Andrew Miller
Organisation	
Address	47 Birch Grove Garswood Wigan WN4 0QZ
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 and 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

I don't feel this plan is effective as there is no statement of common ground with neighbouring authorities and shows a clear lack of joint working, which is of particular importance to an area that borders Wigan council. This lack of joint working shows that the plan is not justified as not all alternatives have been taken into account.

This plan is not effective, as it is not deliverable without significant investment in local infrastructure. The high volumes of predicted traffic will impede on already over capacity junction 23 of the M6 motorway.

The current plan is also not legal. A statutory requirement is that letters must be sent to people in situations in which their houses are removed from Greenbelt, this has not been done in all situations.

National policy would indicate that Greenbelt holds a purpose in assisting urban regeneration by encouraging the recycling of other urban land. Using Greenbelt fails to encourage such building and will not promote the regeneration of many of St Helen's former industrial land. The council has already granted permission for building in the Greenbelt in respect of site 2ES. National policy would indicate the Greenbelt should be used in exceptional circumstances yet St Helens council plan to build on Greenbelt land with little consideration.

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The plan is not justified as the council requires strict proof that the development is required and has provided insufficient evidence so far.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/12/2019 8:09:55 PM
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PO1225

①-LPA05 ②-LPA04 ③-Green Belt Review
 ④-LPA07 ⑤-Para 172 DTC

Representor Details

Web Reference Number	WF0162
Type of Submission	Web submission
Full Name	Mrs Vicky Riley
Organisation	Mr
Address	35 Kiln Lane WA10 6AD
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

As I understand the whole of the North West are creating these local plans but there doesn't seem to be much mentioned about discussions with other authorities. I think it is known as Duty to Cooperate and Statement of Common ground, but they appear to be absent.

With all regional authorities following a similar growth trajectory, they must surely be competing for the jobs and new residents.

This surely cannot be deemed sustainable.

Current government policy is not to be encouraging international immigration, in fact the opposite.

That must mean that the migration for these jobs and houses must be UK internal.

If one borough gains though, another must lose. So they cannot all grow by these ludicrous and aspirational figures that are being suggested.

The St Helens growth figures are far in excess of any previous actual growth and looking extremely optimistic to say the least.

The employment growth seems to be completely centred and focused on logistics and warehousing.

That growth though appears to be reliant on land being released.

I think someone at the council must have recently watched "Field of Dreams" and adopted an 'if you build it, they will come' attitude.

This must lead to a situation of questioning the entire strategic decision process that this local plan is built upon.

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The construction industry themselves have questioned whether they even have the ability and capacity to deliver such astronomical growth predictions.

The standard method calculation shows 468 houses per annum and the plan does not demonstrate any exceptional need to deviate from this and shift to 486. A minimal increase of 18pa is not exceptional.

The table in the plan (4.6) details all the housing numbers.

I can't follow the trail of the figures and some appear to be wrong and there must be a transparency question raised in regard to this table.

It is almost a self-fulfilling problem given that of the 1695 capacity that is required to be found on green belt, 794 of them are for non-delivery (15% of SHLAA).

Instead of performing the huge green belt review, it would have been better to figure out how to ensure delivery of everything in the SHLAA and then find a relatively small amount of contaminated land to make up the balance of approx. 700 dwellings.

Using the smaller figure of 468 (342 fewer houses) plus ensuring delivery of those 794 means only a shortage of 559 dwellings.

Such a low number surely cannot lead to exceptional circumstances for a once in a lifetime green belt review.

There must also be a transparency question raised in regard to the green belt review process.

The parcels of land apparently undergo a developability assessment with the result being good, medium or limited, but the process and findings to arrive at the results are missing from the documents and therefore cannot be scrutinised in this consultation process.

A massive concern of mine would be the delivery of infrastructure needed for growth of this scale.

All around Windle and Eccleston there are massive congestion issues.

It is the same at Haydock and around the M6.

St Helens Council will quite simply be incapable of delivering the requirements to manage this scale of growth.

They cannot maintain the roads today, never mind with thousands more cars on them.

More congestion will be inevitable leading to more noise and air pollution leading to greater health issues.

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

Reduce the growth projection.

Do not use green belt.

Utilise more brownfield land.

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

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

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

Response Date	3/12/2019 7:39:21 PM
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PO1226

① - LPA04 ② - Statement of Common Ground

Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

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

[paraphrased] is not justification.

There is no statement of common ground with neighbouring authorities.

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

Leave the Green Belt designation on this land.

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

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

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

Response Date	3/12/2019 7:34:35 PM
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PO1227

①-LPA06 ②-LPA04

Representor Details

Web Reference Number	WF0172
Type of Submission	Web submission
Full Name	Mr Michael Dennett
Organisation	
Address	17 Sandfield Road Eccleston St Helens WA10 5LR
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

It is a disgrace to be giving up greenbelt land for housing when there is so much brownfield land available within the town. Past sites such as The Shires had to be cleared and treated to build on and this could be done again with numerous plots around the borough. Knowsley council did this with the old BICC site so it can and should be done first.

The roads around proposed site 8HS are already gridlocked at rush hour and the works at Windle Island have turned Eccleston roads into a rat run, an extra 1000+ cars a day cannot be sustained. It takes weeks to get a Doctors or Dentist appointment and the local schools are at bursting point with the projected admittance of children who already live here nevermind an extra 1500 families. St Helens council are using old statistics to try and pull the wool over peoples eyes about how many house are actually needed, they are using stats from the ONS(2014) stating 486 a year will be needed to meet housing needs when a more up to date report from 2016 states that it's actually 383 needed!!

The greenbelt should be saved for future generations to enjoy and not have a town that was once green to look at and just be left with 1000's of hectares of post industrial mess to enjoy!!

The loss of grade 1 and 2 agricultural land which has been farmed for over 100 years is a joke when we don't know what is going to happen with Brexit.

The land 8HS south of A580 is used by the community to walk and exercise in and around.

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It makes me laugh how on one hand in the councils propaganda magazine St helens first, they are talkin about "The year of environment" with a councillor quottng "The council is fully committed to this initiative which is a great opportunity for members of the public to get out in our beautiful parks and OPEN SPACES..." and then on the other hand trying to take it away.

The plan is not effective and is just a back door to building in high council tax areas.

They are living in a dream world with completely made up assumptions about jobs being created and the house they will build in the greenbelt will not alleviate the so called housing crisis as the jobs provide in warehousing are minimum wage roles.

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

All green belt land should be retained for future generations.

Re-develop brownfield and PDL sites- it can and should be done and there is plenty of evidence in the surrounding areas- Southport developing an old landfill site.

If brownfield sites are not developed we will be left with derelect old industrial sites, whilst the beautiful green belt has gone for greedy house builders and the council letting this happen in the HIGHER COUNCIL TAX BANDS!!

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

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

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

Response Date	3/12/2019 5:50:31 PM
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PO1228

① - LPA04 ② - Statement of Common Ground

Representor Details

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

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

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

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

No statement of common ground with neighbouring LAs.

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

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

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/12/2019 4:04:06 PM
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PO1229

①-LPA05 ②-GEN ③-LPA04

Representor Details

Web Reference Number	WF0182
Type of Submission	Web submission
Full Name	Mr Peter Roper
Organisation	
Address	2 Knutsford Close Eccleston St Helens WA10 5RD
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

The methodology is flawed, is not deliverable and does not comply with NPPF 2018.

it does not meet:

1. meet the requirement for Sustainable development
2. the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
3. sustainable housing, targets proposed are based on aspirational employment growth predictions.
4. effective land use by concentrating on Green Space development over town centre development with higher densities.
5. Does not utilise/recognise brown field development
6. does not recognise Agricultural Land Quality.

The following are also ill-considered.

1. Economic growth predictions for are based on flawed historical data that does not justify the aspirational targets included in the plan.

2. The Housing Need assessment does not use a recognised and accepted methodology.

3. The Plan makes adequately consider brown field opportunities.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is adequately considered along with the impact on farming and associated jobs.

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4. Traffic impacts have not been adequately addressed. In fact the plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF.
5. The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

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

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

Refocus on development of brownfield sites for the benefit of all communities.

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

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

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

Response Date	3/12/2019 3:40:07 PM
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PO1230

Sites 8EA + 7EA

① LPA04
② LPA10

Representor Details

Web Reference Number	WF0205
Type of Submission	Web submission
Full Name	Miss Stephanie Garner
Organisation	
Address	60A Vista Road Newton le Willows Merseyside WA12 9ER
Agent Details	

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

Yes (via e-mail)

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

Policy	
Paragraph / diagram / table	
Policies Map	EA8 Parkside East and EA9 Parkside West
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

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.

Parkside West contains important local wildlife sites and priority woodland providing habitat for locally rare, red listed and nationally protected species. The loss of this habitat cannot be mitigated as the extensive meadows have taken decades to mature and are unique within the local area. Wildlife corridors will be lost. The SSSI Highfield Moss is located adjacent to the site and is highly sensitive to increases in nitrogen dioxides and changes in ground water levels. Development and associated exhaust pollution threatens the viability of the SSSI.

The former colliery footprint only occupies about a fifth of the Parkside West site. The extent of proposed development is excessive and will destroy and industrialise the rural character of a valuable area of currently protected Green Belt land which prevents urban sprawl on the boundary of St Helens and Warrington boroughs.

The reliance on the logistics industry is economically flawed, particularly one so dependant on consumer demand. The Council have not learned the lesson of the coal industry locally and its demise and the effect on unemployment. Warehousing is increasingly automated so supposed job predictions are also flawed.

Local infrastructure is insufficient to accommodate the additional burden of thousands of vehicles each day and without weight restrictions on the A49 there is nothing to prevent HGVs from using

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① + ②

residential roads within Newton Le Willows to access the site, and increasing current congestion and air pollution.

The M6 adjacent to the site and A49 through High Street are Air Quality Management Areas due to breaches in pollution levels caused by vehicle exhaust emissions. The greatest contribution to nitrogen dioxide pollutants have been shown to be from HGVs and buses. SHMBC has a legal duty to work towards reducing these levels to safe limits. A road based logistic development and increased commuter traffic along this route is not compatible with the legal duty to reduce pollution on this route.

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

Development at Parkside West should be restricted to the footprint of the former colliery only. The region is already flooded with warehouse jobs and the local rate of logistics employment is much higher than the national average. To improve social mobility and educational aspiration, the site would be better developed into a technology and science park similar to the Langtree development at Daresbury in Warrington.

Parkside West is effectively a ready made country park. The area is semi rural in character and would serve all the surrounding local communities if a much needed accessible green space was located here. As stated in the NPPF the Green Belt surrounding the former colliery should be maintained and enhanced for recreational use. It could easily be converted into a wildlife reserve in conjunction with exploiting the tourist potential of the unique history, heritage and battlefield location.

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

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

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

Response Date	3/11/2019 9:01:53 PM
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PO1231

Representor Details

Web Reference Number	WF0226
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	---
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	---

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

Until the last two years or so St Helens had two free newspapers delivered on a regular basis. The St Helens Reporter is now available online only and the St Helens Star doesn't appear to be delivered in all areas and in large swathes of the Borough it isn't available for purchasing in the shops. It should not be the responsibility of pro Greenbelt Groups to bring the Local Plan to the attention of the public, that is what the Council should be doing to fulfil its statutory obligations.

A development in this position and on this scale isn't justified. Given the number of empty units in St Helens and in adjoining areas and the similar proposals in those areas, the Council should be put to strict proof of the need for these warehouses.

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

This representation is in respect of Policy LPA04 – Sites 2EA, 5EA and 6EA, all situated to the North of the A580 East Lancashire Road, Haydock and bounded by the A580, Slag Lane, Liverpool Road, Millfield Lane and Haydock Lane a total of almost 65 hectares or 160 acres of Greenbelt farmland to be covered in concrete, tar macadam and huge sheds.

In January 2017 the Council granted planning permission for warehouse development at Florida Farm North, (Site EA2) some 36.37 hectares of Greenbelt Land

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.

Development at this location would place even greater amounts of water into Clipsley Brook which floods at the junction of West End Road and Stanley Bank Way (A58).

The problem isn't made any easier because the Council, in respect of the Florida Farm North development, has relaxed its requirements for flood prevention from a one in 100 year storm plus 40% for climate change to one in a 100 year plus 10% for climate change, without giving any adequate reasons why. The Employment Land proposals at LPA04 Sites 5EA and 6EA will do nothing to ease the burden on the amount of water in Clipsley Brook.

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

The developers of the site 2EA at Florida Farm North stated in their planning application that the development would generate an estimated 6,700 additional vehicle movements per day through the A580/Haydock Lane junction. The additional air pollution caused by these vehicles was described as negligible in the report to the Planning Committee. There must come a time, however, when all the negligible amounts add up to substantial.

A re-aligned junction at A580/Haydock Lane in respect of the development at 2EA was constructed with money received from the Liverpool City Region rather than being provided by the developer in what is said to be a £150 million development. This is now a 4-way junction with Toucan crossing facilities meaning that traffic in the morning and evening peak periods is queuing for longer and so generating more pollutants.

The additional traffic generated by the additional warehouses at 5EA and 6EA will place further pressure on the already heavily over burdened local highways network. Highways works have recently been undertaken at the junction of the A58/Millfield Lane/Tithe Barn Road but it doesn't appear that any provision has been made for this additional traffic.

The loss of approximately 217 acres of farmland in this small area North and South of the A580 could prove to be crucial to the ability of the Country to grow its own food crops.

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

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

It is too late for Site 2EA as the Council has already granted planning permission for these monstrous warehouses in an inappropriate location.

In respect of Sites 5EA and 6EA these should be removed from the list of sites to be removed from the Greenbelt.

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

Yes, I wish to participate at the oral examination

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

I wish to address the inquiry on behalf of the residents of this locality who have had their lives devastated by the inappropriate development at Site 2EA.

Response Date	3/11/2019 12:22:42 PM
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PO1232

Representor Details

Web Reference Number	WF0260
Type of Submission	Web submission
Full Name	Ms Joanna Hayward
Organisation	
Address	502 Garswood Road Garswood WN40XH
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA04 Sites 2EA, 5EA 6EA
Paragraph / diagram / table	Housing between Liverpool Road, Millfield Lane
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

The release of greenbelt will cause significant harm to the purposes of the Greenbelt.

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

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

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

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/10/2019 2:35:44 PM
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PO1233

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

Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

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

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

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

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

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

Suggestion

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

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

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

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

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

Response Date	3/10/2019 1:20:56 PM
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PO1234

Representor Details

Web Reference Number	WF0266
Type of Submission	Web submission
Full Name	Mr Adrian Storey
Organisation	
Address	502 Garswood Road Garswood WN40XH
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

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

Volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	3/10/2019 1:07:06 PM
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PO1235

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

Representor Details

Web Reference Number	WF0276
Type of Submission	Web submission
Full Name	Mrs Kathryn Spencer
Organisation	
Address	4 Queens Way Rainford St Helens Merseyside WA11 8EU
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
 - the economic analysis is flawed and based on over-optimistic assumptions ①
 - the level of land needed is therefore not as high as set out in the Local Plan ②
 - therefore there are no exceptional circumstances to change Green belt boundaries
 - other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
 - these alternatives will have less impact on the environment and lead to less need for new infrastructure
 - the Council have failed to co-operate with other councils and have not published any statement(s) of common ground ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

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

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

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

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

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The Local Plan is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

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

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

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

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

Response Date	3/9/2019 10:21:59 PM
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PO1236

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

Representor Details

Web Reference Number	WF0278
Type of Submission	Web submission
Full Name	Miss Christina Cook
Organisation	
Address	119 Higher Lane Rainford St Helens Merseyside WA11 8BQ
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

• therefore there are no exceptional circumstances to change Green belt boundaries

• other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land

• these alternatives will have less impact on the environment and lead to less need for new infrastructure

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

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

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

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

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

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

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

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The Local Plan is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

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

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

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

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

Response Date	3/9/2019 7:30:13 PM
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PO1237

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

Representor Details

Web Reference Number	WF0279
Type of Submission	Web submission
Full Name	Miss Rebecca Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens Merseyside WA11 8BQ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

• therefore there are no exceptional circumstances to change Green belt boundaries

• other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land

• these alternatives will have less impact on the environment and lead to less need for new infrastructure

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

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

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

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

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

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

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

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The Local Plan is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

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

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

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

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

Response Date	3/9/2019 7:25:22 PM
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PO1238

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

Representor Details

Web Reference Number	WF0280
Type of Submission	Web submission
Full Name	Miss Hollie Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens Merseyside WA11 8BQ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
 - the economic analysis is flawed and based on over-optimistic assumptions ①
 - the level of land needed is therefore not as high as set out in the Local Plan ②
 - therefore there are no exceptional circumstances to change Green belt boundaries
 - other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land ②
 - these alternatives will have less impact on the environment and lead to less need for new infrastructure
 - the Council have failed to co-operate with other councils and have not published any statement(s) of common ground ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

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

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

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

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

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

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The Local Plan is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- The site is subject to frequent flooding and acts as a reservoir for controlled dispersal of water in times of peak rainfall.

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

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

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

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

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

Response Date	3/9/2019 7:17:37 PM
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PO1239

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

Representor Details

Web Reference Number	WF0281
Type of Submission	Web submission
Full Name	Mrs Jean Lamb
Organisation	
Address	13 Rookery Lane Rainford St Helens Merseyside WA11 8EE
Agent Details	

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

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
 - the economic analysis is flawed and based on over-optimistic assumptions ①
 - the level of land needed is therefore not as high as set out in the Local Plan ②
 - therefore there are no exceptional circumstances to change Green belt boundaries
 - other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land ②
 - these alternatives will have less impact on the environment and lead to less need for new infrastructure
 - the Council have failed to co-operate with other councils and have not published any statement(s) of common ground ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

PO1240

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

Representor Details

Web Reference Number	WF0282
Type of Submission	Web submission
Full Name	Mrs Jacqueline Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens Merseyside WA11 8BQ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
 - the economic analysis is flawed and based on over-optimistic assumptions ①
 - the level of land needed is therefore not as high as set out in the Local Plan ②
 - therefore there are no exceptional circumstances to change Green belt boundaries
 - other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
 - these alternatives will have less impact on the environment and lead to less need for new infrastructure
 - the Council have failed to co-operate with other councils and have not published any statement(s) of common ground ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②

PO1241

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

Representor Details

Web Reference Number	WF0283
Type of Submission	Web submission
Full Name	Mr Zach Cunningham
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

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

I do not believe this version satisfies:

the requirement for Sustainable development

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

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

Economic growth predictions for St Helens are based on flawed historical

③

①

- data that does not justify the aspirational targets included in the plan. ①
- Adequate regional and cross border collaboration has not been undertaken. ⑤
 - The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
 - The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
 - The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
 - The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ②
 - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
 - The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. ③
 - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) ④
 - The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ③
 - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to ④

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

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

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

Response Date	3/9/2019 6:18:12 PM
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PO1242

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

Representor Details

Web Reference Number	WF0284
Type of Submission	Web submission
Full Name	Mr Evan Cunningham
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

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

No

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

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

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

I do not believe this version satisfies:

the requirement for Sustainable development

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

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

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

①

- Adequate regional and cross border collaboration has not been undertaken. (5)
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. (2)
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. (2)
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. (3)
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) (4)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. (3)
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. (4)

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

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

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

Response Date	3/9/2019 6:13:25 PM
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PO1243

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

Representor Details

Web Reference Number	WF0285
Type of Submission	Web submission
Full Name	Ms Fiona Meli
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

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

No

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

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

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

I do not believe this version satisfies:

the requirement for Sustainable development

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

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

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

①

- Adequate regional and cross border collaboration has not been undertaken. (5)
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. (2)
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. (3)
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) (4)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. (3)
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. (4)

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

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

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

Response Date	3/9/2019 6:08:57 PM
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PO1244

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

Representor Details

Web Reference Number	WF0286
Type of Submission	Web submission
Full Name	Ms Clare Cunningham
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

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

I do not believe this version satisfies:

the requirement for Sustainable development

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

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

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

①

- Adequate regional and cross border collaboration has not been undertaken. ⑤
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ②
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. ③
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) ④
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ③
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. ④

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

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

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

Response Date	3/9/2019 6:03:36 PM
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PO1245

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

Representor Details

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

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

No

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

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

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

I do not believe that this version satisfies:

the requirement for Sustainable development

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

The following fundamental elements of the plan remain questionable:

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

①

- Adequate regional and cross border collaboration has not been undertaken. ⑤
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. ②
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. ③
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) ④
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ③
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. ④

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

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

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

Response Date	3/9/2019 5:44:22 PM
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PO1246

Representor Details

Web Reference Number	WF0288
Type of Submission	Web submission
Full Name	Mrs Rebecca Flinders
Organisation	
Address	8 Kiveton Drive Ashton in Makerfield Wigan Wn4 9ex
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	C/2019/0015/CON
Paragraph / diagram / table	Green belt assessment
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

This is pure land grabbing and goes against the ethos of green belt allocation even if it is legally sound. On all of the proposed Greenbelt retraction plans there is no consideration to retaining a sound or benign environment. The impact of this development is on the borders of St Helens so will mainly affect neighbouring areas under the control of Wigan Council. The traffic increases, pollution congestion will occur outside of St. Helens boundaries and I cannot see any plan in place to counteract this. How many people want to live in built up industrial areas without green spaces. This is pure revenue to the local authorities in the form of additional council taxes masked by the guise of creating employment by destroying the environment. There are surely enough brown field sites available to provide housing although I'm sure the reluctance to develop these is to save costs to the planning applicants.

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

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

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

Response Date	3/9/2019 5:42:16 PM
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PO1247

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

Representor Details

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

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

Yes (via e-mail)

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

Policy	LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

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

the requirement for Sustainable development

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

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

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

①

- Adequate regional and cross border collaboration has not been undertaken. ⑤
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ②
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. ③
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) ④
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ③
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. ④

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

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

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

Response Date	3/9/2019 5:36:51 PM
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PO1248

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

Representor Details

Web Reference Number	WF0293
Type of Submission	Web submission
Full Name	Mr Ian Spencer
Organisation	
Address	121 Higher Lane Rainford St Helens WA11 8BQ
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

- there are no exceptional circumstances to justify not using the standard method to calculate housing need ②
 - the economic analysis is flawed and based on over-optimistic assumptions ①
 - the level of land needed is therefore not as high as set out in the Local Plan ②
 - therefore there are no exceptional circumstances to change Green belt boundaries
 - other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land ②
 - these alternatives will have less impact on the environment and lead to less need for new infrastructure
 - the Council have failed to co-operate with other councils and have not published any statement(s) of common ground ⑤
- The Plan was prepared prior to the proper assessment, compilation or publication of a Register of Brownfield sites and therefore the basis of all subsequent proposals is unsound. ②
- The Plan does not properly address or consider the impact of proposed allocated development sites on existing infrastructure, amenities or facilities. As such it is unnecessarily creating and storing up problems for the future. ④

PO1249

Representor Details

Web Reference Number	WF0321
Type of Submission	Web submission
Full Name	Mrs Wendy Hill
Organisation	
Address	11 Girvan Crescent Garswood Near Wigan WN4 0SS
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

*Predicted high volumes of traffic will be in addition to already over capacity on the highways in the locality.

*No common ground with neighbouring authorities.

* Significant and permanent harm to the greenbelt will be caused.

*By releasing greenbelt land it defies the underlying principle of recycling derelict land/other urban land.

*Strict proof should be needed for this type of development in this position and on the scale proposed as there is no proof, this is therefore not justified.

*Site 2EA has already had planning permission granted this is in the greenbelt and contrary to NPPF guidelines as current local plan is in place.

*Further pressure will be placed on Clipsley Brook especially down stream at The Ship Inn especially as site 2EA only provides for a 1 in 100 rainfall event +20% (should have been 50%) - additional building in this area will exacerbate the problem.

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

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

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

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

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

Response Date	3/6/2019 9:03:46 PM
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PO1250

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

Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

I believe that this version does not satisfy:

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

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

- 1) Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan
- 2) Adequate regional and cross border collaboration has not been undertaken
- 3) The Housing Need assessment does not use Standard Methodology and no case for exceptional circumstances has been made
- 4) The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486

③

①

⑤

②

- 5) The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not yet available or included on the Brownfield Register
- 6) The St Helens Council statement of Contaminated Land sites (2015) indicates that 3170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3170 ha available, if it were to be remediated
- 7) The council in conjunction with Liverpool City Region Combined Authority and neighbouring authorities have no policy for bringing unsuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered
- 8) The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered
- 9) The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- 10) The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquility and general health. It does not promote less vehicle dependency with it's proposals for edge of town developments
- 11) The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities

②

③

④

③

④

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

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

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

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

Response Date	3/5/2019 4:00:56 PM
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PO1251

Representor Details

Web Reference Number	WF0354
Type of Submission	Web submission
Full Name	Mrs Hannah Harrison
Organisation	
Address	3 Lakeside Court Rainford WA11 8LE
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	HA8
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

No justifiable reason to use prime farming land for building.

Risk of flooding to adjacent areas.

Loss of employment.

No justification for using green belt for building.

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

This land should not be considered for building.

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

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

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

Response Date	3/5/2019 12:18:06 PM
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PO1252

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

Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective

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

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

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

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

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

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

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

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

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

There has been no consultation with NATURAL ENGLAND over the loss of this highly productive farming land. ③

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

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

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

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

Response Date	3/5/2019 9:06:24 AM
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PO1253

① - LPA04 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0363
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

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

Yes (via e-mail)

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

Policy	Development of warehousing on the land between Haydock Lane and Liverpool Road Policy LPA04 Sites 2EA 5EA 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

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

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities

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②

7. Please set out modification(s) you consider are necessary
Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/4/2019 3:55:50 PM
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PO1254

① - LPA04 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0363
Type of Submission	Web submission
Full Name	Mr Paul O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

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

Yes (via e-mail)

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

Policy	Development of warehousing on the land between Haydock Lane and Liverpool Road Policy LPA04 Sites 2EA 5EA 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

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

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities

①

②

7. Please set out modification(s) you consider are necessary
Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	3/4/2019 3:55:50 PM
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PO1255

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

Representor Details

Web Reference Number	WF0373
Type of Submission	Web submission
Full Name	Mr. Robert Stock
Organisation	
Address	16 Lynton Way, Windle, St. Helens, Merseyside, WA10 6DZ
Agent Details	

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

Yes (via e-mail)

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

Policy	Objective of the Local Plan
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The Local Plan has been devised with the intention of achieving as much Council Tax income as is possible from house building. This has been stated in public arenas by St. Helens Council. The predetermined employment growth is calculated based on unreasonable assumptions with little evidence to support them. And it is these aspirational figures and the use of "out of date" data, which brings about a greater housing requirement than is actually needed. A better and more realistic Local Plan would have been achieved, had the figures used been based on the ONS(2018), which uses more current information. Hence, the Local Plan is not positively prepared. St. Helens Borough has sufficient Brownfield and Contaminated land which could quite easily meet housing requirements. While St. Helens Council may not currently have funding to de-contaminate some of the contaminated sites, this will not always be the case, especially when taken over a 15-30-year time frame. The removal of land from the Green Belt therefore cannot be justified. Hence, The Local Plan is not justified.

The Local Plan is weak on infrastructure planning and does not adequately address major transport problems which are already apparent, and which will worsen still further as the Liverpool City Region

①

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③

Development comes more into being. Also, there is little on how school and medical facility _____ (3)
shortages, are to be addressed. Hence, the Local Plan is not effective.
The Local Plan cannot be said to be current, since it does not use the most current data or current _____ (182)
national planning framework. I would have more confidence in the Local Plan if (1) it complied with
NPPF(2018), and (2) it used the more accurate and up-to-date housing and employment statistics in
ONS(2018). Other Authorities round and about St. Helens Borough are also producing Local Plans _____ (4)
which are over stating housing requirements, demonstrating a failure to cooperate. Hence, the
Local Plan is not consistent with current national policy.

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

Make the Local Plan more representative of current knowledge and data by adopting the ONS(2018)
report on employment and housing statistics, Thereby eliminating the need in this Local Plan to
reallocate land from the Green Belt.

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

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

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

Response Date

3/4/2019 4:10:51 AM

PO1256

①-LPA04 ②-LPA05 ③-GEN ④-Para 17.2 OTC

Representor Details

Web Reference Number	WF0381
Type of Submission	Web submission
Full Name	Mr Alastair Rooke
Organisation	
Address	10 Ansdell drive Eccleston St Helens WA10 5NB
Agent Details	

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

No

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green belt review 2018

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

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

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

Justified, Effective, Consistent with national policy

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

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

The housing need assessment does not use standard methodology, and no case for exceptional circumstances has been made.

The plan makes no mention of brownfield and previously developed land that is not available or included on the brownfield register.

Adequate regional and cross border collaboration has not been undertaken.

The loss of grade 1 and 2 agricultural land that comprises most allocated and safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The increase in traffic proposed in the plan will have a significant impact on air-quality, noise, tranquillity and general health.

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

Retaining all Green belt areas for the future of our children must be put above greed and money.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now.

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

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

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

Response Date	3/3/2019 4:29:37 PM
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PO1257

① - LPA04 ② - LPA05 ③ - Statement of Common Ground

Representor Details

Web Reference Number	WF0386
Type of Submission	Web submission
Full Name	Mrs Jacqueline Scott-Harley
Organisation	n/a
Address	4 Green Lane Rainford St Helens WA11 8EJ
Agent Details	n/a

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

Yes (via e-mail)

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

Policy	St Helens Borough Local Plan 2020-2035
Paragraph / diagram / table	8HA 9EA
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

In respect of the overall figures in the Plan;

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

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

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

• therefore there are no exceptional circumstances to change Green belt boundaries

• other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land

• these alternatives will have less impact on the environment and lead to less need for new infrastructure

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

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

②

①

②

③

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

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

2

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

Please see above

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

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

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

Response Date	3/3/2019 10:36:37 AM
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PO1258

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

Representor Details

Web Reference Number	WF0388
Type of Submission	Web submission
Full Name	Mr John McKeon
Organisation	Mr
Address	3 Windlebrook Crescent Windle WA10 6DY
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The plan is: based on flawed methodology; not deliverable and does not comply with NPPF 2018.

Also, the plan does not satisfy :

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

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

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

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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.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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

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

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

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

Response Date	3/3/2019 10:06:47 AM
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PO1259

① - LPA04 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0390
Type of Submission	Web submission
Full Name	Mr Stephen Harrison
Organisation	
Address	177, Liverpool Road Haydock, St Helens Wa119RX
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt in respect of site 2EA -Florida Farm North.

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

High volumes if predicted traffic will add to the already over capacity on the highways in the vicinity. Further to this, the more HGVs the more 'wear and tear' on the roads, thus more and more pot holes and uneven surfaces. This will intern affect personal vehicles suspension and tyre use.

The warehouses that are being built at the moment originally stated that they would be single storey in height. This is the case, however, these warehouse are still visible for residents on Liverpool Road whom back onto the Florida Farm land.

How would YOU honestly feel if this was YOU?

There is no statement of common ground with neighbouring authorities.

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They say that this new infrastructure will bring X amount of new jobs... Very good, but for WHO? The residents of Haydock? NO in fact this would draw more people into the area, stretching the already crippled infrastructure. Thus the new development will not help with jobs for the people of Haydock. Furthermore, if the machinery in the warehouses is going to be automated, where does this help the work force?

Haydock was once a quiet and peaceful village. Yes, it had to go with the times and have some industrialisation, but where does this stop? The Greenbelt is there for the residents of Haydock to enjoy. Why ruin it?

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

Delete this land from the proposal removal from the Greenbelt

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

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

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

Response Date	3/2/2019 7:27:31 PM
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PO1260

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

Representor Details

Web Reference Number	WF0395
Type of Submission	Web submission
Full Name	Mr Michael McLoughlin
Organisation	
Address	3b Sadlers Lane Rainford St. Helens WA11 7HT
Agent Details	Mrs Patricia McLoughlin 3b Sadlers Lane Rainford St. Helens, WA11 7HT

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

Yes (via e-mail)

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

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

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

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

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

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

this version does not satisfy:

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

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

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

③

①

⑤

• The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

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

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

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

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

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

• The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26.

The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

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

• The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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

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

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

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

Response Date

3/2/2019 1:22:19 PM

PO1261

Representor Details

Web Reference Number	WF0402
Type of Submission	Web submission
Full Name	Miss Keira O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

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

Yes (via e-mail)

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

Policy	Development of warehousing on the land between Haydock Lane and Liverpool Road Policy LPA04 Sites 2EA 5EA 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

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

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	2/28/2019 4:27:23 PM
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PO1262

Representor Details

Web Reference Number	WF0407
Type of Submission	Web submission
Full Name	Mr Euan O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

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

Yes (via e-mail)

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

Policy	Development of warehousing on the land between Haydock Lane and Liverpool Road Policy LPA04 Sites 2EA 5EA 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

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

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	2/28/2019 4:16:57 PM
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PO1263

Representor Details

Web Reference Number	WF0411
Type of Submission	Web submission
Full Name	Mrs Julie O'Brien
Organisation	
Address	8 Langholm Road Garswood Wigan WN4 0SE
Agent Details	

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

Yes (via e-mail)

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

Policy	Development of warehousing on the land between Haydock Lane and Liverpool Road Policy LPA04 Sites 2EA 5EA 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

.

Not Justified

The council should be put to strict proof of the need for this type of development, in this position and on this scale

One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Using greenbelt fails to encourage this.

The release of greenbelt will cause significant harm to the purposes of greenbelt

The council has already granted planning permission in the greenbelt in respect of site 2EA - Florida farm North

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

High Volumes of predicated traffic will add to the already over capacity on the highways in the vicinity

There is no statement of common ground with neighbouring authorities

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

Delete this land from the proposed removal from the greenbelt

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

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

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

Response Date	2/28/2019 3:52:16 PM
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PO1264

① - LPA04 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0454
Type of Submission	Web submission
Full Name	Mrs June Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

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

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

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

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

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

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

There is no statement of common ground with neighbouring authorities.

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

Delete this land from the proposed removal from the Greenbelt.

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

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

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

Response Date	2/22/2019 2:19:13 PM
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PO1265

① - LPA04 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0459
Type of Submission	Web submission
Full Name	Mr Michael John Buckle
Organisation	
Address	58 Hamilton Road Garswood WN4 0SU
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA 04 - Sites 2EA, 5EA and 6EA.
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

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

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

\The Council has already granted planning permission in the \greenbelt in respect of site 2EA - Florida Farm North.

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location.

High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/22/2019 11:40:27 AM
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PO1266

① - LPA04 ② - LPA05 ③ - LPA08

Representor Details

Web Reference Number	WF0466
Type of Submission	Web submission
Full Name	Mrs Sue Lemasurier
Organisation	Mrs
Address	72 Broadway Eccleston, WA105DH WA10 5DH
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	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The figures used to justify economic growth predictions are out of date and therefore the targets within the plan are not justified. The plan does not take account of Brownfield and PDL land not yet on the Brownfield Register, nor does it take account of land that is only mildly contaminated and could be made suitable for housing at relatively small expense - surely it makes sense to use such sites for housing before considering the use of green space, especially within the long term of the plan period. It seems to me the plan is more for the economic benefit of farmers and developers than it is for the population of the area. It is unclear how and where the necessary infrastructure to support such a large development will be provided and funded. As town centre shops become increasingly empty plans to develop housing within the town centre could go some way towards providing housing, for example through the provision of social housing for the elderly with ground floor retail provision thus freeing up existing family sized homes, and also through providing town centre apartments for first time buyers. I appreciate the need to provide housing and also to bring more money into the town but do not think a large edge of town estate will benefit the local community: instead it will deprive them of the countryside which together with relatively easy transport connections makes the area desirable - if the plan does proceed I think the result will be a decline in desirability of the local area and result in lower local spending for the town. I think the Council should ensure efficient use of its existing housing stock together with unused and unsightly sites in order to clean up the town and bring it into the current century, together with allowing small

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select developments in order to attract people with higher incomes into the area since it is only by increasing average income levels locally that the town centre will have the potential to become an attractive place to live near.

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7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

2/21/2019 12:44:50 PM

PO1267

① - LPA04 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0470
Type of Submission	Web submission
Full Name	Mrs Valerie Wilson
Organisation	
Address	2 Hollins Close Garswood Wigan WN4 0RR
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04 Sites 2EA,5EA,6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - the Council should be put to strict proof of the need for this type of development in this position & on this scale.

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.

The Council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North.

The risk of flooding further down the Clipsey Brook will be exacerbated by future development at this location.

High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity and add to air pollution.

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/20/2019 3:58:11 PM
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PO1268

① - LPA04 ② - LPA05 ③ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0473
Type of Submission	Web submission
Full Name	Mr Paul Trelford
Organisation	
Address	30 Howards Lane, Eccleston WA10 5HY
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

There are no exceptional circumstances to justify not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the level of land needed is therefore not as high as set out in the Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

For these reasons and unless the plan is significantly modified it will fail both the legal tests it has to pass and the tests of soundness

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

7. Please set out modification(s) you consider are necessary

Identify and regenerate the numerous brownfield sites around already developed infrastructures

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/18/2019 8:33:56 PM
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PO1269

①-LPA04 ②-LPA05 ③-LPA06 ④-IDP ⑤-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0478
Type of Submission	Web submission
Full Name	Mrs Susan Barton
Organisation	
Address	19 Brooklands Road Eccleston St Helens WA10 5HE
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is not positively prepared.

St Helens has adequate Brownfield and Contaminated land which could easily meet housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.

①

②

④

③

The Plan does not comply with NPPF(2018) as it was written prior to it's publication. Neither does it consider the more accurate and true housing and employment statistics in ONS(2018) figures. Duty to cooperate has been weak and neighbouring authorities are also planning to over supply housing which cannot be sustainable in this area of the North West.

182

5

7. Please set out modification(s) you consider are necessary

Adopt the ONS(2018) housing need statistics and remove all Green Belt reallocation from the Plan.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/16/2019 2:35:45 PM
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PO1270



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

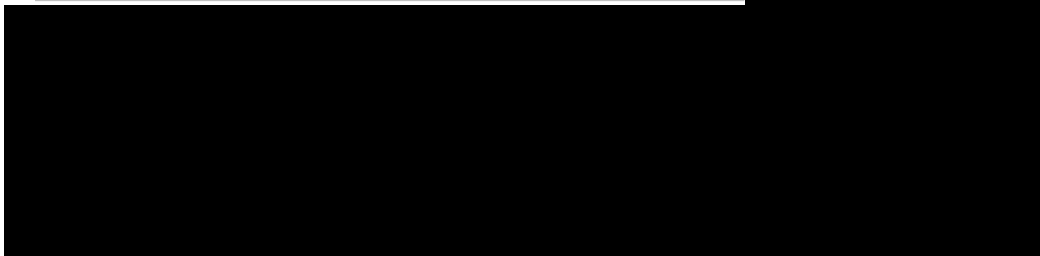
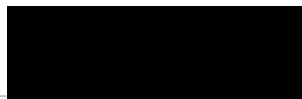
Dear Sir / Madam,

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

communities; contribution to high quality and built environment; minimising the need to travel; and lowering St Helen's carbon footprint.

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.

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

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

PO1271

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

PO1272



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes
 Hannah Payne
 to:
planningpolicy@sthelens.gov.uk
 13/03/2019 16:22



1 Attachment



Representation Form.pdf

Dear Sir/Madam,

Please see attached completed Representation Form and accompanying representations submitted on behalf of Barratt Homes to be taken into consideration as part of the consultation on the St. Helens Local Plan Submission Draft.

Note that we would like to be informed of future progress on the Local Plan and request the opportunity to attend Examination in Public.

We would be grateful if you could confirm receipt by way of a return email.

Kind regards,

Hannah

Hannah Payne | Senior Planner



indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



This e-mail (including any attachments) is intended only for the recipient(s) named above.
 It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person.
 If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

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.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see enclosed representation.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see enclosed representation.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> No , I do not wish to participate at the oral examination	<input type="checkbox"/> Yes , I wish to participate at the oral examination
-------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please see enclosed representation.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

indigo.

Every update of the St. Helens Strategic Housing Land Availability Assessment since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. We consider that the policy addresses the housing delivery issues in the borough through a revised spatial distribution and release of Green Belt land for housing. We support this policy but have concerns over the emphasis placed on the delivery of brownfield sites.

02

However, the priority placed on the re-use of previously development land over other allocated sites is not considered appropriate. We question the rationale for lowering the threshold for developer contributions for developers of brownfield sites given it is incorrect to assume developers on greenfield sites have less constraints. As such, each site should be taken on its own merits with developers' contributions subject to viability considerations.

03

At LPA02(4), further clarity should be provided on when a full review of the Plan will be triggered.

04

The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included in LPA02 as health and wellbeing of St. Helens' residents is covered within Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. This part of the policy should therefore be removed.

05

Policy LPA03: Development Principles

On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined.

06

Nonetheless, the development of the Florida Farm South draft allocation supports the development principles identified within this policy. It will provide circa 600 homes; contributing not only towards the boroughs housing target and a sustainable mix and tenures of quality homes but also through direct and indirect investment in the local area. This in turn will contribute towards the borough's regeneration objectives.

07

Policy LPA04: A Strong and Sustainable Economy

The employment target of a minimum of 215.4ha up to 2035 has been reduced from the minimum of 306ha up to 2033 outlined in the Preferred Options Local Plan.

Although this target appears sufficient to meet anticipated need, this figure does not reflect the Spatial Vision and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general.

08

The allocation of employment sites within the Green Belt particularly those along

09

PO1273



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

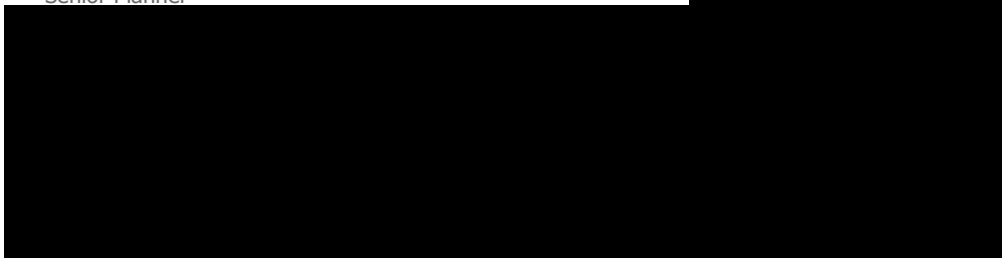
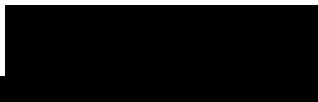
To whom it may concern,

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.

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 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE REFER TO REPRESENTATION DOCUMENT
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<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:

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

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

PO1274



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)
Emer Cunningham

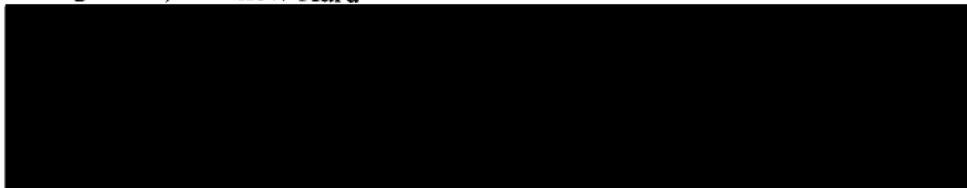
to:

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.
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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.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	Address: St James' Tower 7 Charlotte Street Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	
Signature	Date: 13/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> No , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	<input type="checkbox"/> Yes , I wish to participate at the oral examination
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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.

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.

- 4.9. 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.
- 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. 13
- 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

PO1275

① LPA04

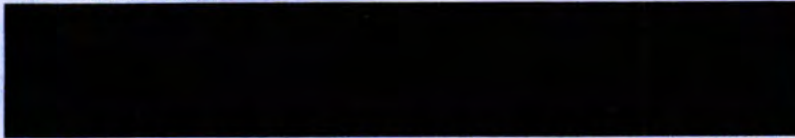


{In Archive} Local plan 2020 - 2035

to:

planningpolicy

06/02/2019 11:01



I would like to object to the extent of warehouse developement local to the M6 / East Lancs road and its effect on the neighbouring boroughs..

] ①

Regards
David Houlton
3 Cranham Ave
Lowton

Virus-free. www.avast.com

PO1276

Representor Details

Web Reference Number	WF0248
Type of Submission	Web submission
Full Name	Mrs Catherine Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

7. Please set out modification(s) you consider are necessary

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016).
- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 6:03:27 PM
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PO1277

Representor Details

Web Reference Number	WF0249
Type of Submission	Web submission
Full Name	Mr Brendan Houlihan
Organisation	
Address	68 Ecclesfield Rd Eccleston St Helens WA10 5NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

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- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

7. Please set out modification(s) you consider are necessary

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

PO1278

Representor Details

Web Reference Number	WF0250
Type of Submission	Web submission
Full Name	Mr Richard Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

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- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

7. Please set out modification(s) you consider are necessary

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

PO1279

Representor Details

Web Reference Number	WF0313
Type of Submission	Web submission
Full Name	Mrs Ann-Marie Barrow
Organisation	
Address	11 Lynton Way Windle St. Helens WA10 6EQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

This version of the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council

PO1280

Representor Details

Web Reference Number	WF0346
Type of Submission	Web submission
Full Name	Mrs Elizabeth Graner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA10 4EY
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

01

02

03

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7. Please set out modification(s) you consider are necessary

In addition, the following fundamental elements of the Plan remain questionable -

PO1281

Representor Details

Web Reference Number	WF0347
Type of Submission	Web submission
Full Name	Mr Alan Garner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA104EY
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

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I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

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- the requirement for Sustainable development
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- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

01

02

03

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05

7. Please set out modification(s) you consider are necessary

In addition, the following fundamental elements of the Plan remain questionable -

PO1282

①-LPA01 ②-LPA02 ③-LPA04 ④-LPA02

WF0394.pdf

⑤-Green Belt Review 2018 ⑥-LPA04 ⑦-Para 1.7.2 DTC

⑧-LPA05 ⑨-LPA08 ⑩-LPA07 ⑪-LPA08

Representor Details

Web Reference Number	WF0394
Type of Submission	Web submission
Full Name	Mr Michael McLoughlin
Organisation	
Address	3b Sadlers Lane Rainford St. Helens WA11 7HT
Agent Details	Mr Michael McLoughlin

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

this version does not satisfy:

- the requirement for Sustainable development 01
 - the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
 - sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
 - effective land use by concentrating on Green Space development over town centre development with higher densities. 04
 - food security by ignoring Agricultural Land Quality. 05
- In addition, the following fundamental elements of the Plan remain questionable -
- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
 - Adequate regional and cross border collaboration has not been undertaken. 07
 - The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
 - The latest estimate produced by the ONS (2016) predicts that 383 houses

per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/2/2019 1:35:59 PM
---------------	---------------------

PO1283

Representor Details

Web Reference Number	WF0445
Type of Submission	Web submission
Full Name	Mr Paul McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes
Paragraph / diagram / table	
Policies Map	Areas 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

7. Please set out modification(s) you consider are necessary

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

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- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/24/2019 3:12:06 PM
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PO1284

Representor Details

Web Reference Number	WF0446
Type of Submission	Web submission
Full Name	Mrs Helen McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes
Paragraph / diagram / table	
Policies Map	Area s 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	yes
Habitats Regulation Assessment	yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

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The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

7. Please set out modification(s) you consider are necessary

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/24/2019 3:06:37 PM
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PO1286



{In Archive} St Helens Local Plan 2020-2035 Submission Draft & Parkside Planning Application P/2018/0048/OUP

to:

planningpolicy@sthelens.gov.uk

27/01/2019 20:32



Dear Sir / Madam,

Please accept this email as formal representation and objection regarding the plan and also regarding the potentially misalignment between the plan and the most recent Parkside Planning application.

I have grave concerns regarding the plan and the content that entails the Parkside redevelopment.

I have recently received draft plans for the Parkside development (16th Jan 2019) and it seems there is serious misalignment between the plan and the revised plans. I have grave concerns also with the previous planning application but now it seems as if the stories are not aligned and hence you are perhaps not making the best and most informed decisions.

In the plan it mentions all the merits of the rail freight terminal, in the recent planning application, the rail freight terminal is actually at risk and might not happen. This would seriously put additional HGV load on the area. The most recent planning application also omits previous road extensions to help with HGV volumes but now this is not proposed to be the case and all traffic would pass through local residential areas. Surely this is not something ST Helens council would wish as you would potentially drive residents out of St Helens into other areas given your plans to industrialise your town and villages without any consideration for health, safety, shrinking your revenues due to residents relocating etc.

I have the following concerns I would like you to consider and factor into your plan and the specifics regarding Parkside regeneration :-

- Your plan does not seem aligned and in fact is potentially contradictory to planning applications. You might therefore be advertising / making decision on something that is incorrect and potentially leave you open to legal duress against you.
- FUMES & EMISSIONS The A49 is already a busy road, this development would greatly increase the traffic flow. An increase in traffic fumes (as well as any emissions from the actual planned facility) would be considerable and would have a detriment to local residents, children and wildlife.
- TRANSPORT This proposed development would drastically increase the traffic volume through built up residential areas including the high street. Surely any development cannot be approved that initially only has access and will increase traffic radically through residential areas. The residential areas should remain sacrosanct and even for phase one, bespoke access needs to be incorporated that does not impact existing residential areas.
- HGV's AND SAFETY As above, the increased traffic volume based on current plans greatly increases the risks of accidents and potential Road Traffic deaths but channelling HGV's through the high street and the surrounding residential areas! This surely cannot be an acceptable factor to increase the

dangers to local residents by channelling significant additional volumes of HGV's through residential areas. Again, an alternative bespoke and mandatory access to the site needs to be included even as phase one of the development to prevent the council increasing the dangers on our roads to local residents.

- **NOISE & ROAD MAINTENANCE** The A49 has seen increased HGV use in recent months as the new train station is developed as this understandably requires commercial vehicles to access the site whilst construction is happening. Now this is near completion, the new consumer traffic that will utilise the park and ride station needs to be built into forecasts it will be a double whammy of additional cars and additional HGV's. The Road noise to ourselves has increase radically because of the increased volume of HGV's but also because the road surface has become potted and deteriorated very quickly given the increased usage by HGV's. With the planned development only having initial access via the A49, this would increase this problem and make it a continual problem for residents which would be unacceptable hence alternative bespoke and mandatory access to the site needs to be included even as phase one of the development that avoids using the A49. The plans show that this is planned for later phases but this needs to be the day 1 solution to prevent problems on the A49
- **PENNINGTON DRIVE ACCESS** Turning out of Pennington drive onto the A49 is already a challenge given the high usage of the A49 by traffic. This is especially true turning right towards Winick as this is somewhat of a blind corner. Serious consideration should be given to this junction as part of the planning application as by increasing traffic flow (HGV's and Cars) will make this junction a bottle neck and with HGV's this will create a real road safety issue given the increase stopping distances of HGV's when they would be coming around the blind bend on the junction of A49 & Pennington Drive heading towards Newton as this will be the preferred route for any vehicles wanting to head northbound on the M6 likely. So consideration should be given to this blind corner as this could be a real Road Traffic Accident Black Spot without the introduction of control lights etc. to cope with any additional HGV traffic.
- **PARKING** We already experience parking issues with people leaving cars on Pennington Drive to use the local train station. Any additional development would increase the potential parking problems if staff at the new development don't have an excess of parking at the facility. Residential parking permits / zones should be considered to mitigate this issue for all neighbouring residential areas impacted.

If you require any further explanation or wish to discuss these points, please do not hesitate to contact myself via the contact details below. Thank you for considering these factors that would impact us as local residents and our neighbourhood and that creates additional significant dangers [REDACTED]. I am sure you would not want this to be the headline of your local plan

Kind regards,

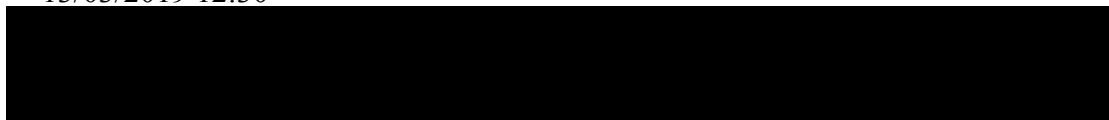
John

John Rea
4 Pennington Drive
Newton Le Willows
St Helens Council
WA12 8BA

PO1289



St Helens Local Plan Submission Draft
 McBride, Sean
 to:
 'planningpolicy@sthelens.gov.uk'
 13/03/2019 12:30



5 Attachments



St Helens Local Plan Submission Draft Rep - March 2019.pdf



Vision Document - Land at Weathercock Hill Farm Rev A 13 03 19_compressed (2).pdf



Weathercock Hill Farm_Ecological Statement(1.1).pdf



Landscape Feasibility Statement - Land at Weathercock Hill Farm.pdf 2503.TN.pdf

Dear Sir/Madam

Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards
 Sean

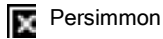
Sean McBride
 Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH



We are proud to be an official partner of Team GB.



