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**ST HELENS**  
BOROUGH COUNCIL

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

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

**PLAN ORDER**

**PO1401 – PO1500**

**SEPTEMBER 2020**

# Plan Order Index

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

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

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

PO1401

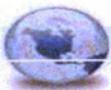
EFO016

① - GEN

② - PARA 1.7.2

11/03/2019 09:28

③ - LPAOS



**St Helens Local Plan Submission - Representation Form**  
Jo Banks to: planningpolicy

From:

To:

planningpolicy@sthelens.gov.uk

1 attachment



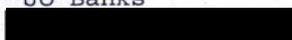
LPSD - Representation Form.pdf

Dear Sir/Madam

Please find attached my objection to the latest plans to build on Eccleston/Windle Greenbelt land.

Kind regards

Jo Banks





St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

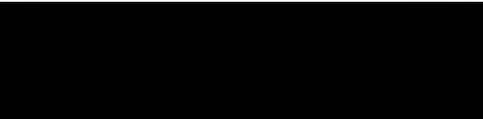
Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

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

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: Joanne	First name:
Last Name: Banks	Last Name:
Organisation/company:	Organisation/company:
Address: 56 St Thomas Close	Address:
Postcode: WA10 6BN	Postcode:
	Tel No:
	Mobile No:
	Email:

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

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

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

Yes  (Via Email)

No

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

## **RETURN DETAILS**

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

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

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

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

### **PART B – YOUR REPRESENTATION**

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

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

Policy	LA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review (2018)					

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

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

Legally Compliant?	Yes	No x (NO)
Sound?	Yes	No x (NO)
Complies with the Duty to Cooperate	Yes	No x (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?	X
Justified?	X (NO) the plan is based on flawed methodology
Effective?	X (NO) the plan is not deliverable
Consistent with National Policy?	X It does not comply with NPPF 2018

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

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

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. ] 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. ] ③

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

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

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so. ] ①

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise. ] ①

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

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land. ] ②

The Plan is not effective.

Please continue on a separate sheet if necessary

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

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

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

brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

Please continue on a separate sheet if necessary

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

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

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

**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.**

PO1402



St. Helens Borough Local Plan 2020-2035 (Submission Draft) Representation Form - T. Wiswall  
paul.johnson  
to:  
planningpolicy  
11/03/2019 09:58



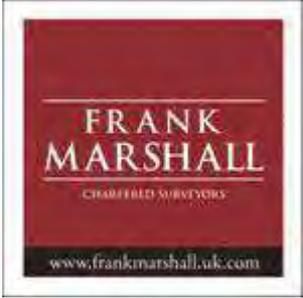
1 Attachment



image001.jpg image002.jpg image003.jpg St. Helens Representation Form complete - T. Wiswall.pdf

We attach herewith a completed representation form and plan for your attention.

Paul Johnson FRICS FAAV  
Director,  
Frank Marshall & Co.,  
121 Billinge Road,  
Garswood,  
Ashton-in-Makerfield,  
Wigan. WN4 0XD



CHARTERED SURVEYORS  
AUCTIONEERS & ESTATE AGENTS



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St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title: Mr.
First Name: Thomas	First name: Paul
Last Name: Wiswall	Last Name: Johnson
Organisation/company:	Organisation/company: Frank Marshall & Co.
Address: Garswood Gates Farm, Liverpool Road, Haydock.	Address: 121 Billinge Road, Garswood, A-in-M, Wigan.
Postcode: WA11 9RP	Postcode: WN4 0XD



Signature: 	Date: <input type="text" value="22nd February 2019"/>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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



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

### PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
LPA02				Page 11						
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

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

In relation to the three parcels of land edged red on the attached plan amounting to about 8.2 hectares in the ownership of Mr. Wiswall, following the development of Florida Farm North and the effective removal of that site from the Green Belt, the land edged red no longer fulfils a Green Belt purpose when matched against the principles of preventing unrestricted spread of development, preventing neighbouring farms merging and safeguarding the countryside from development. In addition as outlined in table 2.1 of the Council's Green Belt Review (December 2018), the bund which now separates the Florida Farm development from the land

edged red is not as strong a boundary feature as Liverpool Road which is a more natural and definable boundary. The ribbon residential development along Liverpool Road already effectively impairs the purpose of the Green Belt to the South of Liverpool Road.

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.

**Removal of land edged red on the plan from the Green Belt and its designation as a residential site in the Plan.**

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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



PO1403



Local plan  
Cheryl Rank  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 14:46



1 Attachment



lpsd-representation-form CR.doc

Sent from my Samsung device

----- Original message -----



Date: 11/03/2019 2:44 pm (GMT+00:00)



Subject: lpsd-representation-form CR



St. Helens Council

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

- ① - LPA05
- ② - LPA06
- ③ - DEC
- ④ - GEN

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: Mrs	Title:
First Name: Cheryl	First name:
Last Name: Rank	Last Name:
Organisation/company:	Organisation/company:
[REDACTED]	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [REDACTED]	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.

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Yes x (Via Email)

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

### **RETURN DETAILS**

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

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

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

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

### **FURTHER INFORMATION**

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

### **NEXT STEPS**

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

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

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

Please tick as appropriate

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

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

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

Does not satisfy:-

The requirement for sustainable development.  
 The criteria for sustainable transport – promoted increased car dependency.  
 Sustainable housing, based on aspirational employment growth predictions.  
 Effective land use by concentrating on green space over town centre development and brownfield.

Food securing – not referring to agricultural land quality.