As part of our partnership with Team GB, we're **Building Futures**, giving away £1 million to the next generation of stars. [Find out more....](#)

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Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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For more information please visit <http://www.symanteccloud.com>

**St. Helens Borough Local Plan
2020-2035 Submission Draft**

Representations submitted on behalf of Persimmon Homes North West

March 2019



EL 0177

Framework stating that Green Belt boundaries should only be altered 'through the preparation or updating of plans' (para 135).

-
- 3.4 Whilst addressed in more detail later in this representation, the Council's Strategic Housing Land Availability Assessment 2017 [SHLAA] identifies an existing housing land supply of 6,344 homes; significantly short of the emerging Local Plan housing requirement of 9,234 net additional dwellings. The Company considers that exceptional circumstances exist to release land from the Green Belt, as required at para 137 of the Framework.

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-
- 3.5 It is necessary that the Council seeks to identify sufficient sites to meet St Helens' full objectively assessed need within its own authority area. Given Warrington and Halton, those neighbouring authorities who form the Mid-Mersey HMA, are also undertaking a Green Belt review to accommodate their future housing needs; it being confirmed that they (along with nearby districts in Liverpool and Greater Manchester City Regions, and West Lancashire) will be unable to accommodate St Helens' unmet needs.

-
- 3.6 The Company also supports the Council's identification of land for safeguarding to meet the longer term housing and employment needs of St Helens, considering this approach to be in accordance with para. 139 of the Framework.

09

Policy LPA03: Development Principles

- 4.1 The Company are broadly supporting of the development principles set out within policy LPA03 particularly the creation of sustainable communities and the requirement that new development assists in meeting the challenges of population retention and growth, by providing a mix of homes, including types and tenures to meet needs and aspirations of all existing and future residents.

10

Policy LPA04: A Strong and Sustainable Economy

- 5.1 The Company generally supports policy LPA04 which seeks to maximise opportunities for economic growth, job creation and skills development.

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-
- 5.2 Whilst acknowledging the importance of protecting sites allocated for employment and viable employment sites from being developed for alternative uses, it is considered that paragraphs 4 and 5 of the policy do not fully accord with the Framework.

5.3 Para. 120 of the Framework sets out that planning policies and decisions need to reflect changes in the demand for land; where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in the plan, they should:-

- reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
- Support applications for alternative uses, where the proposed use would contribute to meeting an unmet need for development.

12

5.4 Paragraph 121 further states that Local Planning Authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help meet identified development needs, including the use of retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors.

5.5 Reuse of historic employment sites has been a constant source of housing land supply in St Helens in recent years, as evidenced by the Company's current sites at the former Vulcan Works and Deacon Trading Estate; it should be considered that such sites will continue to form part of the housing land supply in the Plan period.

Policy LPA05: Meeting St Helens Borough's Housing Needs

Housing Requirement

6.1 The Company acknowledges the Council seeking to adopt a housing requirement figure in accordance with the standard method figure, whilst having regard to economic growth projections in the Liverpool City Region Strategic Housing and Employment Land Market Assessment [SHELMA] and the St Helens Employment Land Needs Assessment [ELNA].

6.2 Of concern to the Company however is that the proposed annual requirement of 486 dpa represents a significant drop in housing requirement from the requirement identified within the Preferred Options Plan (2016) and also the currently adopted Core Strategy (2012) of 570 dpa – amounting to 1,680 homes across the plan period.

13

PO1290

PF1347



St Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

1428
13 MAY 2019 6:02 AM E1

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 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: **planningpolicy@sthelens.gov.uk**

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

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 3rd 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.

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:

"If any allocations are made within the Bold Forest Park area in the new Local Plan, they will be based on a process that is consistent with Green Belt policy and exceptional circumstances will need to be demonstrated."

-
- 5.1. It has been argued throughout this document that the 2016/2017 LAP's proposals to remove some of HA4's constituent land parcels from the Green Belt were flawed. There is an even greater argument throughout this foreword section against the new proposals in 2018-19 for the removal and a massive new development across the whole site – and for that to happen now rather than to be reviewed in 2035. Members of the Community broadly welcomed the Bold Forest Park AAP and are concerned to see this substantial change. 11
-

- 5.2. The AAP recognises that *"There is an extensive equestrian sector in and around Bold with major yards at Bold Heath Equestrian Centre, Northfields, Old Brook Hall Farm and Tunstalls Farm and many more small DIY livery and grazing facilities. Consequently, much of the land is utilised for pasture and hay-cropping."*

- However, these properties surround and/or are part of GBP_074/HA4.
 - Removal of HA4 from the Green Belt and its consequential development directly affects these establishments.
 - The loss of pasture and hay production (through any compulsory purchase, for example) could lead to their demise – as opposed to the remit of encouraging such businesses as set out in the AAP.
 - The Tunstalls Farm livery is under particular threat. The property and its fields have been tenanted by the same family for 4 generations. It is well managed permanent pasture which (with the inclusion on LWS_108), takes up the whole of the land sub-parcel GBR_074c. It is owned by the council (a fact not declared in the Bold Forest Park AAP) and the loss of its grazing pastures (as put forward by the council) would, by definition, mean it would cease to exist.
- 12
-

- 5.3. The AAP sets out a vision for encouraging a green and open landscape and is committed to improving access to the countryside and recreational hubs for outdoor activities. It also reports the findings of *"Consultation undertaken by URS21 suggests that the overwhelming activity need is for routes to facilitate walking, running and cycling."*
- The AAP itself points out that the local community and visiting public want the ambience of the open countryside. *"3.2.9 The environmental quality of the area is of fundamental importance to the success of the Forest Park..."*
- 13

The proposals will materially affect these considerations.

6. IMPORTANT THINGS OF NOTE:

- 6.1. Since the original report was produced in January 2017, the Bold Forest Park AAP has been approved (July 2017). This material fact, the records from Merseyside Bio-Bank - and the results of the recent Phase 1 habitat survey suggest the options put forward in the conclusion of the original document are now invalid.

These facts and findings appear to leave only one feasible option – that HA4/GBP_074 should not be removed from the Green Belt, nor should it be allocated for housing.

- 6.2. The wording within the Green Belt review 2018 and the Local Plan 2020 – 2035 regarding HA4 is misleading and disingenuous in places.

The description of the sub-parcel GBP_74d states that it *"...has a strong boundary to the east ..."*
"...includes old coal mining buildings..." "...and a new development..." 14

- The boundary to the east of the parcel has a simple post and wire fence around the grazing field, no hedge or fence at the farmer's side of the footpath, there is a ditch.
-

PO1291

PF1348



St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

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
------------	---------------

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.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

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 3rd 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.

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:

"If any allocations are made within the Bold Forest Park area in the new Local Plan, they will be based on a process that is consistent with Green Belt policy and exceptional circumstances will need to be demonstrated."

-
- 5.1. It has been argued throughout this document that the 2016/2017 LAP's proposals to remove some of HA4's constituent land parcels from the Green Belt were flawed. There is an even greater argument throughout this foreword section against the new proposals in 2018-19 for the removal and a massive new development across the whole site – and for that to happen now rather than to be reviewed in 2035. Members of the Community broadly welcomed the Bold Forest Park AAP and are concerned to see this substantial change. 11
-

- 5.2. The AAP recognises that *"There is an extensive equestrian sector in and around Bold with major yards at Bold Heath Equestrian Centre, Northfields, Old Brook Hall Farm and Tunstalls Farm and many more small DIY livery and grazing facilities. Consequently, much of the land is utilised for pasture and hay-cropping."*

- However, these properties surround and/or are part of GBP_074/HA4.
 - Removal of HA4 from the Green Belt and its consequential development directly affects these establishments. 12
 - The loss of pasture and hay production (through any compulsory purchase, for example) could lead to their demise – as opposed to the remit of encouraging such businesses as set out in the AAP.
 - The Tunstalls Farm livery is under particular threat. The property and its fields have been tenanted by the same family for 4 generations. It is well managed permanent pasture which (with the inclusion on LWS_108), takes up the whole of the land sub-parcel GBR_074c. It is owned by the council (a fact not declared in the Bold Forest Park AAP) and the loss of its grazing pastures (as put forward by the council) would, by definition, mean it would cease to exist.
-

- 5.3. The AAP sets out a vision for encouraging a green and open landscape and is committed to improving access to the countryside and recreational hubs for outdoor activities. It also reports the findings of *"Consultation undertaken by URS21 suggests that the overwhelming activity need is for routes to facilitate walking, running and cycling."*
- The AAP itself points out that the local community and visiting public want the ambience of the open countryside. *"3.2.9 The environmental quality of the area is of fundamental importance to the success of the Forest Park..."* 13

The proposals will materially affect these considerations.

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-

PO1292



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.

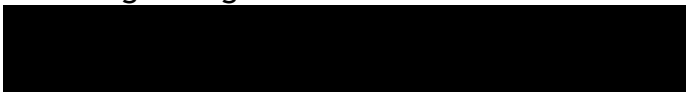
Please confirm receipt.

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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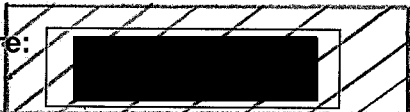
Part A – Personal Details

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"/>
------------------------------------------------------------------------------------------------	--------------------------------------------------

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Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
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

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We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

employment property and have an adverse effect on the property market. It would lead to widespread vacancy. We think the data in Tables 4.2, 4.3 and 4.4 is inaccurate.

Our view is supported by the expert opinion of economist Dr. Glenn Athey, who was commissioned by St Helens Green Belt Association (an umbrella residents group opposed to Green Belt loss). In his report, Dr Athey concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts has used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with a number of other assumptions underpinning employment land policies, including forecasts of port freight. In light of Dr Athey's expert opinion, CPRE Lancashire calls for the Council to review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. CPRE Lancashire calls for the economic data, analysis to be corrected.

This is particularly the case when considering the fact that all surrounding geography in Liverpool City Region, Greater Manchester, Cheshire and West Lancashire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland for development, which is important for future food security, and is currently protected by Green Belt designation on the basis of economic analysis that is flawed and consequently not fully justified. Some of the land so allocated is among the most versatile in the country. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. CPRE Lancashire is concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

In any case, what is the local benefit of B8 Warehousing formats with new technology replacing human resources resulting in very low density employment formats, causing great harm to Green Belt purpose? We think there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, and question the need for such an excessive amount in the countryside. The duty to cooperate has not been complied with on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities, resulting in sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. CPRE Lancashire believes local planning of large warehousing formats should be in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

CPRE Lancashire is opposed to needless release of Green Belt land for employment uses. Previously we raised concern over 2EA, 4EA, 7EA, and 8EA (LPA10), but we reserve the right to comment on other employment sites included in LPA04.1 at the examination.

It is supported that planning applications for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St.Helens Borough's Housing Needs

In recent years, CPRE has undertaken considerable research to show that housing assessments

PO1293



CPRE Lancashire response
jackie.copley
to:
planningpolicy
13/03/2019 09:20



1 Attachment



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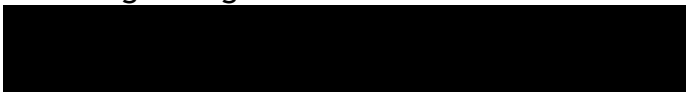
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Yours sincerely

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Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

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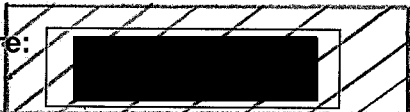
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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
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------------------------------------------------------------------------------------------------	--------------------------------------------------

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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

PO1294



St Helens Local Plan: Submission Draft - Florida Farm North & South
Kathryn Duckworth

to:

planningpolicy

24/02/2019 15:07



1 Attachment



Letter Opposing Planning Consent for Local Plan.doc

Please find my attached representation in relation to the above:

202 Liverpool Road
ASHTON-IN-MAKERFIELD
Wigan
Lancs
WN4 0YT

24th February 2019

St Helens Council
Town Planning
Town Hall
Victoria Square
ST HELENS
Merseyside
WA10 1HP

TO WHOM IT MAY CONCERN

Dear Sir/Madam

**Re: St Helens Borough Local Plan: Submission Draft – Florida Farm
North & South**

I object to the Local Plan proposals in the above areas, for the following reasons:

- Loss of greenbelt/agricultural land – all brownfield land should be cleaned up & utilised for new builds & it should be a mandatory requirement for local authorities to adhere to in order to protect our precious greenbelt land for future generations. If we continue our destruction of greenbelt land, all that our children/grandchildren will be left with is an abundance of urban brownfield land, creating eyesores & in some cases danger for children playing there, as no one will want the hassle & expense of cleaning them up.
- Loss of flora & fauna – it's impossible not to kill a lot of wildlife & reduce their remaining habitat drastically if these proposals succeed. Do you not understand the damage this plan will do to the environment with the ensuing pollution that will occur? We are being told by experts that the way we live our lives at the moment is not sustainable & we are on a precipice – concreting over green belt land should not be allowed, we need green spaces & trees to encourage wildlife.
- Bericote's current warehouse build is an eyesore that the council said would be hidden from view on Liverpool Road with raised banks & trees – not so!, if they're planning to hide it with trees that is a very expensive option or are we having saplings that we take years to grow (which in itself it not what we were led to believe) or is it a case of

1 and 2

2

nothing will be done as you have got what you wanted so to hell with the residents.

- Risk of flooding at Springfield Park & Clipsley Brook again & possibly other areas as well if more land is covered in concrete.
- Proximity to existing residential areas, which could be stressful & result in a devaluation of these properties.
- Noise from vehicles arriving/departing from the proposed 24 hour site operation & the loud reverse warning noise they make.
- Light pollution – has an effect on wildlife, our ecosystem & people who are unfortunate enough to live in close proximity to excessive artificial lighting.
- Road congestion – the proximity of this area to M6 motorway, East Lancs Road & Haydock Industrial Estate has always meant that it is very heavily used & often leads to a congested network of roads. As local residents are fully aware, this whole area becomes grid-locked on a regular basis due to an accident occurring within this road network.
- Pollution from HGV diesel particulates & vehicles used by employees at the proposed development.
- The current levels of noise & vibration from HGVs already has an effect on residents' lives. The vehicles thunder up & down these roads, causing windows to rattle, manhole/grid covers become loose & noisy & having windows open means you can hear the noise inside your home.

land 2

Please do not allow the destruction of any more of our precious greenbelt land by allowing profit orientated developers to dictate how our community should be carved up. There are numerous empty units & brownfield sites across Merseyside & these should & must be the first priority for this development – 'HANDS OFF HAYDOCK GREENBELT – NO MORE DEVELOPMENTS ON FLORIDA FARM'

Yours sincerely

Kathryn Duckworth

PO1295

① - GEN ② - LPA04

ELO003



Fw: REPRESENTATION TO THE LOCAL PLAN

to: planningpolicy

25/02/2019 08:49



From: PHIL ROUND

Date: 24/02/2019 20:43

Subject: REPRESENTATION TO THE LOCAL PLAN

I wish to make representations reference the local plan.

In no way is this a balanced plan where a large proportion of green belt removal is concentrated on two specific areas, Newton and Haydock. I recognise the need for more housing and it good to see that new housing developments are being built on brown field sites. Unfortunately I do not see the two main developments in Newton, Vulcan and Viaduct sites being backed with necessary infrastructure to deal with traffic and additional population. This is likely to be repeated with the Parkside development, P/2018/0048/OUP which will add to traffic congestion, It is an inappropriate development due to the proximity of a residential area and a high volume of HGV's will end up on totally inadequate local roads. This is also an area of quality management where pollutants are often in breach of quality standards.

I cannot comment on other areas of the borough although there will need to be a change in the way the borough is managed if any local plan is likely to be successfully implemented.

Phil Round
76 Southworth Road
WA12 0DG

ps I AM NOT A ROBOT

PO1296



St. Helens Local Plan Submission Draft (LPSD)
Martyn Fenton
to:
planningpolicy@sthelens.gov.uk
11/03/2019 08:43

Martyn Fenton
80 Church Road
Rainford
St Helens
WA11 8QQ

11th March 2019

I submit my objection to the St Helens Local Plan in general with respect to building on greenbelt land and in particular to the land being removed from greenbelt for housing "need" in the area designated - HA8. The area covered by HA8 land is agricultural grade 1 land , why destroy this valuable asset?

①

The industrial estate itself has a lot of derelict or empty space which can be used for the employment site mentioned in the plan - have the Council been on this estate to see this for themselves?

②

The use of Brownfield sites for housing purposes should be the priority over and above using greenbelt land, thus helping to regenerate and helping to sustain a vital core to our town centre. The Council has used inflated housing need in their Local Plan and this can be supported with evidence.

Environmental issues should be taken seriously e.g., the extensive wildlife in the area, any increase in housing will result in unacceptable and severe impacts on our road networks. Extra traffic brings more pollution, noise and health concerns.

The local infrastructure can barely cope at the moment- Rainford High School has little or no further capacity for pupils

The local GP service are bursting at the seams, and it is equally difficult to access local hospitals with inadequate and expensive local bus services

①

The release of greenbelt land is only allowed under exceptional circumstances and St Helens Council at no time has demonstrated or provided evidence for this, neither have they given clarity on why they have inflated the housing numbers under national planning framework guidelines

PO1297



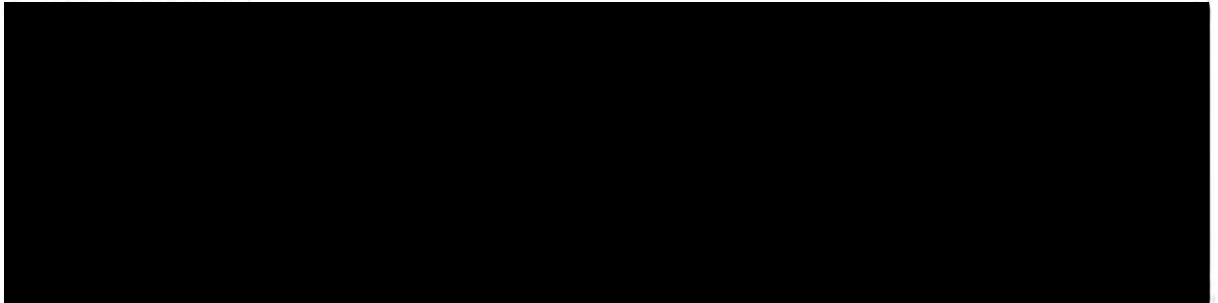
St Helen's Local Plan Submission Draft - Rep on behalf of English Land (submitted 12.3.19)

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



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PLANNING**

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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

5 Proposed Amendments

5.1 Context

Although we support the site's allocation for employment use in principle, there is a compelling case to improve the clarity/consistency of the site allocation, and enhance the highway and viability provisions of the site allocation. In reviewing the Submission Draft and the evidence base supporting it, there appears to be significant deficiencies and inconsistencies which should be addressed by the Council in advance of formally submitting the draft Local Plan for consideration by the inspector. This is especially in the context of the NPPF which requires Local Plans must satisfy the 'soundness' tests, i.e. (i) positively prepared; ii) justified; iii) effective; and iv) consistent with national policy.

The table below highlights the key deficiencies and inconsistencies, the reasons, and the proposed amendments. These amendments will improve clarity/consistency and enhance the highway and viability provisions. The amendment will ultimately make the Local Plan 'sound' in line with the NPPF.

5.2 Proposed Amendments

Deficiencies & Inconsistencies	Reasons	Proposed Amendments
Submission Draft - Draft Policies Map, Inset Allocation (Appendix 5) and Table 4.1 (site reference: 9EA)	<p>The site access to Sandwash Close is not explicitly shown on the Draft Policies Map or in Appendix 5 and is therefore unclear.</p> <p>The additional site access from Pasture Lane is not explicitly shown on the Draft Policies Map or in Appendix 5. This is inconsistent with highway considerations and the previous grant of planning permission in 2012. Access to Pasture Lane (in addition to Sandwash Close) will clearly benefit local traffic conditions and improve the viability of the site. Such infrastructure/engineering works are also exempt in Green Belt policy terms (see NPPF, para 146). The access from Pasture Lane was approved in 2012 (P/2012/0043). The site allocation should also take into account the industrial agency advice from Jones Lang LaSalle and Sanderson Weatherall (see Appendices 2 and 3).</p>	<p>Extend the site allocation to form accesses from Sandwash Close and Pasture Lane. More specifically:</p> <ul style="list-style-type: none"> The site access from Sandwash Close should be shown in the Policies Map and Appendix 5. For flexibility the site allocation should extend along the frontage to Sandwash Close to reflect the red edge boundary line associated with the extant planning permission (1291/017) (see Image 2 in this statement). This is also consistent with the red line boundary of our client's ownership and thus do not require to involve any third party to create unfettered access to the land from the public highway. Also include a footnote below Table 4.1 to express the same. The site access from Pasture Lane should be shown in the Policies Map and Appendix 5. It should broadly reflect the approved site plan associated with planning permission P/2012/0043 (see Image 3 in this statement). Also include a footnote below Table 4.1 to express the same.

Submission Draft – Table 4.1 (site reference: 9EA – 'Appropriate Uses')	<p>The site allocation restricts the land uses to only B2 and B8 uses. This is inconsistent with the extant planning permission which includes B1 uses, the current UDP allocation which includes B1 uses, and the grant of planning permission in 2012 which includes B1 uses.</p> <p>Class B1 uses includes offices, light industrial and R&D – all conducive and compatible in principle for an employment area and supported by the draft strategic policies (LPA02, LPA04).</p>	Include Class B1 uses within the range of appropriate uses.
Submission Draft – Footnote 15 (page 31)	The site is not fully consistent with the fact our client's site also benefits from an extant planning permission (in addition to sites 2EA and 6EA). Notably, the evidence base (Sustainability Appraisal) expressly states that the site has the benefit of an extant planning permission and can be completed without the need to obtain planning permission.	Footnote 15 should include reference to the fact that site 9EA also has the benefit of an extant planning permission for B1/B2/B8 uses and can come forward in any event without the need to obtain planning permission.
Evidence Base - Economic Viability Assessment (Keppie Massie)	The purpose of the report is to consider the viability of the site allocations in the Local Plan but it does not specifically comment on site 9EA and the viability benefits of allowing access off Pasture Lane.	Inclusion or supplementary note from Keppie Massie to address the access option to Pasture Lane in the context of improving the viability of the site, taking into account the industrial agent comments received (see chapter 4).
Evidence Base – Sustainability Appraisal: SA Report and Technical Appendix A	<p>Paragraph 4.2.13 fails to acknowledge site 9EA benefits an extant planning permission for B1/B2/B8 uses.</p> <p>ID104 E13 in the assessment table (page 37 in the SA Report) is inconsistent with the Technical Appendix A. Furthermore, there is no tangible evidence/risk to biodiversity, landscape sensitivity, or distance to prominent ridgeline. Also, the development of this site for employment uses will clearly support the local economy, reduce poverty and social exclusion and minimise the need to travel (in contrast with the table which suggests a 'neutral' impact only)</p>	<p>Amend the following:</p> <ul style="list-style-type: none"> • Include reference about the extant planning permission in para 4.2.13. • Ensure the table and Appendix A are consistent. • Amend the table/Appendix A to identify biodiversity, landscape sensitivity and distance to prominent ridgeline impacts will be 'neutral/positive'. • Amend the table to say the impact on the local economy, poverty/social exclusion, and need to travel will be 'positive'.

PO1298



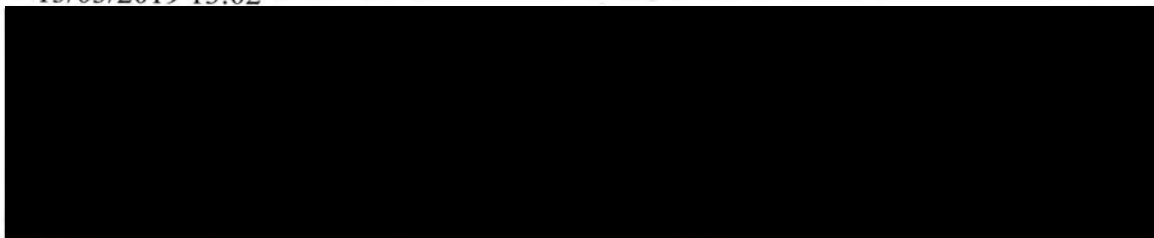
St Helens Submission Draft Local Plan: Representations on behalf of Bericote Properties Ltd [NLP-DMS.FID586504]

Katie Howarth

to:

planningpolicy@sthelens.gov.uk

13/03/2019 13:02



2 Attachments



41575_09 Bericote St Helens Soundness Reps 13.03.2019.PDF



41575_09 Ipsd-representation-form Bericote 7.03.2019.pdf

Dear Sir/Madam

On behalf of our client, Bericote Properties Ltd, pleased find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form is also attached.

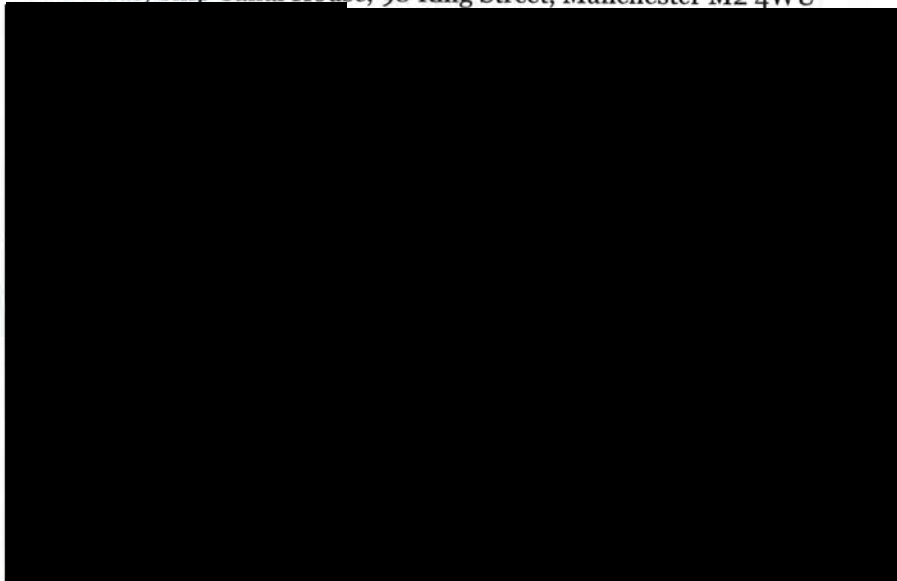
It would be much appreciated if you could confirm receipt of this response by return.

Regards

Katie Howarth

Associate Director

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU



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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mrs
First Name: Simon	First name: Caroline
Last Name: Spencer	Last Name: Musker
Organisation/company: Bericote Properties Limited	Organisation/company: Lichfields
Address: 8 Hamilton Terrace Leamington Spa	Address: Ship Canal House 98 King Street Manchester
Postcode: CV32 4LY	Postcode: M2 4WU
Tel No:	
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 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete **PART B** of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
See cover letter		See cover letter		See cover letter					
Other documents (please name document and relevant part/section)				See cover letter					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <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)

			Yes, I wish to participate at the oral examination
--	--	--	-----------------------------------------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

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 16th 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

Policy LPA04: A Strong and Sustainable Economy

Policy LPA04 recognises the importance of achieving economic growth in the Borough to increase aspiration, skills and employment in St Helens. The policy seeks to deliver a minimum of 215.4 ha of land between 1 April 2018 and 31 March 2035. Table 4.1 and the Policies Map allocates land at Florida Farm, Slag Lane according to Policy 2EA for 36.67 ha of B2 and B8 development.

Consideration of Policy

Bericote Properties strongly supports the allocation of land at Florida Farm for 36.67 ha of employment development and the sites' removal from the Green Belt. However, the appropriate uses defined under the Use Classes Order do not reflect the extant planning permission and reserved matters approvals described above and that fact that ancillary B1 is a necessary function of distribution buildings. 05

Tests of Soundness

It is not effective: Policy LPA04 fails to facilitate ancillary B1 Uses on the site which form a key part of the operational requirements of logistics buildings.

Recommended Change

Bericote Properties considers that Policy LPA04 is sound provided that Table 4.1 in relation to 2EA enables ancillary B1 on the M6Major.com Site.

Policy LPA04.1 Strategic Employment Sites

Policy LPA04.1 Strategic Employment Sites allocates land at Florida Farm North, Slag Lane, Haydock and identifies that the proposals are supported by a comprehensive Masterplan and other criteria which the site will be assessed against should a planning application be made.

Consideration of Policy

Bericote Properties strongly supports the allocation of land at Florida Farm and considers that the Policy is generally sound. It is requested that the footnote 22 reflects the correct site reference 2EA not 6EA. 06

Tests of Soundness

Policy LPA04.1 2EA is sound but the typographical error in the footnote referring to the 6EA Site needs deleting. 07

Recommended Change

Bericote Properties considers that Policy LPA04.1 is sound provided that the typo on footnote 22 is amended.

Conclusion

Accordingly, Bericote requests that the Council considers and reflects our representations in the further drafting of the Local Plan. We also request to be present at the oral examination.

In respect of land at M6Major.com the plan is considered to be generally sound subject to the amendments referred to above and assurances that the Council will support the development of land to facilitate Unit 3 to maximise the development potential of this site in the next version of the Plan.

PO1299



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)
Emer Cunningham

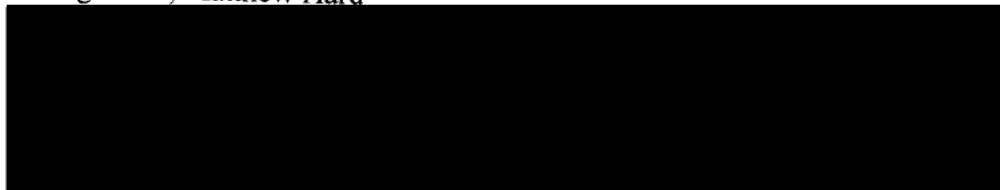
to:

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

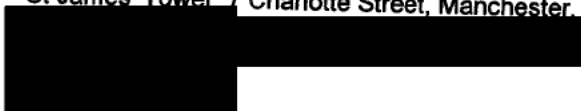


indigo.



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)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Emer
Last Name:	Last Name: Cunningham
Organisation/company: Murphy Group	Organisation/company: Indigo Planning
Address: c/o Agent	Address: St James' Tower 7 Charlotte Street Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	
Signature	Date: 13/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	<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.
<p>The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.</p>

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

- 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

PO1300

Representor Details

Web Reference Number	WF0221
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey WA5 3RH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA04.1, Statagic Employment Sites
Paragraph / diagram / table	Section 4.13
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Bold Forest Park Area Action Plan, Adopted July 2017

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

From consulting the National Planning Policy Framework (NPPF, last updated 19th February 2019, especially paragraphs 133 -147) I read that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also explicitly states that once established Green Belt boundaries should only be altered in 'exceptional circumstances' and that these "Very special circumstances" will not exist unless any potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." The Draft Local Plan (St Helens Borough Local Plan 2020-2035: Proposed Submission Draft, December 2018) includes a proposal to allow the extension of the Omega industrial site west into the eastern side of Bold Forest Park (in the report, designated as Area 1EA, comprising 31 hectares), which is currently part of the St Helens Green Belt. I consider that the proposed change is unsound because of a lack of justification for the required 'exceptional circumstances' needed to allow conversion of Green Belt land – in this case farmland - to industrial use. This change to a secure, well-established, Borough, County, and mature tree-lined Green Belt boundary is being proposed to meet projected future employment requirements for Warrington, adjacent to St Helens. Warrington currently has a net 14,000 commuters coming into the borough each day so is not generally short of employment opportunities for its population, and is presently using up the vast potential of the Omega South employment area land with both warehouses and housing, suggesting that their

priority is not to create significant additional employment within the Borough. In the future, this proposed change could make a small contribution to Warrington's employment numbers, but it is insignificant compared with all the many and various opportunities proposed within Warrington itself, with an available land area consisting of hundreds of hectares in total. In addition, Warrington is having to compete with other areas in the north west of England such as Haydock, Heywood, Middleswich and Knowsley for warehouse business. It is, therefore, unclear how an argument of 'exceptional circumstances' might be made for this proposed change from farmland to warehousing at this location. 01

The proposed area 1EA is within Bold Forest Park. Removal of this land from Green Belt goes against the stated aims of the Bold Forest Park Area Action Plan that was signed by St Helens Council in 2017 after significant work to look at all aspects of environmental value and protection and enhancement of the area. (In the AAP Technical Report, the land 1EA is shown as Medium/High sensitivity [Section 2.3.7] – the highest category given, and also as 'Conserve/Enhance' in Figure 9. The designated nature conservation site of Booth's Wood would be right on the edge of the proposed area 1EA, removing the protecting buffer such that the industrial site would run right up against the TPO'd trees and the boundary of the original mediaeval deer park.) 02

Since the numbers quoted in the Draft Local Plan apparently demonstrate that this area of farmland is not needed to meet St Helens employment requirements, it would appear that the anticipated benefit that could arise from this proposed industrial extension would be in the form of a relatively small amount of additional Council revenue (70% of which would go to St Helens, 30% to Warrington). Set against this is the damage done to the agricultural land of Bold Forest Park and the rest of the Park countryside by having the intended warehouses on its eastern side. In addition, even more traffic and air pollution will be generated in the west Warrington area from the increased diesel lorry traffic. Local Warrington residents will be affected by the increased pollution, noise and congestion. 03

In the documentation for this proposal to remove area 1EA from the Green Belt, there is a general statement, as made for other areas under consideration, that there are people living within 1km of the area who are in the bottom 20% of the economic scale. If this statement is considered to have any particular significance, it should perhaps be noted that the population on and around this southeast side of the Bold Forest Park countryside area is of very low density apart from the extensive Warrington-based Lingley Green and Whittle Hall areas of Great Sankey, which comprise mostly of new modern three- and four- and five- bedroom detached houses. If the report is suggesting as a justification that there may be a potential employment opportunity for any nearby population in St Helens, it should be noted that, in practice, the M62 cuts these populations off such that they are at least 8km away by road and about 1.5 hours away by existing public transport from this area (using information from Google maps in March 2019). 04

In the event that such a development is allowed to proceed, the documentation does not contain any information e.g. under 'Requirements' that might help mitigate the environmental damage done to Bold Forest Park. This seems to have been considered for certain other sensitive areas, but was this considered here? Many of the trees and woods in the Bold Forest Park area probably date from the first half of the 18th century when the new Bold Hall was built, when they lined the original driveway – and many are now protected by TPOs. There is a variety of wildlife and under the St Helens AAP there is the intention to increase tree cover by 10% in this area. However, the generally open aspect of the farmland means that once the current strong treelined boundary is breached, the whole area across to the St Helens conurbation from the Warrington boundary would be visible to the development. The development at Omega South is currently well screened from the St Helens Green Belt area by mature trees along the County and Borough boundary. 05

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 06

PO1301

E10065



Wigan Council response to the St Helens Borough Local Plan 2020-2035

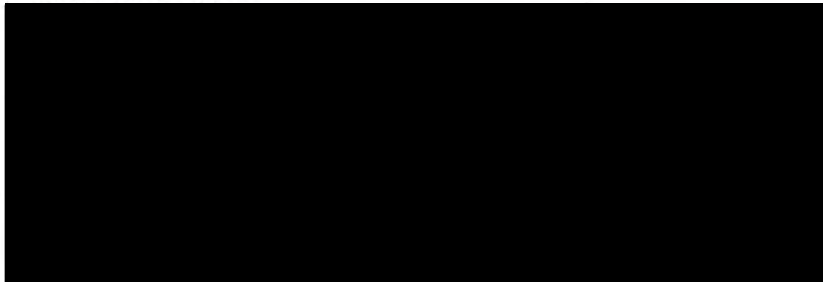
see attachments

N.Clarke

to:

planningpolicy

11/03/2019 18:34



- ① - LPA04
- ② - LPA04.1
- ③ - LPA06 (res)
- ④ - LPA06 (HATIF)
- ⑤ - LPA07
- ⑥ - LPA10

1 Attachment



Letter and reps on St Helens LP 11 Mar 19.pdf

Please note that Wigan's Council's representations on the St Helens Local Plan have been approved by the Council's Portfolio Holder for Planning and Environment but that the required 5 working days until that decision can be enacted have not passed and will not have passed until after your deadline of 13 March. They are therefore submitted on that basis and we will advise accordingly of the status once that time has passed.

Dear [REDACTED]

Thank you for the opportunity to comment on the Submission Draft version of your St Helens Borough Local Plan 2020-2035.

Overall, Wigan Council is supportive of the plan and is keen to continue working with you on key cross boundary issues of interest, including access to training and employment, accessibility by bus services, cycling and walking, and highway and other infrastructure improvements.

In this context, there are a small number of opportunities to improve the plan, most of which have been discussed at officer level recently, and parts that we specifically support. The related representations concerning them are attached and set out below, and cover parts of the following policies:

Policy LPA04: A Strong and Stable Economy

Policy LPA04.1: Strategic Employment Sites

Policy LPA06: Safeguarded Land

Policy LPA07: Transport and Travel

Policy LPA10: Parkside East

We firmly believe and that these matters can be overcome by short alterations to the wording of the policies.

All of these matters are, of course, pertinent to the duty to cooperate and the new requirement to prepare a statement of common ground. We will be happy to work further with you on this and discuss any matters arising to agree proposed amendments for submission alongside the plan, if possible. More generally, we wish you all the very best with progressing your local plan through to adoption.

Yours sincerely

Marie Bintley

EL00065



[REDACTED]
Strategic Director – Place Services
St Helens Council
Town Hall
Corporation Street
St Helens WA10 1HP

Our reference: PB/NC/MB/KF
Your reference:
Please ask for: Marie Bintley
Extension:
Direct line: [REDACTED]
Date: 11 March 2019

[REDACTED]
St Helens Borough Local Plan 2020-2035

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Policy LPA04.1: Strategic Employment Sites

Policy LPA06: Safeguarded Land

Policy LPA07: Transport and Travel

Policy LPA10: Parkside East

We firmly believe and that these matters can be overcome by some alterations to the wording of the policies.

All of these matters are, of course, pertinent to the duty to cooperate and the new requirement to prepare a statement of common ground. We will be happy to work further with you on this and discuss any matters arising to agree proposed amendments for submission alongside the plan, if possible. More generally, we wish you all the very best with progressing your local plan through to adoption.

Yours sincerely

[REDACTED]
Marie Bintley
Assistant Director Growth and Housing

Please reply to: Marie Bintley

Wigan Council, Places Directorate: Economy and Environment, PO Box 100, Wigan, WN1 3DS

[REDACTED]

Representations on St Helens Borough Local Plan 2020-2035 from Wigan Council

Policy LPA04: A Strong and Stable Economy

This policy allocates the following sites for employment development that are immediately adjacent or very close to the borough boundary with Wigan:

- Three sites between the A58 Liverpool Road and Haydock Industrial Estate, Haydock.
- Land North and South of Penny Lane, Haydock.
- Parkside, Newton-le-Willows.

Clause 10 of the policy states that "The Council will support....the creation of apprenticeships and training opportunities for local people". Where "local people" clearly includes residents in places like Ashton-in-Makerfield, Golborne and Lowton within Wigan Borough, measures should be taken to ensure that such opportunities are available for residents in Wigan Borough, as well as St Helens, and this should be recognised in the policy. We would also be happy to agree the means for how this can be achieved in practice and provide you with the relevant contacts to ensure it is implemented through the development management process.

Policy LPA04.1: Strategic Employment Sites

Most of the sites identified in the first and third bullet points under Policy LPA04 above are designated as Strategic Employment Sites under Policy LPA04.1.

Clause 2 of this policy states that "Any planning application for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole site, which must set out details of at least: e) Indicative layout promoting permeability and accessibility by public transport, cycling and walking."

Where these sites are close to the boundary with Wigan Borough, it is essential that cross-boundary connections with Wigan by bus, cycling and walking are a serious part of these considerations. The policy should acknowledge this relationship specifically, together with the need to work with Wigan Council, Transport for Greater Manchester and Highways England to improve cross-boundary accessibility by public transport, cycling and walking.

Issues for bus travel are compounded by the fact that bus ticketing arrangements are different within Greater Manchester and Merseyside and walking and cycling links are restricted by the motorway and heavy traffic on roads to and from motorway junctions.

Policy LPA06: Safeguarded Land North East of Junction 23 M6 (South of Haydock Racecourse), Haydock (ref 2ES)

One of the two areas safeguarded for future employment development is Land North East of Junction 23 M6 (South of Haydock Racecourse), Haydock. It is very close to Ashton-in-Makerfield and Golborne and is currently subject to a planning application from Peel, on which this council has a holding objection on the grounds of traffic impacts. In the previous version of this local plan, the site was allocated for employment development but it is now proposed as safeguarded land with the need for substantial improvements to enhance capacity at Junction 23 within the Plan period.

The policy is clear that planning permission for the development of the safeguarded sites for employment development will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for employment development on safeguarded sites in the Plan period will be refused.

①

②

③

(2ES)

PO1302

LE10066



Response to St Helens Borough Local Plan 2020-35 Submission Draft (LPSD) Respinse

Tony Lewis

to:

planningpolicy

11/03/2019 18:38

① LPA 04

② LPA 05

③ PARA 1.7.2

With respect to the St Helens Borough local plan 2020-2035 submission draft, we have the following comments :-

The submission, whilst an improvement on the 2016 draft proposals, is based on economic and demographic growth scenarios which are not substantiated either by historic data or the latest outputs from the Office of National Statistics (ONS).

In addition the government itself is questioning standard methodology for existing housing targets. Consequently the plan and its impact on the green belt etc is based on both data and methods which are being questioned. The so called "transformational strategy" is a high risk strategy rather than a more prudent strategy based on recent historic data particularly in terms of a slower economic growth which reflects what is actually happening.

The impact of a more conservative growth scenario in which new economic activity reflects actual growth rates has either seemingly been ignored or possibly not examined in depth by the council. This raises the suspicion that the proposed plan is based on untested "circular arguments" founded on hypothetical growth figures rather than one based on sound data and information reflecting actual growth, migration and demographics. The "economic Activity" consultancy report refers to the difficulty of forecasting 20-30 years into the future based on hypothetical changes. The Councils "transformational approach" leads to a high risk plan with detrimental consequences for land use, particularly, Green belt in the Borough. A more conservative approach is necessary.

A more conservative growth scenario, raises the possibility that Brownfield sites could meet the future land requirements for industry and domestic needs. This would be enhanced if further proposals are brought forward in the plan to deal with low-level contaminated land which represents a substantial area of the borough. This appears to be an opportunity missed by the council. The cost of any cleanup has to be measured against the permanent loss of good-quality land. Such a comparison is not evident in the plan.

Dealing with Brownfield/Contaminated land, as part of this plan, would significantly enhance the borough bringing benefit for all its residents.

It would also appear that the ambitious annual number of housing completions is not currently capable of being met by the construction industry based on historic data. This again calls into questions a growth scenario which results in loss of both valuable greenbelt land over the next 30 years. If there is a legal requirement to identify areas of land safeguarded for future development, why cannot these plots of land be left in the green belt for now and be re-examined nearer the relevant time, based on better data and information.

Changing the greenbelt is irreversible and should be based on accurate data and not on a risky growth scenarios which appears unrealistic in both the short and longer term.

Further questions are raised on the compatibility of the proposed St Helens plans with neighbouring councils plans. These councils will have equal aspirations for growth. Although part of the Liverpool city region, only limited evidence is provided of the degree of consultation with the adjacent councils in the City region and with the neighbouring councils of Wigan and Warrington. If all councils adopt

③ - Para 1.7.2
DofC

transformational strategic plans, the result will be an over supply of houses and a subsequent increase in brownfield sites with destruction of valued undeveloped land.

10

In addition, it is noticeable that around the borough, many small to medium housing sites begin development. They then stop for many years usually at the "footings" stage. Whilst in planning numbers terms houses are being built, in reality they are not. The council, within the plan, should be putting forward proposals to ensure housing completions if a complete nonsense is not to be made of the planning process.

Within the draft plan, Infrastructure and Environmental developments are indicated as being necessary but without detailing what types of improvement will be sought and whether realistically they can be funded. This represents a missed opportunity to make firm commitments to the residents of the borough in areas which impact them directly. As an example Eccleston Mere and the land around it represent a fantastic amenity with great potential for the Borough, provided accommodation can be reached with the owners - an area where the Council needs to take a lead coordinating role.

In conclusion, the draft plan as submitted is **unsound and not justifiable** for a number of reasons including those indicated. It needs to be **modified** to be based on realistic growth figures with maximum exploitation of sites of brownfield and contaminated land for development. No changes to the Greenbelt should be made to create Safeguarded sites at this point in time. The need for these sites should be re-examined, based on the latest historic data and trends, nearer the end date of the plan.

Tony Lewis/ Marjorie Lewis

12 Orchard Hey, Eccleston, St. Helens, Merseyside WA10 5AQ

PO1303

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
Reps.

③ LPA03

⑥ LPA07

⑨ LPA09

⑫ TIA

STC 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

<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

PO1304



UPDATED Homes England response to St Helens Local Plan Submission Draft
 Lucinda Taylor
 to:
 planningpolicy@sthelens.gov.uk
 15/03/2019 16:32

① - LPA04
 ② - General

1 Attachment



Homes England - St Helens Local Plan Reps FINAL.pdf

Please find attached the updated Homes England response to the St Helens Local Plan Submission Draft consultation.

Grateful if you could please replace this with the letter sent on 13 March 2019 and please confirm safe receipt.

Many thanks

Lucinda

Lucinda Taylor MRTPI
 Senior Development Manager
 North West Public Sector Land

Please note I do not work on Wednesdays



Homes
 England

Level 1A
 City Tower
 Piccadilly Plaza
 Manchester
 M1 4BT

#MakingHomesHappen

We're the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. [Find out more and help make this happen.](#)

Homes England is the trading name of the Homes and Communities Agency. Our address for service of legal documents is Arpley House, 110 Birchwood Boulevard, Birchwood, Warrington, WA3 7QH. VAT no: 941 6200 50. Unless expressly agreed in writing, Homes England accepts no liability to any persons in respect of the contents of this email or attachments.

Please forward any Freedom of Information Requests to: enquiries@homesengland.gov.uk

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**Homes
England**

Local Plan
St Helens Council
St Helens Town Hall
Victoria Square
St Helens
WA10 1HP

13.03.2019

Dear Sir / Madam,

Consultation on St Helens Borough Local Plan 2020-2035: Submission Draft

Homes England Response

I would firstly like to thank you for the opportunity to comment on the St Helens Borough Local Plan 2020-2035: Submission Draft.

Homes England is the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.

We have a diverse land portfolio including landholdings located within St Helens and would therefore like to make the following comments in relation to these. ✓

Omega South Western Extension

Homes England has a significant land holding identified as **Omega South Western Extension**, Land north of Finches Plantation, Bold (Sub-parcel GBP_076c) within the consultation area.

The site is approximately 31.22 ha (77.15 acres) and is located on the edge of St. Helens Borough, immediately adjacent to Omega, a major mixed use development located in the Borough of Warrington. Omega is being delivered by Omega Warrington Ltd (OWL) in partnership with Homes England (as landowner), supported by Warrington Borough Council and the Cheshire and

Homes England
Arpley House
110 Birchwood Boulevard
Birchwood
Warrington
WA3 7QH

①

Warrington LEP.

The Omega South Western Extension is identified in the St Helens Borough Local Plan 2020-2035: Submission Draft as an employment allocation and a consequential area for Green Belt release (site 1EA). St. Helens and Warrington Councils have identified, under the duty to cooperate, that the emerging Warrington Local Plan is unlikely to be able to accommodate all of Warrington's employment land needs for 2017-2037 within its administrative boundary. St. Helens Council has therefore agreed to allocate 31.22ha (site 1EA) of land adjoining the existing Omega South employment area to help Warrington Council to meet these needs. Warrington Borough Council has stated in its Local Plan Development Option consultation document 2017 (paragraph 2.38) that the development of the sub-parcel should '...contribute to meeting Warrington's employment land needs.'

Homes England is supportive of the proposed employment allocation and subsequent green belt release. There are no over-riding constraints that apply to its suitability for employment use and the allocation would help to meet the employment land needs of both St Helens and Warrington.

Peasley Cross

Homes England's land at Peasley Cross extends to approximately 1.82 hectares (4.5 acres) and is owned part under freehold title and part under leasehold; the leasehold relating to existing residential properties located along the eastern boundary of the site (please see attached plan showing the entire land interest edged in red and the leasehold element in blue). It is located approximately one mile south of St Helens Town Centre; immediately to the south of Peasley Cross Hospital and is bound by existing residential uses on all other boundaries.

The site is allocated for residential development within the existing Local Plan Core Strategy (October 2012) as site 5H2 and identified within the Council's 2017 SHLAA (Site Ref: 89 'Land rear of 64-94 Marshalls Cross Road) as being developable with a potential yield of 12 units. It is located within a sustainable location, although is partly within Flood Zone 3.

Since acquiring the site in 2016, Homes England has undertaken a large amount of due diligence work relating to flood risk, drainage, ground conditions and ecology. This has concluded that the site is deliverable in the short term for residential development and could, subject to planning, provide in the region of 35 units whilst also retaining the existing properties located along the eastern boundary of the site.

Given our remit as the government's housing accelerator, Homes England marketed the site in September 2018 and we are currently in the process of disposing of the site to secure deliver residential development on the site.

PO1305

ELO267

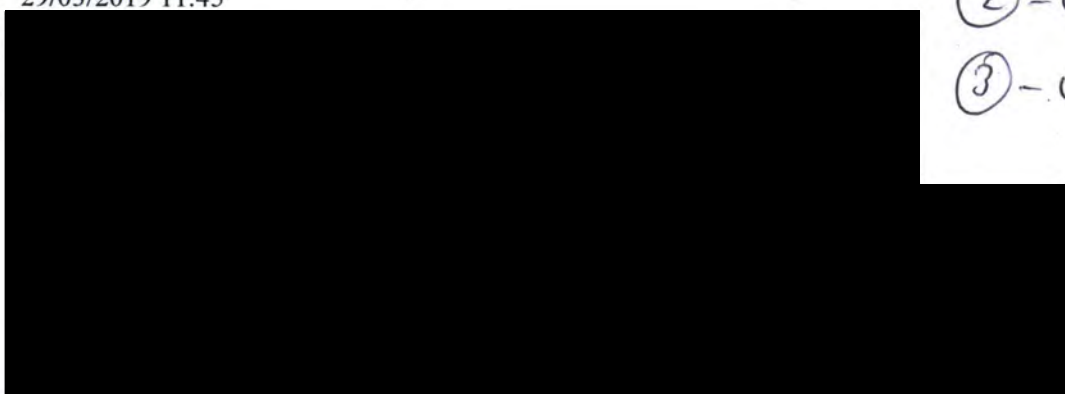


St Helens Local Plan - Submission Draft
Morgan, Anne
to:
planningpolicy@sthelens.gov.uk, [REDACTED]
29/03/2019 11:45

① - LPA04

② - LPA06

③ - LPA00



1 Attachment



Letter to [REDACTED] re St Helens Local Plan March 2019.pdf



Please find attached a letter from the Mayor of Greater Manchester in relation to the St. Helens Local Plan Submission Draft. If you would like to discuss any of the issues raised please do not hesitate to contact me.

Many thanks,

Anne

Anne Morgan
Head of Planning Strategy
Greater Manchester Combined Authority
Churchgate House, 56 Oxford Street, Manchester M1 6EU



www.greatermanchester-ca.gov.uk



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ANDY BURNHAM

**MAYOR OF
GREATER
MANCHESTER**

[REDACTED]
Strategic Director – Place Services
St Helens Council
Town Hall
Corporation Street
St Helens
WA10 1HP

21st March 2019

Dear [REDACTED]

St Helens Borough Local Plan 2020-2035

I am writing to you to register my longstanding concerns about the level of logistics development being proposed around the M6, particularly J23 and the potential impact of this upon residential communities in Lowton, Golborne and Ashton-in-Makerfield.

I know that Wigan Council share these concerns and have submitted holding objections to the planning applications at Haydock Point and Parkside West, on the grounds of traffic impacts and air quality. I fully support Wigan Council in their comments requiring the policies for sites adjacent to the Wigan border to acknowledge this proximity and to protect the amenity of Wigan residents, particularly in terms of traffic and air quality.

The M6 is already at saturation point and it is hard to see how any further development can be sustained without major investment in capacity.

Policy LPA06 Land north east of Junction 23 M6 (South of Haydock Racecourse), Haydock

It is good to note that whilst this site was allocated for employment development in the previous version of your local plan, Policy LPA06 now proposes that it is safeguarded land with the need for substantial improvements to enhance capacity at Junction 23 within the Plan period. The policy is clear that planning permission for the development of the safeguarded sites for employment development will only be granted following a future Local Plan review. This is better than the wholly unacceptable employment development proposed in the previous version of the plan, given the pressure it would add to Ashton-in-Makerfield which is routinely at a standstill during the rush hour. Unless there is now direct access to the M6 – avoiding any pressure on local roads or J23 – then I will continue to oppose this development.

PO1306



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.

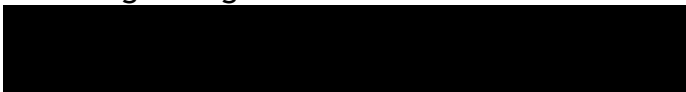
Please confirm receipt.

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

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

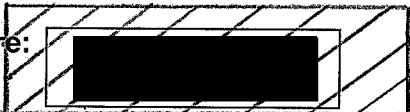
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
------------------------------------------------------------------------------------------------	--------------------------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

Policy LPA02: Spatial Strategy

We are pleased to read the re-use of previously developed land in Key Settlements will remain a key Priority in local plan Policy LPA02: Spatial Strategy, as we too strongly advocate a brownfield preference approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. We acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." However, observe that the use of the phrase "as far as practicable" will make LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future. Therefore we strongly urge for this phrase to be deleted, or LPA02 will remain ineffective, if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

CPRE Lancashire strongly opposes Green Belt release. We consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer has an interest in low value farmland being consented for residential use and having responded to the call for sites. Many developers chase land value rises from farmland being allowed for residential use, and they aren't in the least bit bothered about issues such as sustainability, ecology, rural economic sectors. If the developer's land is in a 'sustainable' location and it would constitute 'sustainable development' this would be mutually beneficial to both developer and wider society, but if the land is in a place that is 'unsustainable' then it would be at a cost to society and it should not be allowed.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. Understandably, the loss of Green Belt stirs up strong emotions and CPRE tenaciously defends it. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

CPRE Lancashire supports the policy intention that says: "The quality of life, health and wellbeing of St Helens Borough's residents, workers and visitors and the quality of the natural environment will be supported by:" and we applaud the text in the five supporting bullet points.

Policy LPA03: Development Principles

CPRE Lancashire also generally supports Policy LPA03: Development Principles, as we agree places should be inclusive and that deprivation should be alleviated in the future. Similar to our comments to LPA01 and LPA02 we are greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

Policy LPA04 Strategic Employment Sites

CPRE Lancashire is strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St Helens, which we regard as unjustly excessive. We believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of

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

PO1307



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

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

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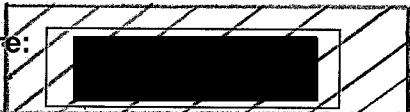
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
------------------------------------------------------------------------------------------------	--------------------------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

employment property and have an adverse effect on the property market. It would lead to widespread vacancy. We think the data in Tables 4.2, 4.3 and 4.4 is inaccurate.

Our view is supported by the expert opinion of economist Dr. Glenn Athey, who was commissioned by St Helens Green Belt Association (an umbrella residents group opposed to Green Belt loss). In his report, Dr Athey concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts has used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with a number of other assumptions underpinning employment land policies, including forecasts of port freight. In light of Dr Athey's expert opinion, CPRE Lancashire calls for the Council to review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. CPRE Lancashire calls for the economic data, analysis to be corrected.

This is particularly the case when considering the fact that all surrounding geography in Liverpool City Region, Greater Manchester, Cheshire and West Lancashire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland for development, which is important for future food security, and is currently protected by Green Belt designation on the basis of economic analysis that is flawed and consequently not fully justified. Some of the land so allocated is among the most versatile in the country. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. CPRE Lancashire is concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

In any case, what is the local benefit of B8 Warehousing formats with new technology replacing human resources resulting in very low density employment formats, causing great harm to Green Belt purpose? We think there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, and question the need for such an excessive amount in the countryside. The duty to cooperate has not been complied with on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities, resulting in sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. CPRE Lancashire believes local planning of large warehousing formats should be in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

CPRE Lancashire is opposed to needless release of Green Belt land for employment uses. Previously we raised concern over 2EA, 4EA, 7EA, and 8EA (LPA10), but we reserve the right to comment on other employment sites included in LPA04.1 at the examination.

It is supported that planning applications for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St.Helens Borough's Housing Needs

In recent years, CPRE has undertaken considerable research to show that housing assessments

PO1308

Representor Details

Web Reference Number	WF0175
Type of Submission	Web submission
Full Name	mr steven ireland
Organisation	
Address	105 longton lane rainhill l35 8nu
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	lpa6
Paragraph / diagram / table	3hs
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	yes
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

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.

1. There's a declining population. There's no evidence presented supporting the need for additional housing, without any details where the additional home occupiers will come from. 01
2. Brown field will supply land for 5808, houses. there's no argument to justify removing greenbelt.
3. Declining industries in St Helens involves a lot of the existing population traveling outside the borough boundaries for employment. 02
4. Anyone moving into St Helens looking to purchase a property will need a salaried employment. inevitability that puts additional cars in the area 3HS where roads are cant cope with current level of traffic.
5. The 2 major roads supporting Rainhill, is A57 Warrington Rd and Rainhill Rd. These Roads are congested already. Any more traffic will put pressure on residential roads , which have seen increases significantly, to name but a few: Mill lane, Holt lane, Longton lane. 03
6. Any improvement works for Warrington rd, will need to overcome the Skewed Bridge. There's little scope to improve there.
7. Any traffic rises will lead to additional air pollution, increasing risks to health and pedestrian accidents.
8. 3HS area has got the infrastructure to support increase housing, Doctors, Dentists, school places these services will be accessed elsewhere, committing people to travel. 04

9. Any development in 3HS increase risk to existing properties, by not allowing the flood plain draining the land via the brook.
10. St Helens council hasn't provided Sport England a decision on their previous objection which should be rejected or upheld.
11. 3HS supports 13 species of protected flora and fauna
-

7. Please set out modification(s) you consider are necessary

The council should withdraw this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)
The council should not remove this land from green belt to place it as safeguarded

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 5:18:52 PM
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PO1309

①-LPA02 ②-LPA04 ③-LPA07 ④-LPA06
⑤-LPA08 ⑥-LPC12 ⑦-LPD07

WF0183 pdf

Representor Details

Web Reference Number	WF0183
Type of Submission	Web submission
Full Name	Mrs Clare McDermott
Organisation	N/A
Address	8 Mallard Gardens St Helens WA9 5BL
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	7HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	x
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The population has been declining and without knowing the impact of Brexit it is unclear why there is a requirement for additional housing on this land. 01

St Helens Council suggests availability for 84 units.

Declining business including industry has declined since the middle of the 1980s and the area proposed relies on employment outside of the area to be able to afford the houses. 02

This obviously has an impact on the traffic throughout the area and the current infrastructure is insufficient to cope with that and the additional pollution.

There have been houses built on the old Sutton site, further down the road nearer to Sutton on Elton Head Road plus the new Waterside development with additional housing suggested there. Elton Head Road is heavily used at present including a through route for the ambulance service which means the traffic noise is already high and the number of cars, vans, buses and wagons also contribute to the pollution. 03

The area of Rainhill only has one A road which services this area in addition to the by pass so it is heavily used and Elton Head Road is used as a cut through.

Add another 160 cars plus would add to congestion, pollution and noise levels.

This will also impact pedestrian safety to have increased traffic and again pollution levels.

I have breathing problems and over the past few years I have reviewed the pollution levels and surrounding areas and between 2013 and 2015 there were on average 51.9 deaths per 100,000 from

respiratory diseases in the under 75s compared to 44.3 for the North West and 33.1 for the rest of England with Thatto Heath rated as the second highest effected in the Borough. 03

Therefore this area of Elton Head Road would be affected by the increase not only of cars but the additional pollution linked to homes and gardens.

The area designated in 7HS is a natural green band of land which acts as a buffer between the industrial buildings built on the link way and the new housing estate further down Elton Head Road. There are foxes and rabbits, bats, squirrels and the occasional heron who inhabit the area and there are numerous wild birds in the area.

If this area were to disappear and removed from the green belt area and place into safe guarding and then subsequently development it would be one large housing estate from Rainhill through to St Helens forming a huge urban development and lack of green space. OK

If areas of natural land are removed from the green belt areas then this would cause significant harm to the purpose of having the green belt.

Additional housing would add to the problems of school places and availability of seeing the doctor in the local surgeries. It could also impact hospital and A&E facilities, doctors and dentists. If the new houses were occupied and they could not gain access to local facilities then they would have to travel and again this adds to the amount of cars on the road. 05

If you add approximately 160 cars (some families will have more than 2 cars) and the number of journeys per day then we would find it hard to exit our close which is hard at the moment between the hours of 7 and 9 and then 3 and 5 and 6 and 8 due to the rush hour and school times. 03

There is also flooding every year on the road and the three closes opposite the proposed site were built on 3 ponds and this is obvious in times of bad weather.

At moment at least the water is near the farm land and does not always spread across the road.

If there was significant building then the utilities and facilities would need to be thoroughly excavated and proper drainage and management implemented. 06

The area has confirmed flood zones and a high water table to lose the space available to help with the drainage could put our houses at risk of flooding.

We also have shortages every now and then and broadband can drop in and out and if you add further volumes then this could impact these services again if volumes increased. 07

7. Please set out modification(s) you consider are necessary

The council should not consider removing this land from green belt or open spaces to place in safe guarding.

I have been advised that this could be reviewed every five years so although it states it is safeguarded until 2035 I am registering my representation for my future safety and wellbeing.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 3:02:20 PM
---------------	----------------------

PO1310

Representor Details

Web Reference Number	WF0222
Type of Submission	Web submission
Full Name	Mrs Gill Holmes
Organisation	
Address	13 Villiers Crescent Eccleston St. Helens WA10 5HP
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Please see comments
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

1: St Helens council have stated a principle of brownfield site first and greenfield only in extreme circumstances, however they have not demonstrated diligence in identifying suitable brownfield sites for housing or monies to support decontamination of these sites. Other councils have demonstrated a commitment to regeneration of town centres through housing development - a strategy that is desperately needed in St Helens. There has been little demonstration of imagination in solving this issue and the decision to build on greenfield sites is an easy option which leads to further dereliction and decay of the town centre. Eccleston's inclusion is the green belt which is to be safe guarded for development, this is grade 1 or 2 agricultural land, a very necessary resource at this time, therefore the plan is not justified ore sustainable. 01

2: Employment growth. The figures supplied are based on unreasonable assumptions and will lead to an oversupply of housing. the main source of employment will be warehousing which will not provide the high earning jobs suggested, also it is anticipated that warehousing industry will increasingly make use of robot technology which will reduce the predicted employment figures. These factors will affected the numbers and type of housing development and is not reflected in the plan making it unjustifiable and unsustainable. The employment figures quoted should be replaced by ONS (2018) which uses more current data. 02

3: Infrastructure: the Infrastructure Delivery Plan is weak to the point of non-existence. The areas to be developed already have the problems of oversubscribed schools and major transport problems. The 8HS is beside the A580 a major route between Manchester and Liverpool, already undergoing major work to improve traffic flow. Further disgorgement of thousands more cars onto this road will make this expensive upgrading pointless. Bleakhill Road is already a bottle-neck morning and night without further cars from a new development adding to the problem. There is also the issue of road safety there is the school on this road and access to this will become more difficult together with the danger of air pollution from idling cars - a very pertinent problem currently. It is proposed that Houghton's Lane development will exit directly onto the A580 in an area that is an know black spot - 3 people lost there lives at this point just before Christmas. For Windle and Eccleston 8HS acts as a lone greenspace and a buffer for the road pollution from the A580. It is the only accessible area of greenbelt criss-crossed by footpaths which are regularly used by residents. The Plan is not effective or justified. 03

4: Duty to cooperate: there is little evidence of discussion with other authorities or services e.g NHS. Neighbouring authorities have major development plans for both employment and housing and there is little evidence of discussion between authorities as to how realistic these plans are. It appears that it is a race to develop land and the first to build will win, such a policy will cause over prediction of employment and housing need which could be disastrous for the region. There appears to have been little negotiation with the NHS and the services that can be provided. The area already has a recruitment problem both for GPs and hospital staff, Brexit will make this worse and there has been little discussion as to how this development will affect services already stretched and whether it is possible for the NHS to respond to the extra demand. Therefore the plan is not sustainable. 04

The Plan does not comply with NPPF (2018) and it does not consider the more accurate and true housing and employment information in ONS (2018) figures therefore due to all the factors listed (and more) this could lead to an unsustainable oversupply of housing in the North West together with the loss of valuable agricultural land. 05

7. Please set out modification(s) you consider are necessary

Suggestion:

The ONS (2018) needs to be adopted, more accurate and realistic housing need statistics should be developed/sourced;

funding to decontaminate brownfield sites should be sourced;

redevelopment of town centre sites to enhance regeneration of this area is a priority;

remove all Green Belt areas from the plan; protect agricultural land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

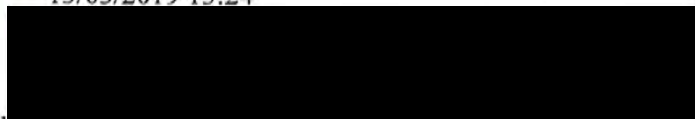
9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 2:19:27 PM
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PO1311



Re: Representation
Mel Benyon
to:
planningpolicy
13/03/2019 13:24



1 Attachment



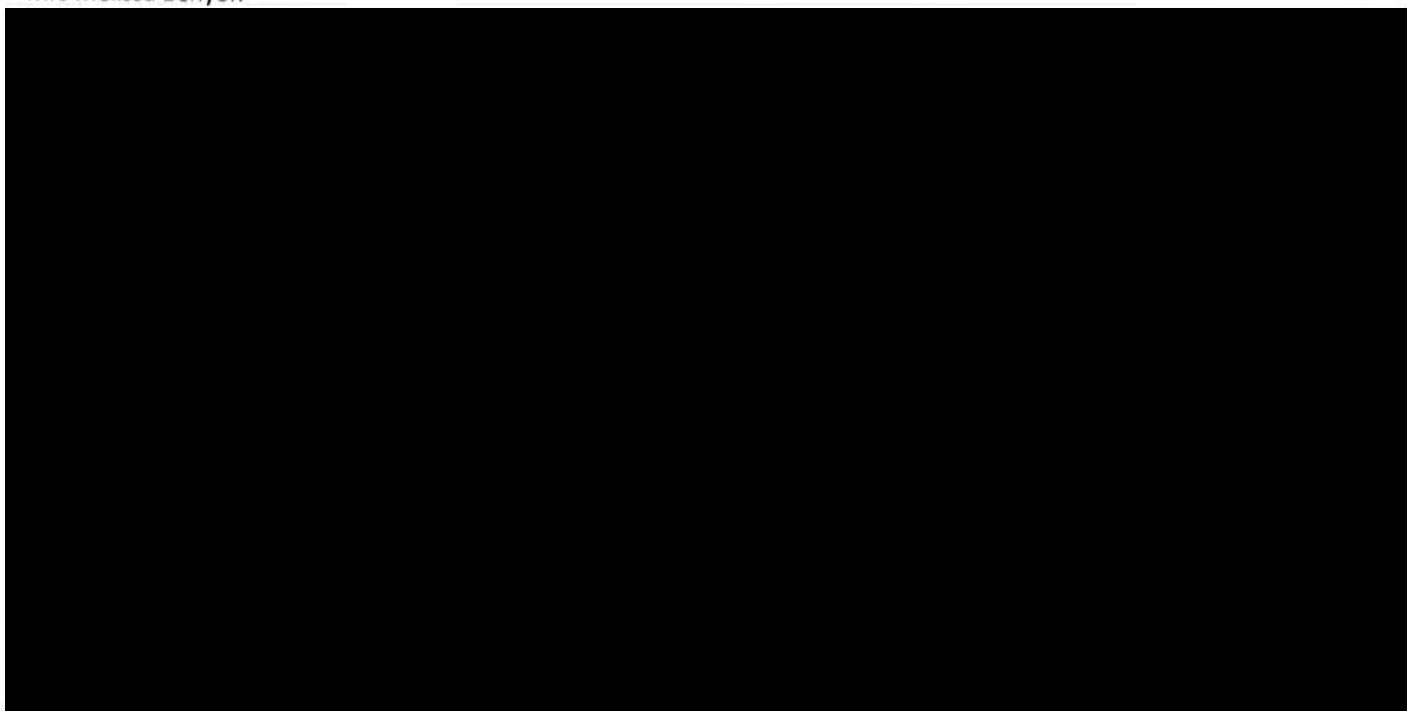
OBJECTION LETTER.docx

Dear Sirs

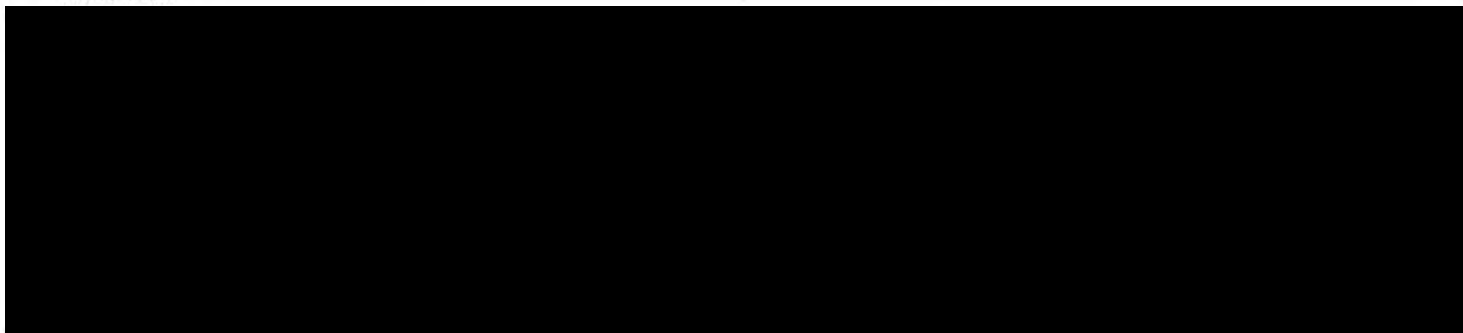
Please find attached my representation for the current Local Plan to development WA10 8HS 'Eccleston Vale'.

Kind regards

Mrs Melissa Benyon



Lancots Lane
Sutton Oak.
St Helens
UK
WA9 3EX



Melissa Benyon
9 Ecclesfield Road
Eccleston
St Helens
WA10 5LU

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on current or accurate figures.

It would appear figures from 2014 are being used to forecast 486 houses per year, when the Office for National Statistics estimate from 2016, 383 houses. Surely, the most up to date figures should be utilised for something as important as a 15-year plan. 01

Putting that to one side, the Council's own Brownfield Register suggests land availability for 5808 houses. Given the table 4.6 of the plan, which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower density of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figures from that table would still only equate to 1724 houses and 57Ha of land for housing. It makes little sense then why Table 4-5 allocates 288Ha of land for housing. 02

The council further then claims the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha or development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required. 03

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That does not even begin to look at other sites not on the register due to contamination issues. 04

The plan makes little to no mention of Brownfield or Previously Developed Land that is not yet available or included in the register. The council's own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 433Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. It appears the Council have no policy in place for bringing back these sites for use; it is completely unreasonable to assume that they cannot be made available within the 15-year plan period. 05

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of green belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply cannot be considered sound. 06

A major concern I have with the scale of growth being aspired to within the Local Plan is the infrastructure required to support it, something that St Helens Council are simply not taking into consideration.

The Infrastructure Development Plan (IDP) documents the projects currently underway to attempt to alleviate problems faced today, but seems to lack any substance on what will be done to solve issues of the future that adoption of this plan will bring

07

The plan promotes unsustainable traffic growth, which will cause severe traffic issues that surely cannot satisfy the National Planning Policy Framework (NPPF). The traffic growth will be in the exact areas that the borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, etc. The IDP refers to some of these existing but does not detail how these problems will be solved or funded. It mentions a great deal about 'seeking' or contributions 'will be sought' but there are numerous TBC's and unknowns detailed within IDP.

08

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and general health. The IDP does not address these issues.

The IDP touches on Healthcare and Education, but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it does not address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with long term impacts of the education needs of new and existing communities.

09

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requirements 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data, which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document, it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on Hectares of Grade 1 farmland resulting in the loss of jobs.

10

11

In conclusion, the Local Plan in its current form when examined by the Planning Inspector cannot be considered justified, effective and consistent with National policy. Consequently, it must surely follow that it cannot be considered sound.

Kind regards

Yours faithfully

Melissa Benyon

PO1312



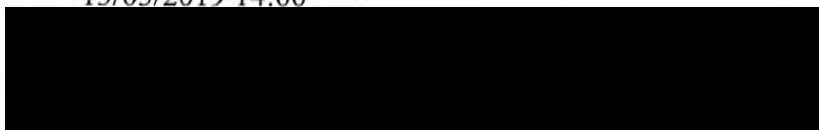
OBJECTION LETTER

Cathrine Benyon

to:

planningpolicy

13/03/2019 14:00



1 Attachment



OBJECTION LETTER.docx

Dear Sirs,

See attached objection letter to St Helens Council Local Plan in relation to development of 'Eccleston Vale'.

Regards,

Cath Benyon

Director

Aidapt Bathrooms Ltd

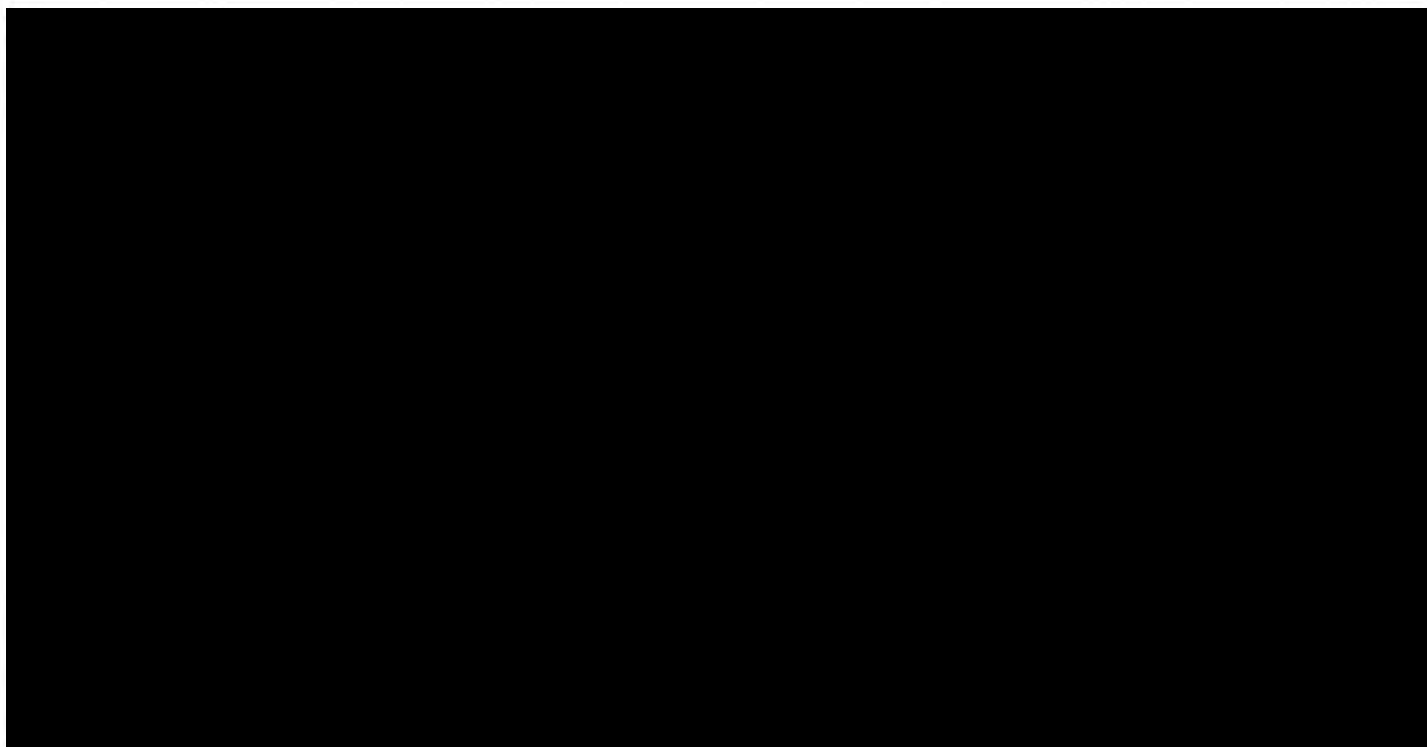
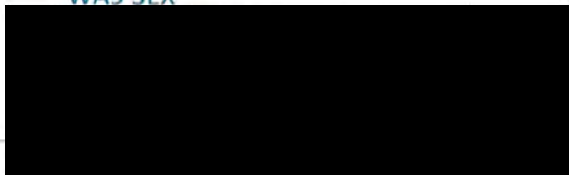
Lancots Lane

Sutton Oak

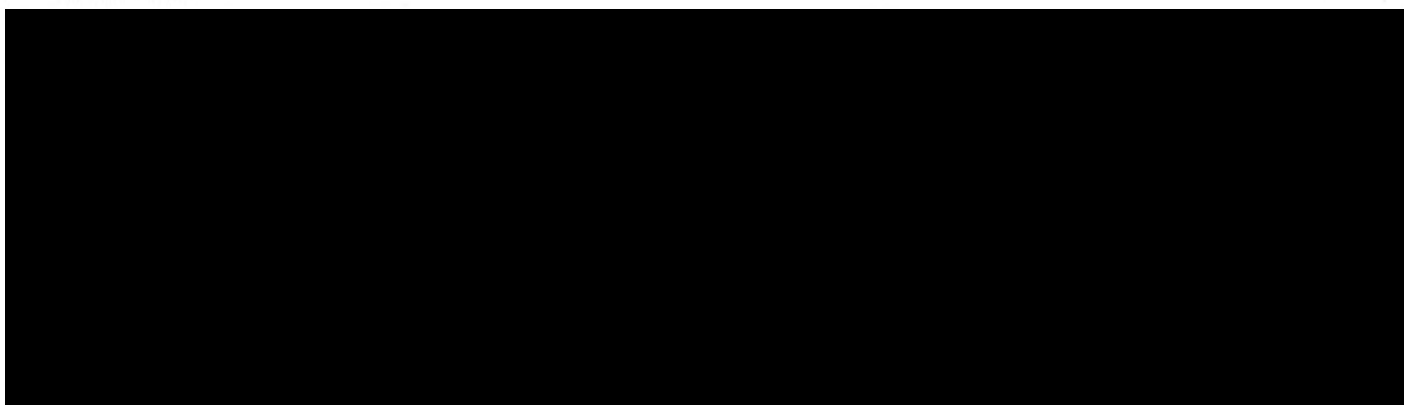
St Helens

Merseyside

WA9 3EX



St Helens
UK
WA9 3EX



Catherine Hanwright
56A, The Oaks,
Houghtons Lane
Eccleston
St Helens
WA10 5LD

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on current or accurate figures.

It would appear figures from 2014 are being used to forecast 486 houses per year, when the Office for National Statistics estimate from 2016, 383 houses. Surely, the most up to date figures should be utilised for something as important as a 15-year plan. 01

Putting that to one side, the Council's own Brownfield Register suggests land availability for 5808 houses. Given the table 4.6 of the plan, which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figures from that table would still only equate to 1724 houses and 57Ha of land for housing. It makes little sense then why Table 4-5 allocates 288Ha of land for housing. 02

The council further then claims the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha or development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required. 03

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That does not even begin to look at other sites not on the register due to contamination issues. 04

The plan makes little to no mention of Brownfield or Previously Developed Land that is not yet available or included in the register. The council's own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 433Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. It appears the Council have no policy in place for bringing back these sites for use; it is completely unreasonable to assume that they cannot be made available within the 15-year plan period. 05

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of green belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply cannot be considered sound. 06

A major concern I have with the scale of growth being aspired to within the Local Plan is the infrastructure required to support it, something that St Helens Council are simply not taking into consideration.

The Infrastructure Development Plan (IDP) documents the projects currently underway to attempt to alleviate problems faced today, but seems to lack any substance on what will be done to solve issues of the future that adoption of this plan will bring

The plan promotes unsustainable traffic growth, which will cause severe traffic issues that surely cannot satisfy the National Planning Policy Framework (NPPF). The traffic growth will be in the exact areas that the borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, etc. The IDP refers to some of these existing but does not detail how these problems will be solved or funded. It mentions a great deal about 'seeking' or contributions 'will be sought' but there are numerous TBC's and unknowns detailed within IDP.

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and general health. The IDP does not address these issues.

The IDP touches on Healthcare and Education, but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it does not address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with long term impacts of the education needs of new and existing communities.

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.

In conclusion, the Local Plan in its current form when examined by the Planning Inspector cannot be considered justified, effective and consistent with National policy. Consequently, it must surely follow that it cannot be considered sound.

Kind regards

Yours faithfully

Catherine Hanwright

PO1313

Representor Details

Web Reference Number	WF0375
Type of Submission	Web submission
Full Name	Mrs Anne Quayle
Organisation	
Address	7 Pikes Bridge Fold Eccleston St Helens WA10 5AZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04
Paragraph / diagram / table	Paragraph 4.12.5
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.

I am not in a position to comment on whether the local plan is legally compliant, sound or complies with the duty to cooperate in terms of their correct legal meaning therefore my Yes and No above is based purely on a layman's view. That is, I assume with all the work put into this documentation, it is legally compliant, that you believe it to be sound and to comply with the duty to cooperate otherwise you would not be recommending that it is submitted. However, in layman's terms my concern is that the basis for the future employment plans is not sound and will not lead to the growth that all the other undoubted good objectives the plan sets out to achieve. This was the basis of my objection to the previous draft. I cannot see that large scale storage and distribution will lead to either the number of jobs being generated nor to them being well paid, high value jobs which would enable our young people to stay here and afford to buy all the homes that you have estimated we would need to build to house them. The young people that I know who are staying here are in low paid jobs and those who want a graduate career job are necessarily having to find them outside the borough. There is nothing in the plan that makes me believe there will be good quality jobs for future local graduates who will want to live here and pay council tax and spend their income in the borough. Nor will it attract well paid people to want to come to live and work here.

7. Please set out modification(s) you consider are necessary

I'm afraid I am not aware of how this could be achieved but I feel that somehow we need to include ways to attract quality employers to the area be they in the scientific, high technology manufacture or other areas which are well paid and generate good income for the borough. Only in this way will we require the kind of housing that people can afford to buy and pay the tax income that is needed to run the undoubted problem areas we have in this borough. These are expensive to support such as looked after children, adult social care, housing benefit, etc.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

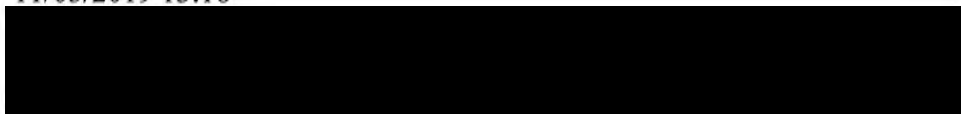
Response Date	3/3/2019 7:05:36 PM
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PO1314

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

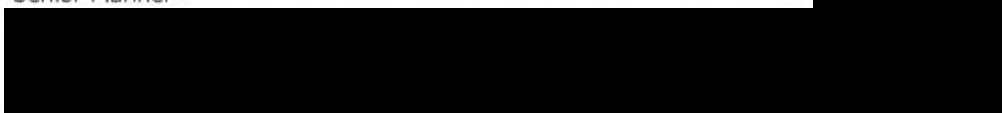
To whom it may concern,

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.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: ANDREW	First name: DAN
Last Name: COTTON	Last Name: INGRAM
Organisation/company:	Organisation/company: BARTON WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

Signature: [Redacted]	Date: 13/03/19
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <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

Policy LPA04: A Strong and Sustainable Economy

- 3.16 Our Client is supportive of the employment land requirements which are set out within this policy (a minimum of 215.4 hectares between April 2018 and March 2035) and wholeheartedly supports its inclusion within the New Local Plan.
- 3.17 Our Client notes however that whilst the Council states it will aim to deliver 215.4 hectares of employment land, the actual allocation of land for employment equates to 265.3 hectares.
- 3.18 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.
- 3.19 Notwithstanding the unnecessary confusion caused by the varying requirement periods (as outlined within Section 2), it is clear that the Council have allocated for 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. The Council should ensure, however, that enough land is allocated for housing to take account of the over supply of employment land and should consider releasing further sites for allocation in order to ensure that population increase resulting from this employment growth is accommodated.

Policy LPA04.1: Strategic Employment Sites

- 3.20 Our Client welcomes the provision of strategic employment sites within the New Local Plan and the clear benefits these will bring to the Borough. Our Client particularly welcomes the inclusion of site 1EA: Omega South Western Extension, Land north of Finches Plantation, Bold, recognising the clear benefits having a large employment site in close proximity to a new key housing site would bring in sustainability terms.
- 3.21 Our Client would seek to ensure that suitable planning obligations, particularly with regard to highway infrastructure, are incorporated into such a development to ensure that these are not unduly passed on to residential developments within the vicinity.

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

PO1315



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

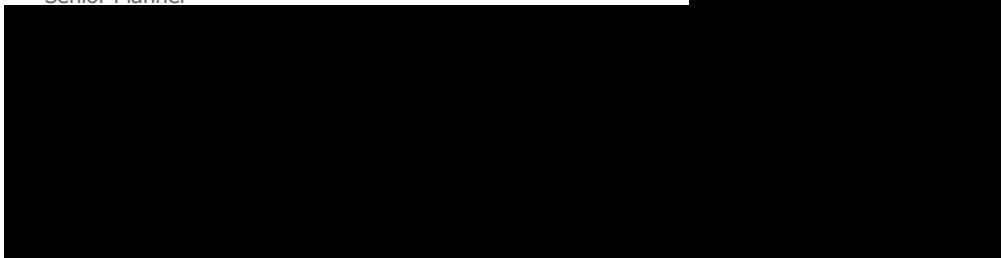
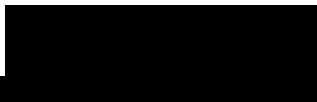
To whom it may concern,

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.

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 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				WHOLE SUBMISSION DRAFT			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE REFER TO REPRESENTATION DOCUMENT
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ **No**, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER
SITES.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

St Helens Borough Local Plan 2020 - 2035

Submission Draft

Representations on behalf of Miller Homes

March 2019

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

PO1316

Representor Details

Web Reference Number	WF0248
Type of Submission	Web submission
Full Name	Mrs Catherine Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

7. Please set out modification(s) you consider are necessary

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016).
- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 6:03:27 PM
---------------	----------------------

PO1317

Representor Details

Web Reference Number	WF0249
Type of Submission	Web submission
Full Name	Mr Brendan Houlihan
Organisation	
Address	68 Ecclesfield Rd Eccleston St Helens WA10 5NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 0
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

7. Please set out modification(s) you consider are necessary

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. 86
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09
- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 5:58:24 PM
---------------	----------------------

PO1318

Representor Details

Web Reference Number	WF0250
Type of Submission	Web submission
Full Name	Mr Richard Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

7. Please set out modification(s) you consider are necessary

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 09
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09
- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 5:51:50 PM
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PO1319

Representor Details

Web Reference Number	WF0313
Type of Submission	Web submission
Full Name	Mrs Ann-Marie Barrow
Organisation	
Address	11 Lynton Way Windle St. Helens WA10 6EQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

This version of the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council

are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 12:03:49 PM
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PO1320

Representor Details

Web Reference Number	WF0346
Type of Submission	Web submission
Full Name	Mrs Elizabeth Graner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA10 4EY
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

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7. Please set out modification(s) you consider are necessary

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
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- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08
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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. 05
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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

3/5/2019 6:20:22 PM

PO1321

Representor Details

Web Reference Number	WF0347
Type of Submission	Web submission
Full Name	Mr Alan Garner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA104EY
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

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In addition, the following fundamental elements of the Plan remain questionable -

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- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/5/2019 6:18:13 PM
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PO1322

①-LPA01 ②-LPA02 ③-LPA04 ④-LPA02

WF0394.pdf

⑤-Green Belt Review 2018 ⑥-LPA04 ⑦-Para 1.7.2 DTC

⑧-LPA05 ⑨-LPA08 ⑩-LPA07 ⑪-LPA08

Representor Details

Web Reference Number	WF0394
Type of Submission	Web submission
Full Name	Mr Michael McLoughlin
Organisation	
Address	3b Sadlers Lane Rainford St. Helens WA11 7HT
Agent Details	Mr Michael McLoughlin

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

this version does not satisfy:

- the requirement for Sustainable development 01
 - the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
 - sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
 - effective land use by concentrating on Green Space development over town centre development with higher densities. 04
 - food security by ignoring Agricultural Land Quality. 05
- In addition, the following fundamental elements of the Plan remain questionable -
- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
 - Adequate regional and cross border collaboration has not been undertaken. 07
 - The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
 - The latest estimate produced by the ONS (2016) predicts that 383 houses

per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

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- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/2/2019 1:35:59 PM
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PO1323

Representor Details

Web Reference Number	WF0445
Type of Submission	Web submission
Full Name	Mr Paul McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes
Paragraph / diagram / table	
Policies Map	Areas 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

7. Please set out modification(s) you consider are necessary

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

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- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
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- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/24/2019 3:12:06 PM
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PO1324

Representor Details

Web Reference Number	WF0446
Type of Submission	Web submission
Full Name	Mrs Helen McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes
Paragraph / diagram / table	
Policies Map	Area s 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	yes
Habitats Regulation Assessment	yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

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7. Please set out modification(s) you consider are necessary

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

06

07

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- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
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- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/24/2019 3:06:37 PM
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PO1325

Representor Details

Web Reference Number	WF0128
Type of Submission	Web submission
Full Name	mrs julie ireland
Organisation	
Address	105 longton lane rainhill l35 8nu
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

1. St Helens has a reducing population where is the additional population coming from to justify additional housing.
2. St Helens own brownfield register suggests land availability for 5808 houses
3. The councils plan means another 57 hectors land over the Brownfield land to build 1437 houses not the 288 hectors in table 4.5
4. 3HS has a declining industrial base, meaning its population rely s for their employment outside St Helen's boundary.
5. The road infrastructure around 3HS isn't capable to cope with existing levels of traffic, increases in traffic will divert more cars into the small roads of the existing estates. namely Longton lane, Two Butt lane, Holt Lane, Mill Lane, View rd, Stoney lane, Blundells lane.
6. Warrington Rd and Rainhill Rd junction at Skewed Bridge is at capacity with the councils own figures, similarly the junction at Portico lane and Prescot Rd at capacity.
7. Increased traffic increases risk to pedestrians and increases air pollution.
8. The release of greenbelt will cause significant harm to the reason having green belt
9. 3HS infrastructure can't sustain increases with dentist, doctor, school places
10. 3HS is a designated flood zone, to loose the land draining leaves existing properties at risk.
11. Sport England objected stage 1 plan, this objection hasn't been answered.
12. 3HS incudes more than 13 flora and fauna species protected

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13. There is no statement of common ground with neighboring authorities

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7. Please set out modification(s) you consider are necessary

The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not consider removing this land from green belt to place in safeguarded

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 9:43:01 PM
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PO1326



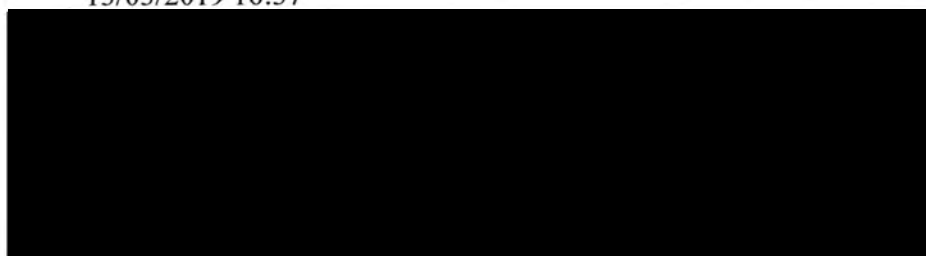
St Helens Local Plan 2020-2035 Submission

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

--

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

3.0 Economy

National Planning Policy

16. National planning policy sets out that "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future." (NPPF, paragraph 80).

17. When preparing planning policies NPPF paragraphs 81 and 82 provide further guidance for plan-makers:

81. Planning policies should:

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period (**see paragraph 10 of this submission for our comments on the plan period**);
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

82. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-

driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

Economic Forecasts

18. The Council's planning policies for the economy are extremely aspirational. They are based on data derived from the *Oxford Economics Forecasts*. These forecasts are themselves optimistic and are based on the premise that by releasing Green Belt land, economic growth will be stimulated. This is not an objectively assessed need, it is speculative supply with a view to creating a need. This conclusion is borne out in the work of Dr Athey (economist, My Local Economy) who states:

“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.” (Athey, paragraph 2.1)

19. Rather than set out an Objectively Assessed Need (OAN) using projections from past data e.g. BE Group's baseline figures in the *Employment Land Needs Study Addendum Report* (January 2019), the Council have taken that objectively assessed baseline figure and added in land that can only come forward by an inflated assessment of need in the Submission Draft. This is largely based on the assumed need to meet projected jobs forecasts, which themselves are based on assumptions about land supply. A circular argument. The Council need to return to a more realistic OAN for employment land based on the evidence available from past take-up rates.

Transparency

20. A further problem arises in relation to the *Oxford Economic Forecasts* in that they are not publicly available. Dr Athey concludes:

“However, whilst the Oxford Economics forecasts are integral to the Liverpool City Region SHELMA, and are referred to in documents supporting the SHBC Local Plan, and the LEP Economic Growth Strategy, the forecasts are not available publicly to appraise. The forecasts, data, and details about assumptions or methodology are not publicly available and were not available to support the SHBC draft local plan or the public consultation. (Athey, paragraph 4.2)

21. Formal enquiries made to the Council have not resulted in the *Oxford Economics Forecasts* or data being provided or made public. This data is not publicly available for scrutiny, yet underpins the LCR SHELMA, and all subsequent local plans in the Liverpool City Region. It is highly unusual to have such forecasts, material to the planning policies, not being made publicly available. The Council were asked to supply these documents on a number of occasions, but the documents/data have not been provided.

22. This raises a soundness issue. To be sound plans have to be justified i.e. “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”,. Without access to supporting evidence the Council cannot demonstrate that the plan is justified. The Submission Draft is based on evidence that is not verifiable and, therefore, the Plan cannot be demonstrated to be sound without publication of the evidence used as its basis.

Circular Argument

23. As well as issues of transparency it is clear that the Council’s forecasts are based on a circular argument with assumptions about land supply, including release of Green Belt being justified to provide employment. As Dr Athey quotes from the *Employment Land Needs Study Addendum Report*, January 2019 (pages 10-11):

“This modelling had input from St Helens Council in regards to promoted major development projects being considered in the preparation of the Local Plan Preferred Options, being focussed on logistics and warehousing schemes, including the potential Green Belt

sites around Haydock, west of Omega and Parkside West and East.
(Athey, paragraph 2.3)

24. What is clear is that by the Council setting the criteria for the “Transformational Growth” Scenario in the *Oxford Economics Forecasts*, including the use of Green Belt land to provide employment sites, one of a range of policy scenarios has been chosen instead of an objectively based needs assessment of economic and market trends. This creates a circular argument more land for employment creates more jobs, more jobs justify more land for development. There are other reasonable alternatives, based on other policy scenarios, but these are rejected as not aspirational enough e.g. using the long-term land take-up for the period 1997-2015 of 4.9 hectares per year.

25. The Council’s own evidence prepared by BE Group is revealing in this respect. In the *Employment Needs Study Addendum Report* (Amended January 2019). This states that the OAN for employment land was “forecast by looking at past take-up and considering job forecasts for the study” (*Employment Needs Study Addendum Report*, paragraph 1.3) (my emphasis). As has already been stated, the job forecasts include assumptions about significant future release of land through planning policy (see *Employment Needs Study Addendum Report*, paragraph 2.17). BE Group then compare this jobs figure with past land take-up and conclude that the area of land to be developed on that basis would not be sufficient to deliver the jobs forecast: a circular argument. Assumptions about future land provision having influenced the job forecast are then employed to justify release of additional employment land.

26. This reasoning can be seen in the *Addendum Report*. In that document the BE Group state that “past take-up of employment land was considered to be the preferred basis of forecasting of the employment OAN”. They then point out that this past take-up has not been constant and that some periods had less growth. This is not considered to be unusual, the local economy and national economy goes through periods of growth and recession.

27. BE Group choose two long-term take-up periods 1997-2015 and 1997-2012. The former had a land take-up rate of 4.9 hectares per year, the latter 5.8 hectares per year. ✓
28. The period 2011/12-2015 is excluded from the 1997-2012 baseline on the basis that “there was a lack of adequate market attractive supply. This is “cherry picking” data to suit the Council’s aspirations. As previously stated, economies have periods of growth and contraction. The long-term 1997-2015 data should be used. ✓
29. In the *Addendum Report* these two long-term take-up periods are then used to generate two baseline figures for the 25-year period, 2012-2037. On the 4.9 hectares per year scenario this generates a baseline of 122.5 hectares, but a 5-year buffer is added of 24.5 hectares, leading to a total figure for 2012-2035 of 147.0 hectares. Using the 5.8 hectares per year, with a 5-year buffer results in 174.0 hectares 2012-2035. To these two baseline figures of 147.0 and 174.0 an additional land for major projects is added of 30-40 hectares. ✓
30. A more reasonable approach would have been to have taken an evidence based i.e. using the long-term 1997-2015 past take-up rate figure for the OAN. This reflects the ups and downs of the economic cycle. **The OAN figure for employment land should be 4.9 hectares per year, 122.5 hectares over St Helens suggested plan period.**] (3)
31. However, a further issue with the Council’s approach is the use of the time period 2018-2037 for employment land needs. This is different from the housing figures (2016-2035) and different again from the plan period on the cover of the Submission Draft 2020-2035. Unfortunately, what has gone has gone. St Helens cannot plan for the past. There is nothing in national planning policy to say that employment land, perceived as having in some way been missed out on by St Helens, should be rolled forward into future plans. This may have some rationale and support in national policy when considering housing, for example, say to meet the assessed need of people living in the Borough whose housing needs are currently unmet. But, with regard to employment land, no such argument ✓

pertains. **The Plan period for employment land should be consistent with other parts of the plan e.g. housing, 2016-2035. On this basis, and using 4.9 hectares the baseline OAN should be a total of 93.1 hectares.**

3

32. The *Addendum Report* also adds in assumptions for large strategic sites. It is accepted such sites may need to come forward and be added to the employment land requirement in Policy LPA04, 2. Such sites should be identified, if in Green Belt, as part of a selective review of Green Belt to meet the need for such strategic sites.

33. There is no justification for an additional five years of supply, this is an arbitrary figure and should be deleted.

3

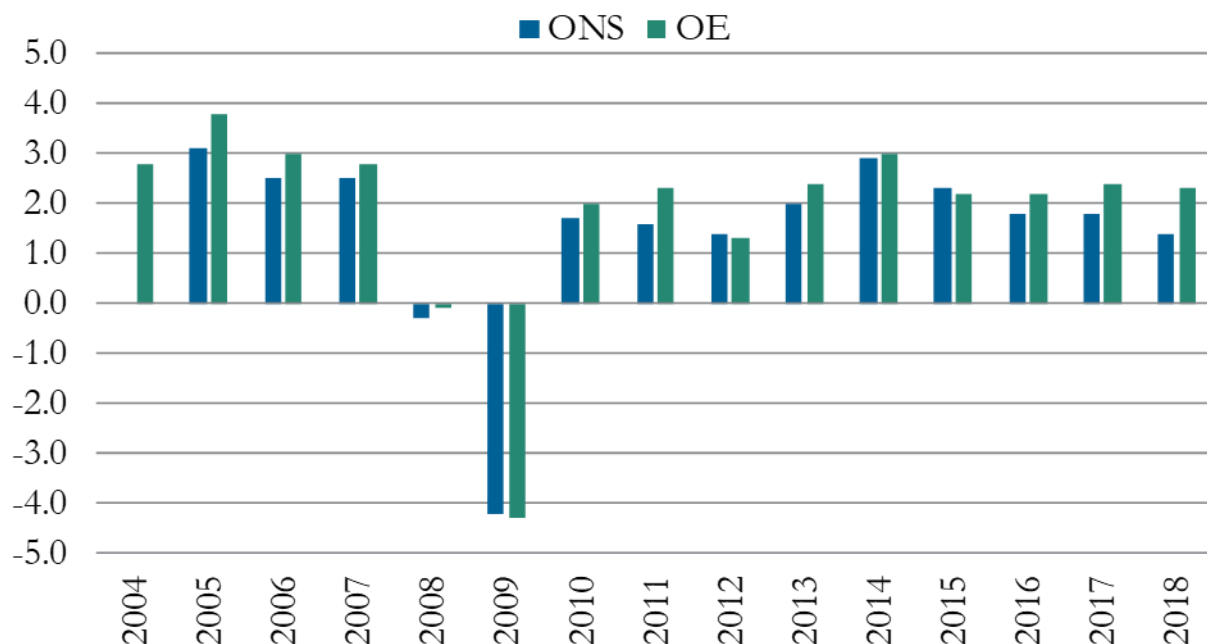
Out of Date Forecasts

34. The third issue relates to the Council's economic forecasting made in 2016. They are now out of date. Compared with the evidence on economic growth over recent years (2015 to 2017), they are extremely over optimistic.

35. The Oxford Economic model uses national economic growth rates to inform forecast local growth rates. For example, Oxford Economics has projected the UK rate of growth at 2.2 per cent (2016), 2.4 per cent (2017) and 2.3 per cent (2018) compared the actual out-turn, as estimated by the Office for National Statistics at 1.8 per cent (2016), 1.8 per cent (2017) and 1.4 per cent (2018).