- Economic growth predictions for St Helens are based on flawed historical data that is in contrast to the aspirational targets detailed in the plan. The survey of town centre occupancy was completed in 2016, this high street has changed yet again with major stores leaving or moving to retail parks. (1)
- Adequate regional and cross border collaboration has not been undertaken. (3)
- The housing need assessment does not use standard methodology, no cases made for exceptional circumstances. (1)
- Latest estimate ONS [2016] predicts that 383 houses per year will be required to meet housing need in St Helens. This plan refers to older forecasts [2014] of 486 and therefore out of date. There are many sites in the borough that remain undeveloped and even sites that development has stalled. For example, in Eccleston 2 sites remain unfinished, Millbrook Lane and Burrows Lane. There are other sites around the central rail line and sites within the town centre. Other authorities have been developing along these lines, in particular Knowsley. (1)
- No mention made of brownfield and previously developed land that's not yet available or included on brownfield register. Councillor Long submitted a motion at full council meeting July 2018 lobbying government to press for immediate funding to ensure more brownfield land can be released in the borough. He is on record that the borough should adopt a balanced growth plan for the long term benefit of the people, insisting the council will be sensitive in the way it carries out it's plan by adopting a brownfield first policy, no evidence of this. (4)
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- Council and LCRC and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the brownfield register back into use. Not reasonable to assume such sites cannot be made available within 15 year plan or the 25 year safeguarded period. (4)
- Fails to mention the loss of Grade 1 & 2 agricultural land that comprises most allocated and safeguarded sites. This will have a negative impact on farming and associated jobs in that industry. This is going against current thought on the need to produce more agricultural crops and move towards less dependency on animal farming. These areas of land also have established public rights of way across the land. (2)
- Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF [2016]. Not considering the impact of large volumes of HGV's using the A580. The Windle Island area is already a major blackspot. Proposal to develop the site 8HS for over 1000 houses will severely impact on the area with increase in traffic, there is no reasonable access to the site from Crantock Grove or Ecclesfield. Would not be (4)  
(2)

PO1404



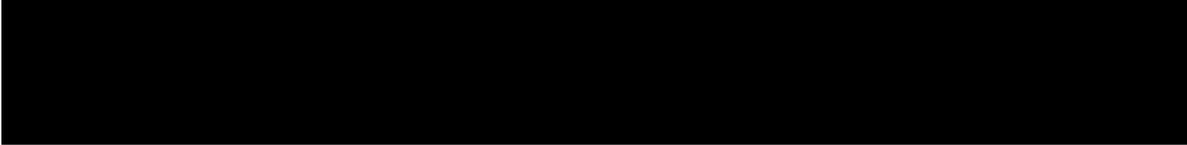
Ipsd-representation-form CR

Richard Rank [REDACTED]

to:

planningpolicy

11/03/2019 15:27



1 Attachment



Ipsd-representation-form CR.pdf

[REDACTED] has attached the following document:



Ipsd-representation-form CR

Google Docs: Create and edit documents online.

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because someone shared a document with you from Google Docs.



Site 8HS

Ef0020

① - LPA05

② - LPA06

③ - DEC

④ - GEN

EMBED  
MSPhotoEd.  
3

Ref: LPSD

(For official use only)

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Representation (i.e. Comment) Form**

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

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Richard	First name:
Last Name: Rank	Last Name:
Organisation/company:	Organisation/company:
Address: 94 St Georges Avenue Windle	Address:
Postcode: WA10 6HD	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

**Signature:**  **Date:**

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

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

Yes  (Via Email)

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

## **RETURN DETAILS**

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

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

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

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

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

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

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Legally Compliant?	<input checked="" type="checkbox"/> x
Sound?	<input checked="" type="checkbox"/> x
Complies with the Duty to Cooperate	<input checked="" type="checkbox"/> x

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. 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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The criteria for sustainable transport – promoted increased car dependency.

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- Fails to mention the loss of Grade 1 & 2 agricultural land that comprises most allocated and safeguarded sites. This will have a negative impact on farming and associated jobs in that industry. This is going against current thought on the need to produce more agricultural crops and move towards less dependency on animal farming. These areas of land also have established public rights of way across the land. (2)

PO1405

EF0025

SITE IHA

① - LPA05

② - PARA 1.7.2  
DTC



Representation forms  
Barbara  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 16:54  
Hide Details



3 Attachments



St Helens Comment form LPA05-1HA safeguarded BT.pdf



St Helens Comment form LPA05-1HS smocklane BT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
Barbara

Sent from Mail for Windows 10

① - LPA05

EFO025

② - PARx 1.7.2.

SITE 1HA

DEC.

Ref: LPSD
(For official use only)



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

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This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs	Title: .....
First Name: Barbara	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive	Address: .....
Garswood	.....
Postcode: WN4 0SJ	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted]	Date: 20 Feb 2019
-----------------------	-------------------

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

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

Yes (via email)                       No

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

## **RETURN DETAILS**

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Town Hall  
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St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
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Telephone: **01744 676190**

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3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 1HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
The release of Greenbelt land causes significant harm to the purpose of the Greenbelt	<div style="border-left: 1px solid black; border-right: 1px solid black; padding-left: 5px;"> <p style="text-align: right;">①</p> <p style="text-align: right;">②</p> <p style="text-align: right;">①</p> </div>
The council needs to prove its population estimates as the population of St Helens has been declining since 1981	
Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services	
There is no statement of common ground with neighbouring Authorities	
One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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

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

✓	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.**

PO1406

EFO027

SITE 2HA



Representation forms  
Barbara  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 16:54  
Hide Details

① - LPA OK  
② - PAX 1.72  
DEC



3 Attachments



St Helens Comment form LPA05-1HA safeguarded BT.pdf



St Helens Comment form LPA05-1HS smocklane BT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
Barbara

Sent from [Mail](#) for Windows 10

① - LPA05  
② - PARA 1.7.2  
Dec.

EF0027  
SITE 2HA



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

Ref: LPSD  
  
(For official use only)

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

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: .....
First Name: <u>Barbara</u>	First name: .....
Last Name: <u>Traynor</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>24 Oban Drive</u> <u>Garswood</u>	Address: .....
Postcode: <u>WN4 0SJ</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 20 Feb 2019

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

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

Yes (via email)  No

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

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WA10 1HP**

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
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Effective?	<input checked="" type="checkbox"/>
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Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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**Thank you for taking the time to complete and return this response form.**

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

PO1407

① - LPA05    ② - Para 1.7.2 DTC  
③ - LPA06, 8HS    ④ - LPA02

Page 1 of 1  
EFO028



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

John Gore

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:59



1 Attachment



2019 03 11 lpsd-representation-form - JG.doc

Dear Sir/Madam,

Please find attached my completed comments form.