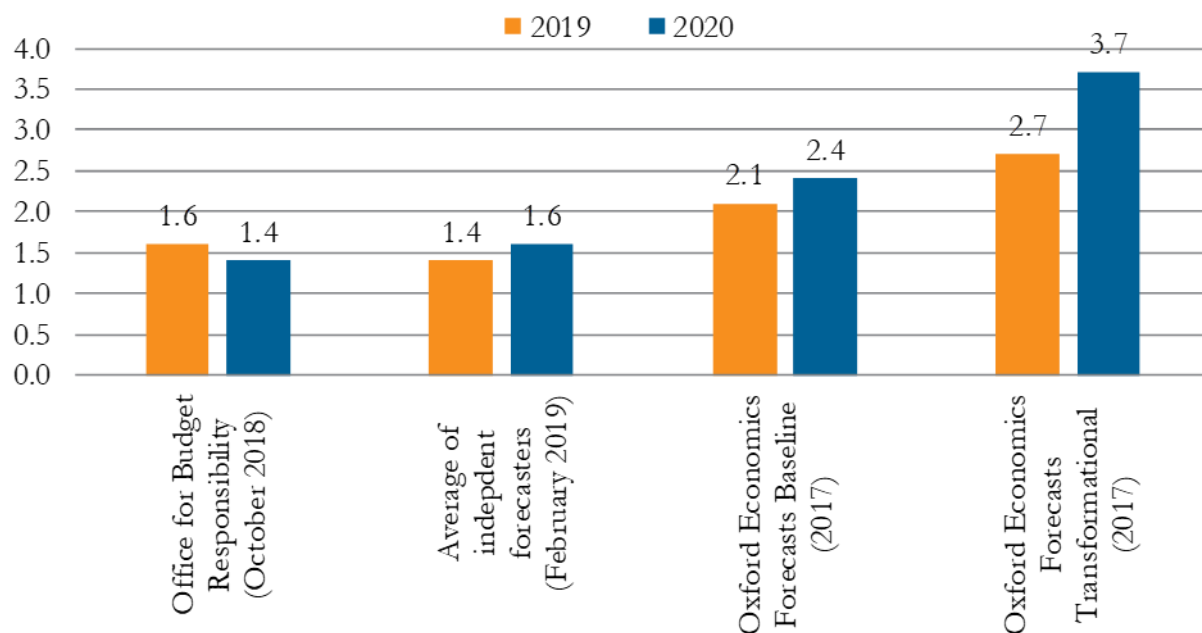
36. Similarly, looking forward, in 2016, Oxford Economics forecast 2.1 per cent growth for 2019 and 2.4 per cent growth for 2020 in its baseline scenario, and 2.7 per cent and 3.7 per cent growth in 2019 and 2020 respectively in its Transformational Growth Scenario. Both scenario forecasts are very optimistic compared to recent forecasts by the Office for Budget Responsibility (in October 2018) of 1.6 per cent growth in 2019 and 1.4 per cent growth in 2020. These are shown in Figures 2 and 4 of Dr Athey's submission reproduced below as Figures 1 and 2:

Figure 1. Comparing Oxford Economics Forecast with Office for National Statistics Estimates of GVA Growth (Per Cent)



Source: Office for National Statistics and Oxford Economics.

Figure 2. Comparing Short-Run Forecasts for the UK Economy



Source: Office for Budget Responsibility, HM Treasury, Oxford Economics.

37. In addition, the 2016 Baseline and Growth Scenario forecasts were originated shortly after the Brexit vote and this places them in a very uncertain context. By way of contrast, Oxford Economics' 2017 projections for jobs growth are lower than the historical trend for both Workforce Jobs and employee jobs. This further undermines their perceived accuracy (Dr Athey, paragraph 2.8)

38. The overall conclusion to draw from the Council's evidence and the interpretation of that evidence base is that:

- a) It is not transparent and, therefore, not independently verifiable;
- b) It is based on out dated data;
- c) It is based on a circular, self-fulfilling argument that results from a flawed methodology.

For these reasons a lower OAN for employment land of 93.1 hectares 2016 to 2035 is justified. Larger sites to meet strategic needs can come forward. At this time, as part of a selective review of Green Belt.

Warehousing and Logistics

39. The Submission Draft seeks to secure significant growth in the warehousing and logistics industries. Table 4.2 of the Submission Draft identifies this as within the range 110-155 hectares. There are now considerable doubts about the data underpinning this approach.

Port Freight

40. The UK port freight forecasts used in the Liverpool City Region SHELMA are significantly out of date, this data was published in 2006. A 2019 forecast is now available from the Department of Transport. This forecast projects a much lower growth in freight volumes than the 2006 forecasts. In total, the 2006 forecasts projected a 12 per cent growth in UK port freight compared to an actual contraction of -13 per cent. The 2006 forecasts projected a growth of 12 per cent in port freight between 2020 and 2030, compared to the 2019 forecasts projecting

a single digit 8 per cent growth rate. (Dr Athey, paragraph 2.11). Dr Athey concludes that:

“Since port traffic will drive the need for storage and distribution facilities, this lower forecast for port freight will have significant implications for land use demand, and renders the assumptions behind the LCR SHELMA and St Helens Local Plan questionable.” (Dr Athey, paragraph 4.22). ✓

41. This is further evidence that the Submission Draft Plan is not justified by up to date evidence and that the Submission Draft is not sound.] ④

Vehicle Production

42. Further assumptions about the growth of UK vehicle production are also out of date, with vehicle production in steep decline since January 2017. This renders the assumptions in the SHELMA and Submission Draft concerning the growth of port freight movements and storage arising from motor vehicles redundant (Dr Athey paragraphs 2.12, 4.24 and 4.25). This is further evidence that the Submission Draft Plan is not justified by up to date evidence and that the Submission Draft is not sound.] ④

Sub-Regional Context

43. Based on the *Addendum Report* (paragraph 2.14) the forecasts for B8 requirements in the Liverpool City Region are for of 321 hectares of additional land by 2033. ✓
44. If St Helens were to maintain a 16% share of such uses, which it currently has, this would equate to 51 hectares of land for B8 uses by 2033. with a two-year difference in time period (2033 as opposed to 2035). The Local Plan seeks to significantly exceed Liverpool City Region figures, based on Table 4.2 of the Submission Draft by in the region of 100-200%. Whilst it is part of the Council's aspirational strategy there is no evidence that this approach has been discussed or agreed at City Region level.] ③

PO1327



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

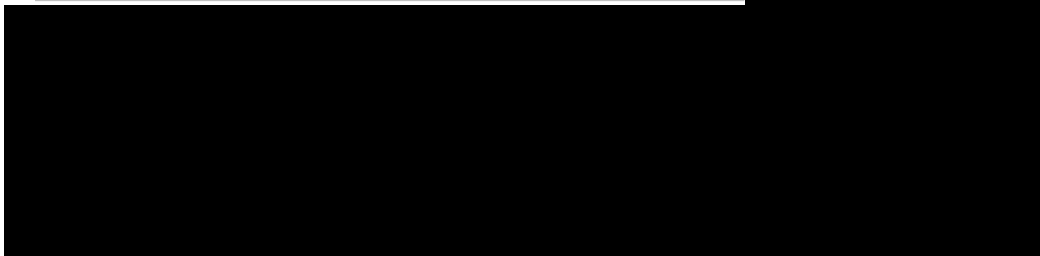
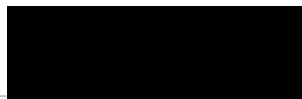
Dear Sir / Madam,

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

communities; contribution to high quality and built environment; minimising the need to travel; and lowering St Helen's carbon footprint.

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.

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

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

economic growth scenario set out within the SHELMA, that the borough will not be able to fully contribute towards or take advantage of its position within the LCR.

29

Policy LPA05 – Meeting St Helens' Housing Needs

3.22 Our Client is disappointed to see the proposed reduction in the proposed housing requirement from the Preferred Options Draft of the Local Plan which set out a requirement of 10,830 dwellings from 2014 – 2033; equating to an average requirement of 570dpa. It is worthy of note that such a requirement was the same as set out within the Core Strategy (2012).

30

3.23 The Local Plan now seeks to reduce that housing requirement to a minimum of some 9,234 net additional dwellings between 2016-2035; an average of at least 486dpa.

3.24 In the first instance, as set out above, we consider that the Council should give consideration to increasing its housing requirement to align with the wider aspirations of the LCR as set out within the SHELMA to drive forward economic growth. We would consider that the Council's starting point should at least be to meet the economic growth scenario outlined within the SHELMA of 860dpa.

3.25 If the SHELMA growth scenario is discounted there remains a strong case for the uplift of the housing requirement to go beyond that derived by the Government's SMOAN. We agree with the Local Plan's (paragraph 4.18.5) stated shortfalls of the SMOAN in that it does not take into account increased employment growth from development of additional employment Sites leading to increased housing need. We also agree that long terms trends of declining affordability is likely to present an upward pressure on the outputs of the standard method.

31

3.26 With regard to the above, we welcome the Council updating its SHMA to provide additional evidence to consider an uplift to the SMOAN; an approach which is considered to be sound in principle. We welcome the SHMA's proposed uplift to account for economic growth over and above what is considered by the SMOAN; i.e. from 468dpa to 486dpa. However, we consider that it is not entirely clear why 486dpa has been selected as the most appropriate housing requirement and we make a number of observations that the uplift applied should be significantly greater.

32

PO1328

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

PO1329

Representor Details

Web Reference Number	WF0221
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey WA5 3RH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA04.1, Statagic Employment Sites
Paragraph / diagram / table	Section 4.13
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Bold Forest Park Area Action Plan, Adopted July 2017

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

From consulting the National Planning Policy Framework (NPPF, last updated 19th February 2019, especially paragraphs 133 -147) I read that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also explicitly states that once established Green Belt boundaries should only be altered in 'exceptional circumstances' and that these "Very special circumstances" will not exist unless any potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." The Draft Local Plan (St Helens Borough Local Plan 2020-2035: Proposed Submission Draft, December 2018) includes a proposal to allow the extension of the Omega industrial site west into the eastern side of Bold Forest Park (in the report, designated as Area 1EA, comprising 31 hectares), which is currently part of the St Helens Green Belt. I consider that the proposed change is unsound because of a lack of justification for the required 'exceptional circumstances' needed to allow conversion of Green Belt land – in this case farmland - to industrial use. This change to a secure, well-established, Borough, County, and mature tree-lined Green Belt boundary is being proposed to meet projected future employment requirements for Warrington, adjacent to St Helens. Warrington currently has a net 14,000 commuters coming into the borough each day so is not generally short of employment opportunities for its population, and is presently using up the vast potential of the Omega South employment area land with both warehouses and housing, suggesting that their

priority is not to create significant additional employment within the Borough. In the future, this proposed change could make a small contribution to Warrington's employment numbers, but it is insignificant compared with all the many and various opportunities proposed within Warrington itself, with an available land area consisting of hundreds of hectares in total. In addition, Warrington is having to compete with other areas in the north west of England such as Haydock, Heywood, Middleswich and Knowsley for warehouse business. It is, therefore, unclear how an argument of 'exceptional circumstances' might be made for this proposed change from farmland to warehousing at this location. 01

The proposed area 1EA is within Bold Forest Park. Removal of this land from Green Belt goes against the stated aims of the Bold Forest Park Area Action Plan that was signed by St Helens Council in 2017 after significant work to look at all aspects of environmental value and protection and enhancement of the area. (In the AAP Technical Report, the land 1EA is shown as Medium/High sensitivity [Section 2.3.7] – the highest category given, and also as 'Conserve/Enhance' in Figure 9. The designated nature conservation site of Booth's Wood would be right on the edge of the proposed area 1EA, removing the protecting buffer such that the industrial site would run right up against the TPO'd trees and the boundary of the original mediaeval deer park.) 02

Since the numbers quoted in the Draft Local Plan apparently demonstrate that this area of farmland is not needed to meet St Helens employment requirements, it would appear that the anticipated benefit that could arise from this proposed industrial extension would be in the form of a relatively small amount of additional Council revenue (70% of which would go to St Helens, 30% to Warrington). Set against this is the damage done to the agricultural land of Bold Forest Park and the rest of the Park countryside by having the intended warehouses on its eastern side. In addition, even more traffic and air pollution will be generated in the west Warrington area from the increased diesel lorry traffic. Local Warrington residents will be affected by the increased pollution, noise and congestion. 03

In the documentation for this proposal to remove area 1EA from the Green Belt, there is a general statement, as made for other areas under consideration, that there are people living within 1km of the area who are in the bottom 20% of the economic scale. If this statement is considered to have any particular significance, it should perhaps be noted that the population on and around this southeast side of the Bold Forest Park countryside area is of very low density apart from the extensive Warrington-based Lingley Green and Whittle Hall areas of Great Sankey, which comprise mostly of new modern three- and four- and five- bedroom detached houses. If the report is suggesting as a justification that there may be a potential employment opportunity for any nearby population in St Helens, it should be noted that, in practice, the M62 cuts these populations off such that they are at least 8km away by road and about 1.5 hours away by existing public transport from this area (using information from Google maps in March 2019). 04

In the event that such a development is allowed to proceed, the documentation does not contain any information e.g. under 'Requirements' that might help mitigate the environmental damage done to Bold Forest Park. This seems to have been considered for certain other sensitive areas, but was this considered here? Many of the trees and woods in the Bold Forest Park area probably date from the first half of the 18th century when the new Bold Hall was built, when they lined the original driveway – and many are now protected by TPOs. There is a variety of wildlife and under the St Helens AAP there is the intention to increase tree cover by 10% in this area. However, the generally open aspect of the farmland means that once the current strong treelined boundary is breached, the whole area across to the St Helens conurbation from the Warrington boundary would be visible to the development. The development at Omega South is currently well screened from the St Helens Green Belt area by mature trees along the County and Borough boundary. 05

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 06

07

PO1330

Representor Details

Web Reference Number	WF0214
Type of Submission	Web submission
Full Name	Mr Sean Hollowed
Organisation	
Address	6 The Fairways Ashton-in-Makerfield Wigan Lancs WN4 0YX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)
No

3. To which part of the Local Plan does this representation relate?

Policy	LPA04 - sites 2EA, 5EA & 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:
Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale. 01

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. 02

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt. 03

The Department of Communities and Local Government has stated that, "Local Authorities may only alter Greenbelt boundaries in exception circumstances." I do not believe that the Council has proved in its Plan that the circumstances are exceptional. 04

The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North. 05

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. 06

High volumes of predicted traffic will add to the already over capacity on the roads in the vicinity. 07

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 7:13:49 PM
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PO1331

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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PO1332

Representor Details

Web Reference Number	WF0246
Type of Submission	Web submission
Full Name	Mr Paul Parkinson
Organisation	---
Address	37 Springfield Park Haydock Lancashire WA11 0XP
Agent Details	--- ---

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 - 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan isn't Legally Compliant in that although my rear fence is the boundary of Parcel LPA05 – 2HA (Land at Florida Farm South) I haven't received a letter or email from the Council informing me that I live within 200 metres of land that it is proposing to remove from the Greenbelt. I understand that it has recently come to light that there appear to be many residents of Bold and Clock Face who also haven't received notification of the proposals. One can only speculate as to how many residents throughout the Borough haven't been advised of the proposals affecting them.

The Council is quoting figures for its projected population that appear to be wildly over optimistic. The population of St Helens has been in decline since the 1970's so the Council should be put to strict proof of its population estimates. All the surrounding Local Authorities ie Wigan, Warrington, Halton, Knowsley and West Lancashire are all forecasting similar increases in population without giving any indication of where the extra residents are coming from.

Cross referencing this with the Council's employment policy of seemingly putting all its eggs in the basket marked 'warehousing', such jobs with its notoriously low pay, will not attract workers to move into the Borough to purchase the new build housing.

01

02

03

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this.

Examples of brownfield sites that could be developed for housing and aren't put forward in the Local Plan are:

1 Land off Parr Street in St Helens Town Centre, to the rear of St Helens Central Station. This site was formerly the Council owned abattoir which was demolished many years ago and has been derelict ever since. In close proximity to the station and the Town Centre this site would appear to be ripe for development and would clear up an unsightly mess. OK

2 Land off Bellerophon Way, Haydock, to the rear of the Tesco Haydock. This land is currently being marketed as housing land but again it isn't allocated in the Local Plan.

These are just two examples and there are many other areas of brownfield sites throughout the Borough that could be developed but the Council would appear to favour release of Greenbelt rather than insisting that developers remediate brownfield sites to clean up the many eyesore areas. The Council states that it has a 'brownfield first' policy but this seems to be mere lip service and is not put into practice or made manifestly clear from the Local Plan.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt in that is closing the Green spaces between the settlements of Haydock, Garswood and Blackbrook.

This site, Florida Farm South, is some 23 hectares or approximately 57 acres. On the opposite side of the A580 East Lancashire Road the Council granted planning permission for warehouse development at Florida Farm North, some 36.37 hectares of Greenbelt Land..

Its proposals are that a further 28 hectares to the north of that site should also be allocated for warehousing, giving a total of almost 65 hectares or 160 acres to be covered in concrete, tar macadam and huge sheds.

Those sites, together with Florida Farm South will amount to approximately 217 acres of Greenbelt for development, a huge proportion of the Greenbelt in this vicinity.

..
Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. Building housing developments on the fringes of the Borough encourages the use of motor cars because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe because of the proximity to the newly re-configured junction of Haydock Lane and the A580 which lies to the East of the proposed junction.

This junction was constructed with money received from the Liverpool City Region rather than being provided by the developer in what is said to be a £150 million development. This is now a 4-way junction with Toucan crossing facilities meaning that traffic in the morning and evening peak periods is queuing for longer and the drivers are then moving away from the signals and rapidly accelerating. These vehicles will be confronted by vehicles leaving the proposed housing development. 05

The proposal for a roundabout junction at Liverpool Road & Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

A development of this size at this location is likely to generate over 2000 additional vehicle movements per day. Anyone leaving the development to travel in the direction of Manchester can only do so by leaving at this junction and then accessing the A580 via the A58/A580 junction or by travelling through Haydock via the A599 and accessing the A580 via the Haydock Lane junction referred to above.

The Council has proposals to upgrade the A58/A580 junction but it isn't known whether the works have anticipated the additional traffic that will be generated by the proposal. Other than the construction of the roundabout referred to at the junction of Liverpool Road and Vicarage Road there don't appear to be any additional highways infrastructure proposals. This roundabout is merely to provide access to the development, it doesn't mitigate the problems that will be created by the development.

Air pollution is already a major problem in St Helens with the statistics for deaths from pulmonary disease being higher than average. The recent BBC website article about polluted areas of the UK, list Merseyside and Manchester as two of the worst polluted areas. The A580 links these two areas and already carries a heavy burden of traffic. 05

The developers of the site at Florida Farm North stated in their planning application that the development would generate an estimated 6,700 additional vehicle movements per day through the A580/Haydock Lane junction. The additional air pollution caused by these vehicles was described as negligible in the report to the Planning Committee. There must come a time, however, when all the negligible amounts add up to substantial. 06

There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into Clipsley Brook which floods at the junction of West End Road and Stanley Bank Way (A58). The problem isn't made any easier because the Council for the Florida Farm North development has relaxed its requirements for flood prevention from a one in 100 year storm plus 40% for climate change to one in a 100 year plus 10% for climate change, without giving any adequate reasons why. The Employment Land proposals at LPA04 Sites 5EA and 6EA will do nothing to ease the burden on the amount of water in Clipsley Brook. 05

The loss of approximately 217 acres of farmland in this small area could prove to be crucial to the ability of the Country to grow its own food crops.

The Council doesn't appear to have provided a statement of common ground with neighbouring authorities. 07

7. Please set out modification(s) you consider are necessary

The site at LPA05 - 2HA should be deleted from the list of land to be deleted from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

I wish to speak on behalf of residents in the vicinity of this proposed development who have already had their lives blighted by the granting of planning permission for the warehouse development at Florida Farm North.

Response Date	3/10/2019 6:08:16 PM
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PO1333

Representor Details

Web Reference Number	WF0210
Type of Submission	Web submission
Full Name	Councillor Rob Reynolds
Organisation	
Address	10 The Spinney, Rainford, Lancashire WA11 8AS
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	All
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**Legality of the plan**

In page 2 of the council's guidance on this form (https://www.sthelens.gov.uk/media/9460/lpsd-representation-form_guidance-note.pdf) under the heading "Legal compliance and duty to cooperate" they say that "The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI)".

The SCI is available here: <https://www.sthelens.gov.uk/media/3195/statement-of-community-involvement-november-2013.pdf>

The SCI says that "evidence gathering" and "community involvement" must precede the decision to adopt the plan; however I believe that the Councillors in charge of the process had made their minds up before the consultation began. I believe this can be demonstrated by consideration of the facts. The consultation was announced shortly before Christmas and ran over the Christmas break, this made press coverage and opposition difficult. Despite this the council was obviously overwhelmed by the response. This is evidenced by their repeated failure to meet their own deadlines.

At the beginning of the local plan process St Helens Council did not have a brown field register and when pressed to prepare one by opposition councillors they refused saying they did not need one. They have since been forced to prepare one by the government, but again I think this shows that the minds of the councillors in charge of the process were made up before the consultation even began. They wanted more council tax and business rates and they had an overwhelming majority on the council to force this through, evidence was unnecessary and greenbelt land was expendable.

01

Senior Councillors from the ruling group have made numerous statements which suggest that their minds were made up prior to the consultation. One example is the comment by the then leader of the council on 1/05/2017 that one group of residents opposing the plan were "#nimbys". Bizarrely this comment was posted at 1.40am. [REDACTED] said that "As I say you are #nimbys it's ok to build just not in my back yard." While this was after the consultation I believe this makes his mindset and his attitude to the plan and to disagreement with it very clear.

[REDACTED] went on to say that "People forget that as a council we have had £90m cuts. We must do something to bring in money. I support jobs and investment any day over nimbyism." In my view the reference to the reduction in the council's central government grant shows that his principle interest was in generating a greater income for the council from council tax and non-domestic rates. While this is not an unreasonable position for him to take it is not one that justifies the release of large areas of greenbelt land. His comments can be read here:

<https://www.sthelensstar.co.uk/news/15257511.star-readers-react-to-nimby-comments-by-council-leader-towards-green-belt-group/>

On page 12 of the SCI at paragraph 3.5 it says that the council will "foster good relations between people in a diverse community". I do not believe they can possibly have complied with this when the then leader of the council resorted to childish personal insults in the early hours of the morning, to residents of the borough he was meant to be leading.

In November 2017 [REDACTED] (who was then a member of the council's executive) said that "Some of that green belt like at Florida Farm used to be pit head. Some of it used to be coal mines. It's not as if we are talking about the rolling hills of Shropshire here. But then there are other parts of St Helens that are also listed as green belt that are absolutely outstanding and deserve protection." He was dismissing the concerns of local residents about the loss of their greenbelt land because in his view it isn't as pristine as land in Shropshire. This comment shows that his thinking was being influenced by factors that were totally irrelevant to the decision. His comment can be found using the link below, you will note that St Helens Council failed to respond to resident's concerns about [REDACTED] views: <https://www.sthelensreporter.co.uk/news/protest-groups-seek-clarification-on-councillor-s-greenbelt-remarks-1-8863709>

[REDACTED] was initially the council executive member with responsibility for the local plan, however he was sacked during infighting within the ruling group. He was replaced by [REDACTED] who had clashed with opponents of the plan on social media and had in his own words given "vocal support to the Local Plan and other planning applications."

[REDACTED] said that "It is not fair on the council that the objections that this has attracted should overshadow the delivery of an ambitious Local Plan that this council deserves." I believe this shows that [REDACTED] mind was made up and that he was more concerned about the interests of the ruling group of the council and what he felt they deserved than he was about local residents. [REDACTED] resigned a week later after being served with an official notice by police which set out an allegation of harassment against him (he denied any link between the notice and his resignation). I cannot believe that [REDACTED] was the right person for the role given his antagonistic relationship with opponents of the local plan and the fact that the council's standards committee had already ruled against him once. He was replaced by the man he had himself replaced a week earlier, [REDACTED] ([https://www.theboltonnews.co.uk/news/15289535.\[REDACTED\]_resigns_from_growth_role_after_a_week/](https://www.theboltonnews.co.uk/news/15289535.[REDACTED]_resigns_from_growth_role_after_a_week/)).

A further illustration of [REDACTED] behaviour and his relationship with opponents is found in the fact that he was subsequently censured for comments made between November 2016 (before the consultation) and September 2017 "related to various campaign groups"

<https://www.wigantoday.net/news/politics/councillor-accused-of-sending-phallic-symbol-to-campaign-group-1-8911889> Again referring back to paragraph 3.5 of the SCI, given his behaviour the appointment of [REDACTED] could not but harm efforts to "foster good relations between people in a diverse community".

the new leader of the Council refused to defend the local plan in our meeting of 21/12/2018 saying that "As council leader, I became one of the unpaid council representatives on the long-standing partnership set up to regenerate the former Parkside Colliery site. For openness and transparency, I will follow my usual practice and make a declaration of interest and follow the convention of leaving the room for that item." If [REDACTED] was too conflicted to vote on the decision to adopt the plan should he not have removed himself from the process of developing it? Either he had a conflict of interests or he did not, this cannot be a sort of Schrodinger's conflict of interests which applies when it suits him does but not when it does not

<https://www.sthelensreporter.co.uk/news/politics/st-helens-council-leader-slams-opposition-vote-against-local-plan-1-9504626>

It is my belief that this local plan is not legally compliant as the council have failed to comply with their own Statement of Community Involvement. My belief that they have failed in this duty is founded on my view that senior members of the ruling group made their minds up based on factors that are irrelevant to the process and that they never took the consultation process seriously. I believe I have demonstrated this through my comments above.

Soundness of the local plan

The council's own guidance says that the plan has to be "prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs". As I have set out above I believe that senior members of the council's ruling group, including two members who had been in charge of the plan and the then leader of the council have shown that they were being influenced by irrelevant factors. These factors include the desire to increase the council's income from council tax and business rates, a feeling that the council "deserved" the local plan and the fact that some of the land affected was not as pristine as "the rolling hills of Shropshire". This is what the senior councillors in charge of the process were willing to say in public. I cannot begin to imagine what they were saying in private.

I have also set out above some of my concerns relating to the attitude to consultation and the decision making process. Additionally when the question of whether the council should adopt this plan was finally brought to Councillors they called a special meeting for the 20th of December, less than a week before Christmas. Opposition councillors were only given two weeks to consider the plan before this meeting, members of the ruling group were briefed a week earlier. Most councillors are not professionals, many of us have jobs and commitments to our friends and families. Many of us had long standing plans in the run up to Christmas that we could not cancel.

The decision to hold an extra meeting at such short notice and give us so little time to prepare was totally unjustified and really quite outrageous. No apology was made for this and no explanation offered, we had a council meeting planned for January and no reason has ever been offered as to why this could not have waited until then. The decision to give Councillors from the ruling group a briefing a week before opposition members is, in my view, an appalling abuse of power. Especially given the timescales involved. If the plan was sound I do not believe the council would have made decisions which made opposition so difficult. They should have been willing to give opponents a fair chance to set out their views and then listened with an open mind.

The council has departed from the standard method to calculate housing need and there are no exceptional circumstances to justify this. The population projections used are overly optimistic about population growth in the borough. I fear that the land released from our greenbelt will be developed first as it is easier and cheaper than development on brownfield sites and that at the end of the process the population will not have increased by as much as expected. In this scenario we would have lost our green spaces and would be left with undeveloped brownfield sites. There is therefore, in my view, no "exceptional circumstances" justifying the release of greenbelt land.

The vision section of the local plan "high quality new employment development", but the only sector I could see specifically mentioned in a section on "Economy and skills" is logistics. The whole economic development side of the plan seems to be based on warehouses. The figures for how the land allocated for economic development will be used send a clear message; office space 10-15

hectares, research and development 1-4, light industry 15-20 hectares, storage and distribution is 110-155 hectares. Out of 190-239 hectares in total; more than half of that land is to be allocated to warehouses. Again I believe that the council's estimate of how many jobs "logistics" will create are an absurd over estimation.

Talk of "a diverse portfolio of accessible employment" is a fig leaf to hide an over reliance on one sector, a sector of poorly paid unskilled jobs and one that is increasingly automated. This is not long-term strategic thinking, it is a sign of how intellectually bankrupt this plan is and just how badly it would fail our Borough. St Helens has low paid jobs, we need a much greater diversity in employment that this plan would not deliver.

With respect to site 8HA in my own ward (and home) of Rainford. This site floods almost every winter and is obviously unsuitable for development. It slopes down towards a stream that runs through an area of the Borough called Blackbrook. Blackbrook regularly floods in heavy rain and both the Council and the Environment Agency have acknowledged the role that these fields play in slowing down the flow of water into the brook and therefore in reducing the peak flow of water in the stream. To build on these fields is an obvious folly that can only make this situation worse. The land is also grade one agricultural land and intensively farmed. Road access to the site is, in my view, inadequate for the addition of several hundred new cars and the roads could not be expanded without either eating into the site or demolishing houses. Many residents fear the effect that this development would have on doctors surgeries and local schools.

The council say that they want to have some of the land released from the greenbelt without incorporating it into the current local plan. This is in case it might be needed for a future local plan. This is self evidently not an exceptional circumstance.

I apologise for the length of my comments, but I feel very strongly about this and I have tried to the point.

7. Please set out modification(s) you consider are necessary

To adopt more reasonable population projections which will reduce the requirement for greenbelt land.

To come up with a new economic development plan that is not so heavily focussed on warehousing and which would again reduce the amount of greenbelt land required.

To remove site 8HA from the local plan.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 8:08:19 PM
---------------	----------------------

PO1334

EF0008



St Helens Local Plan - Representations OBO Parkside Regeneration LLP
 William Mulvany
 to:
 planningpolicy@sthelens.gov.uk
 04/03/2019 12:14

①-LPA02

②-FIGURE 4.1

③-FIGURE 4.2

④-LPA04.1

⑤-LPA10

⑥-APPENDIX 5

9 Attachments



lpsd-representation-form Policy LPA02.pdf lpsd-representation-form Policy LPA04.1.pdf



lpsd-representation-form Policy LPA04.pdf lpsd-representation-form Policy LPA10.pdf



lpsd-representation-form Appendix 5.pdf Parkside Masterplan red.pdf Parkside Rail Safeguarding red.pdf



FPC-ARP-XX-XX-FN-RX-00001 red.pdf 2018-09-14 Arup Feedback on AECOM Rail Technical Note.pdf

Dear Planning Policy

Please find attached representations to the Submission Draft Local Plan that are submitted on behalf of our client Parkside Regeneration LLP.

Please acknowledge safe receipt.

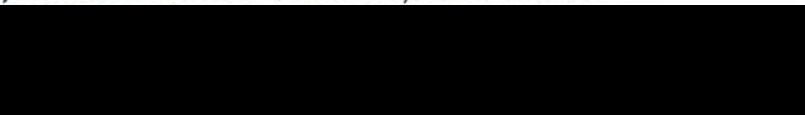
Kind regards

WILL MULVANY

Associate: Chartered Town Planner
 BSc (Hons), MA, MRTPI



Junction 41 Business Court, East Ardsley, Leeds, WF3 2AB



RTPI

Chartered Town Planner



RIBA

Chartered Practice

**THE ACADEMY
OF URBANISM**



SMARTER
PLANNING
CHAMPION



Scanned By Trend Micro Hosted Email Security (Mon Mar 4 12:14:25 2019)



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

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 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA04.1	Paragraph / diagram / table		Policies Map	√	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input checked="" type="checkbox"/>	No <input 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 draft Policy LPA04.1: Strategic Economic Sites.

In particular, our client supports allocation of land at the former Parkside Colliery (Policy LPA04.1 and Policies Map reference 8EA – Parkside West) 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.

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

4

suggested revised wording of any policy or text. Please be as precise as possible.

None

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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 employment strategy and site specific considerations such as the rail safeguarding area for site 7EA, 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.**

PO1336



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.

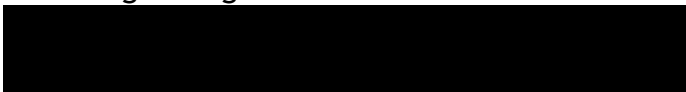
Please confirm receipt.

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

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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

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This form has two parts;

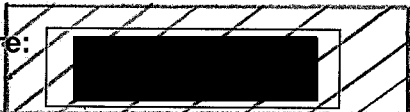
Part A – Personal Details

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

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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

employment property and have an adverse effect on the property market. It would lead to widespread vacancy. We think the data in Tables 4.2, 4.3 and 4.4 is inaccurate.

Our view is supported by the expert opinion of economist Dr. Glenn Athey, who was commissioned by St Helens Green Belt Association (an umbrella residents group opposed to Green Belt loss). In his report, Dr Athey concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts has used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with a number of other assumptions underpinning employment land policies, including forecasts of port freight. In light of Dr Athey's expert opinion, CPRE Lancashire calls for the Council to review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. CPRE Lancashire calls for the economic data, analysis to be corrected.

This is particularly the case when considering the fact that all surrounding geography in Liverpool City Region, Greater Manchester, Cheshire and West Lancashire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland for development, which is important for future food security, and is currently protected by Green Belt designation on the basis of economic analysis that is flawed and consequently not fully justified. Some of the land so allocated is among the most versatile in the country. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. CPRE Lancashire is concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

In any case, what is the local benefit of B8 Warehousing formats with new technology replacing human resources resulting in very low density employment formats, causing great harm to Green Belt purpose? We think there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, and question the need for such an excessive amount in the countryside. The duty to cooperate has not been complied with on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities, resulting in sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. CPRE Lancashire believes local planning of large warehousing formats should be in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

CPRE Lancashire is opposed to needless release of Green Belt land for employment uses. Previously we raised concern over 2EA, 4EA, 7EA, and 8EA (LPA10), but we reserve the right to comment on other employment sites included in LPA04.1 at the examination.

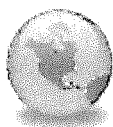
It is supported that planning applications for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St.Helens Borough's Housing Needs

In recent years, CPRE has undertaken considerable research to show that housing assessments

PO1337

EF0059/
01-25



R. Ward PAG Response to St Helens Local Plan Submission Draft January 2019

to:
planningpolicy SHC Local Plan
13/03/2019 10:29

Sing

Cc:
Dave Tyas, Mark Lewis
Hide Details

From: [REDACTED]
To: planningpolicy SHC Local Plan <planningpolicy@sthelens.gov.uk>
Cc: [REDACTED]
[REDACTED]

3 Attachments



lpsd-representation-form R. Ward PAG Response.pdf



R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf



lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf

Dear Sir,

Re: St Helens Local Plan Submission Draft January 2019 Public Consultation period ending 5pm
Wednesday 13 March 2019

1, Richard Ward, a member of the Parkside Action Group (PAG), submit the following Representation documents as a part of the above local plan public consultation.

As requested, I have completed the "St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form Ref: LPSD"

Therefore, please find attached the following documents:

1. lpsd-representation-form R. Ward PAG Response.pdf
2. lpsd-representation-form R. Ward PAG Response(Signed Front Page March 2019).pdf
3. R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

EF0059

01-25



Re: PAG Response to Local Plan Draft Submission

to:
planningpolicy@sthelens.gov.uk
13/03/2019 10:21

Cc:

Hide Details

From: [REDACTED]
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>
Cc: [REDACTED]

3 Attachments



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3. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context).pdf

Yours faithfully,

Richard Ward

On 13/03/2019 09:31, Dave Tyas wrote:

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas
Co-Chair PAG.



St Helens
Council

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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: 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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Title: Mr.	Title:
First Name: Richard	First name:
Last Name: Ward	Last Name:
Organisation/company: Parkside Action Group Local People; Battlefields Trust; Open Spaces Society	Organisation/company:
Address: Hermitage Green Lodge Hermitage Green Lane Winwick Warrington	Address:
Postcode: WA2 8SJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date: [REDACTED]

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPD7EA; LPD8EA; GBP_039; GBP_041			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No X
Sound?	Yes <input type="checkbox"/>	No X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
Please see documents:	
1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)	
2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see documents:

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No , I do not wish to participate at the oral examination	X	Yes , I wish to participate at the oral examination
--	------------------------------------------------------------------	----------	------------------------------------------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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
		Total	306.12	14,167	

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 70m² per job, equates to approx 14,000 x 70 = 980,000m² of warehousing floor space. Where Phase 1 and Phase 2 accommodate approximately 244,000m².

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 = 980,000m² 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 (NO₂) / NO_x (vegetation); Particulate Matter (PM₁₀), Fine Particulate Matter (PM_{2.5}); Ozone (O₃); Sulphur dioxide (SO₂)/SO_x; Benzene; Lead (Pb); Carbon monoxide (CO); Carbon dioxide (CO₂); Nickel (Ni); Ammonia (NH₃); 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 eCO₂ produced just from the construction of 980,000m²

The eCO₂ of constructing 980,000m²: each 1m³ of concrete used equates to 2.38 tonnes eCO₂, where 1 tonne of concrete produces 1 tonne of eCO₂; and 1m³ of steel equates to 7.9 Tonnes of eCO₂, where 1 tonne of steel produces 1 tonne of eCO₂. The estimate for construction of eCO₂ of the size of warehousing envisaged of size 980,000m² 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 eCO₂ 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 eCO₂ value will be:

Concrete: 980,000m² x 1m x 2.38 tonnes x 1 tonne eCO₂ = 2,332,400 tonnes eCO₂

Steel: 980,000m² x 0.5m x 7.9 tonnes x 1 tonne eCO₂ = 3,871,000 tonnes eCO₂

Totalling **6,203,400 tonnes eCO₂** 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 eCO₂ figure does not include the thousands of HGV container movements per year to satisfy the 980,000m² of B8 warehousing envisaged: Containers having an average weight (from full of cornflakes to full of potatoes) is 14 tonnes per container at 68g eCO₂/tonne/kilometre for HGV. The resultant carbon emissions eCO₂ 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.

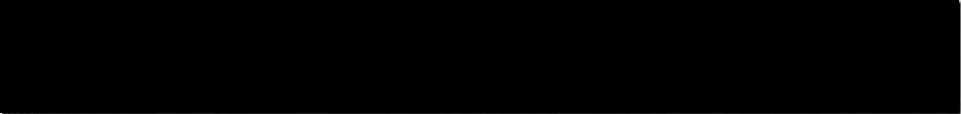
05-09 The B8 warehousing proposal by SHC shown above due to the air quality impacts also apply to the Policies LPA04; Policy LPA 04.1; Policy LPA10; Policy LPC09, Policy LPC10; LPSD7EA; LPSD8EA Which all need to be altered, changed or removed for a better series of policies that can be said to be a platform for the local people to shape their surroundings.

PO1338

ELOOS6



St Helens Local Plan 2020 - 2035, Submission Draft - Representations
 Dan Ingram
 to:
 planningpolicy@sthelens.gov.uk
 11/03/2019 13:18



1 Attachment



26800.A3.DI.DM - St Helens LP Submission Draft Reps - Travers Farm, Bold 190311 with Appendices.pdf

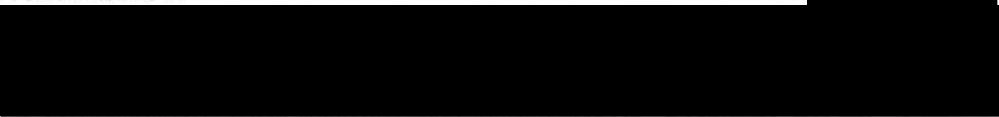
To whom it may concern,

Please find attached a copy of representations, including Vision Statement, prepared by Barton Willmore on behalf of our Client, Andrew Cotton and Family, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan Ingram
 Senior Planner



Consider the Environment, Do you really need to print this email?

The information contained in this e-mail (and any attachments) is confidential and may be privileged. It may be read, copied and used only by the addressee, Barton Willmore accepts no liability for any subsequent alterations or additions incorporated by the addressee or a third party to the body text of this e-mail or any attachments. Barton Willmore accepts no responsibility for staff non-compliance with our IT Acceptable Use Policy.

- ① - GEN
- ② - Spatial Vision
- ③ - Objective 4
- ④ - key Diagram
- ⑤ - LPA01

- ⑥ - LPA02
- ⑦ - LPA03

- ⑧ - LPA04
- ⑨ - LPA04.1

- ⑩ - LPA05
- ⑪ - LPA05.1

- ⑫ - LPA06
- ⑬ - LPA08

- ⑭ - LPA09
- ⑮ - LPC01

- ⑯ - LPC02
- ⑰ - LPC07

- ⑱ - LPC09

- ⑲ - Appendix 5



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

EF0176

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: MR
First Name: ANDREW	First name: DAN
Last Name: COTTON	Last Name: INGRAM
Organisation/company:	Organisation/company: BARTON WILLMORE
Address: C/O AGENT	Address: TOWER 12 BRIDGE STREET MANCHESTER
Postcode:	Postcode: M3 3BZ
Tel No:	
Mobile No:	
Email:	

Signature: [Redacted]	Date: 13/03/19
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <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

Policy LPA04: A Strong and Sustainable Economy

- 3.16 Our Client is supportive of the employment land requirements which are set out within this policy (a minimum of 215.4 hectares between April 2018 and March 2035) and wholeheartedly supports its inclusion within the New Local Plan.
- 3.17 Our Client notes however that whilst the Council states it will aim to deliver 215.4 hectares of employment land, the actual allocation of land for employment equates to 265.3 hectares.
- 3.18 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.
- 3.19 Notwithstanding the unnecessary confusion caused by the varying requirement periods (as outlined within Section 2), it is clear that the Council have allocated for 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. The Council should ensure, however, that enough land is allocated for housing to take account of the over supply of employment land and should consider releasing further sites for allocation in order to ensure that population increase resulting from this employment growth is accommodated.

Policy LPA04.1: Strategic Employment Sites

- 3.20 Our Client welcomes the provision of strategic employment sites within the New Local Plan and the clear benefits these will bring to the Borough. Our Client particularly welcomes the inclusion of site 1EA: Omega South Western Extension, Land north of Finches Plantation, Bold, recognising the clear benefits having a large employment site in close proximity to a new key housing site would bring in sustainability terms.
- 3.21 Our Client would seek to ensure that suitable planning obligations, particularly with regard to highway infrastructure, are incorporated into such a development to ensure that these are not unduly passed on to residential developments within the vicinity.

PO1339

EL0098



Removal of green belt site IEA
Keith Gleave
to:
planningpolicy
12/03/2019 14:40

IEA

① - LPA04

② - LPA04.1

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

PO1340



ST HELENS BOROUGH LOCAL PLAN 2020-2035 SUBMISSION DRAFT – PUBLIC
CONSULTATION 2019 LETTER OF REPRESENTATION – OMEGA
WARRINGTON LTD

Chris Gardner

to:

planningpolicy

12/03/2019 16:18

Cc:

Colin Graham

① LPA04

② LPA04.1



2 Attachments



Representation letter 12032019.pdf St Helens LDP Rep Form 11032019.pdf

Dear Sir/Madam

On behalf of our clients, Omega Warrington Ltd (OWL), we are pleased to submit a letter of representation and duly completed representation form to the St Helens Borough Local Plan 2020-2035 Submission Draft (Draft Local Plan) consultation process.

We trust you find the attached in order and look forward to receiving confirmation of receipt of these documents in due course.

Regards

Chris Gardner
Director





St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Chris
Last Name:	Last Name: Gardner
Organisation/company: Omega Warrington Ltd	Organisation/company: Progress Planning Consultancy
C/O Agent	Address: 16 Norwood, Newport-on-Tay FIFE Postcode: DD6 8DW
Tel No: C/O Agent	
Mobile No: C/O Agent	
Email: C/O Agent	

Signature: 	Date: <input type="text" value="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 <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	Policy LPA04: A Strong and Sustainable Economy & LPA04.1: Strategic Employment Sites	Paragraph / diagram / table		Policies Map	1EA	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	
Justified?	
Effective?	
Consistent with National Policy?	

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
<p>Please refer to accompanying representation letter submitted on behalf of Omega Warrington Ltd</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

x	No , I do not wish to participate at the oral examination		Yes , I wish to participate at the oral examination
----------	------------------------------------------------------------------	--	------------------------------------------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.



Local Plan
St Helens Town Hall
Victoria Square
St Helens
Merseyside
WA10 1HP

12 March 2019

Dear Sir/Madam

**ST HELENS BOROUGH LOCAL PLAN 2020-2035 SUBMISSION DRAFT – PUBLIC CONSULTATION 2019
LETTER OF REPRESENTATION – OMEGA WARRINGTON LTD**

On behalf of our clients, Omega Warrington Ltd (OWL), we are pleased to submit a representation to the St Helens Borough Local Plan 2020-2035 Submission Draft (Draft Local Plan) consultation process. ✓

The site subject of this representation comprises the land to the west of Omega South, identified in the Draft Local Plan document as a Strategic Employment Site under policy LPA04 and LPA04.1. The allocation reference under Policy LPA04.1 is 1EA 'Omega South Western Extension, Land north of Finches Plantation, Bold'. ✓

OWL fully support the allocation of 1EA as employment land under LP Policies LPA04 and LPA04.1. and will continue to work closely with both St Helens Council and Warrington Borough Council to ensure the delivery of this Strategic Employment Site during the Local Plan Period.] ① ②

Our clients also welcome the requirement established by Policy LPA04.1 that all applications, made within a Strategic Employment Site must be supported by a comprehensive masterplan for the whole site. Miller Developments will, at the appropriate stage, seek to promote a development masterplan for the site that will address the matters of detail set out in the Policy and also see to take cognisance of the high level, site specific requirements set out in Appendix 5 of the Draft Local Plan.] ②

Whilst OWL is fully supportive of the proposed allocation, as a natural extension to Omega South, it is considered that the extent of the current allocation site may not be sufficient to allow for the successful masterplanning of the site.] ① + ②

In allocating the site, the land has been removed from the Green Belt and it is therefore important as part of any masterplan process that the relationship between the Green Belt and the development is appropriately managed.



Any masterplan for the site will need to provide robust, long-term defensible boundaries to the west where potential impact on the Green Belt may be most apparent. The ability to deliver these boundaries in the form of mature woodland areas, as part of a comprehensive masterplan process will enable the successful integration of the development within the wider Bold Forest Park to the benefit of the surrounding communities.

To ensure the site is able to respond to the varied occupier requirements in the market and that the site makes an effective contribution to employment land supply, it is considered likely that any masterplan for the site may need to consider an area beyond the allocation identified in the Draft Local Plan. A more far reaching masterplan will maximise the developable area of the site whilst allowing for the implementation of sufficient, high quality landscaping and other features that will safeguard the appearance and purpose of the Green Belt and contribute to the wider Mersey Forest objectives for the area.

As a consequence, we write to confirm OWL's intention to enter into further dialogue with St Helens Council regarding the full extent of the allocation at 1EA, with a view to extending the allocation boundaries to allow for the viable development of the site, whilst ensuring a comprehensive and effective masterplan can be delivered.

We trust you find this in order and look forward to receiving confirmation of receipt of this representation in due course.

Yours sincerely,

[Redacted signature]

Chris Gardner

[Redacted contact information]

PO1341

ELO167



Highways England Response to the St Helens Borough Local Plan 2020-2035 Submission

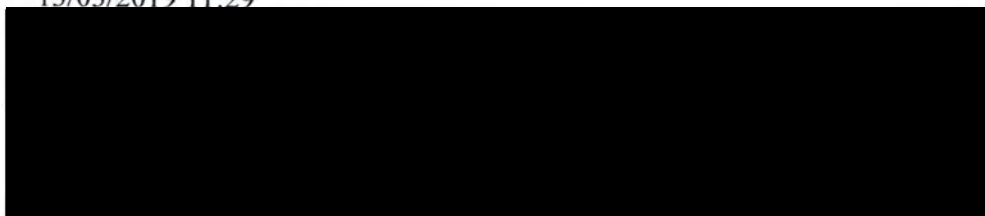
Draft

Johnson, Adam

to:

planningpolicy@sthelens.gov.uk

13/03/2019 11:29



1 Attachment



St Helens Borough Local Plan 2020-2035 Submission Draft - Highways England Response - 13 March 2019.pdf

Good morning

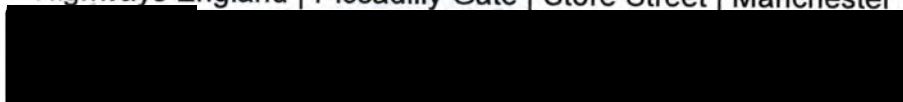
Please find attached Highways England's response to the St Helens Borough Local Plan 2020-2035 Submission Draft.

Kind regards

Adam

Adam Johnson, Assistant Asset Manager (Liverpool City Region)

Highways England | Piccadilly Gate | Store Street | Manchester | M1 2WD



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- 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

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

to enable individual and cumulative impacts to be assessed. This should include site-specific infrastructure requirements at the Local Plan level.

We have undertaken a sifting exercise to establish employment allocations which Highways England would currently consider to be most relevant to the SRN, due to their size and proximity to SRN junctions with existing performance issues. The key employment allocations for Highways England are as follows:

- 1EA – Omega South Western Extension, Bold;
- 2EA – Florida Farm North, Slag Lane, Haydock;
- 3EA – Land north of Penny Lane, Haydock;
- 4EA – Land south of Penny Lane, Haydock;
- 5EA – Land to the west of Haydock Industrial Estate, Haydock;
- 6EA – Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock;
- 7EA – Parkside East, Newton-le-Willows;
- 8EA – Parkside West, Newton-le-Willows; and
- 10EA – Land at Lea Green Farm West, Thatto Heath.

Whilst this is not an exhaustive list of the sites in which Highways England will maintain an interest, they are nonetheless those which are likely to have the greatest impact on the SRN. As with all planning matters, we would welcome early involvement in order to ensure that the needs of the SRN are met.

Housing Sites

As with the employment allocations, we have undertaken a sifting exercise to create a list of those sites for housing which are likely to have the greatest impact on the SRN. These include sites with a capacity of more than 150 dwellings and situated less than 7km from a key SRN junction. The key housing allocations for Highways England are as follows:

- 1HA - Land south of Billinge Road, east of Garswood Road and west of Smock Lane, Garswood,
- 2HA – Land at Florida Farm, Slag Lane, Blackbrook
- 4HA – Bold Forest Garden Suburb, Bold
- 5HA – Land south of Gartons Lane, Bold
- 6HA – Land east of City Road, Cowley Hill, Town Centre
- 7HA – Land to the west of the A49 Mill Lane, Newton-le-Willows
- 9HA – Former Linkway Distribution Park, Elton Head road, Thatto Heath; and
- 10HA – Moss Nook Urban Village, Watery Lane.

Again, this is not an exhaustive list of the sites in which Highways England will maintain an interest, they are the sites most likely to have an impact on the SRN. As with the above employment allocations, we would welcome early involvement during the planning process for each of these sites.

PO1342

ELD169



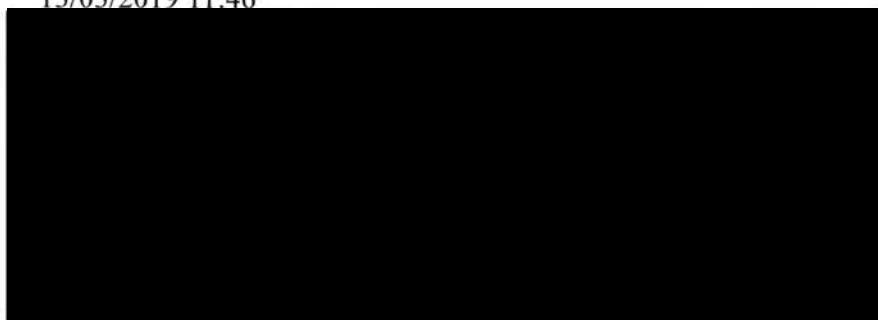
ST HELENS BOROUGH LOCAL PLAN 2020 - 2035 - representation

Peter Black

to:

planningpolicy

13/03/2019 11:46



① - LPA04

② - LPA04-1

③ - GBR

④ - LPA06

⑤ - LPA10

1 Attachment



St Helens Local Plan objection final 3 March 2019.pdf

I attach a representation from Culcheth and Glazebury Parish Council and Croft Parish Council.

Could you let me know that this has been received safely please?

Peter Black

Blackfryers Planning and Environmental Consultants

9 Ecclesbridge Road

MARPLE SK6 7PF



St Helens Local Plan – submission draft

Culcheth and Glazebury Parish Council and Croft Parish Council

Culcheth and Glazebury Parish Council Clerk to the Council Mr. M. Durrington 9, Wigshaw Lane, Culcheth WA3 4LX	Croft Parish Council Clerk to the Council Mr. M. Pope Unit K1, Taylor Business Park Warrington Road, Risley WA3 6BH
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1 Introduction

This document has been developed and agreed by **Culcheth and Glazebury and Croft** Parish Councils as their response to the Submission Draft for the St Helens Borough Local Plan 2020-2035. We have examined the submission draft and various supporting documents including:

- Employment Land Needs Assessment – Addendum Report January 2019; and
- Liverpool City Region LEP: Growth Scenario November 2016

We want St Helens and the surrounding communities to grow and thrive as places with a good quality of life. We agree with the vision '*By 2035, St Helens Borough will provide, through the balanced regeneration and sustainable growth of its built-up areas, a range of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest. A range of high-quality new employment development will have taken place...*'.