Yours faithfully,

John Gore



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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This form has two parts;

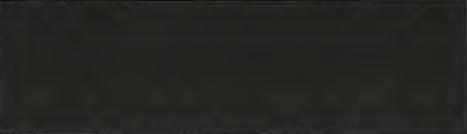
**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: John	First name:
Last Name: Gore	Last Name:
Organisation/company:	Organisation/company:
Address: Laurel Cottage 2 Catchdale Moss Lane Eccleston St Helens	Address:
Postcode: WA10 5QG	Postcode:
	Tel No:
	Mobile No:
	Email:

<b>Signature:</b> 	<b>Date:</b> <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.

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

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

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**Telephone:** 01744 676190

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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?	
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. <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	
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	

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this cannot be justified.

The level of land needed is therefore not as high as set out in the SHBC Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

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

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

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

For these reasons and unless the plan is significantly modified it will fail both the legal tests it has to pass and the tests of soundness.

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

In respect of the parcel of land defined as 8HS in the SHBC plan. This is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a main thoroughfare for traffic from Liverpool Super port to the M6. This section of the A580 is extremely busy, noisy and polluted with existing traffic, including increasing numbers of cars and Heavy Goods Vehicles.

The roads adjacent to the A580 on the Eccleston village side are narrow and cannot accommodate the extra cars that a further 1000 houses will generate and pedestrian safety has not been considered.

[REDACTED] Lane is 230 metres from the junction of the A580 and during the last year there have been numerous road traffic accidents on the busy A580 within 500 metres of our home. Unfortunately, two of the accidents in the last year involved two fatalities, one at each accident. One was at the junction of Catchdale Moss Lane with the A580 and the other was at junction of Houghtons Lane with the A580. Houghtons Lane junction is where it is proposed, in the SHBC plan, at 8HS, that 1000 houses be built on land which is currently greenbelt. These junctions are notoriously bad junctions and historically have incurred road traffic accidents involving fatalities on the A580 due to the heavy traffic using the busy A580. If SHBC plans to build 1000 houses at 8HS goes ahead and the subsequent traffic increase, then the incidence of road traffic accidents and potential for further fatalities is inevitable.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the SHBC Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There are no exceptional circumstances under which this parcel of land should be removed from the green belt and be 'safeguarded'. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use within the plan. It cannot be sound policy to sacrifice Green Belt and productive farmland whilst leaving other sites, including that in St Helens town centre, to further decay and decline. These sites should be developed and built upon before Green belt is considered for use as they have good public transport, bus and train connections to Liverpool, Manchester and beyond to employment areas. The parcel of land at 8HS is not well serviced by public transport. The train stations are over 3 miles away. The current bus routes do not connect Eccleston and Windle, where 8HS is situated, with employment areas.

The 8HS site has Windle Brook running through it. This lies on a flood plain and any development needs to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and

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PO1408

Sinc 845

EF0029



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

Pamela Milligan

Pamela Milligan

to:

planningpolicy@sthelens.gov.uk

11/03/2019 21:20

Hide Details

From: Pamela Milligan [REDACTED]

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

① - LPA05

② - LPA06

③ - GBR (2018)

④ - S.A.

⑤ - IDP

1 Attachment



lpsd-representation-formpm110319.doc

Dear Sir/Madam

Please find attached my completed representation form in respect of the above.

My details:

Pamela Milligan  
132 Bleak Hill Road  
Windle  
St Helens

I would be obliged if an acknowledgement of receipt could be provided.

Yours faithfully

Pam Milligan



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title: N/A
First Name: Pamela	First name:
Last Name: Milligan	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 132 Bleak Hill Road Windle St Helens	Address:
Postcode: WA10 6DN	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]

Date:

11.03.19

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3. To which part of the Local Plan does this representation relate?								
Policy		Paragraph / diagram / table		Policies Map	8HS	Sustainability Appraisal/ Strategic Environmental Assessment	Sustainability Appraisal: SA Report Jan 2019	Habitats Regulation Assessment
LPA05								
LPA06								
Other documents (please name document and relevant part/section)				National Planning Policy Framework (2019) Green Belt Review (2018) Infrastructure Delivery Plan				

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

Please tick as appropriate

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

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

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

**National Planning Policy Framework, Feb 2019 (NPPF) - Objectively Assessed Need**

NPPF requires that the SHLPSD (local plan) must be positively prepared; justified; effective and consistent with national policy.

I believe that the local plan outlines excessively high aspirational growth rates for housing need which is driven by over optimistic employment forecasts. This is not supported by our documented historical growth trends and these are not appropriately acknowledged, nor is there suitable adjustment for the declining working age population. The local plan growth projection assumes a net inward migration yet the area has a higher than average unemployment level which deserves priority for redress. Realisation of these questionable projections is also heavily dependent upon the performance of the Liverpool super-port and data is should be tempered by the adverse, strident nature of automation in the warehousing and logistics sector.

The plan relies heavily upon a web of circular arguments and aggressive economic growth projections which are not robust or transparent enough to justify the aspirational housing targets. Growth scenarios are presented but can be challenged as to whether they are positively prepared, justified and effective because of the selected and mixed methodologies. Statistics used to forecast growth are taken from the LCR SHELMA, published in 2006. **I believe that these factors show the plan to be unsound.**

The council have deviated from the standard methodology to inform their local plan's housing need assessment. Housing projections are thus subject to question. There is much ongoing debate about the use of MHCLG 2014 housing figures rather than the use of 2016 ONS figures. This debate continues and our district should not be saddled with an outdated and uplifted projection together with detrimental, yet avoidable consequences, whilst the argument progresses. SHBC have opted to use 2014 data and in doing so have further uplifted the annual figure to 486, rather than applying the standard 468 defined in the 2014 stats. **I believe this shows that the plan is unsound.**

Planners could be more prudent by selecting 2016 OAN of 383 which would reflect more realistic demographic and economic projections for St Helens. Interestingly a relatively recent press release from the National Audit Office gives voice to widespread concern against the decision to use 2014 data/methodology.

"...flawed methods for assessing the number of houses required, to the failure to ensure developers contribute fairly for infrastructure, it is clear that the planning system is not working well. The government needs to take this much more seriously and ensure its new planning policies bring about the change that is needed".