But the focus on releasing Green Belt primarily to provide sites for logistics developments will bring a low density of poorly paid and low skilled jobs that will neither provide '*balanced regeneration*' or '*sustainable growth*' or provide '*high quality new employment*'. It will also encroach on the countryside, use up valuable open land, reduce the incentive for urban regeneration and seriously erode the gaps between settlements in St Helens and Warrington.

St Helens was once a world leader in industrial technology with the invention and production of float glass. The fall has been dramatic and continues. St Helens declined from the 51st to the 36th most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics employment. This suggests that a continued focus on logistics is unlikely to reduce deprivation and that alternative approaches such as encouraging a higher skilled and educated workforce within a more balanced economy might be more effective.

This objection is not an attempt to stop development, which is inevitable and often welcome. But the current plan needs to be refocussed before it meets the aims stated in the submission draft and to ensure it does not damage communities and the quality of inside and outside St Helens borough.

2 Summary

The plan proposes major releases of Green Belt land to provide for motorway-dependent logistics development, supported by existing and new road building. It:

- Is wasteful of land, including good quality agricultural land
- Would destroy the integrity of the Green Belt
- Bring a low density of poorly paid and low skilled jobs
- Would entrench car dependency both in St Helens and the wider area making residents dependent on congested roads for work, education, shopping and leisure trips.
- Increase inequality
- Increase climate change gas emissions and reduce air quality
- Is ultimately unsustainable and incompatible with a high quality of life either for existing or new residents.

Parkside West and Parkside East, rather than offering a '*transformational employment opportunity*' will mainly attract low-skilled and poorly paid jobs, eat up large tracts of Green Belt and are unlikely to bring many of the claimed benefits. The same is true for the other planned Green Belt logistics developments within St Helens such as Florida Farm.

For employment, the Growth Scenarios used are over-optimistic and are based on significant and unrealistic assumptions about in-migration to the Liverpool City Region. Estimation of land required has used a poor methodology, leading to a gross overestimate of land needed. The focus on logistics creates poor quality employment – low employment density, low skilled jobs and low wages. It also ensures a 'Race to the bottom' with other local authorities chasing the same logistics jobs.

We oppose the following proposed allocations as Strategic Employment Sites under Policy LPA04.1 for reasons outlined in the rest of this document:

- 2EA: Land at Florida Farm North, Slag Lane, Haydock22;
- 6EA: Land west of Millfield Lane, south of Liverpool Road and N of Clipsley Brook, Haydock;
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- 8EA: Parkside West, Newton-le-Willows.

We think the employment strategy should be recast to focus on education and training, leading to higher quality employment and manufacturing. This is a more difficult path to follow than drawing a red line around large sites near motorway junctions and allocating them for warehouses. But an alternative approach is needed if St Helens is to be prosperous and have a future good quality of life.

3 Employment land and logistics

3.1 Amount of land required for employment and logistics

The methodology adopted has significantly inflated the amount of employment land needed:

- And odd baseline (from 2012) has been used
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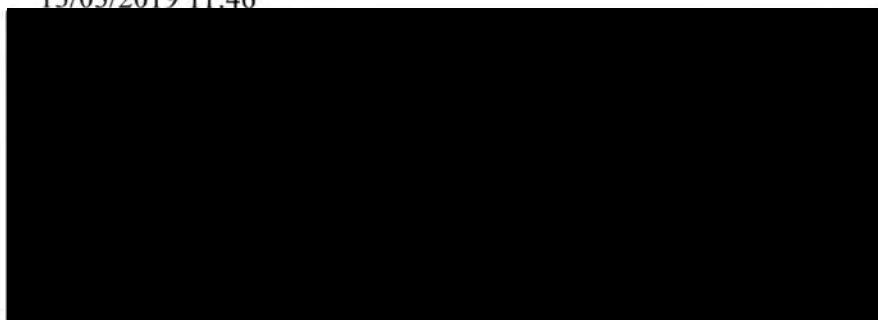
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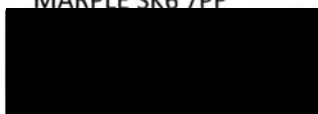
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Peter Black

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St Helens Local Plan – submission draft

Culcheth and Glazebury Parish Council and Croft Parish Council

Culcheth and Glazebury Parish Council
Clerk to the Council Mr. M. Durrington
9, Wigshaw Lane,
Culcheth WA3 4LX

Croft Parish Council
Clerk to the Council Mr. M. Pope
Unit K1, Taylor Business Park
Warrington Road, Risley WA3 6BH

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3 Employment land and logistics

3.1 Amount of land required for employment and logistics

The methodology adopted has significantly inflated the amount of employment land needed:

- And odd baseline (from 2012) has been used
- Amount of employment land needed per year calculated illogically
- Five-year buffer included – this is not required by any planning guidance

- Incorrect inclusion of 'Major Sites' allowance without proper regional consideration

The submission draft is loosely based on the Employment Land Needs Assessment – Addendum Report January 2019 (ELNA). This claims to provide an Objectively Assessed Need for employment land (not to be confused with the new Government housing OAN).

3.1.1 Baseline calculations

Confusingly the submission draft details employment land need from **2012-2035** rather than the plan period 2020-35. It suggests 5.8 ha/y is needed, making 133.4ha, plus a five year 'flexibility buffer' (29ha) and an 'allowance for Liverpool SuperPort¹ and Parkside (65ha) making 227.4ha.

Netting off 'Take-up between 1 Apr 2012 and 31 Mar 2018' and 9.3ha existing land supply, the submission draft suggests that **215.4 hectares** of land for employment development should be allocated between April 2018 and March 2035. As relatively little employment land was used from 2012 to 2018, the effect of using 2012 as a baseline is to inflate the theoretical amount of land needed. This is nonsensical, as 2012-8 is in the past – there is no need to provide land for a period that has already happened

Using ELNA methodology but applying it to the actual plan period (2020-35) and assuming 15 years@5.8 ha/y = 87ha, plus buffer (29ha) and allowance for SuperPort and Parkside (65ha) gives 181ha. Adding 5.8ha for 2019 but netting off 9.3ha existing land supply suggests **177ha is required – roughly 50 ha less than claimed by St Helens, even if ELNA methodology is accepted.**

3.1.2 Amount of employment land needed per year

The ELNA methodology is far from objective. It is predicated on the assumption (ELNA 2.11) that *'employment land take-up in St. Helens has been suppressed for a significant number of years by an inadequate supply of market attractive sites.'* This is not supported by evidence. The only evidence provided is that take-up in some other areas such as Liverpool and Warrington (but not others) was historically greater. Liverpool has a city centre and port - no port in St Helens! Warrington has far better road and public transport communications, and the benefits of new town development including good quality housing and an environment far more attractive for higher quality employment. This means it is not possible to compare arbitrary local authority areas on this basis.

ELNA considered past take-up of employment land and job forecasts as the preferred basis of the forecasting of the employment land need, and this has some merit. However, this past take-up has not been constant, with lower growth before 1998 and little after 2008. Therefore, longer historical take-up periods are the most appropriate for the forecasting as they smooth out boom and bust. ELNA arbitrarily chose 1997-2012, as from 2012-2015 there was a significant decline in employment land take-up in the Borough. This was attributed to a lack of sites, although ELNA presented no evidence as to why this might be the case. This is important as from 1997-2015 147 ha were taken (4.9 ha/y), but 1997-2012 take up was 174 ha (5.8 ha/y). Given that 2015 is more recent than 2012, it seems logical and more scientific that the 4.9 ha/y figure for the period 1997-2015 is used².

¹ Liverpool SuperPort is in Liverpool rather than St Helens.

² Central Government offered a comparable example of unscientific use of statistics in 2019 by choosing to ignore new household formation statistics because the outdated figures fitted their political policy better.

3.1.3 Five-year buffer

ELNA also included a five-year buffer. National Planning Policy Framework (NPPF) mentions the need to make provision for employment land. It mentions 'buffer' in terms of land supply five times, but these are all in relation to housing supply. There is no suggestion that there needs to be a buffer for employment land.

3.1.4 Need for 'Major sites'

ELNA 2.3 suggests '*Discussions with commercial agents in the North West show a general belief that there is substantial further demand for large logistics space in the region in coming years with no significant signs that the market has reached saturation*'. Estate agents would say this, wouldn't they! This is simply hearsay, not scientific and should have no place in a report that purports to provide an 'objective' assessment. Or perhaps estate agents should write the housing policies too?

ELNA also added '30-40ha' for '*additional demand for employment land generated by major projects in the region (SuperPort, Parkside) and the additional spur of the logistics sector above past trends*'. No justification was provided for either 'major projects' need or why 30-40 ha was chosen. In the submission draft 30-40ha figure has been arbitrarily inflated to 65ha, without justification.

Given that other local plans and GMSF intend to allocate land for major projects, this is an issue that should be settled at a regional level. It is possible that a 'Major Site' is needed in St Helens. Given the lack of evidence to establish need (which is not the same as demand) there is no justification to simply add the areas for a major site onto a calculation of need. On this basis, allocation of land for 'major projects' fails the 'Duty to Co-operate' test.

3.1.5 Actual need for employment land

The table below shows several alternative ways of using past demand data to estimate how much land should be allocated for employment uses. A more objective view suggests that the methodology adopted in the submission draft grossly overestimates both need and demand.

In a scenario with realistic growth, no buffer (which is not required by NPPF) and no additional allowance for major sites (which have not been agreed regionally anyway) assumed, then the Councils' allocation exceeds need by a massive 158 ha, or 329%. The Council figures are not credible.

Table 1 Employment land needed under different scenarios

(All ha)	5.8 ha/y	4.9 ha/y	5y buffer	SuperPort Parkside	Adjustment	Allocation required	Difference to draft
Submission draft 2012-2035	133.4	-	29	65	-2.7 -9.3	227.4	0
2020-35 using ELNA and higher demand	87	-	29	65	+5.8 -9.3	177	-50
2020-35 ELNA methodology	-	73.5	24.5	65	+4.9 -9.3	158.6	-68.8
2020-35 ELNA methodology, no 5y buffer	-	73.5	0	65	+4.9 -9.3	134.1	-93.3

2020-35 ELNA methodology, no 5y buffer or major sites	-	73.5	0	0	+4.9 -9.3	69.1	-158.3
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3.2 Employment and related issues

Employment density refers to the average floorspace (in m²) per full-time equivalent (FTE) member of staff. Excluding construction jobs which are temporary, a Regional Distribution Centre houses just one job per 77m². It is widely accepted that increased automation is having a particularly significant effect on distribution. There is a drive towards greater automation to increase the speed and efficiency of multi-product order picking, which at present is largely manual. As racking techniques and stock management software advance there will be further reductions in jobs.

Unemployment in St Helens appears relatively low compared to historic levels, but this is disguised by a harsh social security regime that deters claimants, and the absolute unemployment level hides low pay, increasing casualisation of work, low productivity, under employment³ and poverty. The proportion of residents without any qualifications (12.4%) is 58% above the national average (7.6%). Attainment levels for children and young people at Key Stages 2 and 4 also fall below regional and national averages. St. Helens declined from the 51st to the 36th most deprived out of 326 English local authorities from 2010 to 2019 at a time that the borough was focussed on attracting logistics.

The Liverpool City Region LEP: Growth Scenario, November 2016 was intended to present an upbeat picture of potential growth in order to attract central Government funding. This approach is flawed because all regions (including Warrington/North Cheshire and Greater Manchester) have to present high growth to access funding otherwise lack of his funding will ensure the area falls further behind – a Catch 22 situation. Other issues with the Growth Scenario include:

- Higher in-migration to the City Region is assumed without any evidence where the people will come from or what they will do. Will Manchester empty out?
- It is assumed that the resident employment rate would increase, compared to the baseline scenario, due to the increased availability of employment opportunities through 'transformational developments'.

It is understood that 'transformational developments' means 'logistics'. Of 10,000 jobs expected to be created, about 80% are in logistics warehousing and support services and associated transport. It remains to be seen if logistics jobs result in a rush of bright, well-educated, enthusiastic people into St Helens who will transform the economy.

The growth forecasts deliberately underestimate job displacement. The number of logistics jobs for import and distribution of a given amount of goods is relatively fixed although the locations are footloose. This means additional logistics jobs in St Helens would otherwise have been located elsewhere. If logistics jobs are truly additional for the sector, then they probably represent:

- Additional imports– in which case jobs are being displaced in UK manufacturing
- Growth of internet shopping – in which case jobs are being displaced in traditional shops

³ ELNA 5.16 suggests underemployment in St Helens is 'hard to quantify', so doesn't bother.

The ELNA assumption that major B8 (logistics) development has a low displacement of 35 percent is simply wrong. The assumption of a low displacement level for jobs at Parkside Terminal (none), Parkside East (10%) and Parkside West (25%) due to the rail-based freight focus of the development similarly has no logical basis.

ELNA 5.16 suggests that using the current 40% level of in-commuting for additional jobs means that some 5,670 of these jobs would be filled by those not living in St Helens. Table 14 shows this would lead to significant additional car commuting in contradiction of other draft plan policies including air quality and climate change.

Concentration on one industry (logistics) also contradicts national policy. NPPF 104 suggests '*Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment ...*'. The focus on logistics (over half of the allocated land is expected to be logistics and associated infrastructure) and the car-based nature of this development means that the terms of NPPF 104 cannot be met.

4 Green Belt

4.1 Green Belt land for employment allocation

The submission draft proposes to remove several large sites from the current Green Belt to meet the assumed demand for logistics. This is 'supported' by a Green Belt review. This process was flawed. 4.6.10 suggests that '*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.*' These are odd criteria to choose and only vaguely relate to the reasons for Green Belt designation – which do not include criteria on 'developability'.

Submission draft 4.6.11 suggests that the sites selected for removal from the Green Belt were chosen 'large previously undeveloped sites in close proximity to the M6 and M62 in order to meet modern requirements and market demand'.

This suggests that the results of the Green Belt review were predetermined, and that large sites near motorway junctions were always intended to be developed – the 'review' is merely rubber-stamping decisions that had already been taken. Developers and the Council were so sure that de-designation is a formality that as of 5 March 2019 applications were live at both Florida Farm and Parkside.

4.2 Green Belt land safeguarded for future employment use

Policy LPA06 site 2ES suggests that 55.90ha should be removed from the Green Belt and 'safeguarded' North East of Junction 23 M6, (South of Haydock racecourse), Haydock.

This site performs most of the functions of the Green Belt – it provides separation for the settlements of Golborne, Newton and Ashton-in-Makerfield at a point where the Green Belt is narrow. It prevents encroachment on the countryside and of course it encourages urban regeneration.

While the site is theoretically safeguarded for development after 2035, its removal from the Green Belt will make it a soft target and attract developers. It is almost inevitable that this pressure will

ensure that it is developed. Given the uncertainty and volatility of the logistics sector, and the significant oversupply of employment land explained in 3.1.5 of this document it is neither necessary nor prudent to take this land out of the Green Belt now.

4

5 Parkside East, West and rail interchange

5.1 What is Parkside?

One of the problems with discussing 'Parkside' is that it means different things to different people. 'Parkside colliery' includes just the footprint of the original colliery buildings to many but usually also includes the spoil heaps and ancillary infrastructure much of which is now green and home to more biodiversity than when the land was agricultural. The 'Parkside area' includes additional land between the M6, the A49, the Chat Moss rail line and Warrington which was never affected by colliery activity and has remained open and agricultural. St Helens consider land to the East of the M6, as 'Parkside East' although this is clearly a misnomer and intended to convey the impression that it is either previously used or otherwise suitable for development. It is not related to the Parkside Colliery area and will probably attract different types of employment.

The whole site is currently Green Belt. Mining and associated activity was allowed through a special license and there was a clear understanding that the land remained Green Belt during this activity, and that it should be restored to a land-use compatible with its Green Belt designation when coal-related activity ceased. The preferred use at the time was agriculture, although now other uses could be compatible with Green Belt designation. Given the large amount of available distribution warehouses and proposals elsewhere, the scheme cannot possibly meet the very high bar of 'very special circumstances' that are needed to justify removal of land from the Green Belt.

Part of Parkside West is currently subject to a piecemeal, speculative planning application known as 'Parkside Phase 1'. An analysis of this suggests that the development will create a few low paid and low-skilled jobs; no development alternative have been considered that would lead to higher skilled, better paid jobs. An objective assessment suggests that just 100 new jobs would be created.

5.2 Parkside and the Green Belt

The Green Belt is designated for five reasons:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging recycling of derelict and other urban land.

1

In the northwest urban regeneration was the most important reason for Green Belt designation. In this case the Green Belt performs an important role in separating Newton-le-Willows and north Warrington/Winwick. The proposal for Parkside East particularly would constitute very significant encroachment into the countryside and narrow the gap between settlements unacceptably.

While some of the land in Parkside West could be considered derelict or brownfield, a large part of it is not, the site is essentially rural. Warehouses next to a motorway are not 'urban regeneration'.

It is hard to see that the case for a distribution park could constitute 'very special circumstances' for re-designating Green Belt anywhere in the UK, and in this area, there are several competing proposals for distribution parks. Every promoter of a logistics site will claim that no other site will meet the locational and accessibility requirements of large-scale logistics developments. Indeed, the applicant at Haydock Point (also on currently designated Green Belt) made the same claim, but this does not make it true in either case.

Distribution parks are footloose and can locate almost anywhere on the strategic road network. Sites are available or planned in number of other Greater Manchester and Merseyside locations. Very large logistics warehouses are rare, and are not needed in every borough. Their location should be decided on a regional basis through strategic plans or the duty to cooperate.

5.3 Parkside and other plan policies

Parkside fails Policy LPA03: Development Principles '*3. Improve the economic well-being of the Borough's residents by a) Contributing to the creation and retention of a range of employment and training opportunities that are readily accessible by non-car modes of transport to the Borough's residents, including local unemployed and disadvantaged people*'. Parkside does not create 'a range of employment and training' – it continues the dominance logistics jobs, provides almost no training opportunities at all, and is certainly not '*readily accessible by non-car modes of transport*', being a motorway-based site inevitably poorly served by public transport and with a hostile local environment for walking and cycling.

5.4 Rail connection at Parkside?

Policy LPA10 allocates Parkside East (Site 7EA in Policy LPA04) as suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) '*with the primary purpose of facilitating the movement of freight by rail and its on-site storage and transfer between rail and other transport modes*'. Of the proposed allocation of 124ha of land at Parkside East it is estimated that 64.55ha will contribute to employment land with the remaining 60ha being required to provide related rail access. This is used as a justification for removal from the Green Belt.

Current logistics operations are almost completely dependent on diesel lorries which are responsible for thousands of early deaths through particulate and NOx emissions. There are a few existing rail-based logistics flows such as ASDA movements between distribution centres in Daventry, Grangemouth and Aberdeen. However, these are a tiny proportion of overall flows. Rail is simply not currently sufficiently attractive to logistics and this is unlikely to change.

4.6.12 suggests Parkside 'will act as a link to the Southern English ports and Europe, as well as supporting the growth of the Liverpool SuperPort.' St Helens is 13 miles from Liverpool, which already has excellent existing rail and road links to the docks, so it is hard to see how development at Parkside could add to Liverpool SuperPort. Similarly, the regional already has rail-based container terminals (at Trafford Park and Liverpool) with significant spare capacity that act as links to the Southern English ports and Europe. There are other currently underused rail links (for instance in Halton and Knowsley).

4.36.1 states that there is '*a long-standing history of developer interest in providing a SRFI*' near the former Parkside Colliery. There may have been interest, but for a variety of reasons including transport, planning, environmental and viability there has been no serious and viable scheme put forward in almost 20 years of activity. There is no reason to suggest that this has changed. The

'reasoned justification' for removal from the Green Belt is anything but – it seems to simply be that it is a large site near a railway and motorway – hardly unique.

It is not obvious how a rail link would be funded. The promoters (effectively St Helens Council) wish to go ahead with a first phase of development at Parkside West now, without this providing any contribution towards a rail connection. If, as seems likely the sites are developed piecemeal, then there is no prospect of a rail connection, or significant use if it is provided.

5.5 Battle of Winwick

The Green Belt release covers part of the registered battlefield of the Battle of Winwick in the English Civil War (1642-1651). The battle location, combatants and events are relatively well documented and researched including several diaries written at the time. Significance is increased by association with both Cromwell and Hamilton and the wider consequences of the battle of Preston engagement (which Winwick followed) for the outcome of the Civil War.

The legislation to register battlefields was passed after the destruction of parts of Naseby Battlefield by the A14 and associated industrial/logistics development. Both Winwick and Naseby Battles were in the closing stages of the Civil War.

Parkside West (including parts of the colliery is well-documented as a key part of the battlefield. The appendix shows key battlefield elements. Topographical features mentioned in historical accounts clearly show that the colliery site and other parts of Parkside West were a pivotal part of the battle.

6 Transport and quality of life including air quality

To the south of Parkside East and West, the area immediately to the east of the M6 is largely part of Culcheth and Glazebury, and Croft Parish Council areas. Opportunities for sustainable travel (such as buses, walking and cycling) in the area are sparse, so residents of Culcheth and Glazebury, and Croft are reliant on the network of mostly minor roads to the east of the M6 and north of the M62 and the strategic road network itself. Disruption to the Strategic Road Network (SRN - A580, M62 and M6) is frequent and occurs at least several times a month. When this happens, the traffic from the motorways tries to get through the villages by every possible route, filling up all the minor roads in the area. The most severe examples are:

- A574 from Risley through Culcheth and Glazebury to the A580. Vehicles cannot get out onto the A580, which is itself completely jammed by the traffic escaping from the M6.
- B5207 from Culcheth to Lane Head (Golborne) has cars backed up to Culcheth village centre.
- Kenyon Lane, Stone Pit Lane/Sandy Brow Lane, and Heath Lane/Mustard Lane from Lane Head to Winwick/Birchwood via Kenyon and Croft, with static queues in both communities.

The vehicles cutting through include heavy goods vehicles. Given the pressure on drivers, and the increasing trend towards 'just in time' logistics deliveries, unless enforcement was very heavy handed, a weight restriction on local roads to prevent HGV traffic would be ineffective.

Disruption on SRN is bound to increase if the Parkside East and West are allocated. The effects on the minor roads and communities are severe, and this will get worse. The proposed Parkside Link Road (PLR) would provide a direct link to the SRN, but this is already overloaded at peak times, and in any case is an environmentally destructive proposal. In any case, much traffic would not use PLR.

The area already suffers from air pollution including designated air quality management areas. NPPF para 7 suggests that planning has an environmental role – *‘using natural reserves prudently, minimising waste and pollution, and mitigate and adapt the climate change including moving to a low carbon economy’*. The designation of Parkside East and West will:

- Use fossil fuel reserves profligately and encourage climate change gas production
- Encourage production of air quality pollutants (mainly NOx, but also particulates) through the current exclusive use of diesel engines in goods vehicles.

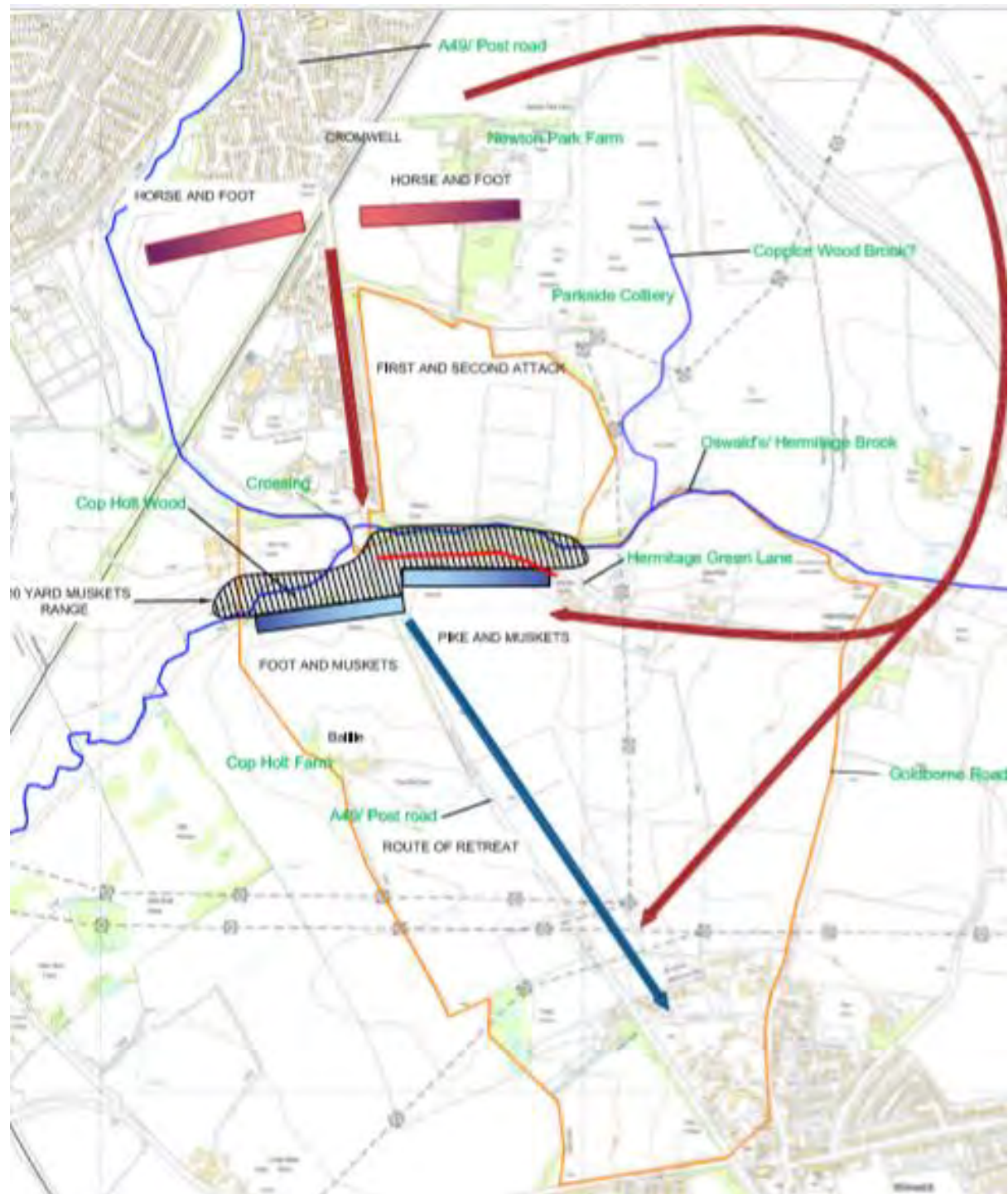
Para 17 suggests that local authorities should *‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable’*. Parkside East and West would be difficult to access except by car. Walking and cycling in the area is already inconvenient, indirect, and dangerous due to traffic speed and volumes and poor air quality

NPPF suggests that planning should *‘Support the transition to a low carbon future’*. Parkside East and West is wholly based on road transport that creates more carbon emissions than either rail transport – which in this location would be powered by electricity and increases the likelihood that goods will travel long distances to their destination. It will therefore increase carbon emissions.

NPPF also suggests that development should *‘Contribute to conserving and enhancing the natural environment and reducing pollution’*. A currently open and mainly green site will be covered with an urban sprawl, and the main access method will be by diesel heavy goods vehicles that will produce particulates and oxides of Nitrogen that are known to cause hundreds of early deaths each year in the St Helens area, and thousands nationally.

End of document appendix follows

Appendix Battle of Winwick battlefield site



PO1344



Representation to the Local Plan Consultation - Sites 5EA and 6EA
Matthew Thomas
to:
planningpolicy@sthelens.gov.uk
13/03/2019 16:41

Page 1 of 1

ELO246

Sites 5EA & 6EA

① - LPA02

② - LPA03

③ - LPA04

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

Planning Policy
Local Plan
St Helens Council
Town Hall
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.

In considering whether this amount of land should be allocated and removed from the Green Belt, the approach to preparing the Local Plan has been based on a robust methodology that takes account of local and regional economic factors as well as consideration of other alternative development scenarios.

The objectives of this policy are therefore considered to be sound and in accordance with National Policy.

Policy LPA04.1 Strategic Employment Sites

This policy provides additional detail to the proposed allocation of the Millfield Park site south of Liverpool Road (6EA) as a Strategic Employment Site. It is noted that any planning application for such a site must be supported by a comprehensive masterplan, which must set out details of the type of development and phasing, indicative layout and design for the whole site to secure an attractive built form and high quality landscaping.

Furthermore, measures to provide good levels of accessibility by sustainable transport methods are also required, as well as a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage issues in a holistic and integrated way. The policy also requires any application to include information in respect of how energy efficiency and the use of renewable or low carbon energy will be promoted and to ensure that sufficient infrastructure is provided to serve the development. These points would generally be considered under any planning application for the site, would be in the interests of good planning and are therefore supported by our client.

It is further noted that any masterplan for a Strategic Employment Site should address the site specific requirements as noted in Appendix 5. In respect of the Millfield Park site, these requirements include:

- appropriate highways access via Millfield Lane and allocated 2EA site,
- the implementation of any measures required to mitigate impacts on the M6 (Junction 23) or other parts of the highway network,
- the design and layout of the development must integrate well with that of any existing or approved development within allocated 4EA and 6EA,
- the provision of effective flood management measures for the Clipsley Brook to reduce the risk of flooding downstream and enhance biodiversity.

Highways Access

It is welcomed that Appendix 5 identifies that access should be taken from Millfield Lane, however the requirement that access should also be provided from Site 2EA is not supported as it is considered that using this alternative access point is unnecessary. The requirement for access from the allocated 2EA site is inappropriate and unnecessary as an appropriate means of access is available from Millfield Lane, using either land that is public highway or within the

PO1345



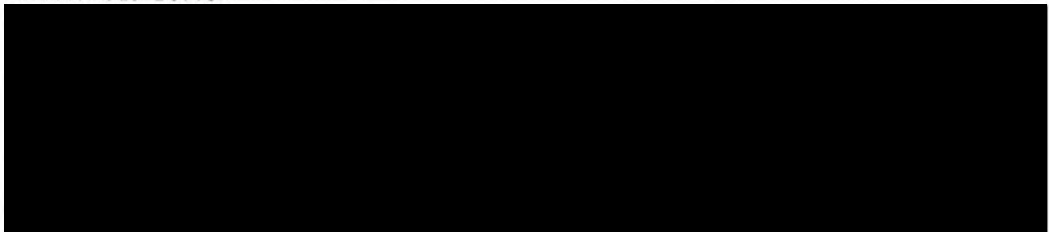
Email 1/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]

Matt Grant

to:

'planningpolicy@sthelens.gov.uk'

13/03/2019 16:48



3 Attachments



41962_05 db symmetry Representations to SHBLP 13-03-19.pdf 41962_05 Appendix 1 - Location Plan.pdf



41962_05 Appendix 2 - Site Assessments Report.pdf

Dear Sir/Madam,

On behalf of db symmetry management Ltd, Lichfields is pleased to submit the attached representations to the St Helens Local Plan Submission Draft.

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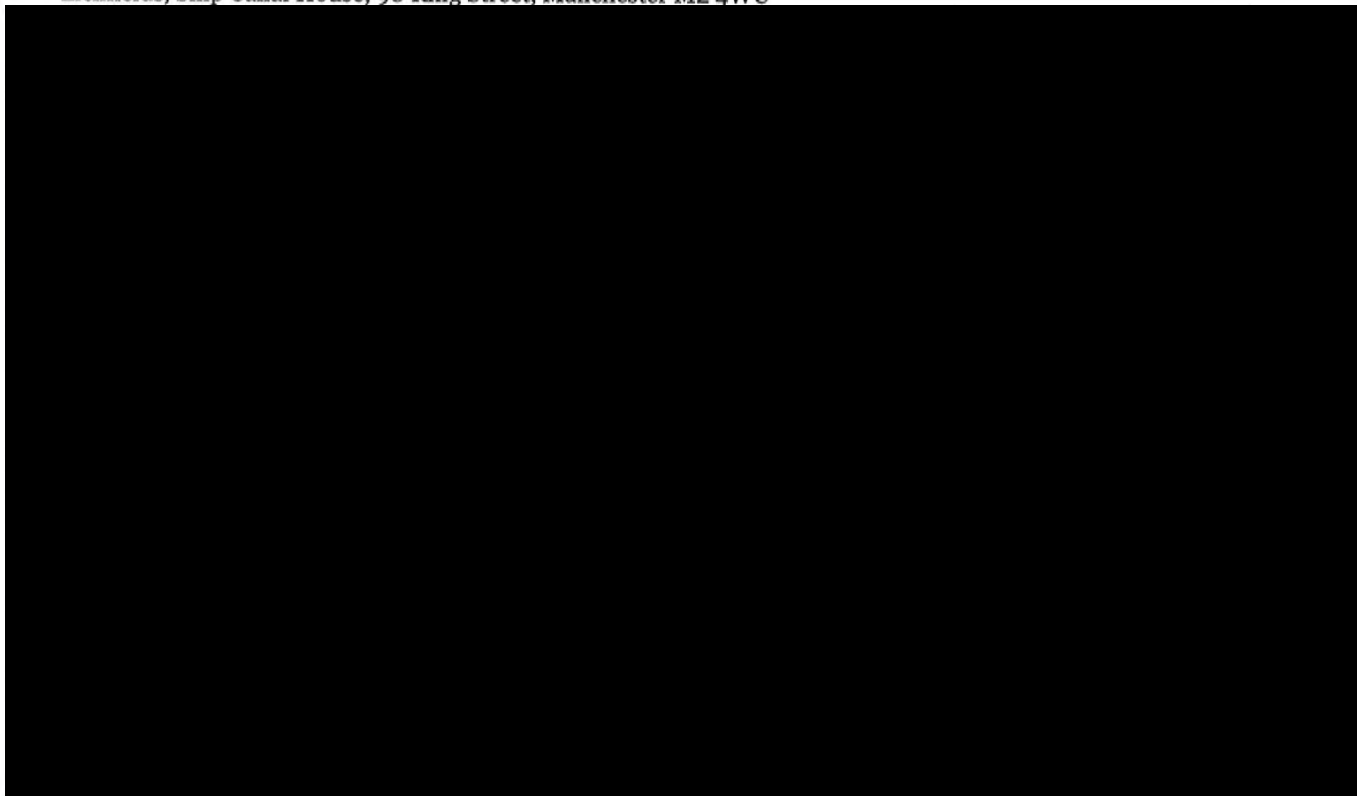
I would be grateful if you could receipt of the representations by return.

Kind regards,

Matt Grant

Senior Planner

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU





RE: Email 2/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]

Matt Grant

to:

'planningpolicy@sthelens.gov.uk'

13/03/2019 16:50

① - LPA04

② - LPA04.1

③ - LPA06

5 Attachments



41962_05 Appendix 5c - FRA & Drainage.pdf



41962_05 Appendix 3 - Delivery Statement.pdf



41962_05 Appendix 4 - SHELMA Rep 30-10-17.pdf



41962_05 Appendix 5a - Air Quality.pdf



41962_05 Appendix 5b - Noise.pdf

Dear Sir/Madam,

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Think of the environment. Please avoid printing this email unnecessarily.

From: Matt Grant

Sent: 13 March 2019 16:48

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

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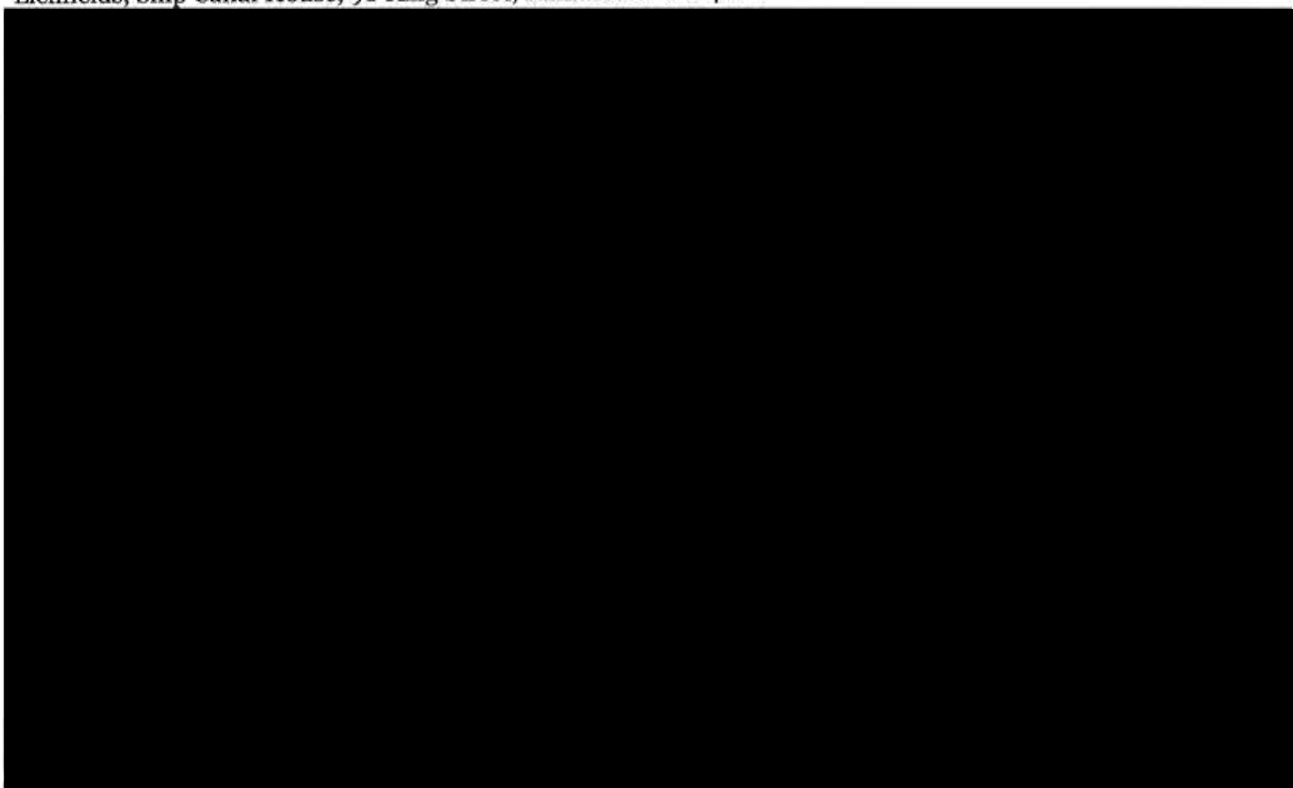
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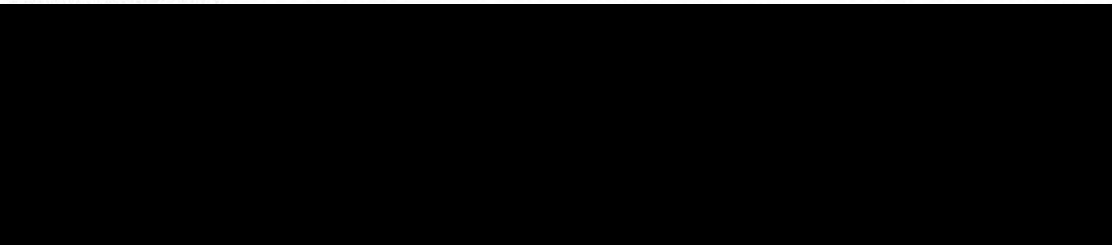
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Matt Grant

to:

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13/03/2019 16:51



4 Attachments



41962_05 Appendix 5e2 - Ground Conditions Risk Table.pdf



41962_05 Appendix 5d1 - Historic Environment.pdf



41962_05 Appendix 5d2 - Historic Environment Figure 1.pdf 41962_05 Appendix 5e1 - Ground Conditions.pdf

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[REDACTED]

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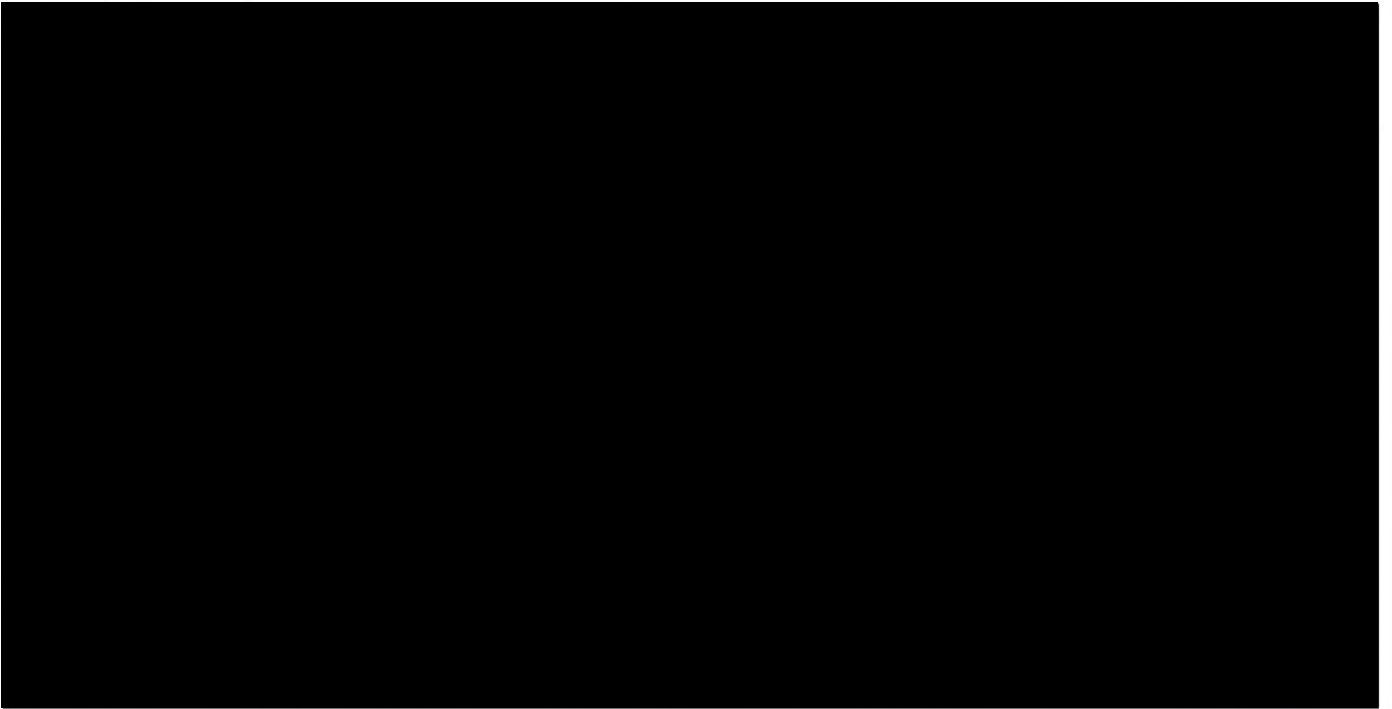
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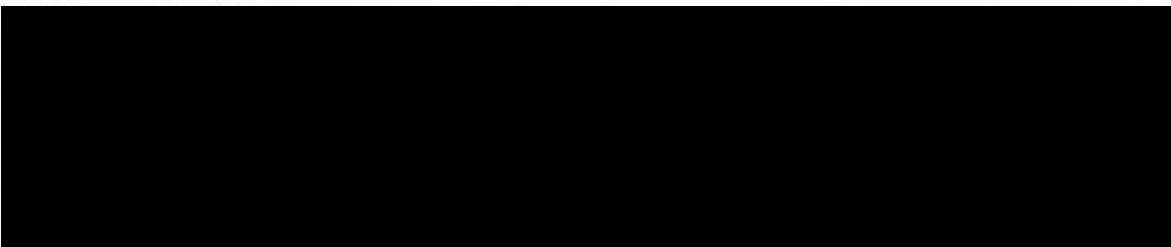
RE: Email 4/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]

Matt Grant

to:

'planningpolicy@sthelens.gov.uk'

13/03/2019 16:52



1 Attachment



41962_05 Appendix 5f - Landscape & Visual.pdf

Dear Sir/Madam,

On behalf of db symmetry management Ltd, Lichfields is pleased to submit the attached representations to the St Helens Local Plan Submission Draft.

Please note that due to size restrictions this is email 4 of 6, with 2 further emails to follow.

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[REDACTED]

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[REDACTED]

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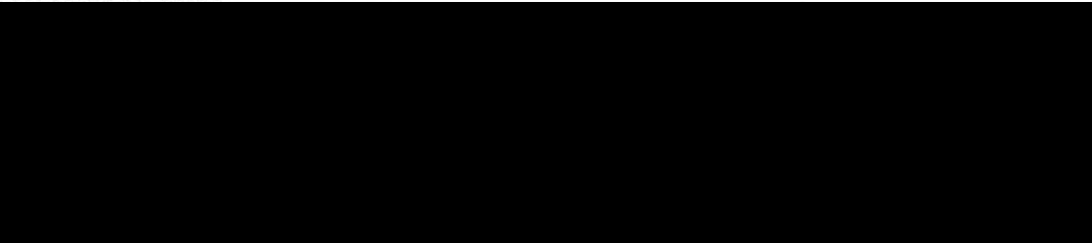
RE: Email 5/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]

Matt Grant

to:

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13/03/2019 16:53



1 Attachment



41962_05 Appendix 5g - Preliminary Traffic & Transport Statement.pdf

Dear Sir/Madam,

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Matt Grant
Senior Planner

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

[REDACTED]

Please note that due to size restrictions this is email 3 of 6, with 3 further emails to follow.

I would be grateful if you could receipt of the representations by return.

Kind regards,

Matt Grant
Senior Planner

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
[REDACTED]

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.



Think of the environment. Please avoid printing this email unnecessarily.

From: Matt Grant

Sent: 13 March 2019 16:49

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
[REDACTED]

Subject: RE: Email 2/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]

Dear Sir/Madam,

On behalf of db symmetry management Ltd, Lichfields is pleased to submit the attached representations to the St Helens Local Plan Submission Draft.

Please note that due to size restrictions this is email 2 of 6, with 4 further emails to follow.

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[REDACTED]

[REDACTED]
Subject: Email 1/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]

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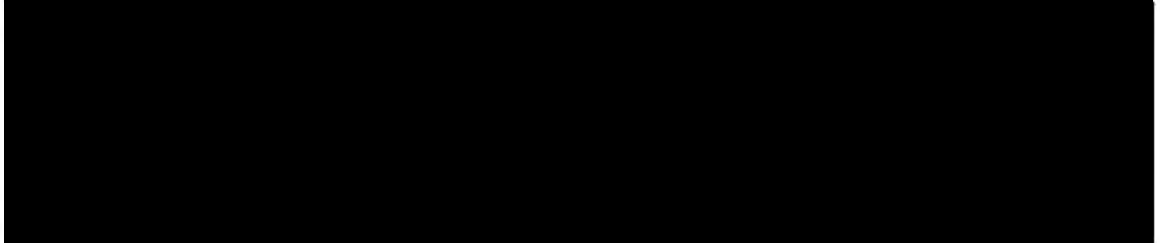
RE: Email 6/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]

Matt Grant

to:

'planningpolicy@sthelens.gov.uk'

13/03/2019 16:54



1 Attachment



41962_05 Appendix 5h - Ecological Assessment.pdf

Dear Sir/Madam,

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From: Matt Grant

Sent: 13 March 2019 16:52

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>



Subject: RE: Email 4/6 - Representations to the St Helens Local Plan Submission Draft (on behalf of db symmetry Ltd) [NLP-DMS.FID602530]

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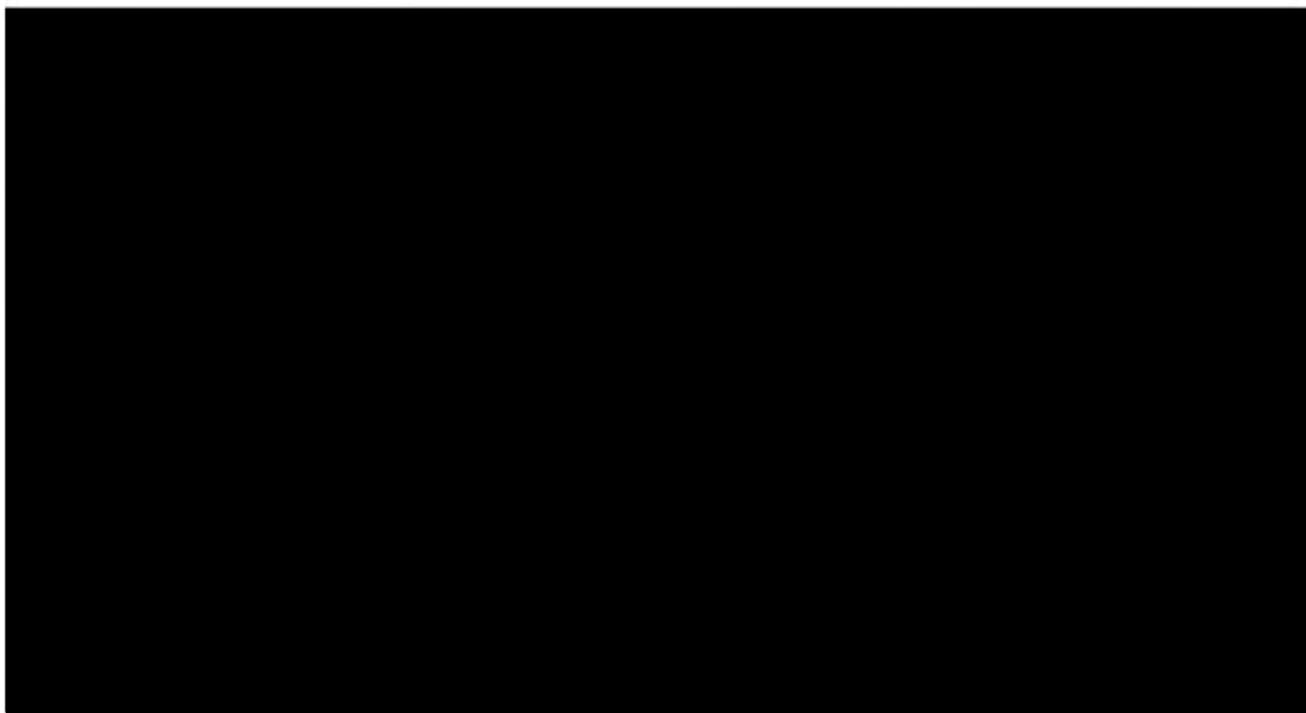
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[REDACTED]



Planning Policy Department
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP

Date: 13 March 2019

Our ref: 41962/05/SPM/MG/17228018v3

Your ref:

Dear Sir / Madam

Representations to the St Helens Submission Draft Local Plan: Omega North Western Extension, Bold

On behalf of db symmetry management Ltd [db symmetry] please find enclosed representations prepared by Nathaniel Lichfield & Partners [Lichfields] in response to the current consultation on the Submission Draft of the emerging St Helens Borough Local Plan [the SHBLP].

db symmetry is a specialist industrial and logistics development company majority owned by Tritax Big Box REIT Plc who control £3.4 billion of assets. db symmetry focuses on land promotion and development delivery and has one of the largest programmes of speculative commercial building in the UK.

Background

These representations are made in the context of db symmetry's interest in land to the west of Omega North, St Helens which is currently located within the Green Belt. A site location plan is enclosed with this letter. db symmetry has previously submitted a Delivery Statement to St Helens Borough Council [the Council] and Warrington Borough Council [WBC] in August 2017. Representations were also submitted to the Liverpool City Regional Strategic Housing and Employment Land Market Assessment [SHELMA] in October 2017 promoting the proposed Omega North Western Extension for logistics development.

The previous representations were supported by a Delivery Statement which clearly demonstrated that the site is suitable, available and that a logistics development at the site is viable/achievable within the next five years. However, under draft Policy LPA06 of the emerging SHBLP, the Omega North Western Extension is proposed to be safeguarded for future development beyond the current plan period (i.e. post 2035).

These representations are supported by a Sites Assessment Report (enclosed with this representation) which considers all of the strategic employment sites that are proposed to be allocated for development under draft Policy LPO4.1 of the SHBLP, as well as the other proposed safeguarded sites. The details of the methodology we have used to undertake this assessment is set out within the report. The previously submitted Delivery Statement (also enclosed) is resubmitted to support this representation, along with the comprehensive suite of technical reports and the previous SHELMA reps. These collectively demonstrate that there are no environmental issues affecting the site that would prevent it from being allocated within the emerging Local Plan and brought forward for development now.