Amyas Morse, Head of NAO – 08.02.19.

**Green Belt Review 2018 - Unnecessary Reclassification of Green Belt land, defined as 8HS in the local plan, to become Safeguarded land.**

I am absolutely opposed to the release of Green Belt land for either industrial or housing development, as identified within this local plan and the Green Belt Review, 2018, primarily because the need for changing the Green Belt boundaries is unequivocally dubious. The local

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plan exists to plan for the future, but surely this planning process is none other than a very unexceptional ongoing process. **There are no exceptional circumstances evidenced which could warrant the release of Green Belt and therefore the plan is unsound.**

NPPF, Paragraph 133 defines Green Belt by 'their openness and permanence' and the latter is indicative of any Green Belt land's worth to a community, namely for health, well-being, flood protection, food-security and wildlife habitats. The release and erosion of Green Belt land is not sustainable. Regions with a higher percentage of Green Belt land are promoted in a positive light as healthier places to live. STHMBC should be intent on maintaining this advantage. The parcel of land **8HS**, offers all of these benefits to both young and old. Hence, it is of far greater value to the borough of St Helens than the brownfield and contaminated sites languishing in and around our town and suburbs, desperately waiting for remediation and a new lease of life which will add value to the town if sympathetically addressed. They can and should play a vital role in revitalising the urban and economic areas. **SHBC purport a Brownfield First policy and whilst there is some progress here there is a long way to go.**

SHMBC have published a statement of Contaminated Land (CL) sites, 2015, indicating that **3,170 ha of the lowest priority contaminated land exists in St Helens. 148 ha of Green Belt are in jeopardy of reclassification to become Safeguarded land, to fulfil a questionable housing need specified in this local plan. This area equates to less than 7% of the 3,170 CL. Surely remediation of 7% (a most paltry target in the term of this plan) would produce far more sustainable and ethical results and contribute to revitalising St Helens.** These areas provide huge potential, if remediated, and SHMBC should look to tighten and implement its policy commensurate with securing funding to this end. **Safeguarded or Green Belt Land is not needed to achieve the objectives of the local plan.**

Liverpool City Region (LCR) hold a Strategic Investment Fund (SIF) which was recently reported to be £80m underspent. Cllr Long (SHMBC) has been on national TV (June 2018), stating that 'two-thirds of St Helens was made up of contaminated land and it will cost £40m to remediate'. Funding is within our reach and could be used commensurate with the LCR's Sustainable Urban Development Strategy.

"The SIF will support projects that:

- Unlock unviable housing sites in order to accelerate housing delivery in the City Region; .....
- include development of housing on Brownfield sites"

SHMBC and St Helens Chamber are eligible to bid into the SIF. They should capitalise on this opportunity rather than ruining productive land assets.

There is great importance attached to the role of Green Belt land. Affirmation of this can be found in NPPF, paragraph 138. Here we are told that there should be concern for **sustainable development which harnesses previously developed land first and offers accessibility to public transport.**

However, contrary to this advice, the local plan has selected Green Belt, i.e. **8HS** which has many valuable features and properties which contribute to local and regional well-being:

**The requirement for Sustainable Development in the context of NPPF, Green Belt Review, Sustainability Appraisal Report and Infrastructure Delivery Plan continued...**

**Sustainability Consideration – Traffic, a local perspective, (NPPF, Sustainability Appraisal Report and Infrastructure Delivery Plan) continued...**

Private vehicle ownership across the borough will grow significantly due to the increased housing development and additionally neighbouring authorities, pursuing the same growth strategies will contribute to traffic volume. Numbers of HGVs and lighter delivery vans will grow commensurate with Liverpool Super port output and the associated logistics and warehousing activity along the A580 (Liverpool to Florida Farm, Haydock M6 junction and beyond).

At peak times the traffic congestion on roads serving our schools is dangerous and would be made more so. Pedestrian safety, especially for children and elderly, is at stake. Traffic management to prevent parking on pavements and on junctions is absent. The emergence of 'rat runs' has, as predicted by resident groups, come to fruition. These alternative routes are now well established and the inherent vehicle volume and speed in 20mph safety zones and 30 mph areas is not controlled.

Road surfaces on 'side roads' and country lanes have been eroded as greater numbers of motorists, attempt to evade the 'improvement area'. The legacy of this is costly remedial works, and will require redress. **Suffice to say that this is not a prominent feature within the local plan's Infrastructure Delivery Plan. Indeed the Infrastructure Delivery Plan, cannot be regarded as robust nor positively prepared.**

Given that public transport in the area is so limited it is interesting to note that many Windle and Eccleston residents who want to visit Liverpool or Manchester, by train, will drive to the Eccleston Park Railway station, because it is a much quicker option than waiting for a bus into St Helens town centre. Car parking at the Eccleston Park and St Helens Central stations are at this time limited. Imagine the impact if just 100 more commuters decided that they would like to travel in this way on a daily basis.

**Sustainability – Schools, A Local Perspective**

The local Primary and Secondary schools are oversubscribed. New schools will be required and there is nowhere to build them. Expansion of Bleak Hill Primary School has recently been agreed to accommodate children, to a great extent, from the 'new' Eccleston Grange Estate. The school is at capacity now. It will be at capacity when extended.

**Sustainability Conclusion:**

Development on 8HS will be unsustainable because there is already inadequate infrastructure (in all of its guises) and this will incur negative impact on the health, well-being and safety of the community.

**For all of these reasons I consider the plan to be unsound.**

**Representation Overall Conclusion:**

8HS should be removed from the 'safeguarding for development' category and maintained as Green Belt for all the reasons outlined above.

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Sino 8HA  
o 8HS

EFO031



Feedback on the St Helens Borough Local Plan 2020-2035

Tony Cowley

to:

planningpolicy@sthelens.gov.uk

12/03/2019 00:51

Hide Details

From: Tony Cowley [REDACTED]

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

① - Gen

② - LPA05

③ - LPA06

2 Attachments



Pat completed form. 11th March 2019.doc My completed objections 11th March 2019.doc

Please find both my Wife and my objections to the Local plan 2020 to 2035

Can you please note the word documents and if you could let me know that are OK

Mr and Mrs Cowley

31 Inglewood Rd  
Rainford  
St Helens  
Merseyside  
WA11 7QL



Sent from [Mail](#) for Windows 10



St.Helens  
Council

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Patricia	First name:
Last Name: Cowley	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 31 Inglewood Rd Rainford St Helens	Address:
Postcode: WA11 7QJ	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature:  Date:

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

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Policy	All of it	Paragraph / diagram / table	All of it	Policies Map	All of it	Sustainability Appraisal/ Strategic Environmental Assessment	All of it	Habitats Regulation Assessment	All of it
Other documents (please name document and relevant part/section)				<b>We believe that the local plans for Windle and Rainford is neither, justified, effective, or consistent with the national policy.</b>					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> No
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> NO
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <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: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> No the plan is based on flawed systems or methodology
Effective?	<input type="checkbox"/> No the plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> No it fails to comply with the national policy HMG

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For both Windle and Rainford the following counts.

- The requirements for sustainable development
- The criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs.

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- Sustainable housing targets proposed are based on aspirational employment growth predictions. (2)
  - Effective land use by concentrating on green space development over town centre development with higher density. (2)
  - Food security by ignoring agricultural land quality. (2)
  - Impact on the local residents and Smog
  - Impact on health of our children
  - Impact on the Fire service increase area to cover and lack of resources, due to cutbacks
  - The Ambulance services, lack of staff to cover the area, increased response times, no communication with the emergency service over this.
  - Increase traffic and its impact on response times, for all the emergency services.
  - Major issues currently, with policing in the area, no plans set and the government are not increasing funding for policing, how is the plan going to manage a system that is already broken.
  - Look at the problems we have now with flooding, so how is the plan going to take account of the extra water runoff?
  - The waste drainage system, is already failing, I have talk to your local maintenance engineers, and they have been patching the system up for years. It will not cope with the extra demand from the increase in housing. (2)
  - Last off, in this world of ever changing circumstances, the world as we know is falling apart. The USA are looking after themselves, and if you want it, its going to cost the top price. Russia is teaming up with China and others putting an increased risk on crisis within the world. The EU is building a one state system and we are going to be out of it or in part of it but without any say. We the UK look to be in a no-man's land with a government that fails to see the obvious. We need to keep these resources available, think what happened in the War dig for victory, planting crops in your own back garden and look at the land that was available then? (2)
- So where are we going to get our food from. Think of Set aside, the EU said, they would pay our farmers to leave land unused so we had to purchase food from the EU not as good as we use to grow in the fields round Windle and Rainford. If you did a risk assessment, like they should have done within these plans. There is no way you would throw away all this arable land that we have now, not when there is an abundance of brown field sites around.

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 idea should be scrapped as it fails to meet any real objectives that benefit the future of the region**

Please continue on a separate sheet if necessary

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

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

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

Yes, I wish to participate at the oral examination

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

**No thanks, I hope that the inspector will see sense.**

**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.**

PO1410

Sites 8HA  
& 8HS

EFO032



Feedback on the St Helens Borough Local Plan 2020-2035

Tony Cowley

to:

planningpolicy@sthelens.gov.uk

12/03/2019 00:51

Hide Details

From: Tony Cowley [REDACTED]

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

① - GEN

② - LPA05

③ - LPA06

2 Attachments



Pat completed form. 11th March 2019.doc My completed objections 11th March 2019.doc

Please find both my Wife and my objections to the Local plan 2020 to 2035

Can you please note the word documents and if you could let me know that are OK

Mr and Mrs Cowley

31 Inglewood Rd  
Rainford  
St Helens  
Merseyside  
WA11 7QL

[REDACTED]

Sent from [Mail](#) for Windows 10



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

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

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: <b>Anthony Raymond</b>	First name:
Last Name: <b>Cowley</b>	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 31 Inglewood Rd Rainford St Helens	Address:
Postcode: WA11 7QL	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: <input type="text"/>	Date: <input type="text" value="11&lt;sup&gt;th&lt;/sup&gt; 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  **Yes, Via Email**

No

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

## **RETURN DETAILS**

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

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

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

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

**Telephone:** 01744 676190

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

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

**PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?									
Policy	All of it	Paragraph / diagram / table	All of it	Policies Map	All of it	Sustainability Appraisal/ Strategic Environmental Assessment	All of it	Habitats Regulation Assessment	All of it
Other documents (please name document and relevant part/section)				<b>We believe that the local plans for Windle and Rainford is neither, justified, effective, or consistent with the national policy.</b>					

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> No the plan is based on flawed systems or methodology
Effective?	<input type="checkbox"/> No the plan is not deliverable
Consistent with National Policy?	<input type="checkbox"/> No it fails to comply with the national policy HMG

6. Please give details of why 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

- For both Windle and Rainford areas the following counts.**
- The requirements for sustainable development
  - The criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- 10

- Sustainable housing targets proposed are based on aspirational employment growth predictions. ] ⑥
  - Effective land use by concentrating on green space development over town centre development with higher density. ] ②
  - Food security by ignoring agricultural land quality. ] ②
  - Impact on the local residents and Smog
  - Impact on health of our children
  - Impact on the Fire service increase area to cover and lack of resources, due to cutbacks
  - The Ambulance services, lack of staff to cover the area, increased response times, no communication with the emergency service over this.
  - Increase traffic and its impact on response times, for all the emergency services.
  - Major issues currently, with policing in the area, no plans set and the government are not increasing funding for policing, how is the plan going to manage a system that is already broken.
  - Look at the problems we have now with flooding, so how is the plan going to take account of the extra water runoff?
  - The waste drainage system, is already failing, I have talk to your local maintenance engineers, and they have been patching the system up for years. It will not cope with the extra demand from the increase in housing. ②
  - Last off, in this world of ever changing circumstances, the world as we know is falling apart. The USA are looking after themselves, and if you want it, its going to cost the top price. Russia is teaming up with China and others putting an increased risk on crisis within the world. The EU is building a one state system and we are going to be out of it or in part of it but without any say. We the UK look to be in a no-man's land with a government that fails to see the obvious. We need to keep these resources available, think what happened in the War dig for victory, planting crops in your own back garden and look at the land that was available then? ③
- So where are we going to get our food from. Think of Set aside, the EU said, they would pay our farmers to leave land unused so we had to purchase food from the EU not as good as we use to grow in the fields round Windle and Rainford. If you did a risk assessment, like they should have done within these plans. There is no way you would throw away all this arable land that we have now, not when there is an abundance of brown field sites around.