Submission Draft Local Plan

The Council published the SHBLP for consultation on 16th January 2019 for 8 weeks. The consultation closed on 13th March 2019. Once adopted, the SHBLP will set out the framework for achieving sustainable growth and development across the borough between the plan period of 1st April 2020 and 31st March 2035.

The purpose of the SHBLP can be summarised as follows:

- Sets out the vision and objectives for the development of the Borough up to and beyond 2035;
- Sets strategic policies guiding the amount, form and location of new development;
- Identifies site allocations for new housing, employment and other forms of development; and,
- Provides local policies with additional requirements to guide the consideration of planning applications for new development, and details of where these will apply.

These representations consider the SHBLP in the context of the identified strategy for securing economic growth and the sites proposed for allocation. ✓

Employment Requirement

The Council's strategy for Economic Development is set out in Policy LPA04 (A Strong and Sustainable Economy) of the SHBLP. The policy sets out the borough's main aspirations in respect of economic growth. Of particular relevance to these representations are the following:

- 1 To help meet the Liverpool City Region's needs for economic growth, job creation and skills development; and,
- 2 To maximise the economic opportunities presented by St Helens Borough's location in relation to strategic road and rail routes.

In order to achieve the above, the SHBLP proposes the delivery of a minimum of 215.4 hectares of employment land between 1 April 2018 and 31 March 2035 to meet the needs of St Helens Borough. The supporting table (Table 4.1) goes on to identify 11 sites that are proposed to be allocated for employment development. The proposed site allocations include a mix of strategic (sites in excess of 20 hectares in size) and non-strategic sites. Table 4.1 states that the cumulative indicative capacity of the 11 proposed allocations is 265.3 hectares which exceeds the minimum requirement. This can be largely attributed to the fact that the Omega South Western Extension is proposed to meet the employment needs of Warrington as opposed to St Helens. When discounting the Omega South site, the supply for St Helens equates to 234 hectares, leaving a more modest oversupply of approximately 20 hectares. ✓

Policy LPA04.1 (Strategic Employment Sites) goes onto provide further detail in respect of the development principles for the strategic employment sites which we have not repeated here.

In respect of the borough's future growth requirements beyond 2035, Policy LPA06 (Safeguarded Sites) identifies sites to be removed from the Green Belt but protected from permanent forms of development for the duration of the current plan period in order to provide a reserve of potential sites to meet longer term employment and housing development needs after 2035. This includes the proposed Omega North Western Extension. ✓

It is acknowledged that the strategy proposed within the SHBLP is 'pro-growth'. It reflects the fact that the warehousing and logistics market is performing well and that there is significant demand for further growth across the Liverpool City Region [LCR] and indeed within St Helens itself. As such, we have not interrogated the identified employment requirement in detail. However, given that it is a key policy aspiration to help the LCR meet what has been identified as a substantial growth requirement in the region of between 400-500] ①

hectares of logistics development over 25 years¹, we believe that there is scope to allocate further land in St Helens now to ensure that the growth aspirations of Borough are met. The borough's access to the strategic road network is unparalleled when compared to any of the other LCR boroughs and substantial demand exists for well-connected sites within the M62 and M6 corridors. Allocating enough land for employment development in well-connected locations is crucial to unlocking the full potential of the LCR in the coming years and fulfilling the growth agenda driven by the Liverpool Superport. ①

Sites Identified to Meet Employment Need

To meet the identified need, the SHBLP proposes to allocate the following sites:

- 1 Site Ref. 1EA - Omega South Western Extension, Land north of Finches Plantation, Bold (to meet employment land needs arising in Warrington) (31.22 hectares);
- 2 Site Ref. 2EA - Florida Farm North, Slag Lane, Haydock (36.67 hectares);
- 3 Site Ref. 3EA - Land North of Penny Lane, Haydock (11.05 hectares);
- 4 Site Ref. 4EA - Land South of Penny Lane, Haydock (2.16 hectares);
- 5 Site Ref. 5EA - Land to the West of Haydock Industrial Estate, Haydock (7.75 hectares);
- 6 Site Ref. 6EA - Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock (20.58 hectares);
- 7 Site Ref. 7EA - Parkside East, Newton-le-Willows (64.55 hectares);
- 8 Site Ref. 8EA - Parkside West, Newton-le-Willows (79.57 hectares);
- 9 Site Ref. 9EA - Land to the West of Sandwash Close, Rainford (6.96 hectares);
- 10 Site Ref. 10EA - Land at Lea Green Farm West, Thatto Heath (3.84 hectares); and,
- 11 Site Ref. 11EA - Gerards Park, College Street, St. Helens Town Centre (0.95 hectares).

It proposes to safeguard the following sites for future employment development:

- 1 Site Ref. Omega North Western Extension, Bold (29.98 hectares); and,
- 2 Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock (55.90 hectares).

Assessment of Sites Proposed to be Allocated

In order to test the strategy proposed in the SHBLP, we have undertaken a Sites Assessment exercise which considers all of the strategic employment sites (which are defined as sites greater than 20 hectares) proposed for allocation under draft Policy LPO4.1 of the SHBLP (excluding site ref. 2EA which has planning permission) and safeguarded through draft Policy LPA06 of the SHBLP. The following sites have been assessed as part of this process:

The following sites have been assessed as part of this process:

- 1 Omega North Western Extension, Bold (Ref. 1ES);
- 2 Omega South Western Extension, Land north of Finches Plantation, Bold (Ref. 1EA);
- 3 Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock (Ref. 6EA);
- 4 Parkside East, Newton-le-Willows (Ref. 7EA);

¹ Liverpool City Region Growth Strategy (2016)

- 5 Parkside West, Newton-le-Willows (Ref. 8EA); and,
- 6 Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock (Ref. 2ES).

We have not assessed the Florida Farm site (Ref. 2EA). It is important to note that this scheme benefits from planning permission (ref. P/2016/0608/HYBR) and is currently under construction. This scheme therefore forms part of the baseline conditions in respect of highways capacity and Green Belt, amongst all other technical matters. The application for the Florida Farm scheme was accompanied by detailed evidence that supported the ability of the highway to accommodate that quantum of development. This was tested and accepted by the Council. Therefore, the consented quantum of floorspace on the Florida Farm site up to the previously consented quantum of floorspace is a commitment. The assessment of other sites does not seek to suggest otherwise than full consented floorspace at Florida Farm can be brought forward without any highways constraints.

For each site, the assessment methodology considered the following:

- Environmental constraints;
- The ability to deliver sustainable development (particularly in the context of proximity/connectivity with the strategic road network);
- The contribution to the Green Belt;
- Other policy constraint; and,
- Deliverability and developability.

For each criterion, the site was assigned a score using a traffic light system of green, amber and red to assess each sites performance. Green means that the site is considered to perform well, amber that it performs moderately well with some issues and red that it performs poorly. The Sites Assessment Report is supported by detailed site assessment proformas which consider all of the issues in detail. Both the report and the proformas should be read in conjunction with this representation.

Table 1 (below) sets out the findings of our assessment when considering each of the criteria using the traffic light scoring system.

Table 1 Site Assessment Findings

	Site					
	Omega North Extension	Omega South Extension	Land west of Millfield Lane	Parkside East	Parkside West	Land south of Haydock Racecourse
Environmental Constraints						
Vehicular Access	Green	Green	Red	Green	Green	Green
Traffic Impact	Green	Green	Red	Red	Red	Red
Landscape Impact	Amber	Amber	Amber	Red	Amber	Red
Flood Risk	Green	Green	Green	Green	Green	Green
Ground Conditions	Green	Green	Green	Green	Amber	Green
Ecology	Green	Amber	Green	Amber	Amber	Amber
Heritage	Amber	Amber	Amber	Amber	Red	Green
Air Quality	Green	Green	Green	Green	Green	Green

	Site					
	Omega North Extension	Omega South Extension	Land west of Millfield Lane	Parkside East	Parkside West	Land south of Haydock Racecourse
Noise						
Other						
Sustainable Development						
Access to Strategic Road Network						
Access to Services/Public Transport						
Green Belt Contribution						
Policy Constraints						
Deliverability and Developability						
Suitability						
Availability						
Achievability/Viability						

Source: Lichfields

The detailed analysis relating to each criterion for each site is located within the Site Assessment proformas and is not repeated here.

We are aware that a number of the proposed strategic allocations (and proposed safeguarded land) are subject to pending planning applications relating to proposals for B2/B8 development, the details of which are set out within the Site Assessment Proformas.

To date, these applications remain pending. It is understood that significant issues exist in terms of their cumulative impacts on highways capacity and traffic impact in respect of Junction 22 and Junction 23 of the M6. Highways England's position remains that planning permission should not be granted for these schemes. It is clear that an acceptable mitigatory solution to allow for all of the proposed strategic developments in the M6 corridor to come forwards is not readily forthcoming and that significant issues remain. Furthermore, we understand that Highways England have recently removed their objection to proposals for employment development on a non-strategic site (site ref. 5EA) adjoining land west of Millfield Lane and that this application will likely be approved in due course. If approved, this scheme will have further implications on the available highways capacity within the M6 corridor.

Whilst we understand that work is ongoing to find a solution to the wider issues, it is unclear if such a solution exists at this time. Furthermore, the issues exist in respect of the planning applications that have been submitted to date. That is before considering the further implications that the development of site 6EA (land west of Millfield Lane) would incur on the M6 corridor (and indeed the local road network). Even if an acceptable mitigatory solution was agreed in respect of all of the current proposals, it is unlikely that it would increase capacity to the level necessary to accommodate any future development on site 6EA.

In light of the above, it is our contention that the strategy to deliver significant clusters of employment development to the east of the borough within the M6 corridor is flawed in respect of highways capacity and traffic impact. It would clearly make sense to redistribute some of the land proposed to be allocated away from the M6 corridor. The strategy that is currently proposed within the SHBLP is already being tested and

there are clearly significant challenges to overcome. Whilst it is possible that a solution will be found, there is a reasonable prospect that this will not be achievable in the short term and therefore it would make sense to unlock more sites as part of the strategy. ✓

Omega North Western Extension

This section sets out why we consider that the proposed Omega North Western Extension should be allocated for development now and not safeguarded for future development. ✓

The proposed Omega North Western Extension is located on the south-eastern boundary of St Helens borough, its eastern boundary adjoining the existing Omega North Development which is located in Warrington. The development of the site will create a sustainable employment extension to Omega North. The site is capable of accommodating up to 1.4 million sq. ft. of logistics floorspace and its development will bring significant job creation and socio-economic benefits to both St Helens and Warrington Borough. ✓

The site is available and in the control of one willing landowner, who has partnered with db symmetry to bring the site forward. It is suitable for logistics development and will form a natural extension to the Omega North site. St Helens has a substantial workforce that can resource the future occupiers of the buildings. Development on the site is achievable and there are no technical constraints that will prevent the site coming forward. The site is economically viable and the developer is confident that employment development can be achieved within the next 5 years. The supporting Delivery Statement clearly sets out the substantial economic, social and environmental benefits the development of the site would achieve and demonstrates that it is suitable, sustainable and deliverable in the short term. ✓

In the context of the sites location in the Green Belt, the St Helens Green Belt Review 2018 acknowledges that it would make sense to remove the site from the Green Belt. Indeed, this is reflected in the proposals to safeguard the site as this does secure the sites release from the Green Belt, albeit restricts development within the current plan period (or at the least until a review takes place). Nevertheless, given that the principle for the sites release from the Green Belt is clearly established, it comes down to a matter of delivery. This representation and the associated documentation clearly demonstrates that the site is deliverable in the immediate short term. ✓

In respect of access, it is proposed that the site will be accessed via Lockheed Road which runs adjacent to the M62 and would connect with the sites south-eastern boundary. It is important to note that Lockheed Road is purpose built to accommodate heavy goods vehicles [HGV's] and serves the existing units at Omega North which are occupied by Travis Perkins, Haydock Commercial Vehicles and Brakes, before connecting with Junction 8 of the M62. db symmetry are in advanced discussions with the Omega North Management Company (who manage the entire Omega North Development) and we understand that there are no constraints in respect of access. It should also be noted that there is potential to deliver an emergency access along Joy Lane to the north of the site. Whilst efforts are not being made at present to secure a secondary access, this is something that could be considered in the short term. Unlocking this access would provide a secondary access to serve the entire Omega North development, offering significant betterment for both existing and future occupiers. ✓

db symmetry wishes to invest in St Helens because it is a pro-growth district with a very strong existing logistics cluster offering critical mass and the supply chains needed to sustain successful operations. Occupiers will have access to a large, highly skilled, very productive and growing workforce that is required to operate successful logistics hubs. ✓

It is important to note that, whilst it is acknowledged that the proposed Omega North Western Extension would have a close relationship with the adjoining Warrington borough, db symmetry are clear that the ✓

development would meet the needs of St Helens and the wider LCR. St Helens should seek to meet their own employment needs and those of the wider LCR and vice versa in respect of Warrington. There is sufficient land in both St Helens and Warrington to meet their own employment land needs and therefore we do not consider there to be reasoned justification for land in St Helens to be allocated to meet Warrington's needs. The fact that the proposed western extensions to both Omega North and South adjoin Warrington does not mean that they should be considered as part of that borough's supply. Indeed, the St Helens Employment Land Needs Assessment (January 2019 Addendum) [ELNA], acknowledges that the Omega South site will create jobs for St Helens Residents:

"Omega South Extension could form part of Warrington's employment land supply in the forthcoming revised Warrington Local Plan. St. Helens and Warrington Council officers both agree that the site would form an expansion to the existing Omega South strategic employment location and therefore would have a direct relationship with Warrington, although it would continue to provide employment opportunities to the residents of St Helens and other areas in the same manner that Omega already does" [ELNA, Paragraph 3.4]

Whilst there is an obvious relationship between the proposed extensions at both Omega North and South with Warrington Borough, the developments are equally important for St Helens and will provide significant employment opportunities to residents of St Helens. Significant highways and accessibility improvements would be delivered as part of the Omega North development would significantly improve connectivity and access with Bold and the wider St Helens borough.

Conclusion

This representation, the Sites Assessment Report (and associated proformas), along with the Delivery Statement and submitted technical evidence clearly demonstrates that the land to the west of Omega North is suitable, available and deliverable for development in the short term (5-year period). The wider Omega development is proven to attract national operators and db symmetry have already received a number of enquiries in respect of the site.

The site is not subject to any significant environmental constraints that would prevent its immediate development in the short term. It is therefore our view that the strategy set out within draft Policy LPA04.1 of the SHBLP should be revisited to allocate the Omega North Extension for industrial, logistics and warehousing.

Furthermore, the Sites Assessment exercise has identified what we consider to be fundamental issues in respect of the current strategy's ability to deliver sustainable development. We are concerned that the strategy has failed to take account of significant issues in respect of the ability for addition highways capacity to be delivered within the M6 corridor to unlock the development of sites proposed for allocation. The capacity was able to accommodate Florida Farm, which is consented and under construction, but the delivery of any further development over and above that which has already been committed is questionable. On this basis we object to the current SHBLP and believe it fails to meet the tests of soundness set out in the Framework [§35]. In this regard the SHBLP:

- a Is not **positively prepared**. Whilst we believe that efforts have been made to prepare a strategy which seeks to meet the areas objectively assessed needs, it is our contention that either the deliverability of the proposed strategy has not been fully considered or the constraints have been ignored.
- b Cannot be **justified** in that the SHBLP disregards evidence which clearly demonstrates that major constraints exist in respect of the pursued strategy which cast significant doubts on whether or not it is actually deliverable. The strategy is already being tested by virtue of live planning applications

relating to sites within the M6 Corridor. We have established that considerable issues exist in respect of the cumulative effects of these developments on highways capacity and we have noted that Highways England's advice to date maintains that planning permissions should not be granted. This clearly casts doubt as to whether the strategy proposed is an appropriate strategy. As such, consideration should be given to reasonable alternatives which could assist with taking pressure off the M6 Corridor.

- c Is not **effective** in that the identified constraints raise doubts as to whether the proposed strategy could actually be delivered over the plan period.
- d Is not **consistent with National Policy** in that the strategy fails secure the overarching objectives of sustainable development set out in the Framework, particularly in respect of environmental objectives.

For the reasons set out above, db symmetry do not consider the strategy currently pursued in the SHBLP to be sound.

The proposed Omega North Western Extension is unconstrained in nature and available to come forward for development immediately. The allocation this site clearly represents a reasonable and justified alternative to the current strategy. It is therefore concluded that the strategy should be revisited and the proposed Omega North Western Extension allocated for industrial and logistics development within the emerging Local Plan.

We look forward to receiving confirmation of the receipt of these representations and ask that they are given full consideration in preparing the next stage of the Local Plan.

Should you have any questions or wish to discuss these representations further please do not hesitate to contact me. We welcome the opportunity to engage with St Helens during the iterative process of the Local Plan.

Yours sincerely

Matt Grant
Senior Planner

Copy: Matt Claxton (db symmetry)

Enc.

1. Site Location Plan
2. Sites Assessment Report
3. Omega North Western Extension Delivery Statement
4. SHELMA Reps
5. Technical Reports

Omega North Extension, Bold Site Assessments Report

**In Support of Representations to the St Helens Local
Plan Submission Draft**

db symmetry

13 March 2019

LICHFIELDS

1.0 Introduction

- 1.1 The following assessment has been undertaken by Nathaniel Lichfield & Partners [Lichfields] on behalf of db symmetry management Ltd [db symmetry]. It has been prepared in order to assist St Helens Metropolitan Borough Council [the Council] in their further consideration of the proposed strategic allocations for employment land within the submission draft of the emerging St Helens Borough Local Plan [SHBLP].
- 1.2 Draft Policy LPA04.1 of the SHBLP identifies the sites proposed for allocation as Strategic Employment Sites:
- Omega South Western Extension, Land north of Finches Plantation, Bold (Ref. 1EA);
 - Land at Florida Farm North, Slag Lane, Haydock (Ref. 2EA);
 - Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock (Ref. 6EA);
 - Parkside East, Newton-le-Willows (Ref. 7EA); and,
 - Parkside West, Newton-le-Willows (Ref. 8EA).
- 1.3 These sites are considered to be strategic due to their size, which in all cases exceeds 20 hectares. There are a number of smaller 'non-strategic' employment sites also proposed for allocation although these are not considered in this report.
- 1.4 Draft Policy LPA06 relates to 'Safeguarded Land' and proposes to release two further 'Strategic Employment Sites' from the Green Belt:
- Omega North Western Extension, Bold (Ref. 1ES); and,
 - Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock (Ref. 2ES).
- 1.5 The draft policy states that Safeguarded Land will be removed from the Green Belt but protected from permanent forms of development for the duration of the current plan period in order to provide a reserve of potential sites to meet longer term development needs after 2035.
- 1.6 This assessment considers all of the sites identified by the Council as proposed strategic employment sites allocations or safeguarded land as part of the emerging Local Plan process. To secure sustainable development and to meet the identified housing needs, the Council should allocate the most appropriate strategic sites for Green Belt release in the Local Plan. In identifying potential sites, the Council will need to have regard to policy and technical opportunities and constraints, as well as other material considerations, and apply the approach in presumption in favour of sustainable development as required by the National Planning Policy Framework [the Framework] [S11].
- 1.7 For the reasons set out in this assessment, it is considered that the proposed Omega North Western Extension, Bold is the most suitable site for removal from the Green Belt and should be allocated as a strategic employment site. It is considered that site should be allocated for economic development rather than identified for safeguarded land as it is the most sustainable, suitable and deliverable site in the borough. The site is capable of being delivered within five years and will provide a high-quality development which will create significant employment opportunities and further enhance the wider Omega development as a nationally significant warehousing, industrial and logistics destination.

2.0

Assessment Methodology

Sites Assessed

2.1

The following sites have been assessed as part of this process:

- Omega North Western Extension, Bold (Ref. 1ES);
 - Omega South Western Extension, Land north of Finches Plantation, Bold (Ref. 1EA);
 - Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock (Ref. 6EA);
 - Parkside East, Newton-le-Willows (Ref. 7EA);
 - Parkside West, Newton-le-Willows (Ref. 8EA); and,
 - Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock (Ref. 2ES).
- We have not assessed the Florida Farm site (Ref. 2EA). It is important to note that this scheme benefits from planning permission (ref. P/2016/0608/HYBR) and is currently under construction. This scheme therefore forms part of the baseline conditions in respect of highways capacity and Green Belt, amongst all other technical matters. The application for the Florida Farm scheme was accompanied by detailed evidence that supported the ability of the highway to accommodate that quantum of development. This was tested and accepted by the Council. Therefore, the consented quantum of floorspace on the Florida Farm site up to the previously consented quantum of floorspace is a commitment. The assessment of other sites does not seek to suggest otherwise than full consented floorspace at Florida Farm can be brought forward without any highways constraints.

2.2

All of the sites that have been assessed are sites that have been identified for allocation as strategic employment sites or land safeguarded for future strategic employment development.

Evidence Used

2.3

The evidence used in this assessment has been taken from a number of sources including the SHBLP, the supporting evidence base, representations submitted at the Preferred Options stage of the Local Plan and information submitted to support currently pending planning applications.

Approach to Assessment

2.4

A proforma for each site has been prepared. The proforma considers each site against a series of key criteria as follows:

1 Environmental Constraints:

- a Vehicular Access;
- b Traffic Impact;
- c Landscape Impact;
- d Flood Risk;
- e Ground Conditions;
- f Ecology;
- g Heritage;
- h Air Quality;

- i Noise; and,
 - j Other.
- 2 **Sustainable Development:**
 - a Access to Strategic Road Network; and,
 - b Access to Services/Public Transport.
- 3 **Green Belt Contribution** (based on the St Helens Green Belt Review 2018).
- 4 **Policy Constraints** (As all of the sites lie within the Green Belt, Green Belt policy has not been considered as a constraint for the purposes of this assessment).
- 5 **Deliverability and Developability:**
 - a Suitability;
 - b Availability; and,
 - c Achievability/Viability.
- 2.5 Following the assessment process, a traffic light system has been used to assess each site against the criteria identified:
 - Green – Performs well;
 - Amber – Performs moderately well with some issues; and,
 - Red – Performs poorly.
- 2.6 It is important that economic, social and environmental factors are balanced when undertaking this kind of assessment. We consider that the hierarchy below sets out a suitable approach to balancing these factors and identifying the most appropriate sites:
 - 1 The general deliverability and developability of each site;
 - 2 The sites proximity and connectivity to the Strategic Road Network;
 - 3 The contribution of the site to the Green Belt; and,
 - 4 Consideration of the environmental and policy constraints.
- 2.7 When assessing the sites, consideration has also been given to whether there are any potential issues ('showstoppers') which would prevent development coming forward on the site (e.g. flood risk, lack of access etc.).
- 2.8 The outcome of the assessment is detailed in the following section.

3.0

Findings

Introduction

- 3.1 Attached at Appendix 1 are the assessment proformas for each site.
- 3.2 Using the information provided in the proformas, table 3.1 assess each site using the traffic light scoring process referred to in the previous section of this report.

Table 3.1 Site Assessment Table

	Site					
	Omega North Extension	Omega South Extension	Land west of Millfield Lane	Parkside East	Parkside West	Land south of Haydock Racecourse
Environmental Constraints						
Vehicular Access						
Traffic Impact						
Landscape Impact						
Flood Risk						
Ground Conditions						
Ecology						
Heritage						
Air Quality						
Noise						
Other						
Sustainable Development						
Access to Strategic Road Network						
Access to Services/Public Transport						
Green Belt Contribution						
Policy Constraints						
Deliverability and Developability						
Suitability						
Availability						
Achievability/Viability						

Source: Lichfields

Commentary on Sites

Environmental Constraints

- 3.3 As Table 3.1 shows, both the Omega North and Omega South Extensions perform best when considering the cumulative environmental constraints for each site.

- 3.4 Of particular relevance is the poor performance of land west of Millfield Lane (Ref. 6EA) and land south of Haydock Golf Course in respect of traffic impact. In respect of land West of Millfield Lane, we are aware that the live planning applications for industrial, logistics and distribution developments on the adjoining non-strategic site (Ref. 5EA) and on Land South of Haydock Golf Course (Ref. 2ES) are experiencing significant issues in respect of highways capacity. It is unclear at this time if an acceptable solution can be found but we understand that the current position is that the applicant has been unable to submit additional information to date which satisfies Highways England's concerns in respect of the developments impacts on J23 of the M6. It is clear however that evidence submitted in respect of these schemes has not considered the development of Land West of Millfield Lane and therefore, even if an acceptable solution is found in respect of the current schemes, additional capacity issues would exist in respect of site Ref. 6EA.
- 3.5 There is also a discrepancy between the access location proposed within the SHBLP and that promoted by Canmoor Developments Ltd [Canmoor]. The site proforma contained at appendix 7 of the SHBLP states that access should be achieved through the existing industrial estate and site 5EA. However, the current planning application on site 5EA does not allow for access to be facilitated through this scheme and Canmoor are promoting access from the adopted highway further north on Millfield Lane or from Liverpool Road. We understand that this is unlikely to be an acceptable solution to the Council.
- 3.6 There are also significant highways issues in respect of the proposals at Parkside West and East. Highways England's latest consultation response in respect of the outline planning application (dated 31st January 2019) raised a number of significant concerns in respect of the proposals. There are considerable comments requesting further information/clarifications in respect of a range of matters including, but not limited to trip rates, traffic flows, assessment scenarios and cumulative sites. It is concluded that planning permission for the first phase of the development should not be granted at this time. Notably, in respect all of the schemes subject to live planning applications, Highways England's advice to date is that planning permission should not be granted.
- 3.7 In terms of wider environmental constraints, the Omega North sites scores the most greens of all the sites. Land at Omega South also performs well with 7 greens and 3 ambers. Land to the South of Haydock Racecourse is the next best performing site with 7 greens, 1 amber and 2 reds. The worst performing sites are land west of Millfield Lane and Parkside West which score 4 greens, 4 ambers and 2 reds respectively.
- 3.8 In respect of landscape impact, the two omega sites, land west of Millfield Lane and Parkside east scored amber due to the relatively contained nature of the sites. Both Parkside East and land south of Haydock Race course scored red. This is linked to their high scores in respect of impact on Green Belt purposes and by virtue of this, it is considered that the development of these two sites would have a greater impact on landscape.
- 3.9 In terms of Flood Risk, all of the sites are located within Flood Zone 1 and therefore are considered to perform well. Likewise, all sites are considered to perform well in respect of ground conditions, albeit the Parkside West site scores amber due to the elements of previously developed land on the site, with the site investigation report submitted in support of the Phase 1 planning application acknowledging that plausible sources of contamination exist within the site.
- 3.10 Both Omega North and land west of Millfield Lane are considered to perform best in respect of ecology. This is because the technical evidence we have reviewed has not identified the presence of any protected species on these sites. The technical evidence associated with the other four

sites identify the presence of or potential for the presence of protected species and therefore a greater deal of mitigation will likely be required at these sites.

- 3.11 In terms of heritage, land to the south of Haydock Racecourse performed best as there are no heritage assets identified within the defined area of search that are likely to be impacted by the development. Four of the sites, including Omega North were found to perform reasonably well although some mitigation is likely to be required in respect of heritage assets located outside of but within reasonably close proximity to the sites. Parkside West is the worst performing site in respect of heritage as there are a number of listed buildings and a designated battlefield located within the site.
- 3.12 All six sites are considered to perform well in respect of air quality. In terms of noise, both Omega sites and land to the south of Haydock Racecourse were found to perform best. Land to the west of Millfield Lane was found to perform reasonably well but a greater degree of mitigation will likely be required due to the sites close proximity to residential properties on the Fairways/Liverpool Road. Noise was considered to be a bigger issue at Parkside East and West also due to the proposed Strategic Freight Rail Interchange.
- 3.13 The only other technical constraint identified across all of the six sites was in respect of land to the west of Millfield Lane (Ref. 6EA). The 'West East Link Main' is a 55km water pipeline operated by United Utilities [UU], connecting Prescot Reservoir near Liverpool to Woodgate Hill Reservoir North of Manchester. The pipeline has the capacity to carry up to 100 million litres of water a day. It runs through the north-eastern part of the site. It is clearly reasonable to assume that this cannot be diverted and therefore any subsequent layout will be constrained by the pipelines location and the associated easements that will be required by UU.
- 3.14 The assessment demonstrates that there are clearly no environmental constraints that should prevent the allocation of the Omega North site within the SHBLP.

Sustainable Development

- 3.15 In the context of achieving sustainable development for industrial, logistics and distribution, we have considered the principal factor to be the sites connectivity with the strategic road network. To a lesser extent we have considered the sites access to services/public transport for employees to access. In respect of the sites connectivity with the strategic road network, all sites score green except for land West of Millfield Lane which scores amber. In respect of Omega North and South, land south of Haydock Racecourse and Parkside East and West, proposals exist that demonstrate direct access could be facilitated from the sites onto the M6 or M62. In respect of land west of Millfield Lane, access to Junction 23 of the M6 can only be achieved via Millfield Lane and the A580 and this route is already constrained by considerable traffic from the existing industrial estate. Therefore, land west of Millfield Lane is scored amber.
- 3.16 In terms of connectivity with services/public transport, all of the sites are located within the region of 3 kilometres from some form of retail facility. For all of the sites, we have identified bus stops located on roads abutting one or more of the site boundaries or in close proximity to a specific part of the site. The sites at Omega North and South benefit from a new bus service that has been instated which serves the adjacent plots for both sites.

Green Belt Contribution

- 3.17 The assessment of sites in respect of Green Belt contribution is based on the St Helens Green Belt Review 2018 and we have not undertaken our own assessment. It should however be noted that we do not necessarily endorse the Council's findings set out within this report.

- 3.18 As none of the sites have been assessed as making 'No Contribution' in the Council's Green Belt Review 2018 in respect of Green Belt purposes, the maximum score allotted to the sites is Amber. All sites have been given a score of amber or red against this criterion dependent on whether the Council's assessment scores them as making a medium or high contribution to the Green Belt. Both Omega North and South, land west of Millfield Lane and Parkside West score amber as they are found to have a medium contribution to Green Belt purposes. Both land south of Haydock Racecourse and Parkside East score red as they are found to have a high contribution to Green Belt purposes. Therefore, in the context of Green Belt contribution, the other sites, including Omega North should be considered more favourably for allocation.

Policy Constraints

- 3.19 As Table 3.1 shows, in terms of policy constraints, all of the sites score Green as we have not identified any additional policy constraints beyond the existing Green Belt allocations.

Deliverability and Developability

- 3.20 When assessed in regard to Suitability, Availability and Achievability, the assessment found both Omega North and Omega South to perform best, both scoring green across all three criteria. We have found that all six sites can be considered to be available for development.
- 3.21 In terms of suitability, the proposals at Parkside (both at the eastern and western sites) are long established and it is considered that the sites are suitable for development in this regard. Likewise, land to the west of Millfield Lane and land south of Haydock Racecourse, are considered to be suitable for development in the context of the majority of environmental constraints. However, the assessment has identified highways capacity/traffic impact issues of a significant nature exist at all of these sites and there is potential for significant cumulative impacts in respect of Junctions 22 and 23 of the M6. It is yet to be established if suitable mitigation can be delivered to accommodate all four of the strategic developments (and indeed a number of smaller non-strategic developments that are proposed) and therefore all four sites score amber for suitability at this time until further clarity is established in respect of highways capacity.
- 3.22 In respect of achievability, Omega North and Omega South both score green and have been found to be achievable and viable. Both land to the west of Millfield Lane and land south of Haydock Racecourse score amber due to the identified highways constraints. This is also the case for Parkside East and West which both score amber. In addition, it is considered that achievability of the both Parkside East and West is interlinked and that neither site will come forwards without the other. This is acknowledged within the Parkside Logistics and Rail Freight Interchange Study (2016) which states that it is crucial for the delivery of a viable SRFI that land on the west and east sides of the M6 is included for future development. The project recently experienced a setback as potential SRFI operator Talgo opted for a site in Longannet, Scotland, the Parkside SRFI losing out.

Comparative Assessments

- 3.23 Applying the hierarchy identified at paragraph 2.7 to the above findings, an overall traffic light rating has been assigned to each site based on performance against the hierarchy, as follows:
- 1 Proposed Extension to Omega North – Green.
 - 2 Proposed Extension to Omega South – Green.
 - 3 Parkside West – Amber.
 - 4 Parkside East – Amber.

5 Land South of Haydock Racecourse – Amber.

6 Land West of Millfield Lane – Red.

3.24 As the ratings indicate, the proposed extensions to Omega North and Omega South perform best against the assessment methodology applied. The sites at Parkside West, Parkside East and land south of Haydock Racecourse are considered to perform reasonably well subject to whether or not a satisfactory solution is found to deal with highways capacity issues. The site at land west of Millfield Lane is considered to perform poorest of all of the sites assessed.

4.0

Conclusion

- 4.1 Based on the results of this assessment process it is considered that, of all the sites considered, the proposed Omega North Western Extension is the most suitable site for removal from the Green Belt and employment allocation in St Helens. The site assessment (and associated technical reports commissioned by db symmetry) clearly demonstrate that the site is not subject to any environmental constraints that would prevent it coming forwards for development immediately. We have demonstrated that the site is clearly deliverable, viable and available to come forward for development immediately. Therefore, the allocation of the proposed Omega North Western Extension clearly represents a reasonable and justified alternative to the current strategy.
- 4.2 Furthermore, the site assessment exercise has raised fundamental concerns in respect of the current strategy, casting considerable doubts on whether or not it can be delivered without leading to significant adverse environmental impacts in respect of highways capacity within the M6 corridor. It is our contention that the conclusions of the assessment warrants consideration to be given to alternative options which could reduce such impacts.
- 4.3 The proposed Omega North Western Extension represents a natural extension to a regionally significant, established employment site which is situated in a highly accessible location and is easily accessible by car and public transport. The site is also well contacted with nearby residential suburbs at Bold, Clock Face and Burtonwood. Overall, the proposed development will offer significant economic, social and environmental benefits to the residents of St. Helens and its allocation for development now would allow these significant benefits to be unlocked.
- 4.4 It is therefore considered that there is an overwhelming case to allocate the proposed Omega North Western Extension for an industrial, logistics and warehousing development now rather than safeguarding the site to meet future development needs. We have presented significant evidence to demonstrate that the site is the most sustainable, suitable and deliverable site in St Helens. The site is capable of being delivered within five years and will provide a high-quality development which will further bolster Omega North as a premier employment destination in the North-West.

Appendix 1: Site Assessment Proformas

Site Assessment Proforma

St. Helens Local Plan Ref: 1ES – Omega North Western Extension

Site Area: 29.98 ha

Location: Omega North Western Extension, Bold (Draft Safeguard Allocation)

Planning History: The site has no planning history.



Environmental Constraints	Comment
Vehicular Access	The access into the site can be taken from Lockheed Road. This road serves the existing warehousing and distribution uses associated with the Omega North development. It has been designed to specifically accommodate high-volumes of Heavy Goods Vehicle [HGV] traffic.
Traffic Impact	Curtins have prepared a Preliminary Transport Assessment [PTA] for the site. The PTA concludes that the development's impact on the operation of junction 8 of the M62 can be mitigated. The document suggests that improvements could be made to the roundabout to mitigate any impacts to the Burtonwood Road (south) arm. Whilst additional assessments would be required for any planning application, the PTA concludes that the initial findings suggest that there are no traffic and transport reasons that should prevent allocation of the site.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Clock Face Farming Character Area. By virtue of the sites location within the Green Belt, development will clearly have an impact on landscape. However, Enzygo have undertaken a Landscape & Visual Appraisal in respect of the proposed development which concluded that the proposals would not result in any significant harm to the landscape character or visual environment and could be well integrated into the proposed location. Therefore, the development of the site would be considered to have a moderate impact on landscape.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding.

Ground Conditions	Tier UK have prepared a desk-based ground conditions assessment in respect of the proposed development which concluded there is no significant risk of on or off-site contamination sources and risks associated with ground instability are considered to be low. Therefore, it is unlikely the development of the site would be constrained by adverse ground conditions.
Ecology	TEP has prepared an Ecology Technical Note for the site. The survey didn't identify any evidence of protected species within the site and the assessment concluded that there are unlikely to be any adverse ecological issues that would prevent the sites allocation.
Heritage	There are no designated or non-designated heritage assets within the site and the available evidence suggests that there is low potential for significant archaeological remains of all periods. A Scheduled Monument, (Old Moat House Medieval Moat, Bold) is located approximately 700m to the north of the site. Three Listed Buildings (Farmhouse at Former Bold Hall Estate and associated structures) are located approximately 700m to the west of the site. The report concluded that whilst there is some potential for minor impacts on the heritage significance of four designated heritage assets within the 1km study area, this is not considered to be in conflict with national or local planning policy.
Air Quality	Air Quality consultants have undertaken a baseline Air Quality Assessment [AQA] in respect of the proposed development. There are no Air Quality Management Areas [AQMA] that cross the site. The closest AQMA is Warrington BC's Motorway AQMA located adjacent to the proposed development site to the southeast, which ends at the borough boundary. St Helens have not declared an AQMA alongside the M62. The AQA concluded the existing conditions within the study area show good air quality. Therefore, no air quality issues are anticipated.
Noise	An initial noise assessment has been undertaken by Hepworth Acoustics and is submitted with this report. The assessment demonstrated that the proposal will not introduce noise sources with any new or distinguishing features. Therefore, no negative noise quality impacts are anticipated.
Other	We are not aware of any other environmental constraints associated with the site.
Sustainable Development	Comment
Access to the strategic road network	The site has excellent connections with Junction 8 of the M62.
Access to services/public transport	The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services. A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding areas. There is a bus stop located at Travis Perkins adjacent to the site.
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes. The review assessed the site against three 'purposes'.
Policy Constraints	Comment
Planning Policy	Beyond the sites designation as Green Belt, we are not aware of any other policy constraints affecting the site.
Deliverability and Developability	Comment
Suitability	The extensive detailed technical assessment work carried out on the site to date confirms that there are no barriers to delivering warehousing, industrial and logistics at the site.
Availability	The site is within the control of db symmetry who have an exclusive option agreement with the landowner. The site has been actively promoted through the Local Plan process and is considered available for development. db symmetry are also in exclusive talks with the landowners and are close to securing access from Lockheed Road into the site. The site is therefore considered to be available for development.
Achievability / Viability	It is anticipated that the site will deliver in the order of 1,500,000 sq. ft. of warehousing,

	<p>industrial and logistics development. db symmetry is a specialist industrial and logistics development company focused on land promotion and development delivery throughout the UK. The development team has been involved in some of the most successful speculative and client led schemes in the country. db symmetry are currently delivering one of the largest programmes of speculative commercial building in the UK. The developer has the opportunity, finance and expertise to bring the Symmetry Park, St. Helens site forward, bringing hundreds of jobs to the region over the next 5 years.</p> <p>db symmetry have reviewed the economic viability of the proposals in terms of land value, attractiveness of the location and level of potential market demand. They have confirmed that significant market demand exists at the site and have already received a number of initial enquiries. db symmetry can therefore confirm that the development of the site is economically viable and are confident that warehousing, industrial and logistics development can be delivered within five years.</p>
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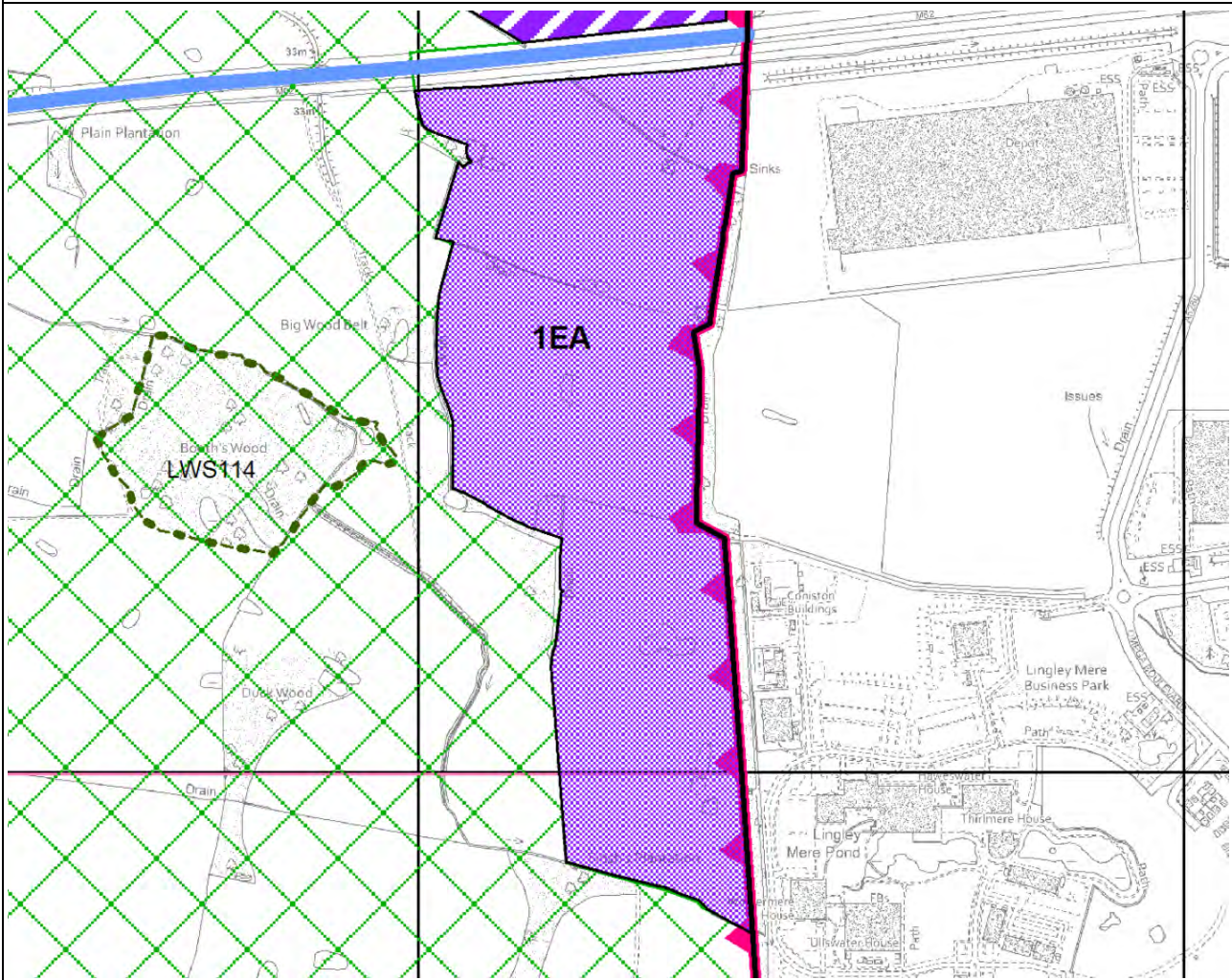
Site Assessment Proforma

St. Helens Local Plan Ref: 1EA – Omega South Western Extension

Site Area: 31.22 ha

Location: Omega South Western Extension, Land north of Finches Plantation, Bold (Draft Allocation)

Planning The site has no planning history.



Environmental Constraints	Comment
Vehicular Access	St Helens Sustainable Transport Impact Assessment (2019) [STIA] identifies that access can be achieved from Skyline Drive, a purpose-built access road from Junction 8 of the M62. However, it is also stated that this junction suffers from high demand and often operates at capacity. Representations submitted by GVA on behalf of Miller Developments propose the delivery of a new exit slip road onto the M62 westbound at the northern boundary of the site although the rep acknowledged that further work needed to be undertaken to establish the feasibility of this.
Traffic Impact	St Helens STIA (2019) acknowledges existing traffic issues on the current Omega South site. Whilst it is acknowledged that the southern extension can integrate well with the existing site, the STIA suggests that significant intervention is likely needed to address the current issues. Miller Developments suggest that the delivery of the westbound slip road onto the M62 will reduce the pressure on the junction 8 roundabout although there is no technical evidence to support this at this stage.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated, identifies the site as being located within the Bold Hall Character Area. By virtue of the site's location within the Green Belt, development will clearly have an impact on landscape. However, representations submitted on behalf of Miller Developments state that the development of the site would not negatively impact the surrounding

	landscape and Green Belt designation. Therefore, the development of the site would be considered to have a moderate impact on landscape.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding.
Ground Conditions	There is no evidence to suggest that the site is subject to any adverse ground conditions although this would need to be verified by a ground conditions assessment.
Ecology	<p>There is a Woodland Priority Habitat Network located within the southern part of the site. The eastern site boundary and a small strip of the western site boundary lie within Woodland Improvement Areas.</p> <p>The representations submitted by GVA on behalf of Miller Developments also state that the pond to the south of the site has potential for Great Crested Newt Habitats. It is recognised that surveys for water voles, breeding birds and bats will need to be undertaken.</p>
Heritage	<p>There are no designated heritage assets within the site.</p> <p>A Scheduled Monument (Old Bold Hall) is located approximately 350m to the west of the site. There are 6 Grade II listed buildings within Old Bold Hall. The representations propose an ecological/heritage/landscape buffer area to mitigate the impact on the heritage assets.</p>
Air Quality	There are no Air Quality Management Areas [AQMA] that cross the site although the M62 AQMA adjoins the sites northern boundary.
Noise	Given the sites location adjoining an existing employment area, the sites development for employment is unlikely to create any issues in respect of noise.
Other	We are not aware of any other environmental constraints associated with the site.
Sustainable Development	Comment
Access to the strategic road network	The site has excellent connections with Junction 8 of the M62.
Access to services/public transport	<p>The site lies approximately 3km from Gemini Retail Park which accommodates a range of shops and services.</p> <p>A new bus service funded by Omega Warrington was recently launched. The service connects the Omega North and South with Warrington Town Centre and surrounding areas. There is a bus stop located at The Hut Group/Asda adjacent to the site.</p>
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes.
Policy Constraints	Comment
Planning Policy	Beyond the sites designation as Green Belt, we are not aware of any other policy constraints affecting the site.
Deliverability and Developability	Comment
Suitability	The information available within the Council's evidence base, along with the representations submitted by GVA on behalf of Miller Developments does not suggest there are any issues that represent significant barriers to employment development at the site.
Availability	<p>The site is a proposed strategic employment allocation (Ref. 1EA). It is controlled by Miller Developments who are actively promoting it through the Local Plan Process for B2/B8.</p> <p>The site is therefore considered to be available for development.</p>
Achievability / Viability	<p>The site is being promoted by a major developer (Miller Developments).</p> <p>The technical evidence submitted to support the allocation of the site states that the site is achievable and deliverable and the wider location is established as a viable location for employment development.</p>

Site Assessment Proforma

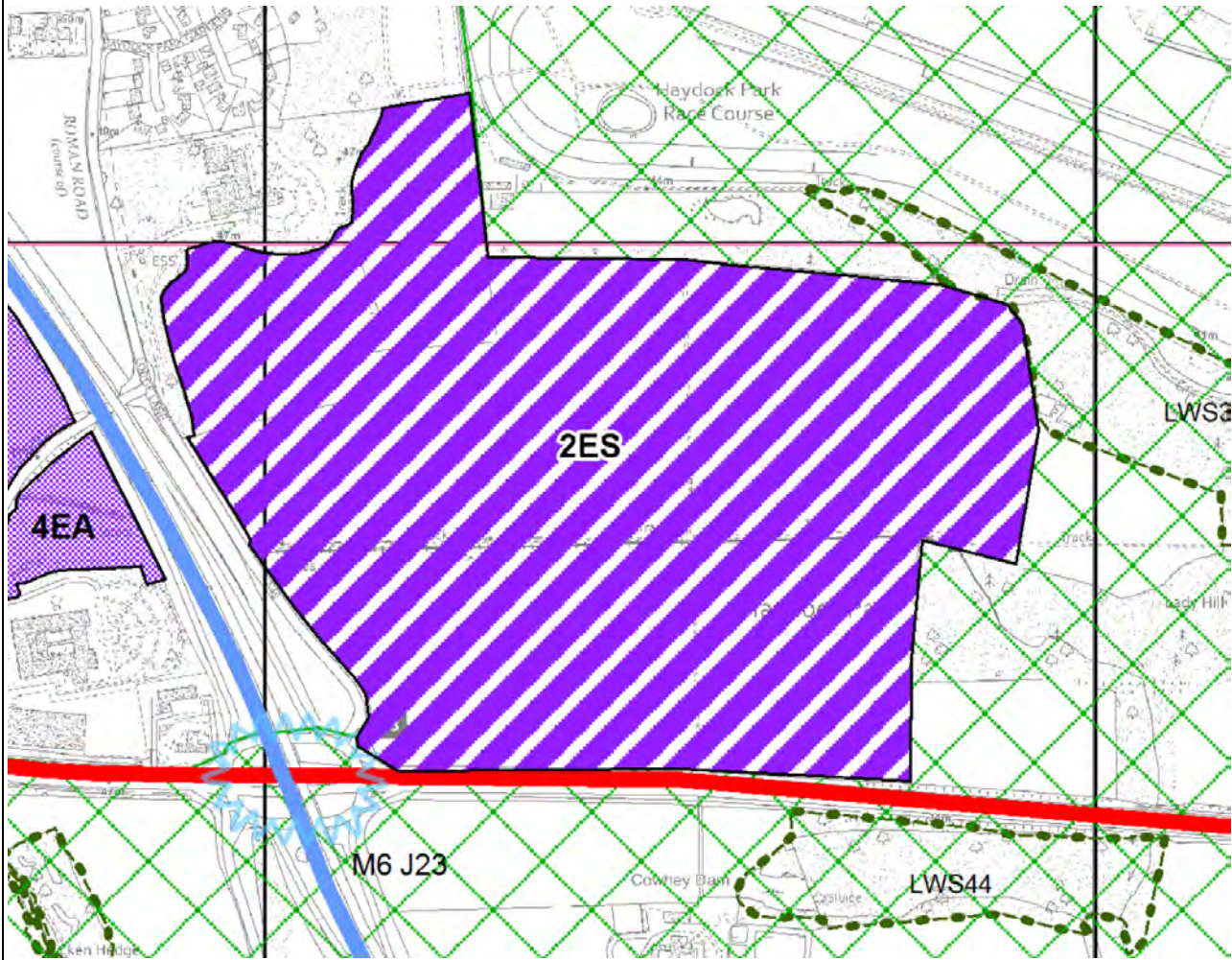
St. Helens Local Plan Ref: 2ES – Land North East of Junction 23 M6

Site Area: 55.90 ha

Location: Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock (Draft Safeguard Allocation)

Planning History

The site is subject to a pending outline planning application (ref. P/2017/0254/OUP) for the development of up to 167,225m² of B8/B2 (up to 20% B2 floor space) which was submitted 13th March 2017 and remains pending. The applicant is Peel Investments Limited. The application boundary predominately sits within the allocation boundary, with a parcel of land to the east extending beyond the allocation boundary.