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 idea should be scrapped as it fails to meet any real objectives that benefit the future of the region. And it put the UK at Risk re local and national sustainability. Think not? Well look at what is happening now, lack of drugs in the Pharmacies' Supermarkets running out of food, and shops now the same! How much worse can it get. We need the fields to feed ourselves. What a state we are in and this will make things worse.**

Please continue on a separate sheet if necessary

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

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

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

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

**No thanks, I hope that the inspector will see sense.**

**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.**

PO1411

EFO036



Local plan comments form

[Redacted]  
to:  
planningpolicy  
12/03/2019 12:06

Site SHH

① - LPA05

② - para 1.7.2

③ - S.A.

1 Attachment



Council local plan comments.doc

Hi there

Attached is our completed comments form on the local plan. We have posted one but just in case it does not arrive want to send this too.

Mr and Mrs Nick Burke



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 and Mrs	Title:
First Name: Philippa and Nick	First name:
Last Name: Burke	Last Name:
Organisation/company:	Organisation/company:
Address: 52 Heyes Avenue, Rainford, Sthelens Postcode: Wa11 8AR	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text" value="12/03/19"/>
--	---

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

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

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

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

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

**Now please complete PART B of this form, setting out your representation/comment.  
Please use a separate copy of Part B for each separate comment/representation.**

**PART B – YOUR REPRESENTATION**

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

3. To which part of the Local Plan does this representation relate?										
Policy	LPA02 (site HA8)	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

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

Green belt land should only be released in exceptional circumstances. That is official government and council policy and remains a central part of planning law in this country. There are no exceptional circumstances in St Helens – a borough with a falling population and house prices below the national and regional average. Housing in St Helens is comparatively cheap and in low demand. The green belt was created to prevent urban sprawl and over-development. It has served that purpose well. The proposals in the Local Plan would undo that good work. St Helens is a borough with few other physical assets and significant health problems such as childhood obesity, high rates of heart and lung disease. Destroying protected green belt land in such circumstances would be a step in the wrong direction given the long-term health trends in St Helens.

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. *8177*

This site (HA8) 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

3

1

814  
The site (HA8) is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which is 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.

St Helens Council wants 486 houses built every year in the borough. But the latest figures from the Office for National Statistics show St Helens only needs 383 houses a year. If these most recent figures from the ONS were used, the amount of building on protected land could be significantly reduced.

The council's own register shows there is enough brown field land in St Helens for 5,818 houses. That would support the council's housing supply for nearly 12 year

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

These alternatives will have less impact on the environment and lead to less need for new infrastructure. The Council have failed to co-operate with other councils and have not published any statement(s) of common ground

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

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's own register shows there is enough brown field land in St Helens for 5,818 houses. That would support the council's housing supply for nearly 12 year

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

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

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

**Yes**, I wish to participate at the oral examination

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

--

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

PO1412

① - Green Belt Review 2018

③ - LPA05 ⑤ - IDP

② - LPA06, 8HS

④ - GEN

⑥ - Para 1.7.2 EFO037  
DTC



Response to Local Plan 2019

Peter & Frances Murphy

to:

planningpolicy

12/03/2019 13:05



1 Attachment



MFM lpsd-representation-form Example 1.doc

Dear Sir/Madam

Please find attached my response, as an Eccleston resident, to the Local Plan 2019.

Yours sincerely

MF Murphy



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: Mrs	Title:
First Name: Mary Frances	First name:
Last Name: Murphy	Last Name:
Organisation/company: Eccleston Resident	Organisation/company:
Address: 56 Millbrook Lane Eccleston St Helens	Address:
Postcode: WA10 4QY	Postcode:
[Redacted]	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: <input type="text" value="12/03/2019"/>
-----------------------	---

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

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

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St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
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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	LA05	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"/>	Nox <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	Nox <input type="checkbox"/>

Please tick as appropriate

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

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

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

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

①

②

prepared.

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

3

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

4

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.

3

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.

2

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.

5

The Plan does not comply with NPPF(2018) as it was written prior to 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 over supplying housing plans which cannot be sustainable in this area of the North West.

6

Please continue on a separate sheet if necessary

PO1413





St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Peter	First name:
Last Name: Murphy	Last Name:
Organisation/company: Eccleston Resident	Organisation/company:
Address: 56 Millbrook Lane Eccleston, St Helens	Address:
Postcode: Wa10 4QY	Postcode:
[Redacted]	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: <input type="text" value="12/03/2019"/>
-----------------------	---

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

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input type="checkbox"/> (Via Email)	No <input checked="" 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 13<sup>th</sup> March 2019** by:

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

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

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

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**Telephone:** 01744 676190

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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 (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"/>	Nox <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	Nox <input type="checkbox"/>

Please tick as appropriate

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

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

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

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

①

②

prepared.

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

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6

PO1414



St Helens Borough Local Plan 2020-2035 (Submission Draft) - Completed  
Representation Form  
Andrew Fido

to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 14:36



1 Attachment



St Helens Submission LP reps-FINAL-11.03.2019.pdf

Dear Sir or Madam,

On behalf of our client BOC, please find attached representations to the St Helens Borough Local Plan 2020-2035 (Submission Draft).

If you have any questions please contact Philip Saunders or myself.