Environmental Constraints	Comment
Vehicular Access	<p>St Helens STIA considered that access is to be taken from Lodge Lane and/or the East Lancashire Road. It is noted that Junction 23 can be particularly difficult to cross for pedestrians as the crossings are currently uncontrolled. It is recommended that it will be essential to provide sustainable and active travel interventions as part of any development that comes forward.</p> <p>The Transport Assessment Addendum (2017) prepared by Vectos on behalf of Peel Investments stated that the site will be accessed by a newly constructed controlled junction from the A580 for the development proposed. The Transport Assessment (March 2017) submitted with the application states that the proposed site access junction will operate within capacity.</p>
Traffic Impact	<p>The Transport Assessment Addendum (2017) submitted with the outline application concluded that the proposed development would not have a material impact on any junction located on the local highway within St Helens and that all junctions will continue to operate within capacity. However, the site has had ongoing issues with highways and as of 27th November 2018, Highways England recommended that</p>

	planning permission should not be granted as further assessment is required. It is unclear at this stage if an acceptable solution can be found in respect of traffic impact.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Wooded Former Estate Character Area. By virtue of the sites location within the Green Belt, development of the site for industrial and logistics will clearly have an impact on landscape. Whilst the site is to a degree contained by existing urban areas, the development of the site will clearly have a relatively significant impact on landscape, particularly in respect of Haydock Racecourse which is identified as an important part of the borough's cultural offer which should be recognised and valued within the Spatial Vision of the Submission Draft Local Plan.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding. There are no flood risk issues arising from the proposed development on this site and as such no mitigation would be required.
Ground Conditions	The Environmental Statement (2017) submitted with the outline application confirmed that site is not subject to any known issues related to ground conditions.
Ecology	<p>The Environmental Statement (2017) submitted with the outline application confirmed the following-</p> <p>There are no national or international designated sites within 2km of the site.</p> <p>The site lies within the Impact Risk Zone for Abram Flashes SSSI and Highfield Moss SSSI. There are also seven Local Wildlife Sites (LWS) within 1km of the site. Haydock Park Woodland LWS immediately bounds the site to the north and east. This contains priority deciduous woodland.</p> <p>The woodlands on the periphery of the site are a habitat for bats. The site is also an area for a number of the priority bird species. Evidence of water voles were found at central the ditch which passes east-west through the site.</p> <p>There was no evidence of badgers or Great Crested Newts within the site.</p> <p>With the application of embedded mitigation, Peel considers that the net residual effect of the Proposed Development on ecological features important in the context of the Liverpool City Region will be positive.</p>
Heritage	There are no designated heritage assets within or in close proximity to the site.
Air Quality	<p>There are no Air Quality Management Areas [AQMA] that cross the site. The closest AQMA is M6 AQMA to the south of the site.</p> <p>The Environmental Statement submitted with the outline application confirmed that site is not subject to or will contribute to any known issues related to air quality.</p>
Noise	The Environmental Statement (2017) submitted with the outline application confirmed that site is not subject to or will contribute any known issues related to noise.
Other	We are not aware of any other environmental constraints associated with the site.
Sustainable Development	Comment
Access to strategic road network	The site is located adjacent to J23 of the M6 and therefore has excellent connections with the strategic road network.
Access to services/public transport	<p>Bus stops are located on the A49 Lodge Lane to the north of the site. These provide connections between Wigan and St Helens.</p> <p>The closest settlements are Golborne and Ashton-in-Makefield, both approximately 3km from the site and offering a range of services.</p>
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a high contribution to Green Belt purposes.
Policy Constraints	Comment
Planning Policy	Beyond its designation as Green Belt land, there are no known policy constraints on the site.
Deliverability and Developability	Comment

Suitability	It is currently unclear if a development can be delivered at the site which is acceptable in terms of traffic impact and thus whether the site is suitable to accommodate a development of the scale proposed. Whilst the applicant has argued that the proposed development would be acceptable in terms of traffic impact subject to mitigation, the site is subject to ongoing issues and as of 27th November 2018, Highways England recommended that planning permission not be granted as further assessment is required and it is unclear at this stage if an acceptable solution can be found in respect of traffic impact.
Availability	The site is controlled by Peel Investments Ltd who are actively promoting it through the Local Plan Process for B2/B8. Access to the site can be achieved from the adopted highway from either the A580 or Lodge Lane. The site is therefore considered to be available for development.
Achievability / Viability	<p>The site is being promoted by a major developer (Peel Investments Ltd).</p> <p>The technical evidence submitted to support the allocation of the site states that the site is achievable and deliverable. However, it is considered that there is evidence to suggest that the development of this site is significantly constrained in respect of highways impact. Significant mitigation is likely required to achieve acceptable development on this site.</p>

Site Assessment Proforma

St. Helens Local Plan Ref: 6EA – Land West of Millfield Lane

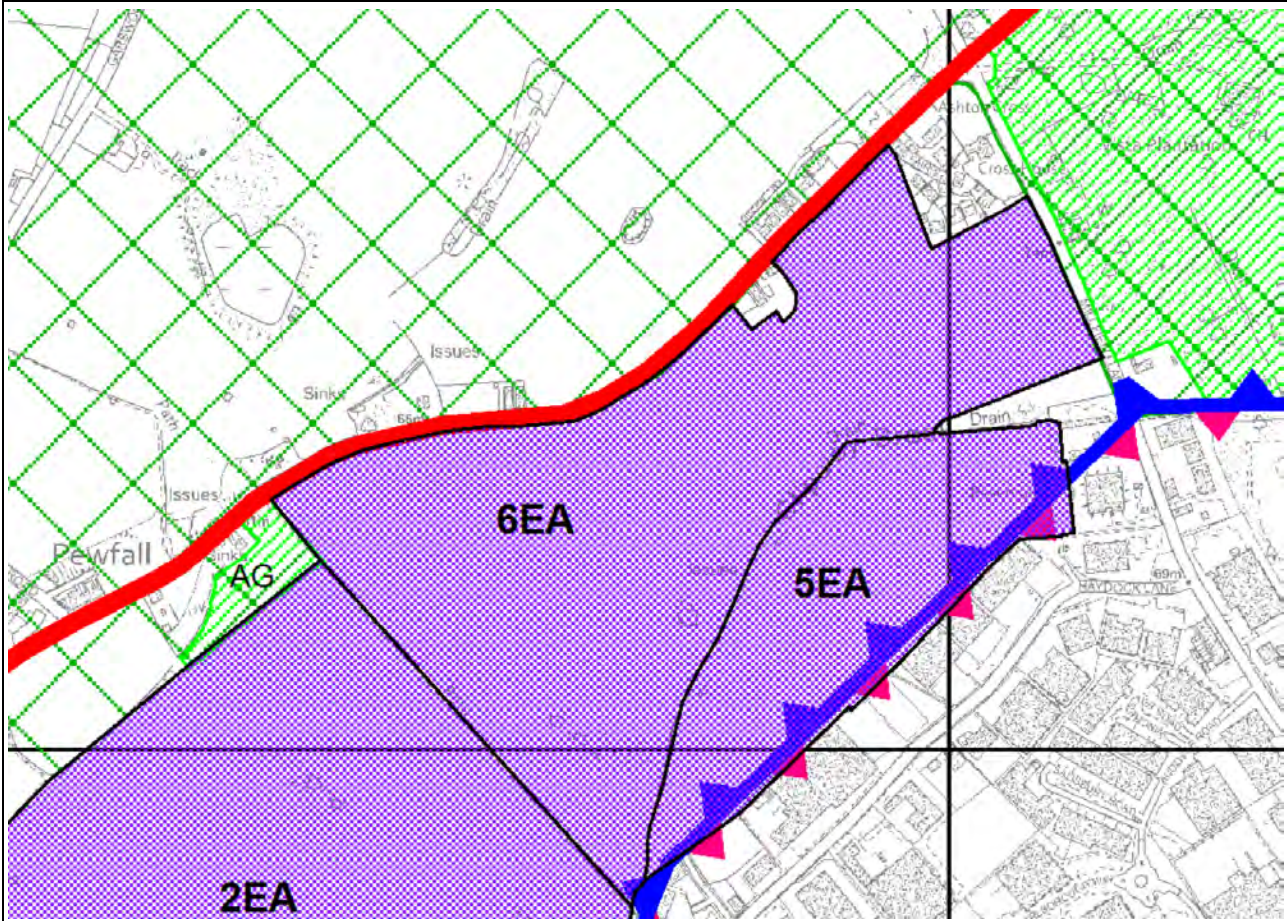
Site Area: 20.58ha

Location: Land West of Millfield Lane, South of Liverpool Road and North of Clipsley Brook, Haydock (Draft Allocation)

Planning History

There are no live or previous planning applications related to the site.

The site adjoins two further sites it is proposed to allocate for employment in the draft local plan. 2EA (Land at Florida Farm) is currently under construction for the erection of 2no. commercial/industrial buildings (ref. P/2016/0608/HYBR). A full planning application for the construction of 4 industrial units (total 27,873sqm GEA) is currently pending in relation to site ref. 5EA land at Haydock Lane Industrial Estate (ref. P/2017/0920/FUL).



Environmental Constraints	Comment
Vehicular Access	<p>St Helens Sustainable Transport Impact Assessment (2019) [STIA] suggests that access should be taken from Haydock Lane through the existing industrial estate. However, it also notes that the site boundary is better placed for access from Liverpool Road but acknowledges that this is a residential street. The STIA also raised concerns around connectivity between sites 2EA, 5EA and 6EA and the need for a comprehensive masterplan in order to ensure the neighbouring sites don't block pedestrian and cycling routes to Haydock.</p> <p>Representations were submitted by Michael Sparks Associates on behalf of Canmoor Developments Ltd [Canmoor] to the Local Plan Preferred Options consultation. These representations contend that suitable access can be provided via Millfield Lane (off the adopted highway). However, to achieve this in an acceptable manner would likely require significant road widening/mitigation and no evidence is provided as to how this could be deliverable. Furthermore, this is contrary to the site-specific requirements for 6EA (set out in Appendix 5 of the SDLP) which state that access should be delivered through the existing industrial estate and site 5EA.</p>
Traffic Impact	The live planning application associated with site 5EA (ref. P/2017/0920/FUL) has been

	subject to considerable objections and concerns in respect of highways matters, particularly in respect of cumulative impacts when considered with the Florida Farm site (ref. 2EA) which is under construction and the proposed safeguarded site land north east of Junction 23 (ref. 2EF) which is subject to a live planning application for up to 167,225m2 of B8/B2 (ref. P/2017/0254/OUP). These issues exist without considering the cumulative impacts of site 6EA coming forwards as well. Whilst it is understood that Highways England has recently withdrawn its objection in respect of the proposals for site ref. 5EA and that this planning application will likely be approved in due course, it is reasonable to assume that significant constraints will exist in respect of capacity on the existing road network and impacts on J23 of the M6 when considering the cumulative impacts of any forthcoming proposals on site ref. 6EA.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Highfield Moss Character Area. By virtue of the sites location within the Green Belt, development of the site for industrial and logistics will clearly have an impact on landscape. However, given the sites relatively contained nature, it is considered that its development would result in moderate impacts in respect of landscape.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding. There are no flood risk issues arising from the proposed development on this site and as such no mitigation would be required.
Ground Conditions	There is no evidence to suggest that site is not subject to any known issues related to ground conditions.
Ecology	The site is an area for the priority bird species Lapwing. Priority Broadleaved woodland and priority Deciduous woodland are located adjacent to Millfield Lane to the east.
Heritage	There are no designated heritage assets within the site. Two Grade II Listed Buildings (Gate Piers, Gates and Flanking Walls at Ashton Cross and Le Chateau) are located adjacent to the site on Millfield Lane to the east.
Air Quality	There are no Air Quality Management Areas [AQMA] that cross the site. The closest AQMA is Greater Manchester's AQMA along the M6 located east of the site.
Noise	The site is not subject to any known noise constraints.
Other	An Ethylene pipeline runs through the centre of the site from the south to the north.
Sustainable Development	Comment
Access to strategic road network	J24 of the M6 to travel northbound is approximately 1 km from the site. Junction 23 of the M6 is approximately 3km from the site. The site is therefore relatively well connected with the strategic motorway network. However, HGV's will need to travel down Millfield Lane/A580 before accessing the M6 which reduces the overall scoring in respect of accessibility.
Access to services/public transport	There are a number of bus stops located on Liverpool Road adjacent to the site although pedestrian access would need to be provided to the north of the site, on Liverpool Road to provide a practical route. Haydock is the nearest urban area, with the Piele Road services located approximately 3 km from the site.
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes.
Policy Constraints	Comment
Planning Policy	Beyond its designation as Green Belt land, there are no known policy constraints on the site.
Deliverability and Developability	Comment
Suitability	It is currently unclear if a development can be delivered at the site which is acceptable in terms of traffic impact. Furthermore, the Local Plan (6EA site specific requirements at Appendix 5) states that access should be taken from Millfield Lane, through the existing industrial estate and site 5EA. However, the current proposals on site 5EA (subject to

	live planning application ref. P/2017/0920/FUL do not allow for access to be facilitated through this site and Canmoor is promoting access to be taken from the adopted highway on Millfield Lane. The evidence and rationale for this is not available. However, it suggests that there are suitability issues in the context of the Local Plan requirements, particularly as we understand that Canmoor have secured access rights into site 5EA through the existing industrial estate so theoretically access could be facilitated.
Availability	<p>The site is a proposed strategic employment allocation (Ref. 6EA). It is controlled by Canmoor who are actively promoting it through the Local Plan Process for B2/B8. Canmoor also control the adjacent non-strategic site (Ref. 5EA) and have secured access rights to this land through the existing industrial estate.</p> <p>The site is therefore considered to be available for development.</p>
Achievability / Viability	<p>The site is being promoted by a major developer (Canmoor).</p> <p>The technical evidence submitted to support the allocation of the site states that the site is achievable and deliverable. However, it is considered that there is evidence to suggest that the development of this site, when considered in the context of other committed developments is significantly constrained in respect of highways impact. Significant mitigation is likely required to achieve acceptable development on this site.</p> <p>Notwithstanding this, the wider location is established as a viable location for employment development.</p>

Site Assessment Proforma

St. Helens Local Plan Ref: 7EA – Parkside East

Site Area: 64.55 ha

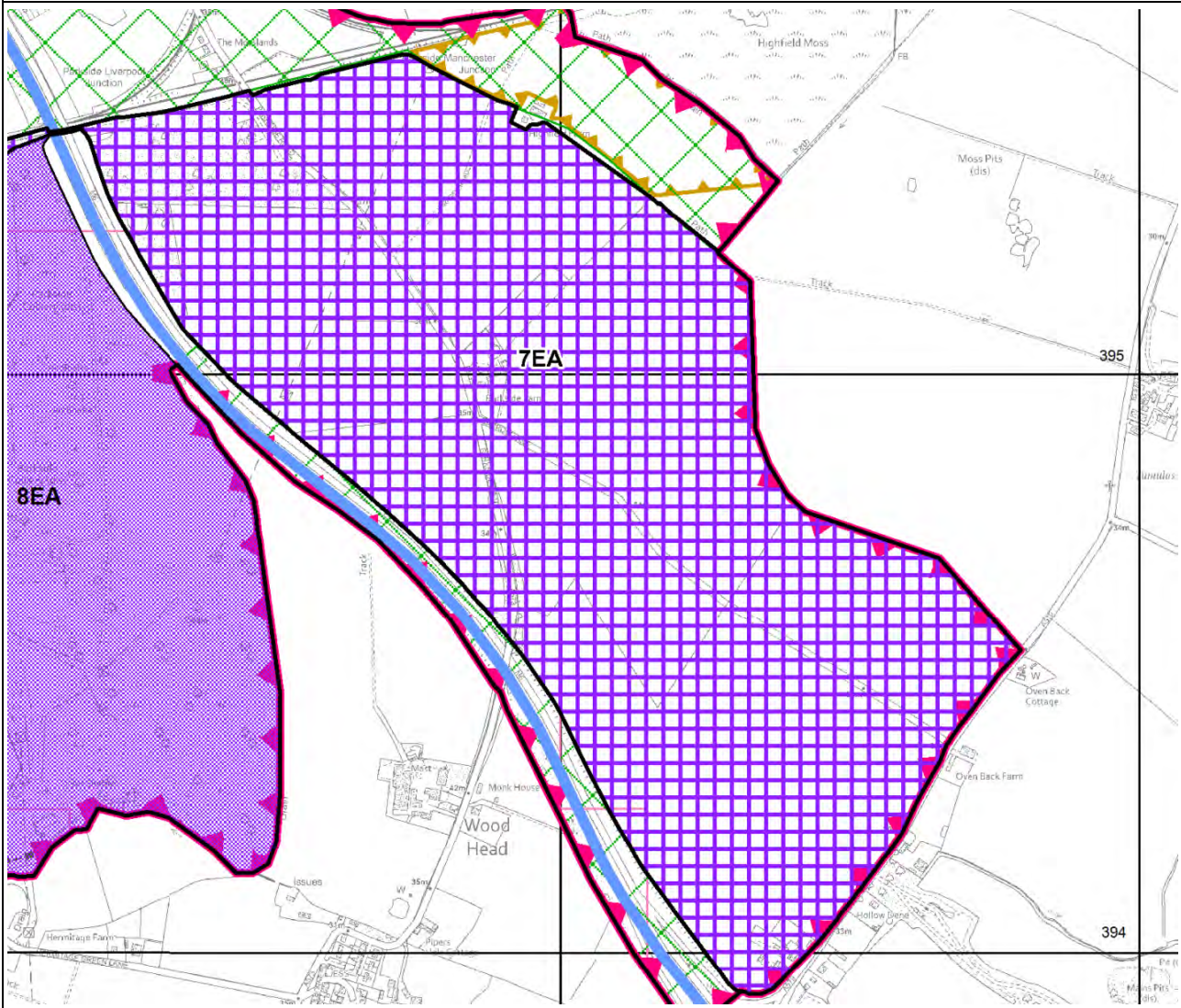
Location: Parkside East, Newton-le-Willows (Draft Allocation)

Planning History

There are no live or historic planning applications for employment uses on to the site.

A planning application (ref. P/2018/0249/FUL) for the formation of a new link road between A49 and M6 junction 22 was submitted on 23rd March 2018. The application is currently pending a decision. The proposed link road will connect sites Parkside East and West with Junction 22 of the M6 and runs from east to west through the sites.

In addition to the employment use draft allocation, the site is considered suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) (Policy LPA10).



Environmental Constraints	Comment
Vehicular Access	St Helens STIA (2019) states that the main site entrance to Parkside East would ideally be off the A579 around 0.5km to the north east of Junction 22 on the M6. Wider strategic access is proposed via the link road connecting Parkside East and West with J22 of the M6.
Traffic Impact	St Helens STIA (2019) recommends that it will be essential to provide sustainable and active travel interventions as part of any development that comes forward. Highways England's latest consultation response in respect of the outline planning application (dated 31 st January 2019) on the adjacent site continues to raise a number of significant concerns in respect of the proposals. It is also recommended that planning permission is

	not granted for the associated link road. There are considerable comments requesting further information/clarifications in respect of a range of matters including, but not limited to trip rates, traffic flows, assessment scenarios and cumulative sites. It is concluded that planning permission should not be granted at this time. Given the intrinsic link between Parkside East and West, and the fact that the objections relate merely to the first phase of the wider development, it is concluded that Parkside East is also likely to be subject to severe issues in respect of traffic impact.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Highfield Moss Character Area. Given the sites dislocation from the urban area and its lack of enclosure to the east, the development of the site would be considered to have a high impact on landscape.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding.
Ground Conditions	The site is not subject to any known issues related to the ground conditions.
Ecology	The site lies with the Highfield Moss SSSI Impact Risk Zone. Areas of priority woodland are found to the north of the site. The site is an area for a number of priority bird species.
Heritage	A grade II listed building (Huskisson Memorial on South Side Of Railway) is located on the sites northern boundary. A grade II listed building (Holly House) lies approximately 600m north of the site off Newton Road. A grade II listed building (Wall, gates and gate peris to front of Kenyon Hall) to the west of the site beyond Winwick Lane. Three Grade II listed buildings lie to the south east of the site. A designated battlefield (Battle of Winwick, Entry No. 1412878) lies on the south east of the site.
Air Quality	There are no Air Quality Management Areas [AQMA] that cross the site. The closest AQMA is Warrington's AQMA along the M6 located south east to the site.
Noise	The Parkside Logistics and Rail Freight Interchange Study (AECOM Study) acknowledged that the development of the site would result in noise levels exceeding the Noise Insulation Regulations (1975) by 2030 at the majority of receptors on the site. The precise effects of any development ultimately depend upon the scale, design and operation of the site. Noise pollution is likely during construction and operations, but mitigation measures could be secured.
Other	We are not aware of any other environmental constraints associated with the site.
Sustainable Development	Comment
Access to strategic road network	The site is well connected with J22 of the M6 and therefore is considered to be well connected with the strategic road network.
Access to services/public transport	There are a number of bus stops located on Newton Road along the sites northern boundary. Newton-le-Willows town centre is, in broad terms located less than 2km to the north-west of the site and provides a range of shops and services.
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a high+ contribution to Green Belt purposes.
Policy Constraints	Comment
Planning Policy	We are not aware of any planning policy constraints beyond the sites designation as Green Belt.
Deliverability and Developability	Comment
Suitability	There is a longstanding history of organisations wishing to bring forward the former colliery site for development and the Council has most recently entered into a joint venture with Langtree. Given the history of the proposals across the wider site, the suitability of Parkside West for an industrial, warehousing and logistics development is considered to be well established. Notwithstanding this, there are issues associated

	with the traffic impact that are yet to be overcome.
Availability	We understand that Parkside East is under the same control as the majority landowner of Parkside West. There are established aspirations to bring both sites forwards. It is therefore considered that the site is available for development.
Achievability / Viability	<p>Previous proposals by Astral Developments/Prologis dating back to 2006 were withdrawn in 2010 (ref. P/2006/1296) as a result of the recession. This demonstrates the site has been subject to historic viability constraints. The site is now being brought forwards in a joint venture between the Council and Langtree. The site was allocated in the Core Strategy, although was not actually released from the Green Belt. It is however proposed for release from the Green Belt in the emerging SDLP. This follows the publication of the Parkside Logistics and Rail Freight Interchange Study (AECOM Study) in 2016 which recommended a more flexible policy approach to assist with the schemes delivery. A planning application has been submitted for a logistics development on the adjacent Parkside West, along with an application for a link road connecting Parkside East and West with the M6. This represents the first phase of proposals in the delivery of the wider SRFI (including both Parkside East and West). The AECOM study concluded that the market attractiveness of this site for logistics activity remains as strong as and arguably stronger than in 2006 when the previous application for the site was put forward. However, it should be noted that the development of the SRFI recently faced a setback as it failed to secure potential Spanish operator Talgo for the site, losing out to a site in Longannet, Scotland which suggests there are alternative sites that are more viable than Parkside East.</p>

Site Assessment Proforma

St. Helens Local Plan Ref: 8EA – Parkside West

Site Area: 79.57 ha

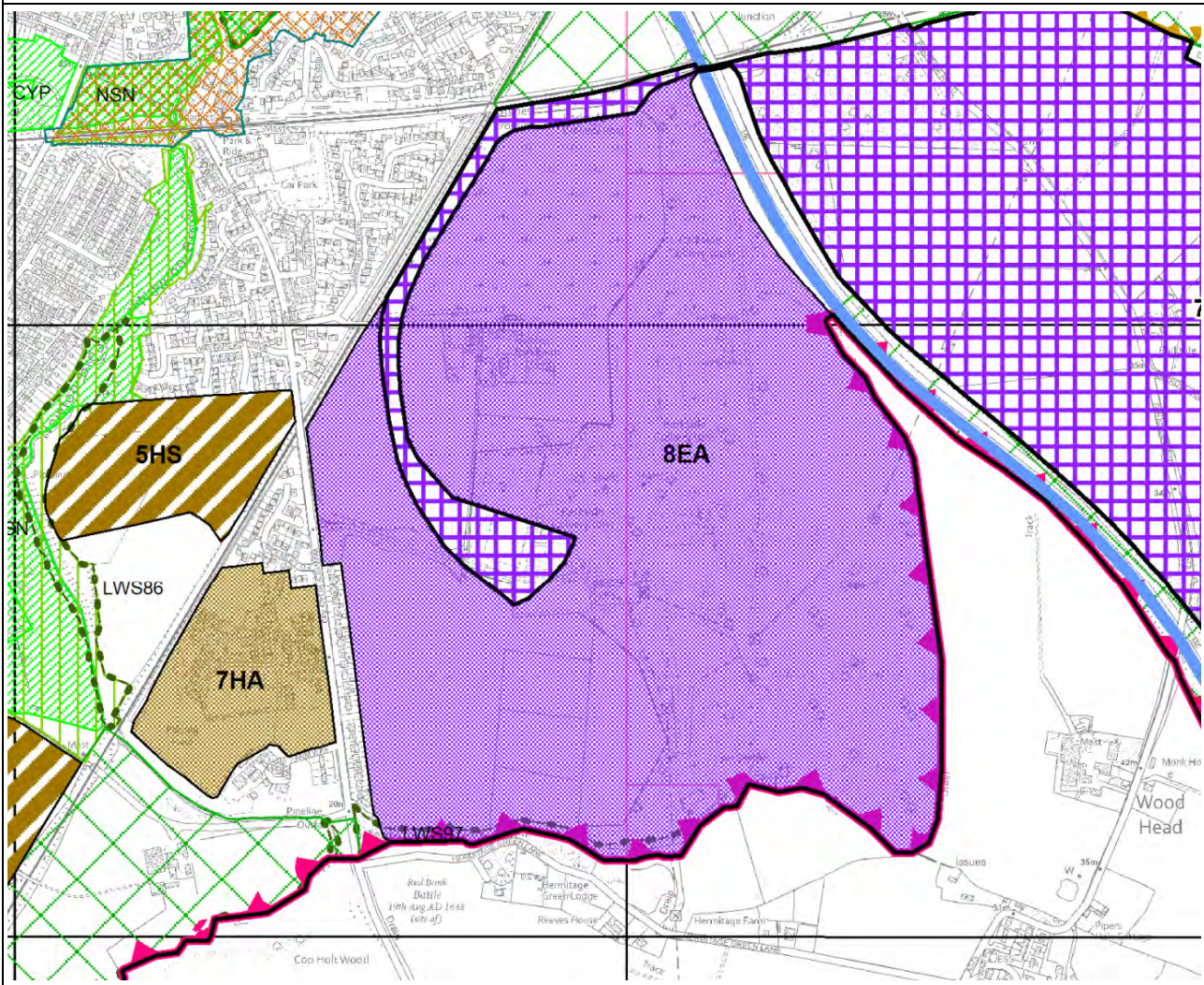
Location: Parkside West, Newton-le-Willows (Draft Allocation)

Planning History

An outline planning application with all matters reserved except for access (ref. P/2018/0048/OUP) was submitted on 16th January 2018 for the construction of up to 92,900 m2 of employment floorspace (Use Class B8/ancillary B1). The application relates to approximately half of the wider allocation to the south. The application has been under consideration for over a year and has not gone to committee. We understand this is due to highways issues.

A planning application (ref. P/2018/0249/FUL) for the formation of a new link road between A49 and M6 junction 22 was submitted on 23rd March 2018. The application is currently pending a decision. The proposed link road will connect sites Parkside East and West with Junction 22 of the M6 and runs from east to west through the sites.

Representations were submitted by Peter Brett Associates on behalf of Smith Property Developments Limited and Interland UK Limited who jointly own a parcel of land that falls within the Parkside West allocation in January 2017. The representations are in respect of proposals for 40 residential dwellings. However, it is unclear whether this residential development will be brought forward. To date, a planning application has not been submitted.



Environmental Constraints	Comment
Vehicular Access	St Helens Sustainable Transport Impact Assessment (2019) [STIA] confirms that the site is currently accessed via the existing former colliery access route from the A49, located to the west of the site. It is proposed that the link road/site will utilise the existing access from the adopted highway. The proposed link road will connect Parkside East and West
Traffic Impact	St Helens STIA (2019) recommends that it will be essential to provide sustainable and

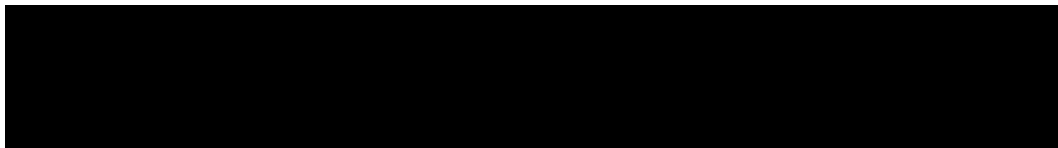
	active travel interventions as part of any development that comes forward. Highways England's latest consultation response in respect of the outline planning application (dated 31 st January 2019) continues to raise a number of significant concerns in respect of the proposals. It is also recommended that planning permission is not granted for the associated link road. There are considerable comments requesting further information/clarifications in respect of a range of matters including, but not limited to trip rates, traffic flows, assessment scenarios and cumulative sites. It is concluded that planning permission should not be granted at this time.
Landscape Impact	The St Helens Landscape Character Assessment (2006), which is now considerably dated identifies the site as being located within the Highfield Moss Character Area. By virtue of the sites location within the Green Belt, development of the site for industrial and logistics will clearly have an impact on landscape. The planning statement submitted with the outline application concludes that the proposed development will result in moderate harm to the landscape character and visual amenity.
Flood Risk	The site is located within Flood Zone 1 and therefore has a 'low probability' of fluvial/tidal flooding.
Ground Conditions	The planning statement submitted with the outline application highlights that contamination is present but is considered to be localised to areas around the former colliery buildings.
Ecology	The site lies with the Highfield Moss SSSI Impact Risk Zone. Areas of priority woodland are found throughout the site. The Environmental Statement submitted with the outline application concluded significant impact to the loss of nesting and foraging habitat for breeding birds; loss of foraging/commuting habitat for bats; loss of invertebrate habitat; and disturbance of bats, birds and invertebrate will occur without mitigation.
Heritage	A designated battlefield (Battle of Winwick, Entry No. 1412878) within the southern part of the site and extends beyond the allocation boundary to the south. Paragraph 194 of the NPPF requires clear and convincing justification to be made in respect of any harm to, or loss of, the significance of registered battlefields. Two Grade II listed buildings (Newton Park Farmhouse and the barn to the east of Newton Park Farmhouse) are located to the west of the site, adjacent to Newton Park Drive.
Air Quality	There are no Air Quality Management Areas [AQMA] that cross the site. The closest AQMA is Warrington's AQMA along the M6 located south east to the site.
Noise	The Noise Assessment which was submitted with the outline application concluded that any potential impact on residential amenity can be mitigated.
Other	We are not aware of any other environmental constraints associated with the site.
Sustainable Development	Comment
Access to strategic road network	The site is well connected with J22 of the M6 and therefore is considered to be well connected with the strategic road network.
Access to services/public transport.	Parkside West benefits from a number of bus stops located adjacent to the proposed site access point on Mill Lane. In broad terms, the site is also located less than 1km from Newton-le-Willows Railway Station and Newton-le-Willows town centre is in broad terms located less than 2km to the west of the site and provides a range of shops and services.
Green Belt	Comment
Contribution to Green Belt Purposes	St Helens Green Belt Review (2018) concluded that the site had a medium contribution to Green Belt purposes.
Policy Constraints	Comment
Planning Policy	Beyond its designation as Green Belt, we are not aware of any other policy constraints affecting the site.
Deliverability and Developability	Comment
Suitability	There is a longstanding history of organisations wishing to bring forward the former colliery site for development and the Council has most recently entered into a joint venture with Langtree. Given the history of the proposals across the wider site, the

	suitability of Parkside West for an industrial, warehousing and logistics development is considered to be well established. Notwithstanding this, there are issues associated with the traffic impact that are yet to be overcome.
Availability	The majority of the site, excluding the small parcel of land controlled by Smith Property Developments Limited and Interland UK Limited is in single ownership and the southern area is subject to a live planning application for a logistics development and link road connecting with site 7EA and the M62. It is therefore considered that the site is available for development.
Achievability / Viability	Previous proposals by Astral Developments/Prologis dating back to 2006 were withdrawn in 2010 (ref. P/2006/1296) as a result of the recession. The site is now being brought forwards in a joint venture between the Council and Langtree. The site was allocated in the Core Strategy, although was not actually released from the Green Belt. It is however proposed for release from the Green Belt in the emerging SDLP. This follows the publication of the Parkside Logistics and Rail Freight Interchange Study (AECOM Study) in 2016 which recommended a more flexible policy approach to assist with the schemes delivery. A planning application has been submitted for a logistics development across the southern part of Parkside West, along with an application for a link road connecting Parkside East and West with the M6. This represents the first phase of proposals in the delivery of the wider SRFI (including both Parkside East and West). The AECOM study concluded that the market attractiveness of this site for logistics activity remains as strong as and arguably stronger than in 2006 when the previous application for the site was put forward. Therefore, based on the evidence available, the site is considered to be achievable/viable.

PO1346



St Helens Local Plan Submission Draft - representations on behalf of Pier (UK) Ltd
Alexa Burns
to:
planningpolicy@sthelens.gov.uk
13/05/2019 13:53



1 Attachment



Representations to St Helen's Local Plan - Submission draft - combined.pdf

Dear Sir / Madam,

Please find attached representations made on behalf of Pier (UK) Ltd to the Submission Draft (Regulation 19) St Helens Local Plan.

We trust these comments will be duly considered. As we wish to participate at the independent examination, we look forward to hearing from you with further details on this in due course.

We would be grateful if you could confirm receipt by return.

Kind regards,

Alexa Burns
Principal Consultant



Emery Planning is proud to support the Keaton Emery Memorial Foundation. To find out more about the charity or to make a donation, please visit www.keatonemeryfoundation.com



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info@emeryplanning.com



Representations to the Submission Draft Local Plan

St Helen's Local Plan – Regulation 19

for Pier (UK) Ltd

Emery Planning project number: 19-245



Project : 19-245
Site address : Land adjacent to Unit 8,
Sankey Valley Industrial
Estate, Junction Lane,
Newton-Le-Willows
Client : Pier (UK) Ltd

Date : 13 May 2019
Author : Alexa Burns

Approved by : Rawdon Gascoigne

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

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Emery Planning Partnership Limited
trading as Emery Planning.

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2. Site Location and description	1
3. Proposed allocation	2
4. Deliverability	2
5. Summary and conclusions	3
6. Appendices	3



1. Introduction

- 1.1 Emery Planning is instructed by Pier (UK) Ltd (hereafter referred to as 'Pier') to make representations to the St Helens Local Plan: Submission Draft. This Statement relates to land adjacent to Sankey Valley Industrial Estate, Newton-Le-Willows.
- 1.2 Pier UK Ltd are vacuum excavation specialists who hire out a range of equipment to utilities companies for network maintenance purposes across the UK. Pier are an important local business who currently have around 70 employees and are expanding their operations.

2. Site Location and description

- 2.1 The site is located within the urban area of Newton-Le-Willows. (A site location plan is provided at Appendix EP1).
- 2.2 The site area, which is approximately 2 hectares, is partly in the ownership of Pier and partly in the ownership of St Helen's Council. Pier is in advanced discussions with the Council with regard to purchasing the area of the land in its ownership.
- 2.3 The site is adjacent to the existing industrial estate. The site can only be accessed by vehicle through the industrial estate as there is a significant drop in levels to the western / southern boundary as the land drops down to meet the Sankey canal. The canal is disused and in part filled in.
- 2.4 The majority of the site is brownfield, excepting a small area to the north which is covered in vegetation.
- 2.5 The existing site is heavily burdened with mounds of waste material, which were unlawfully deposited by the previous site owner. Part of the site is also subject to an historic Enforcement Notice, which requires site clearance / remediation. Our client is committed to undertake the required site clearance and remediation works and is currently in discussions with the Council and other relevant authorities to ensure all of the necessary permissions are in place.

3. Proposed allocation

- 3.1 It is considered that the site (which is proposed 'white land' within the urban area) should be recognised under the Strategic Employment Sites Policy as a location where the existing Industrial Estate could be expanded.
- 3.2 Although this site is not a strategic employment allocation, it should be suitably allocated to encourage its re-use as part of the industrial estate following remediation. Such an allocation would provide certainty about its remediation in accordance with previous action by the Council, future redevelopment and the accordant benefits this would deliver.
- 3.3 Once the site has been cleared and cleaned, Pier intend to use the site as part of their existing business. Any future use would take account of the sensitive nature of the Sankey Valley to the west and the south and can be addressed at the application stage. Pier's proposals would in fact result in enhancements to this important area for recreation and open space, by cleaning and stabilising the steep embankment which forms the site boundary (through additional planting and bunding where appropriate).
- 3.4 We would suggest that a site-specific allocation of our client's site within Policy LPA04.1: Strategic Employment Sites could be worded as follows:

'The following site allocated under Policy LPA04 shall constitute an Employment Site for the modest expansion of Sankey Valley Industrial Estate.'

- 3.5 In the absence of an allocation and in the context of the past history of the site, especially the enforcement action, the absence of certainty around potential uses for a site that is essentially landlocked will only lead to further degeneration. An allocation represents an opportunity to address longstanding issues with the use of this area and ensures the efficient use of land and resources.

4. Deliverability

- 4.1 The land at EP1 falls partly within the ownership of our client and partly with the ownership of the Council. Our client is in advanced discussions to purchase the Council owned part of the site. The intention is to remediate the land and bring it into active use as part of the existing Pier business in the short term.

- 4.2 The allocation of the site for employment use, as proposed, would assist in the site's remediation and the delivery of a suitable long term use for the site, as it would provide certainty about its redevelopment potential which would provide the certainty needed to fund redevelopment.

5. Summary and conclusions

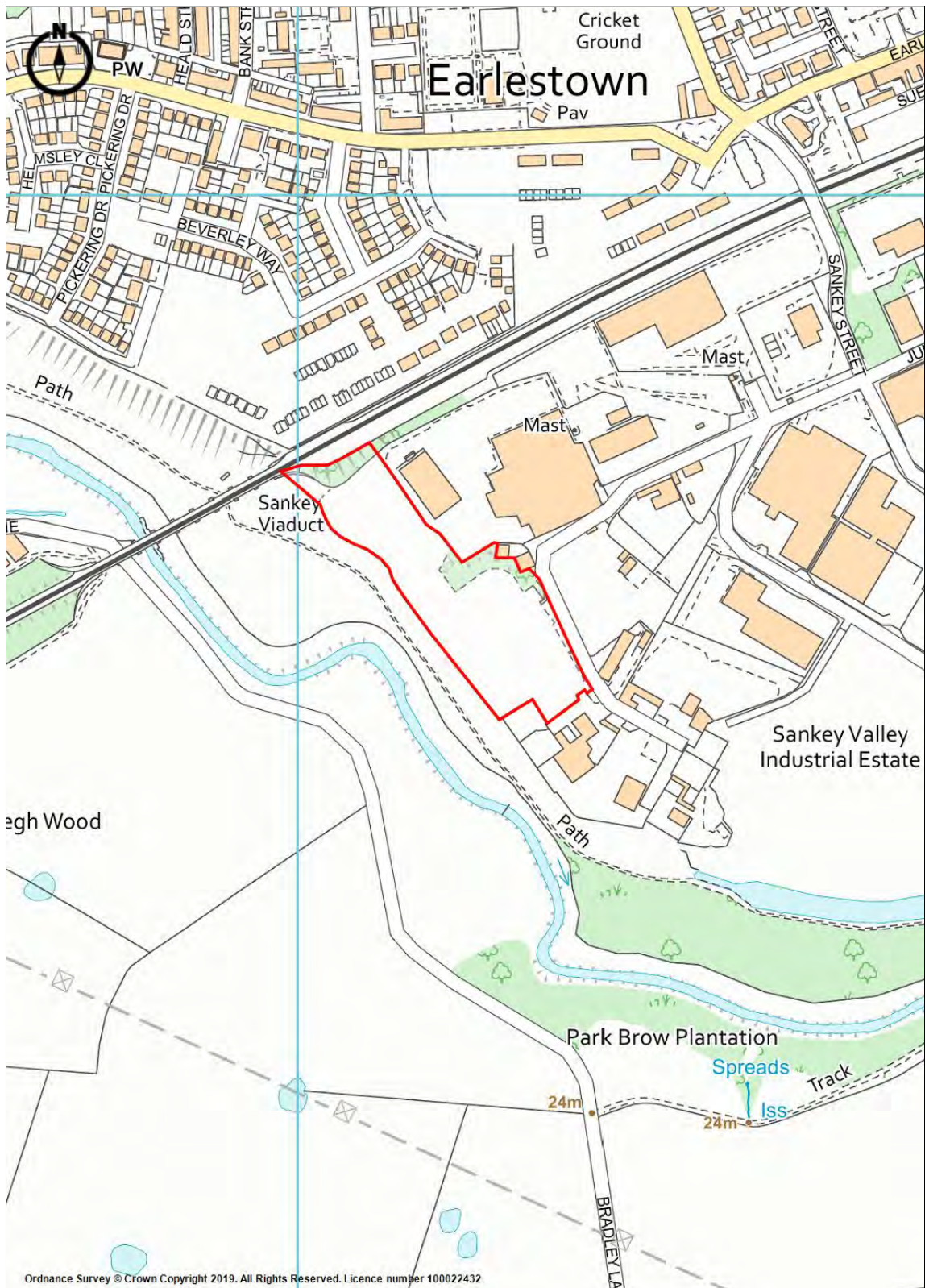
- 5.1 Our site-specific representations with regard to land to the South of Unit 8, Sankey Valley Industrial Estate can be summarised as follows:
- 5.2 The allocation of our client's site as an Employment Site would help to meet the identified employment land requirements in the Borough, assist an existing employer with its expansion plans, and help to secure a positive future for the site which has previously been blighted by mis-use.
- 5.3 The allocation of the site could also help to enhance the important Sankey Valley to the west and south by providing additional planting and bunding to reinforce the steep embankment. This is a benefit and an opportunity both aesthetically and environmentally.

6. Appendices

EP1 – Location Plan

EP1

Land adjacent to Unit 8, Sankey Valley Industrial Estate, Junction Lane, Newton-le-Willows



PO1347



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

15 FEB 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>JOHN</u>	First name: _____
Last Name: <u>FIELD</u>	Last Name: _____
Organisation/company: <u>RATEPAYER PRESIDENT</u>	Organisation/company: _____
Address: <u>4 Eastwood Avenue Newton-le-Willows Merseyside</u>	Address: _____
Postcode: <u>WA12 0BY</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>14/02/2019</u>
------------------	-------------------------

Please be aware that any comments received after the deadline cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via Post) ☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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3. To which part of the Local Plan does this representation relate?								
Policy	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment				
Newton Park side		On Right hand side	Right hand side		Park side			
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>There are already exhaust emissions which exceed UK and EU regulations around Newton le-Willows. This has been made worse recently by the new development at Newton B.R. Station. Parkside development will cause further emissions by cars, LGVs and HGVs if new road and/or warehouses are allowed to be constructed.</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.

When Park Side Colliery was constructed there was a commitment to return the land to Green Belt after the end of the colliery lifetime. This land must be returned to Green Belt and protected, as per commitment prior to NCB constructing the colliery. The roads are grossly unsafe for pedestrians and cyclists made worse by new railway station development and construction and/or warehouses at Parkside would make

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/> Yes, I wish to participate at the oral examination
----------------------------------------------------------	----------------------------------------------------------------------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

If these developments are permitted then after completion of the new Park Side link road and completion of construction of the warehouses, then the access to these developments from the existing A49 must be completely removed in order to avoid dangers as detailed in box above and reduce emissions from cars, LGVs, + HGVs

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.

an Southworth Road, High Street and A49.

PO1348



St. Helens
Council

683
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Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

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PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: 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

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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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Consistent with National Policy?	<input checked="" type="checkbox"/>

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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.

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).

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.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be

PO1349



St. Helens
Council

684

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Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

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Title: MRS	Title:
First Name: Jemma	First name:
Last Name: Jones.	Last Name:
Organisation/company:	Organisation/company:
Address: 6, ORWELL CLOSE STANDISH LOWER CROFT, 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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Please tick as appropriate

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PO1350



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First Name CRAIG	First name:
Last Name: JONES	Last Name:
Organisation/company:	Organisation/company:
Address: 6. ORWELL CLOSE STANDISH LOUGHRAN CROSSLAND.	Address:
Postcode: WN6 8SH. WIGAN.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: 12/3/19.
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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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PO1351



St. Helens
Council

686

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name <u>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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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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Merseyside
WA10 1HP**

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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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate</u> . Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
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6

PO1352



St. Helens
Council

687

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13 MAR 2019

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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 GARY	First name:
Last Name AINSCOUGH.	Last Name:
Organisation/company:	Organisation/company:
Address: 13, ECCLES ROAD, KITT GREEN, WIGAN	Address:
Postcode: WN5 0HR.	Postcode:
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

[REDACTED]

Date:

13/3/19.

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Yes ☒ (Via Email)

No ☐

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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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6

PO1354



St.Helens
Council

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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>HAZEL</u>	First name:
Last Name: <u>ROBY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>50 CLAREMONT AVE, BILLINGE</u>	Address:
Postcode: <u>WN5 7LT</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <u>10/03/19</u>
-----------------------	-----------------------

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PO1355



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 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>JULIE</i>	First name:
Last Name: <i>LOMAX</i>	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 

Date: *26/02/19*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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WA10 1HP**

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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

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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PO1356



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 BILLINGOE</i>	Address:
Postcode: <i>WN5 7MA</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

11/03/19

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6

PO1357



St. Helens
Council

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Ref: LPSPD

13 MAR 2019

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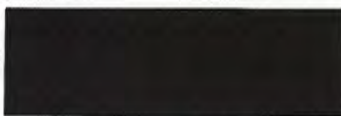
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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
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First Name: <i>RACHEL</i>	First name:
Last Name: <i>FREARSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>14 FOXGLOVE CLOSE, BROUGHTON,</i>	Address:
Postcode: <i>LE9 6YU</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:



Date:

04/03/19

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6

PO1358



St. Helens
Council

693

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Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

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Part A – Personal Details
Part B – Your Representation(s).

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: 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.

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No ☐

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Please use a separate copy of Part B for each separate comment/representation.

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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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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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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.

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PO1359



St. Helens
Council

694

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13 MAR 2019

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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: <i>MR</i>	Title:
First Name <i>THOMAS</i>	First name:
Last Name: <i>IRWIN</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>132 GREENLAW ROAD, STOLVEAVON</i>	Address:
Postcode: <i>AB39 8AL</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

11/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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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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PO1360



St. Helens
Council

695

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Ms</i>	Title:
First Name: <i>KIRSTY</i>	First name:
Last Name: <i>WILKINSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>7 LANGLEY GROVE, DURHAM</i>	Address:
Postcode: <i>DL14 6UJ</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

Date:

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PO1361



St. Helens
Council

698

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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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St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

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Other documents (please name document and relevant part/section)									

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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6

PO1362



St. Helens
Council

699
**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

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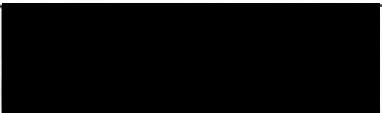
Part A – Personal Details

Part B – Your Representation(s).

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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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6

PO1363



St. Helens
Council

701

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Ref: LPSD

13 MAR 2019

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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>MISS</u>	Title:
First Name: <u>SODIE</u>	First name:
Last Name: <u>TUNSTALL</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>23, PARKFIELD ST</u> <u>WIGAN</u>	Address:
Postcode: <u>WN6 7ED.</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature

Date:

01/03/19

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PO1365



St. Helens
Council

704

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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:
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Date:

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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 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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Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

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6

PO1366



St. Helens
Council

705

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Ref: LPSD

13 MAR 2019

(For official use only)

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Part B – Your Representation(s).

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Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name <u>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>W92 3NE</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature

Date:

4/3/19.

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6

PO1367



St.Helens
Council

706

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Ref: LPSD

13 MAR 2019

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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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PO1368



St. Helens
Council

707

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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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6

PO1369



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft) 1
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019
(For official use only)

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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: <i>MR</i>	Title:
First Name: <i>STUART</i>	First name:
Last Name: <i>FIRTH</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>82 ALT CROSS CROXTETH</i>	Address:
Postcode: <i>L11 4UP</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:



Date:

02/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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St.Helens
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Please use a separate copy of Part B for each separate comment/representation.

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3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

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?	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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PO1370



St. Helens
Council

723

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Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

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Title: <u>MR</u>	Title:
First Name <u>GARY</u>	First name:
Last Name: <u>RALTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>26 COLERIDGE AV.</u> <u>DONTONS GREEN,</u>	Address:
Postcode: <u>WA10 6RN</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

09/03/19

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PO1371



St. Helens
Council

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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:
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6

PO1372



St. Helens
Council

725
**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)

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Part A – Personal Details
Part B – Your Representation(s).

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Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name <i>IAN</i>	First name:
Last Name: <i>ROBY</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>50 CLAREMONT ROAD, BILLINGE,</i>	Address:
Postcode: <i>WV5 7LT</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

09/03/19

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Yes ☒ (Via Email)

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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

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Positively Prepared?	<input type="checkbox"/>
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PO1373



St. Helens
Council

729

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Title: <u>MR</u>	Title:
First Name: <u>JOHN</u>	First name:
Last Name: <u>LYON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>5 TRURO CLOSE, ST. HELENS</u>	Address:
Postcode: <u>WA11 9EL</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

06/03/19

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St. Helens
Council

730
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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:
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Signature:

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PO1376



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

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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>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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PO1377



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:
	Email:

Signature:

Date:

01/3/19.

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First Name <i>BILLY</i>	First name:
Last Name: <i>RICHARDSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>9A VILLAGES TERR NEWTOWN,</i>	Address:
Postcode: <i>CA9 3PL</i>	Postcode:
	Tel No:
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Signature:

Date:

06/03/19

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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.

PO1379

Representor Details

Web Reference Number	WF0013
Type of Submission	Web submission
Full Name	Miss Lynn Mahon
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	P/2018/0249/FUL
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The use of green belt land should be utilised only in exceptional circumstances and reasons fully evidenced and justified. This application is unsound and contrary to strong objections. There are far better places where brown belt land can be utilised. This is unsuitable for an area of local historic importance. The proposed use of this land is highly inappropriate for the surrounding areas, which would increase traffic in an already congested area, the air pollution would increase as would the air quality. It is totally at odds with the Governments policy on green belt land. The area cannot take mass warehousing and HGV's that this would bring. It would destroy Newton-le-Willows, Winwick, and Lowton. The wildlife will be destroyed, masses of habitat destroyed. The planet cannot afford to continue to cause such mass destruction with proposals such as this one. No exceptional circumstances have been met in order to legally push forward with this plan, it contravenes everything descriptive that green belt is. Hundreds of trees that work naturally to absorb the pollutants will be destroyed and hundreds of diesel HGV's poisoning the area will be in their place. We do not need it in this area and we are already being boxed in by Florida Farm, Omega both huge sites in such a small area.

7. Please set out modification(s) you consider are necessary

The planning should be limited only to the brown belt land available and under no circumstances should the green belt be encroached upon. No exceptional circumstances have been met to do so.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	5/7/2019 6:37:01 PM
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PO1380

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?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- 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.

There are no exceptional circumstances to justify not using the standard method to calculate housing need

The economic analysis is flawed and based on over-optimistic assumptions

②

The level of land needed for housing and employment is therefore not as high as set out in the Plan

There are therefore no exceptional circumstances to change Green belt boundaries

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

1.7 Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth.

7. Please set out modification(s) you consider are necessary

There are no exceptional circumstances to justify not using the standard method to calculate housing need

The economic analysis is flawed and based on over-optimistic assumptions

The level of land needed for housing and employment is therefore not as high as set out in the Plan

There are therefore no exceptional circumstances to change Green belt boundaries

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

The Council has identified a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. These figures are in addition to any new dwellings needed to replace demolition losses.

The brownfield land register 2017 identifies enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield, at an average build out rate of 40 per hectare this equates to 35 hectares should be required.

In the Local Plan Preferred Options (LPPO) consultation in 2016/17, the Council proposed to release 51 sites (totalling about 1,187 hectares in area) from the Green Belt to meet future needs for housing and employment development. The current proposals (set out in the LPSD 2019) would result in 27 fewer sites and around 492 hectares less land being released from the Green Belt to meet development needs. I am at a loss as to why 695 hectares is being allocated to housing and employment when only 35 hectares would be required to meet the forecasted housing demand? I can see that a contingency of 20% has been included in the capacity of land removed from the Green Belt as an allowance for the fact that some sites may not be developed as quickly as expected. This seems excessively high, would a more realistic and sensible approach be to allocate 5%, to encourage brown field land to be delivered before greenbelt land is released.

LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I 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.

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).

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.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the

4

5

6

PO1381

SIR SHA

WF0068

① LPA01

④ LPA04

⑦ LPA05.1

⑩ LPA07

② LPA02

⑤ LPA04.1

⑧ S.A.

⑪ PAR 1.7.2

③ LPA03

⑥ LPA05

⑨ LPA06

DEC.

Representor Details

Web Reference Number	WF0068
Type of Submission	Web submission
Full Name	Mr Mark Railton
Organisation	
Address	29 Rookery lane Rainford, St helens WA11 8EF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.
- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed for housing and employment is therefore not as high as set out in the Plan
- There are therefore no exceptional circumstances to change Green belt boundaries

②

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).

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.

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers. The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035.