With kind regards  
Andrew

**Andrew Fido BSc (Hons) MPhil MRTPI PIEMA**  
Director  
Planning

Savills, Wessex House, Priors Walk, East Borough, Wimborne BH21 1PB

Website : [www.savills.co.uk](http://www.savills.co.uk)

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St. Helens  
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title: Mr
First Name: Glen	First name: Philip
Last Name: Jenkins	Last Name: Saunders
Organisation/company: BOC Ltd	Organisation/company: Savills
Address: The Priestley Centre, 10 Priestley Rd, Guildford	Address: Wessex House, Priors Walk, Wimborne
Postcode: GU2 7XY	Postcode: BH21 1PB



Signature:  Date:

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

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Yes (Via Email)

No

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St.Helens Council  
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St.Helens  
Merseyside  
WA10 1HP**

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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	<b>LPA05.1 Strategic Housing Sites</b>	Paragraph / diagram / table	<b>Table 4.5 Site ref. 6HA</b>	Policies Map	<b>6HA</b>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				<b>Appendix 5: Site profiles – Allocated Housing and Employment Sites (6HA)</b>				

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

Please tick as appropriate

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

BOC recognise that there is a need for housing in St Helens and that government policy objectives prioritise the development of brownfield sites in preference to greenfield. However, site allocation 6HA (Land at Cowley Street, Cowley Hill, Town Centre), as detailed in policy LPA05.1 and Table 4.5. is situated adjacent to a variety of noise emitting businesses, one of

which being BOC at Washway Lane. BOC are located a mere 12 metres away from the northern boundary of site allocation 6HA, and are concerned that noise emissions from their operations could impact on the residential amenity of future occupiers should appropriate noise mitigation measures not be enforced by way of Local Plan policy. BOC's operations at Washway Lane include:

- 24/7 operations including HGV vehicle movement during the night;
- The manufacture of compressed hydrogen and nitrogen using various industrial processes
- The operation of garage / vehicle maintenance activities

BOC's 24 hour operations at St Helens play a vital role in supplying large industrial operations and chemical industries nationwide, as well as supplying regional nuclear power and hospital facilities with compressed gases.

With BOC's operations being so vitally important to the regional economy and national infrastructure requirements, it is imperative that applicable acoustic safeguards are specified in policy to ensure that paragraph 182 of the NPPF is adhered to.

Paragraph 182 of the NPPF (our underlining) states that:

*'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.'*

Furthermore, there are a number of other businesses operating in the immediate vicinity, such as a lorry haulage company and a distribution centre, whose combined operations have significant potential to create noise which could be deemed a nuisance by nearby residential occupiers.

Whilst Appendix 5 to the submission plan: Site profiles – Allocated Housing and Employment Sites states that *'the development should include appropriate measures to attenuate noise from the adjacent employment use(s)'* and correspondence with the Council indicates that the Local Wildlife Site (LWS) occupying the northernmost part of allocation 6HA could be retained as a buffer zone, BOC are concerned that **actual policy wording** does not currently provide sufficient safeguards for businesses operating in the immediate vicinity, and is therefore not sound on the basis that it is not in accordance with National Policy and is insufficiently clear to be considered effective.

BOC therefore request that policy LPA05.1 wording and supporting text is amended as it is not sound in its current form, and is inconsistent with NPPF paragraph 182.

Policy LPA05.1 should be amended to ensure that appropriate noise mitigation measures / buffer zone safeguards are set out as **a clear policy requirement** to be addressed through the master planning and planning application process. We believe simple text amendments would be sufficient to achieve this objective.

Our suggested policy amendments are set out under section 7.

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 proposed modifications to policy LPA05.1 as set out below will ensure that Local Plan policy can be considered sound and duly gives weight to requirements of the NPPF paragraph 182, which needs to be considered where strategic residential development is proposed in such close proximity to regionally important noise emitting operations.

Policy amends to LPA05.1 Strategic Housing Sites is outlined below, **with suggested changes in bold underlined.**

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

1. *The following sites allocated under Policy LPA0535 shall constitute Strategic Housing Sites:*

- *2HA: Land at Florida Farm (South of A580), Slag Lane, Blackbrook*
- *3HA: Former Penlake Industrial Estate, Reginald Road, Bold*
- *4HA: Land bounded by Reginald Road / Bold Road / Travers Entry / Gorse Lane / Crawford Street, Bold (Bold Forest Garden Suburb)*
- *5HA: Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold*
- *6HA: Land at Cowley Street, Cowley Hill, Town Centre*
- *9HA: Former Linkway Distribution Park, Elton Head Road, Thatto Heath*
- *10HA: Moss Nook Urban Village, Watery Lane, Moss Nook*

2. *Any planning application for development within a Strategic Housing Site must be supported by a comprehensive masterplan covering the whole site that must set out details of at least:*

- a) amount of development and proposed uses;*
- b) phasing of development across the whole site;*
- c) indicative layout and design details for the whole site that must provide for an attractive built form with high quality landscaping when viewed from within the development and elsewhere;*
- d) measures to provide good levels of accessibility to the whole site from the surrounding area by public transport, walking and cycling;*
- e) indicative layout promoting permeability and accessibility by public transport, cycling and walking;*
- f) a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways, ecological network, landscape character, trees, woodland and water storage in a holistic and integrated way;*
- f) measures to address any potential flood risk and surface water drainage issues in accordance with Policy LPC12;*

- g) measures to promote energy efficiency and generation of renewable or low carbon energy in accordance with Policy LPC13;
- h) a comprehensive strategy for the provision of all new, expanded and / or enhanced infrastructure that is required to serve the development of the whole site; and
- i) details of how development of the site as a whole would comply with other relevant policies of the Local Plan

**For those strategic housing sites adjoining or in close proximity to existing employment and industrial premises (such as Site 6HA), the planning application must also be accompanied by a noise assessment (informed by adequate noise surveys) confirming those parts of the Site appropriate for residential development, and where necessary a noise mitigation strategy to ensure that the amenity of future residential occupiers will not be adversely affected.**

3. Detailed development proposals within a Strategic Housing Site will be required, subject to compliance with Policy LPA08, to provide or make financial contributions towards the provision, expansion and / or enhancement of transport infrastructure (including road, public transport, cycling and pedestrian infrastructure) and / or other infrastructure to serve the needs of the development. Such provision may be either on-site or off-site and must be provided in time to meet the needs of the development. Where a specific development proposal would only cover part of a Strategic Housing Site, the provision and / or contributions must be in accordance with the comprehensive masterplan for the whole site referred to in paragraph 2 of this Policy.

4. The masterplans for each Strategic Housing Site, and any planning application for development within any other allocated housing site, must address the **indicative policy** requirements set out in Appendix 5.