The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35

PO1382

① - LPA04.1

② - LPA06

Representor Details

Web Reference Number	WF0120
Type of Submission	Web submission
Full Name	Mr Bevan Price
Organisation	nil
Address	24 Walmesley Road Eccleston St. Helens Lancashire WA10 5JT
Agent Details	n/a

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

1. Government is encouraging councils to adopt policies that reduce pollution. The council policy to encourage lots of warehouse building / distribution centres will bring thousands of additional diesel lorries on to local roads each year, causing a considerable increase in pollution.

①

2. Converting large amounts of green belt land in Eccleston into "safeguarded for future development" is, I believe, seriously flawed. Even with the suggested revisions to Houghtons Lane, traffic towards St. Helens will be funnelled onto other local roads, e.g. Springfield Lane, Howards Lane (Eccleston) that are totally unsuited to deal with huge amounts of additional traffic.

②

7. Please set out modification(s) you consider are necessary

1. Look for sensible alternatives to provision of warehouse / distribution centres; consider rezoning some of the proposed areas as suitable for housing rather than industrial use.

2. A large reduction of the amount of green belt in Ecclestone proposed for "safeguarding", Whilst Ecclestone cannot avoid all new building, I suggest a maximum of no more than 100 - 150 houses would be more sensible to avoid unacceptable levels of road congestion & pollution.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 10:34:10 PM
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PO1383

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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PO1384

Representor Details

Web Reference Number	WF0214
Type of Submission	Web submission
Full Name	Mr Sean Hollowed
Organisation	
Address	6 The Fairways Ashton-in-Makerfield Wigan Lancs WN4 0YX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA04 - sites 2EA, 5EA & 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale. 01

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. 02

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt. 03

The Department of Communities and Local Government has stated that, "Local Authorities may only alter Greenbelt boundaries in exception circumstances." I do not believe that the Council has proved in its Plan that the circumstances are exceptional. 04

The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North. 05

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. 06

High volumes of predicted traffic will add to the already over capacity on the roads in the vicinity. 07

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 7:13:49 PM
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PO1385

Representor Details

Web Reference Number	WF0215
Type of Submission	Web submission
Full Name	Miss Jane Wilcock
Organisation	
Address	6 The Fairways Ashton-in-Makerfield Wigan Lancs WN4 0YX
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA04 - sites 2EA, 5EA & 6EA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale. 01

One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. 02

The release of Greenbelt will cause significant harm to the purpose of the Greenbelt. 03

The Department of Communities and Local Government has stated that, "Local Authorities may only alter Greenbelt boundaries in exception circumstances." I do not believe that the Council has proved in its Plan that the circumstances are exceptional. 04

The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North. 05

The risk of flooding further down the Clipsley Brook will be exacerbated by future development at this location. 06

High volumes of predicted traffic will add to the already over capacity on the roads in the vicinity. 07

There is no statement of common ground with neighbouring authorities.

7. Please set out modification(s) you consider are necessary

Delete this land from the proposed removal from the Greenbelt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 7:04:41 PM
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PO1386

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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PO1387

Representor Details

Web Reference Number	WF0306
Type of Submission	Web submission
Full Name	Mr Peter Richards
Organisation	West Lancashire Borough Council
Address	52 Derby Street Ormskirk L39 2DF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

West Lancashire Borough Council has no objections to the content of the St. Helens Borough Local Plan 2020-2035 Submission Draft document, and is content that the Plan has been prepared in compliance with all legal requirements and is "sound". In particular, West Lancashire Borough Council can confirm that St Helens Council have engaged on strategic, cross boundary matters in accordance with the requirements of the Duty to Co-operate both as part of the Liverpool City Region (including West Lancashire) working groups and evidence studies, and directly with West Lancashire Borough Council in relation to specific cross-boundary matters which affect St Helens and West Lancashire. ①

In particular, this Council supports the St Helens Local Plan's proposals to allocate a significant area of land for employment purposes (policy LPA04.1) on the M6 Corridor, including for large-scale Logistics space, which will, alongside proposals in West Lancashire's own Local Plan Review for the M58 Corridor, help to meet the wider demand for such large-scale Logistics space arising in the Liverpool City Region (including West Lancashire) as identified by the LCR SHELMA study. ③

This Council also welcomes the Local Plan's support for the Skelmersdale Rail Link proposals (policy LPA07 and on the Key Diagram), which, if delivery can be secured, will be of great benefit to West

②

Lancashire in general (in particular the town of Skelmersdale), as well as Rainford in St Helens borough and Kirkby in Knowsley borough.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 5:18:34 PM
---------------	---------------------

PO1388



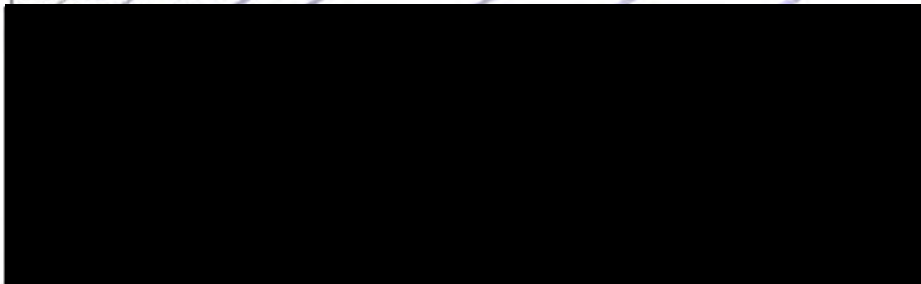
St Helens - Submission Draft

Jones, Robin@Manchester

to:

planningpolicy@sthelens.gov.uk

12/03/2019 07:43



ELO073

① - LPC12

② - GEN

③ - LPD 02

④ - LPA04-1

⑤ - LPA05-1

⑥ - LPD05

⑦ - LPC12

⑧ - LPD01

1 Attachment



St Helens Submission Version 12032019 (Master).pdf

Good Morning,

Please find attached the representation to the public consultation on the Local Plan 'Submission Draft', submitted on behalf of United Utilities.

Grateful if you could confirm receipt.

Many thanks,

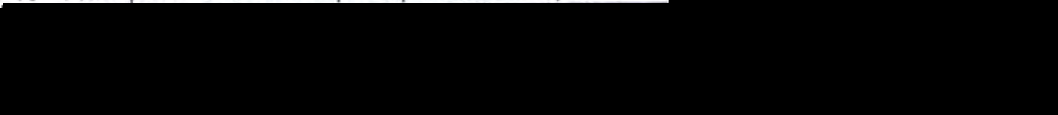
Robin

Robin Jones MRTPI | Planner

Planning and Development

CBRE Ltd

10th Floor | One St Peters Square | Manchester | M2 3DE



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United Utilities Water Limited
Developer Services and Planning
2nd Floor Grasmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Date 12th March 2019

St Helens Council
Town Hall
Victoria Square
St. Helens
WA10 1HP

By Email (planningpolicy@sthelens.gov.uk)

Dear Sir / Madam,

St Helens Local Plan – Consultation on Submission Draft (February/March 2019)

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

This consultation response follows on from a recent meeting held with St Helens Council in January 2019. We would also refer you back to our previous representations to the Local Plan, which remain valid.

Continued communication with United Utilities

United Utilities wishes to highlight that we request continued and constructive communication with St Helens Council to ensure a co-ordinated approach to delivery of allocations. As a result of the original draft, United Utilities have liaised with the Local Planning Authority to identify any infrastructure issues and appropriate resolutions in an attempt to ensure there are no unexpected

Draft Policy LPA04. 1 and LPA05.1 Strategic Sites

UU supports Policy LPA104.1 (Strategic Employment Sites) and Policy LPA105.1 (Strategic Housing Sites) which requires the submission of a comprehensive masterplan which addresses the need, at clause f, to include measures to address any potential flood risk and surface water drainage issues in accordance with Policy LPC12.

Notwithstanding this, United Utilities seeks to emphasise the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice.

United Utilities highlights concerns regarding those large sites which are in multiple ownership. These can be developed in an uncoordinated and fragmented manner dictated by random land ownership boundaries. In practice where sites are in multiple ownership, the achievement of sustainable development can potentially be compromised by developers / applicants working independently. We therefore encourage the council to make early contact with all landowners, seeking to understand how they intend to work together, preferably as part of a legally binding framework. It should be demonstrated that there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning and deliverability. We believe that raising this point at this early stage is in the best interest of achieving challenging housing delivery targets from the allocated sites in the most sustainable and co-ordinated manner.

When considering the above, it should be noted some of the allocated Strategic Sites contain little existing infrastructure. Therefore any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to housing delivery. Some of the allocations are adjacent to existing infrastructure assets that are located on the fringe/limits of the existing water supply and/or sewage infrastructure networks which are of a small diameter and can have limited capacity to support future growth. Providing supporting infrastructure to Greenfield development sites could result in the need to upsize the existing assets to support growth. This reemphasises the need for a co-ordinated approach to development, especially those that are over a number of phases.

We would recommend the following amendment to the policy below, that is part of both LPA04. 1 and LPA05.1:

a comprehensive infrastructure phasing strategy for the provision of all new, expanded and / or enhanced infrastructure for delivery over numerous phases and ~~that~~ is required to serve the development of the whole site; and

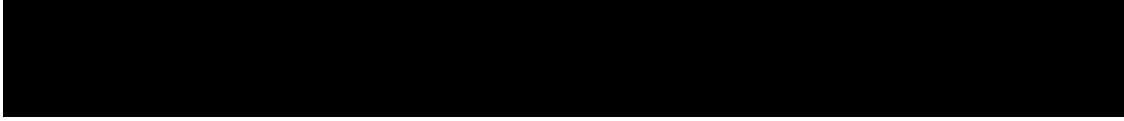
Draft Policy LPD05: Extension, Alteration if Replacement Buildings in the Green Belt

United Utilities wishes to highlight that it owns assets which are currently situated in the Green Belt. Upgrades to these assets may be required in the near future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet the infrastructure requirements of proposed future development in the borough and future

PO1389



Local Plan
Vicky Gregory
to:
planningpolicy@sthelens.gov.uk
13/03/2019 11:17



1 Attachment



lpsd-representation-form.doc

Please find attached my comments on the local plan.

Kind regards
Vicky Gregory



St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Victoria	First name:
Last Name: Gregory	Last Name:
Organisation/company:	Organisation/company:
Address: 29 Park Road North Newton le Willows	Address:
Postcode: WA12 9TF	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

13th March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email) **YES**

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	Policy LPA04 – 8AE: Parkside West	Paragraph / diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Y	Habitats Regulation Assessment	Y
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"/> NO
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/> NO
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/> NO

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/> YES
Justified?	<input type="checkbox"/> YES
Effective?	<input type="checkbox"/> YES
Consistent with National Policy?	<input type="checkbox"/> YES

6. Please give details of why 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

- unsound as it is contrary to strong public objection to the site being removed from Green Belt
- inappropriate development in respect of adjacent residential areas
- the likelihood of significant increased traffic impacts and associated health impacts caused by depreciated air quality.
- The proposed link road may redirect traffic away from Winwick but is not designed to ease the already

critical situation in Newton & on the A49 which is regularly gridlocked.

- Site traffic is also likely to further depreciate air quality in Air Quality Management Areas in vicinity of the site caused by increased traffic levels.
- It is a site of historical significance.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No , I do not wish to participate at the oral examination		Yes , I wish to participate at the oral examination
--	------------------------------------------------------------------	--	------------------------------------------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference**

PO1390



Representations to St Helens Local Plan - Indigo Planning on behalf of Barratt Homes
 Hannah Payne
 to:
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.

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.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see enclosed representation.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see enclosed representation.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> No , I do not wish to participate at the oral examination	<input type="checkbox"/> Yes , I wish to participate at the oral examination
-------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please see enclosed representation.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

indigo.

St James' Tower,
7 Charlotte Street,
Manchester, M1 4DZ

Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP

By email

planningpolicy@sthelens.gov.uk

let.001.NF..21450010

13 March 2019

Dear Sirs

ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

London • Manchester • Leeds • Birmingham • Dublin

Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E1 1JX
Registered number 2078863 VAT number 849246134



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Every update of the St. Helens Strategic Housing Land Availability Assessment since 2010 has found that there is inadequate land in the urban area to meet housing needs in the longer term. We consider that the policy addresses the housing delivery issues in the borough through a revised spatial distribution and release of Green Belt land for housing. We support this policy but have concerns over the emphasis placed on the delivery of brownfield sites.

02

However, the priority placed on the re-use of previously development land over other allocated sites is not considered appropriate. We question the rationale for lowering the threshold for developer contributions for developers of brownfield sites given it is incorrect to assume developers on greenfield sites have less constraints. As such, each site should be taken on its own merits with developers' contributions subject to viability considerations.

03

At LPA02(4), further clarity should be provided on when a full review of the Plan will be triggered.

04

The provisions of LPA02(8) do not relate to spatial strategy and should not therefore be included in LPA02 as health and wellbeing of St. Helens' residents is covered within Policy LPA11: Health and Wellbeing and elsewhere throughout the plan. This part of the policy should therefore be removed.

05

Policy LPA03: Development Principles

On the whole, we support the development principles outlined within the policy as they are sufficient to guide development in the borough without being overly onerous or prescriptive. It should be noted that not all development will be able to respond in a positive way to each of the principles outlined.

06

Nonetheless, the development of the Florida Farm South draft allocation supports the development principles identified within this policy. It will provide circa 600 homes; contributing not only towards the boroughs housing target and a sustainable mix and tenures of quality homes but also through direct and indirect investment in the local area. This in turn will contribute towards the borough's regeneration objectives.

07

Policy LPA04: A Strong and Sustainable Economy

The employment target of a minimum of 215.4ha up to 2035 has been reduced from the minimum of 306ha up to 2033 outlined in the Preferred Options Local Plan.

Although this target appears sufficient to meet anticipated need, this figure does not reflect the Spatial Vision and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general.

08

The allocation of employment sites within the Green Belt particularly those along

09

indigo.

the M6 and A580 corridor will ensure that St Helens can take advantage of its strategic location for logistic development. We therefore support the proposed strategic employment sites at Haydock.

09

Policy LPA05: Meeting St Helens Borough's Housing Needs

The number of houses increased from the initial figure of 451dpa suggested in the scoping consultation to 570dpa within the Preferred Options Plan but has been reduced to 486dpa in the Submission Draft Plan.

We consider that this revised figure is too conservative and means that the Council is only just meeting its identified needs with too much reliance placed on the deliverability of brownfield sites. This is contrary to the provisions of the NPPF which requires plans to be 'positively prepared' and to 'boost significantly' the housing supply.

10

The current housing figure utilised in the Submission Draft Local Plan is calculated and set out within the St. Helens Borough Council Strategic Housing Market Assessment Update (January 2019). Based on the 2014 based Household Projections and the latest affordability ratio the OAN is calculated as 486dpa.

In recent years St Helens have not delivered sufficient housing to meet demand. The borough fell short of housing requirements in 2003/4 and 2006/7. More recent completion rates indicate that in 2013/14 and 2014/15 and 2015/16 there was an improvement but in the years 2016/17 and 2017/18 housing targets were again not met.

The Liverpool City Region places emphasis on a commitment to jobs led growth but housing targets in St Helens have reduced. To reflect the ambitions for growth, we consider that this figure should be increased to provide for a degree of flexibility in the event that allocated brownfield sites do not deliver as anticipated on viability grounds.

11

We therefore support the description of the housing requirement as a 'minimum' figure in order to ensure that there is some flexibility in planned housing delivery and that housing needs, including for more affordable homes, are adequately addressed in the plan period.

12

Due to the level of housing required within the borough, we agree with the Council's approach of meeting the housing target firstly with housing allocations followed by sites with existing consents for housing development. This allows the Council to manage the location of housing development strategically.

13

Policy LPA05(3) proposes a minimum of 30dph on sites that are within or adjacent to a district or local centre or in other locations that are well served by frequent bus or train services and on other sites that are within an existing urban area. This proposed density is broadly supported however, density should be considered on a case by case basis as imposing set densities can have negative impacts on delivery of sites.

14

PO1391



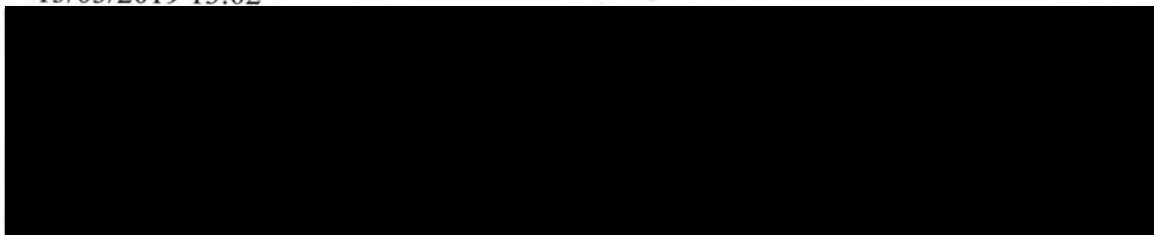
St Helens Submission Draft Local Plan: Representations on behalf of Bericote Properties Ltd [NLP-DMS.FID586504]

Katie Howarth

to:

planningpolicy@sthelens.gov.uk

13/03/2019 13:02



2 Attachments



41575_09 Bericote St Helens Soundness Reps 13.03.2019.PDF



41575_09 Ipsd-representation-form Bericote 7.03.2019.pdf

Dear Sir/Madam

On behalf of our client, Bericote Properties Ltd, pleased find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form is also attached.

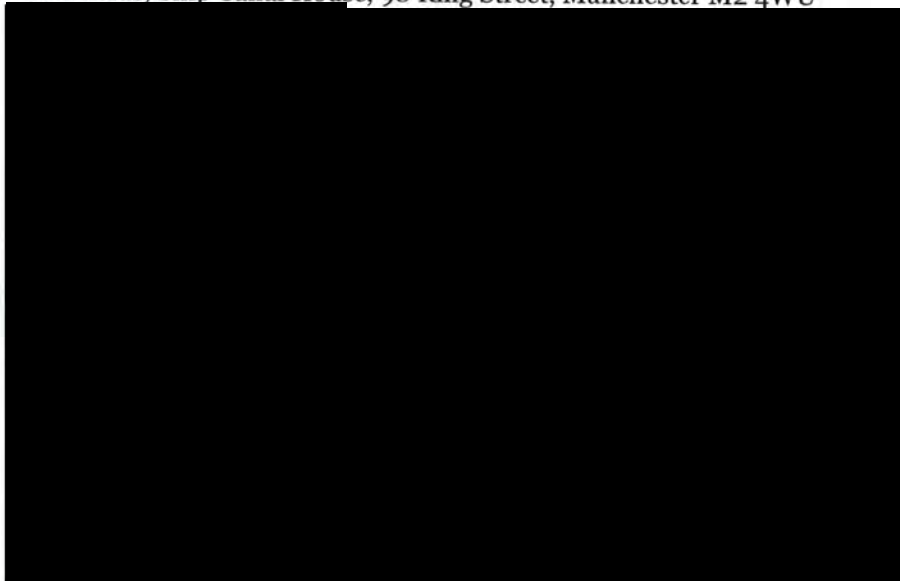
It would be much appreciated if you could confirm receipt of this response by return.

Regards

Katie Howarth

Associate Director

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU



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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mrs
First Name: Simon	First name: Caroline
Last Name: Spencer	Last Name: Musker
Organisation/company: Bericote Properties Limited	Organisation/company: Lichfields
Address: 8 Hamilton Terrace Leamington Spa	Address: Ship Canal House 98 King Street Manchester
Postcode: CV32 4LY	Postcode: M2 4WU
Tel No:	
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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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
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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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.

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See cover letter

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			Yes, I wish to participate at the oral examination
--	--	--	----------------------------------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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

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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 16th 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:

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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

Policy LPA04: A Strong and Sustainable Economy

Policy LPA04 recognises the importance of achieving economic growth in the Borough to increase aspiration, skills and employment in St Helens. The policy seeks to deliver a minimum of 215.4 ha of land between 1 April 2018 and 31 March 2035. Table 4.1 and the Policies Map allocates land at Florida Farm, Slag Lane according to Policy 2EA for 36.67 ha of B2 and B8 development.

Consideration of Policy

Bericote Properties strongly supports the allocation of land at Florida Farm for 36.67 ha of employment development and the sites' removal from the Green Belt. However, the appropriate uses defined under the Use Classes Order do not reflect the extant planning permission and reserved matters approvals described above and that fact that ancillary B1 is a necessary function of distribution buildings. 05

Tests of Soundness

It is not effective: Policy LPA04 fails to facilitate ancillary B1 Uses on the site which form a key part of the operational requirements of logistics buildings.

Recommended Change

Bericote Properties considers that Policy LPA04 is sound provided that Table 4.1 in relation to 2EA enables ancillary B1 on the M6Major.com Site.

Policy LPA04.1 Strategic Employment Sites

Policy LPA04.1 Strategic Employment Sites allocates land at Florida Farm North, Slag Lane, Haydock and identifies that the proposals are supported by a comprehensive Masterplan and other criteria which the site will be assessed against should a planning application be made.

Consideration of Policy

Bericote Properties strongly supports the allocation of land at Florida Farm and considers that the Policy is generally sound. It is requested that the footnote 22 reflects the correct site reference 2EA not 6EA. 06

Tests of Soundness

Policy LPA04.1 2EA is sound but the typographical error in the footnote referring to the 6EA Site needs deleting. 07

Recommended Change

Bericote Properties considers that Policy LPA04.1 is sound provided that the typo on footnote 22 is amended.

Conclusion

Accordingly, Bericote requests that the Council considers and reflects our representations in the further drafting of the Local Plan. We also request to be present at the oral examination.

In respect of land at M6Major.com the plan is considered to be generally sound subject to the amendments referred to above and assurances that the Council will support the development of land to facilitate Unit 3 to maximise the development potential of this site in the next version of the Plan.

PO1392



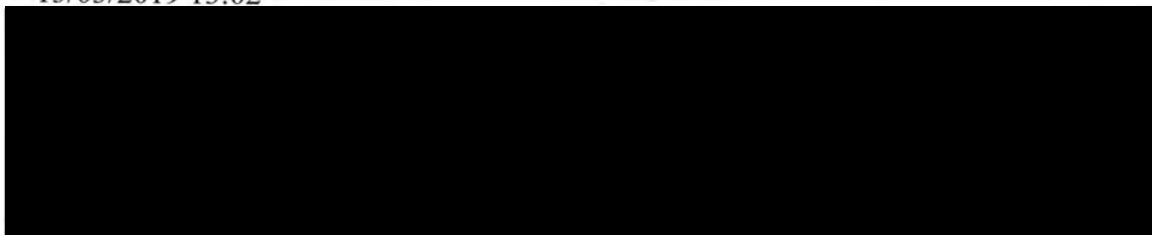
St Helens Submission Draft Local Plan: Representations on behalf of Bericote Properties Ltd [NLP-DMS.FID586504]

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.

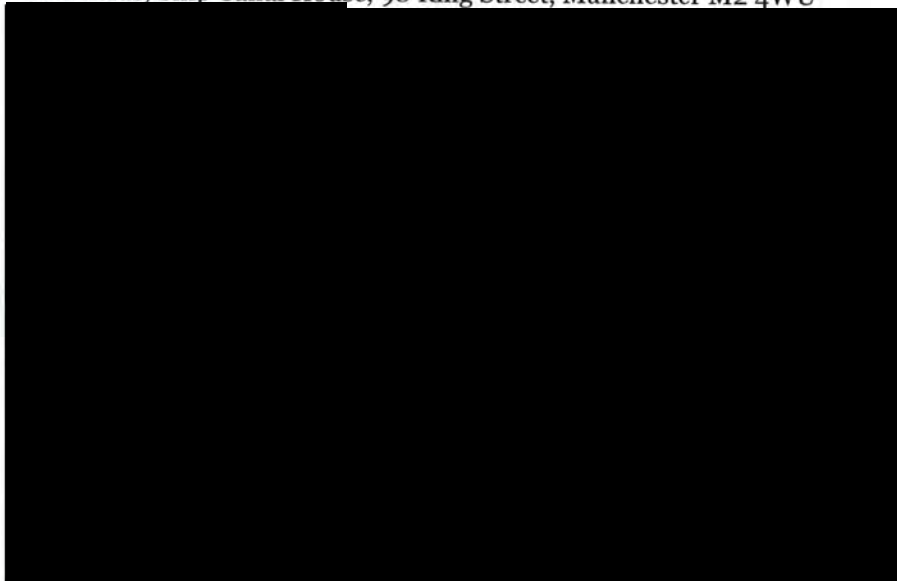
It would be much appreciated if you could confirm receipt of this response by return.

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.

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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: 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

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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

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Justified?	<input type="checkbox"/>
Effective?	<input checked="" type="checkbox"/> X
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Merseyside
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Date: 7 March 2019

Our ref: 41575/09/SPM/MWL/17228140v1

Your ref:

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Recommended Change

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PO1393



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

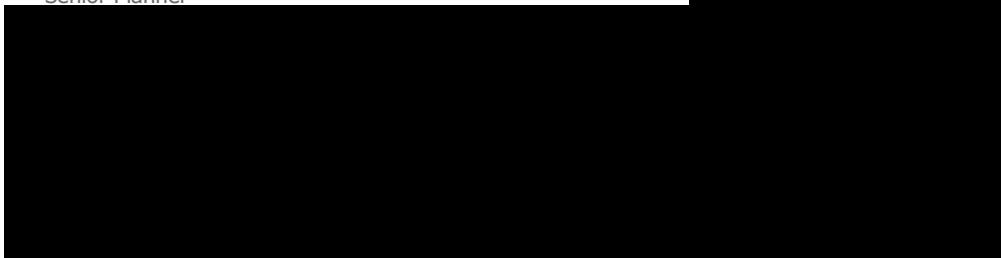
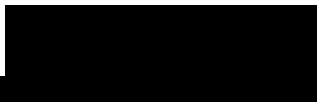
To whom it may concern,

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)

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title: 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.

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Yes ☒ (Via Email)

No ☐

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Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				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.

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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:

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.
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St Helens Borough Local Plan 2020 - 2035

Submission Draft

Representations on behalf of Miller Homes

March 2019

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

- 9.18 Our Client would seek to ensure that suitable planning obligations, particularly with regard to highway infrastructure, are incorporated into such a development to ensure that these do not rest solely with new residential developments.

Policy LPA05: Meeting St Helens Borough's Housing Needs

- 9.19 This Policy outlines how the Council intends to meet the housing needs for the Borough over the Plan Period, including providing details of sites allocated for housing as part of the New Local Plan. Our Client has a number of observations with Policy LPA05 which are detailed below.

Housing Requirement

- 9.20 Policy LPA05 identifies that between 2016 and 2035 a minimum of 9,324 net additional dwellings should be provided within the Borough, at a rate of 486 dwellings per annum. This figure has been arrived at on the basis of the St Helens SHMA Update (2019) and represents a significant reduction from the figure provided within the Preferred Options Draft of the Local Plan. This set out a requirement of 10,830 dwellings from 2014 – 2033; equating to an average requirement of 570 dwellings per annum. It is acknowledged that the housing requirement is based on the Standard Methodology now advocated by the Government, with an uplift to meet economic growth aspirations and affordability.
- 9.21 The Council's Vision, Aims and Objectives suggest that the Council will be ambitions within the Plan in order to promote growth and address identified needs within the Borough. Accordingly, whilst our Client has no objection to the proposed housing requirement, it is important that the Council plans positively for growth during the Plan period and ensures that there is sufficient flexibility within the Plan to exceed this requirement in the event of non-delivery of sites. The provision of additional housing beyond the requirement should not be viewed as a negative.

Monitoring

- 9.22 Our Client acknowledges and supports the provisions of Point 4 of Policy LPA05, recognising the importance of the Council monitoring the delivery of new homes annually in order to ensure that there is an adequate supply of new housing that is sufficient to demonstrate a five-year supply of housing land, inclusive of the appropriate buffer.

PO1394

E10065



Wigan Council response to the St Helens Borough Local Plan 2020-2035

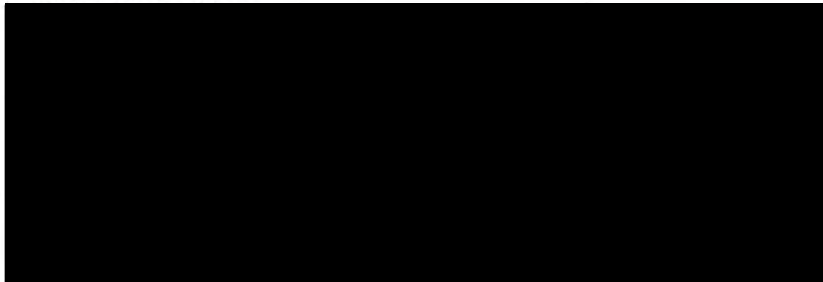
see attachments

N.Clarke

to:

planningpolicy

11/03/2019 18:34



- ① - LPA04
- ② - LPA04.1
- ③ - LPA06 (res)
- ④ - LPA06 (HATIF)
- ⑤ - LPA07
- ⑥ - LPA10

1 Attachment



Letter and reps on St Helens LP 11 Mar 19.pdf

Please note that Wigan's Council's representations on the St Helens Local Plan have been approved by the Council's Portfolio Holder for Planning and Environment but that the required 5 working days until that decision can be enacted have not passed and will not have passed until after your deadline of 13 March. They are therefore submitted on that basis and we will advise accordingly of the status once that time has passed.

Dear [REDACTED]

Thank you for the opportunity to comment on the Submission Draft version of your St Helens Borough Local Plan 2020-2035.

Overall, Wigan Council is supportive of the plan and is keen to continue working with you on key cross boundary issues of interest, including access to training and employment, accessibility by bus services, cycling and walking, and highway and other infrastructure improvements.

In this context, there are a small number of opportunities to improve the plan, most of which have been discussed at officer level recently, and parts that we specifically support. The related representations concerning them are attached and set out below, and cover parts of the following policies:

Policy LPA04: A Strong and Stable Economy

Policy LPA04.1: Strategic Employment Sites

Policy LPA06: Safeguarded Land

Policy LPA07: Transport and Travel

Policy LPA10: Parkside East

We firmly believe and that these matters can be overcome by short alterations to the wording of the policies.

All of these matters are, of course, pertinent to the duty to cooperate and the new requirement to prepare a statement of common ground. We will be happy to work further with you on this and discuss any matters arising to agree proposed amendments for submission alongside the plan, if possible. More generally, we wish you all the very best with progressing your local plan through to adoption.

Yours sincerely

Marie Bintley

EL00065



[Redacted]

Strategic Director – Place Services
St Helens Council
Town Hall
Corporation Street
St Helens WA10 1HP

Our reference: PB/NC/MB/KF
Your reference:
Please ask for: Marie Bintley
Extension:
Direct line: [Redacted]
Date: 11 March 2019

[Redacted]

St Helens Borough Local Plan 2020-2035

Thank you for the opportunity to comment on the Submission Draft version of your St Helens Borough Local Plan 2020-2035.

Overall, Wigan Council is supportive of the plan and is keen to continue working with you on key cross boundary issues of interest, including access to training and employment, accessibility by bus services, cycling and walking, and highway and other infrastructure improvements.

In this context, there are a small number of opportunities to improve the plan, most of which have been discussed at officer level recently, and parts that we specifically support. I attach the related representations concerning them, which cover parts of the following policies:

Policy LPA04: A Strong and Stable Economy

Policy LPA04.1: Strategic Employment Sites

Policy LPA06: Safeguarded Land

Policy LPA07: Transport and Travel

Policy LPA10: Parkside East

We firmly believe and that these matters can be overcome by some alterations to the wording of the policies.

All of these matters are, of course, pertinent to the duty to cooperate and the new requirement to prepare a statement of common ground. We will be happy to work further with you on this and discuss any matters arising to agree proposed amendments for submission alongside the plan, if possible. More generally, we wish you all the very best with progressing your local plan through to adoption.

Yours sincerely

[Redacted]

Marie Bintley
Assistant Director Growth and Housing

Please reply to: Marie Bintley

Wigan Council, Places Directorate: Economy and Environment, PO Box 100, Wigan, WN1 3DS

[Redacted]

Representations on St Helens Borough Local Plan 2020-2035 from Wigan Council

Policy LPA04: A Strong and Stable Economy

This policy allocates the following sites for employment development that are immediately adjacent or very close to the borough boundary with Wigan:

- Three sites between the A58 Liverpool Road and Haydock Industrial Estate, Haydock.
- Land North and South of Penny Lane, Haydock.
- Parkside, Newton-le-Willows.

Clause 10 of the policy states that "The Council will support....the creation of apprenticeships and training opportunities for local people". Where "local people" clearly includes residents in places like Ashton-in-Makerfield, Golborne and Lowton within Wigan Borough, measures should be taken to ensure that such opportunities are available for residents in Wigan Borough, as well as St Helens, and this should be recognised in the policy. We would also be happy to agree the means for how this can be achieved in practice and provide you with the relevant contacts to ensure it is implemented through the development management process.

Policy LPA04.1: Strategic Employment Sites

Most of the sites identified in the first and third bullet points under Policy LPA04 above are designated as Strategic Employment Sites under Policy LPA04.1.

Clause 2 of this policy states that "Any planning application for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole site, which must set out details of at least: e) Indicative layout promoting permeability and accessibility by public transport, cycling and walking."

Where these sites are close to the boundary with Wigan Borough, it is essential that cross-boundary connections with Wigan by bus, cycling and walking are a serious part of these considerations. The policy should acknowledge this relationship specifically, together with the need to work with Wigan Council, Transport for Greater Manchester and Highways England to improve cross-boundary accessibility by public transport, cycling and walking.

Issues for bus travel are compounded by the fact that bus ticketing arrangements are different within Greater Manchester and Merseyside and walking and cycling links are restricted by the motorway and heavy traffic on roads to and from motorway junctions.

Policy LPA06: Safeguarded Land North East of Junction 23 M6 (South of Haydock Racecourse), Haydock (ref 2ES)

One of the two areas safeguarded for future employment development is Land North East of Junction 23 M6 (South of Haydock Racecourse), Haydock. It is very close to Ashton-in-Makerfield and Golborne and is currently subject to a planning application from Peel, on which this council has a holding objection on the grounds of traffic impacts. In the previous version of this local plan, the site was allocated for employment development but it is now proposed as safeguarded land with the need for substantial improvements to enhance capacity at Junction 23 within the Plan period.

The policy is clear that planning permission for the development of the safeguarded sites for employment development will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for employment development on safeguarded sites in the Plan period will be refused.

①

②

③

(2ES)

PO1395

Representor Details

Web Reference Number	WF0221
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey WA5 3RH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA04.1, Statagic Employment Sites
Paragraph / diagram / table	Section 4.13
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Bold Forest Park Area Action Plan, Adopted July 2017

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

From consulting the National Planning Policy Framework (NPPF, last updated 19th February 2019, especially paragraphs 133 -147) I read that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also explicitly states that once established Green Belt boundaries should only be altered in 'exceptional circumstances' and that these "Very special circumstances" will not exist unless any potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." The Draft Local Plan (St Helens Borough Local Plan 2020-2035: Proposed Submission Draft, December 2018) includes a proposal to allow the extension of the Omega industrial site west into the eastern side of Bold Forest Park (in the report, designated as Area 1EA, comprising 31 hectares), which is currently part of the St Helens Green Belt. I consider that the proposed change is unsound because of a lack of justification for the required 'exceptional circumstances' needed to allow conversion of Green Belt land – in this case farmland - to industrial use. This change to a secure, well-established, Borough, County, and mature tree-lined Green Belt boundary is being proposed to meet projected future employment requirements for Warrington, adjacent to St Helens. Warrington currently has a net 14,000 commuters coming into the borough each day so is not generally short of employment opportunities for its population, and is presently using up the vast potential of the Omega South employment area land with both warehouses and housing, suggesting that their

priority is not to create significant additional employment within the Borough. In the future, this proposed change could make a small contribution to Warrington's employment numbers, but it is insignificant compared with all the many and various opportunities proposed within Warrington itself, with an available land area consisting of hundreds of hectares in total. In addition, Warrington is having to compete with other areas in the north west of England such as Haydock, Heywood, Middleswich and Knowsley for warehouse business. It is, therefore, unclear how an argument of 'exceptional circumstances' might be made for this proposed change from farmland to warehousing at this location. 01

The proposed area 1EA is within Bold Forest Park. Removal of this land from Green Belt goes against the stated aims of the Bold Forest Park Area Action Plan that was signed by St Helens Council in 2017 after significant work to look at all aspects of environmental value and protection and enhancement of the area. (In the AAP Technical Report, the land 1EA is shown as Medium/High sensitivity [Section 2.3.7] – the highest category given, and also as 'Conserve/Enhance' in Figure 9. The designated nature conservation site of Booth's Wood would be right on the edge of the proposed area 1EA, removing the protecting buffer such that the industrial site would run right up against the TPO'd trees and the boundary of the original mediaeval deer park.) 02

Since the numbers quoted in the Draft Local Plan apparently demonstrate that this area of farmland is not needed to meet St Helens employment requirements, it would appear that the anticipated benefit that could arise from this proposed industrial extension would be in the form of a relatively small amount of additional Council revenue (70% of which would go to St Helens, 30% to Warrington). Set against this is the damage done to the agricultural land of Bold Forest Park and the rest of the Park countryside by having the intended warehouses on its eastern side. In addition, even more traffic and air pollution will be generated in the west Warrington area from the increased diesel lorry traffic. Local Warrington residents will be affected by the increased pollution, noise and congestion. 03

In the documentation for this proposal to remove area 1EA from the Green Belt, there is a general statement, as made for other areas under consideration, that there are people living within 1km of the area who are in the bottom 20% of the economic scale. If this statement is considered to have any particular significance, it should perhaps be noted that the population on and around this southeast side of the Bold Forest Park countryside area is of very low density apart from the extensive Warrington-based Lingley Green and Whittle Hall areas of Great Sankey, which comprise mostly of new modern three- and four- and five- bedroom detached houses. If the report is suggesting as a justification that there may be a potential employment opportunity for any nearby population in St Helens, it should be noted that, in practice, the M62 cuts these populations off such that they are at least 8km away by road and about 1.5 hours away by existing public transport from this area (using information from Google maps in March 2019). 04

In the event that such a development is allowed to proceed, the documentation does not contain any information e.g. under 'Requirements' that might help mitigate the environmental damage done to Bold Forest Park. This seems to have been considered for certain other sensitive areas, but was this considered here? Many of the trees and woods in the Bold Forest Park area probably date from the first half of the 18th century when the new Bold Hall was built, when they lined the original driveway – and many are now protected by TPOs. There is a variety of wildlife and under the St Helens AAP there is the intention to increase tree cover by 10% in this area. However, the generally open aspect of the farmland means that once the current strong treelined boundary is breached, the whole area across to the St Helens conurbation from the Warrington boundary would be visible to the development. The development at Omega South is currently well screened from the St Helens Green Belt area by mature trees along the County and Borough boundary. 05

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 06

PO1396



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.

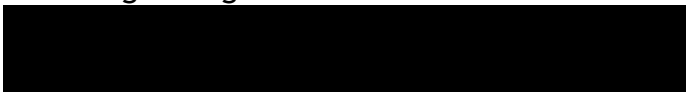
Please confirm receipt.

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

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

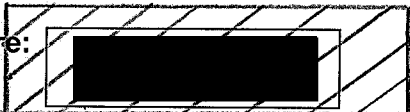
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: 	Date: <input type="text" value="13 March 2019"/>
------------------------------------------------------------------------------------------------	--------------------------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

employment property and have an adverse effect on the property market. It would lead to widespread vacancy. We think the data in Tables 4.2, 4.3 and 4.4 is inaccurate.

Our view is supported by the expert opinion of economist Dr. Glenn Athey, who was commissioned by St Helens Green Belt Association (an umbrella residents group opposed to Green Belt loss). In his report, Dr Athey concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts has used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with a number of other assumptions underpinning employment land policies, including forecasts of port freight. In light of Dr Athey's expert opinion, CPRE Lancashire calls for the Council to review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly. CPRE Lancashire calls for the economic data, analysis to be corrected.

This is particularly the case when considering the fact that all surrounding geography in Liverpool City Region, Greater Manchester, Cheshire and West Lancashire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

It would be grossly negligent for the Council to allocate too much farmland for development, which is important for future food security, and is currently protected by Green Belt designation on the basis of economic analysis that is flawed and consequently not fully justified. Some of the land so allocated is among the most versatile in the country. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. CPRE Lancashire is concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

In any case, what is the local benefit of B8 Warehousing formats with new technology replacing human resources resulting in very low density employment formats, causing great harm to Green Belt purpose? We think there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, and question the need for such an excessive amount in the countryside. The duty to cooperate has not been complied with on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities, resulting in sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. CPRE Lancashire believes local planning of large warehousing formats should be in accordance with promises by Government to protect Green Belt.

Policy LPA04.1: Strategic Employment Sites

CPRE Lancashire is opposed to needless release of Green Belt land for employment uses. Previously we raised concern over 2EA, 4EA, 7EA, and 8EA (LPA10), but we reserve the right to comment on other employment sites included in LPA04.1 at the examination.

It is supported that planning applications for development within a Strategic Employment Site must be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

Policy LPA05: Meeting St.Helens Borough's Housing Needs

In recent years, CPRE has undertaken considerable research to show that housing assessments

PO1397

EFO002

① - LPA05

② - LPA06, 8HS



Representation re Local Plan
Ian Hodgson
to:
planningpolicy
28/02/2019 16:52



1 Attachment



lpsd-representation-form ian hodgson.doc

Please find attached my submission in reponse to the draft Local Plan

Regards
Ian Hodgson



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Ian	First name:
Last Name: Hodgson	Last Name:
Organisation/company:	Organisation/company:
Address: 11 Springbrook Close Eccleston St Helens Postcode: WA10 5EN	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 28/2/19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> X – The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> X – The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> X – The plan doesn't comply with NPPF2018

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

- 1) The justification for the housing requirements has been based on flawed data. The ONS (2016) predicts a requirement for 383 houses per year, significantly less than the Council's outdated forecast of 486. (Indeed looking at the historical trend for static/declining population in St Helens even the ONS figures must be considered "optimistic").
- 2) The plan makes no mention of Brownfield and Previously Developed Land (PDL) that has not yet been included on the Brownfield Register. There are over 3000 ha of the lowest priority contaminated land in the borough – vastly in excess of areas of sites which would be "safeguarded" for development and taken out of Green Belt. The Plan therefore completely fails

in the requirement to consider all reasonable alternatives to taking land out of Green Belt.

3) The Plan does not satisfy the requirement for sustainable development. In particular 8HS is an area of land at the edge of the Eccleston/Windle built-up area up to the East Lincs Road. This area has no rail links and is poorly served by bus transport. Residents in any new-build in this area are likely to be road commuters to Liverpool/Manchester thereby increasing road traffic on this busy route (which is also likely to have greatly increased HGV traffic for the Liverpool superport). The Plan, if approved, will therefore cause unsustainable traffic growth issues which does not satisfy NPPF. We have already had instances of fatal road traffic accidents on the East Lincs Road in this area even with current traffic loads, never mind future increases caused by the Plan.

4) The Plan fails to address the impact on community infrastructure. In particular, thinking about 8HS there is already a shortfall in local healthcare/GP services which the Plan does not address. The schools in areas adjacent to 8HS are already oversubscribed – a situation which would be exacerbated by potential development of 8HS. Any development of this area would result in loss of green space amenities and areas of grade 1 and 2 agricultural land.

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.

Modifications to address my points in question 6:

- 1) Revise the Plan so that housing requirements are based on a MAXIMUM of 383 houses per year (ONS forecast)
- 2) Complete an urgent exercise to include all Brownfield and Previously Developed Land (PDL) in the Brownfield Register. Then revise the plan so there is a presumption of Brownfield Land being used for housing – Green Belt land only to be used in exceptional circumstances (stringent criteria to be set for what constitutes “exceptional”)
- 3) Revise the Plan to ensure all significant housing developments are restricted to areas with good public transport links.
- 4) Ensure that the Plan explicitly addresses how the impact of the Plan on community infrastructure (healthcare, schools, green space) will be mitigated.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No , I do not wish to participate at the oral examination		Yes , I wish to participate at the oral examination
----------	------------------------------------------------------------------	--	------------------------------------------------------------

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

PO1398

EFO012

①-LPA05



Representation Form

Claire Gerrard

to:

planningpolicy

08/03/2019 14:39



1 Attachment



St Helens Borough Local Plan 2020-2035 (Submission Draft) - sthelens.gov.uk (2).pdf

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[/ Comment form](#)

St Helens Borough Local Plan 2020-2035 (Submission Draft)

Representation (i.e. Comment) Form

Please also read the Representations Form Guidance Note (/media/9460/lpsd-representation-form_guidance-note.pdf).

Please ensure the form is completed **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

Title: *

First Name: ***Last Name: *****Organisation/company:****Address: *****Postcode: *****Tel No: *****Mobile No:****Email:**

2. Your Agent's Details (if applicable)

(We will correspond via your agent)

Title:

First Name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

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) *

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.

☒ **Yes (via e-mail)**

☐ **No**

Please submit your completed form by no later than 5pm on Wednesday 13th March 2019.

FURTHER INFORMATION

If you require further information, please see the FAQs at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights, please see the data protection information at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please submit separate Part B forms for each comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and complete 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

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Please read the guidance note for explanations of legal compliance and the tests of soundness.

Is legally compliant? *

☐ Yes

☒ No

Is sound? *

☐ Yes

☒ No

Complies with the duty to cooperate? *

☐ Yes

☒ No

5. If you consider the Local Plan is it because it is not:

Please read the guidance note for explanations of the tests of soundness.

- ☒ **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.

If you wish to SUPPORT the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The proposed plans do not take in to account the feelings and well fair of the local population. As a resident my house was purchased with the benefit of not being overlooked and surrounded by a 'housing estate'. The impact the proposed plans has on the local community has not been considered. The proposed plans are going to bring many problems go the local areas and do not consider the local environment and the

①

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

No building on greenbelt land

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? *

- ☐ 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 in the oral part of the examination, please outline why you consider this to be necessary:

All residents within the affected area need to be present to represent our community and find out exactly what action is being taken and to ensure that our concerns have been taken into consideration and addressed.

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.

Recaptcha field

I'm not a robot

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Thank you for taking the time to complete this response form.

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M (/a-to-z?letter=M) N (/a-to-z?letter=N) O (/a-to-z?letter=O)

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V (/a-to-z?letter=V) W (/a-to-z?letter=W) X (/a-to-z?letter=X)

Y (/a-to-z?letter=Y) Z (/a-to-z?letter=Z)

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PO1399

EFOO13

①-LPA05



Representation Form

Claire Gerrard

to:

planningpolicy

08/03/2019 20:39



1 Attachment



B Gerrard St Helens Borough Local Plan 2020-2035 (Submission Draft) - sthelens.gov.uk.pdf

Attached is the completed Representation Form.

Regards

Barry Gerrard

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Best place to find information and services that your council provides...

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St Helens Borough Local Plan 2020-2035 (Submission Draft)

Representation (i.e. Comment) Form

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Please ensure the form is completed **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).

- Date: is mandatory

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

Title: *

First Name: ***Last Name: *****Organisation/company:****Address: *****Postcode: *****Tel No: *****Mobile No:****Email:**

2. Your Agent's Details (if applicable)

(We will correspond via your agent)

Title:

First Name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Date: *

Date: is mandatory

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) *

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.

☒ **Yes (via e-mail)**

☐ **No**

Please submit your completed form by no later than 5pm on Wednesday 13th March 2019.

FURTHER INFORMATION

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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 submit separate Part B forms for each comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and complete together with Part A so we know who has made the comment. Please also read the guidance note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy

Yes

Paragraph / diagram / table

Yes

Policies Map

Yes

Sustainability Appraisal / Strategic Environmental Assessment

Yes

Habitats Regulation Assessment

Yes

Other documents

Residents not notified as per regulation

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Please read the guidance note for explanations of legal compliance and the tests of soundness.

Is legally compliant? *

- ☐ Yes
☒ No

Is sound? *

- ☐ Yes
☒ No

Complies with the duty to cooperate? *

- ☐ Yes
☒ No

5. If you consider the Local Plan is it because it is not:

Please read the guidance note for explanations of the tests of soundness.

- ☒ **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.

If you wish to SUPPORT the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The proposed plans do not take in to account the feelings and welfare of the local population. As a resident my house was purchased with the benefit of not being overlooked and surrounded by a 'housing estate'. The impact the proposed plans has on the local community has not been considered. The proposed plans are going to bring many problems to the local areas and do not consider the local environment and the

①

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The local viable modification can be to not build on the land and for this to be retained as Green Belt land.

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? *

- ☐ 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 in the oral part of the examination, please outline why you consider this to be necessary:

I consider that every resident wanting to take part should have the opportunity to ensure that their point is put across and represented adequately.

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.

Recaptcha field

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Thank you for taking the time to complete this response form.

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V (/a-to-z?letter=V) W (/a-to-z?letter=W) X (/a-to-z?letter=X)

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St. Helens First (/news/st-helens-first/)



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PO1400

① - LPA05 ② - Para 1-7.2 DTC
③ - LPA06, 8HS ④ - LPA02

Page 1 of 1
EFO015



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

wendy gore

to:

planningpolicy@sthelens.gov.uk

10/03/2019 19:05



1 Attachment



lpsd-representation-form - WG.doc

Dear Sir/Madam,

Please find attached my completed comment form.

Yours faithfully

Wendy Gore



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;


Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Wendy	First name:
Last Name: Gore	Last Name:
Organisation/company:	Organisation/company:
Address: Laurel Cottage 2 Catchdale Moss Lane Eccleston St Helens	Address:
Postcode: WA10 5QG	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text"/>
------------------------------------------------------------------------------------------------	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

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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	LA05 & LA06	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No x
Sound?	Yes <input type="checkbox"/>	No x
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	x
Justified?	x
Effective?	x
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
There are no exceptional circumstances to justify St Helens Borough Council (SHBC) not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the Housing Need assessment does not use Standard Methodology. The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. SHBC are using an older forecast (2014) of 486	

this cannot be justified.

The level of land needed is therefore not as high as set out in the SHBC Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

SHBC have failed to co-operate with other councils and have not published any statement(s) of common ground.

For these reasons and unless the plan is significantly modified it will fail both the legal tests it has to pass and the tests of soundness.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

In respect of the parcel of land defined as 8HS in the SHBC plan. This is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a main thoroughfare for traffic from Liverpool Super port to the M6. This section of the A580 is extremely busy, noisy and polluted with existing traffic, including increasing numbers of cars and Heavy Goods Vehicles.

The roads adjacent to the A580 on the Eccleston village side are narrow and cannot accommodate the extra cars that a further 1000 houses will generate and pedestrian safety has not been considered.

[REDACTED] Catchdale Moss Lane is 230 metres from the junction of the A580 and during the last year there have been numerous road traffic accidents on the busy A580 within 500 metres of our home. Unfortunately two of the accidents in the last year involved two fatalities one at each accident. One was at the junction of Catchdale Moss Lane with the A580 and the other was at junction of Houghtons Lane with the A580. Houghtons Lane junction is where it is proposed, in the SHBC plan, at 8HS, that 1000 houses be built on land which is currently greenbelt. These junctions are notoriously bad junctions and historically have incurred road traffic accidents involving fatalities on the A580 due to the heavy traffic using the busy A580. If SHBC plans to build 1000 houses at 8HS goe ahead and the subsequent traffic increase, then the incidence of road traffic accidents and potential for further fatalities is inevitable.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the SHBC Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There are no exceptional circumstances under which this parcel of land should be removed from the green belt and be 'safeguarded'. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use within the plan. It cannot be sound policy to sacrifice Green Belt and productive farmland whilst leaving other sites, including that in St Helens town centre, to further decay and decline. These sites should be developed and built upon before Green belt is considered for use as they have good public transport, bus and train connections to Liverpool, Manchester and beyond to employment areas. The parcel of land at 8HS is not well serviced by public transport. The train stations are over 3 miles away. The current bus routes do not connect Eccleston and Windle, where 8HS is situated, with employment areas.

The 8HS site has Windle Brook running through it. This lies on a flood plain and any development needs to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and

there is nowhere to build them within the area of 8HS.

3

The SHBC plan does not address essential areas for the need for infrastructure, roads, education, public transport, health and policing requirements for an increased population. It instead concentrates on house building and low skilled employment.

The Plan is not effective.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

No , I do not wish to participate at the oral examination	Yes , I wish to participate at the oral examination
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