Please continue on a separate sheet if necessary

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

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

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

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

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

BOC believe policy LPA05.1 to be unsound. They therefore object to the submission version of the St. Helens Local Plan and wish to reserve a place to speak at the examination in order to more fully explain their position with regards to NPPF compliance.

***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.**

PO1415

①-LPA05, 2HA

Page 1 of 1

EFO040



Fwd: lpsd-representation-form  
susan redman  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 14:59



1 Attachment



lpsd-representation-form.doc

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Sue Redman [redacted]  
Date: 12/03/2019 14:57 (GMT+00:00)  
To: [redacted]  
Subject: lpsd-representation-form

Sue Redman

19 Clipsley Crescent

Haydock

St Helens

Merseyside



St. Helens  
Council

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

Ref: LPSD

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**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Susan	First name:
Last Name: Redman	Last Name:
Organisation/company:	Organisation/company:
Address: 19 Clipsley Crescent, Haydock	Address:
Postcode: WA11 0UH	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	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.

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**Telephone:** 01744 676190

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3. To which part of the Local Plan does this representation relate?							
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LPA05							
Site							
2HA							
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"/> Don't know
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <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

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

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

Access to site – extra volume of traffic in an already congested area. Daily traffic congestion reports on local Radio re traffic along Stanley Bank Road.

No evidence of extra housing being required, numerous houses for sale in this area.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsley Brook.

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

Please continue on a separate sheet if necessary

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

**Delete this land from the proposed remove from the Greenbelt**

Please continue on a separate sheet if necessary

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

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

√	No, 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.**

PO1416



Fwd: lpsd-representation-form (SR)

susan redman

to:

planningpolicy@sthelens.gov.uk

12/03/2019 15:23

Hide Details

From: susan redman [REDACTED]

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

EFOC41

1 Attachment



lpsd-representation-form (SR).doc

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Sue Redman [REDACTED]

Date: 12/03/2019 15:18 (GMT+00:00)

To: "[REDACTED]"

Subject: lpsd-representation-form (SR)



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

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

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Stephen	First name:
Last Name: Redman	Last Name:
Organisation/company:	Organisation/company:
Address: 19 Clipsley Crescent, Haydock	Address:
Postcode: WA11 0UH	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

[REDACTED] Date:

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

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

Yes  (Via Email) No

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

## **RETURN DETAILS**

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

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

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

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

### PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
LPA05	①						
Site 2HA							
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"/> Don't know
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <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

**Access to site – extra volume of traffic in an already congested area. [REDACTED] and on a daily basis have to cope with the delays caused by the amount of traffic around this area.**

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe and the proposal for a junction at Liverpool Road and Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

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

Housing in this area isn't sustainable because of lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged due to lack of facilities. A neighbour who has no transport already has to walk nearly 6 miles daily to take [redacted] to school and this is the same area of the proposed housing so where will these extra school places be available.

There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsley Brook.

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

Please continue on a separate sheet if necessary

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

**Delete this land from the proposed remove from the Greenbelt**

Please continue on a separate sheet if necessary

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

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

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

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

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

this to be necessary:

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

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

PO1417



St Helens Borough Local Plan 2020 - 2023 Representation

PAUL DRAPER

to:

planningpolicy

12/03/2019 22:59



1 Attachment



Paul's Planning reply.pdf

Dear sir/Madam,

Please find attached my completed representation form regarding proposed development of the Garswood area.

regards,

Paul Draper



St Helens Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

### 1. Your Details

(we will correspond via your agent)

Title: MR

First Name: BRYAN PAUL

Last Name: DRAPER

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

Address: 10 SELKIRK AVE

GARSWOOD

ASHTON-IN-MAKERFIELD

Postcode: WN4 0UF

Tel No: [REDACTED]

Mobile No: [REDACTED]

Email: [REDACTED]

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

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

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

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

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

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

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

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

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

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

Signature: [REDACTED] Date: 12.3.19

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

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

Yes (via email)

No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

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

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

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

Telephone: **01744 676190**

## NEXT STEPS

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## DATA PROTECTION

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

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

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

## B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>IT IS NOT JUSTIFIED BECAUSE THERE IS AN ABUNDANCE OF BROWN FIELD SITES THAT COULD BE BUILT ON.</p> <p>IT IS NOT EFFECTIVE BECAUSE IT WILL HAVE MORE OF A DETRIMENTAL IMPACT ON THE LOCAL AREA, FOR THE REASONS LISTED OVERLEAF IN QUESTION 7.</p>

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

- ① GREEN FIELD SITES SHOULD NOT BE USED WHEN THERE IS AN ABUNDANCE OF BROWN FIELD SITES IN THE AREA. EVEN CONTAMINATED LAND COULD BE CLEANED AND USED.
- ② THERE IS INSUFFICIENT NUMBER OF SCHOOLS, DOCTORS AND SHOPS TO PROVIDE FOR THE NUMBER OF HOMES PROPOSED.
- ③ THIS LAND HAS BEEN THE HABITAT FOR LAPWINGS FOR OVER 40 YEARS. WE COULD LOSE THEM FROM OUR AREA FOREVER.
- ④ WILL PRODUCE EVEN MORE TRAFFIC AND POLLUTION ONTO OUR ROADS.
- ⑤ THE CURRENT VILLAGE OF GAREWOOD WOULD BECOME JUST AN IMMENSE ESTATE, SIMILAR TO THE NEARBY WINSTANLEY, LOSING ANY VILLAGE CHARACTER THAT MOST RESIDENTS MOVED HERE FOR.

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:**

N/A

**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.**

PO1418



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation  
(i.e. Comment) Form  
joan draper  
to:  
planningpolicy  
12/03/2019 23:07



1 Attachment



Joan's Planning Reply.pdf

Dear Sir/Madam

Please find attached my response to the proposed development of the Garswood Area.

Regards

Joan Draper



St. Helens Council

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

Ref: LPSD  
(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>JOAN ELAINE</u>	First name: .....
Last Name: <u>DRAPER</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>10 SELKIRK AVENUE</u>	Address: .....
<u>GARSWOOD</u>	.....
<u>ASHTON-IN-MAKERFIELD</u>	.....
Postcode: <u>WN4 0UP</u>	Postcode: .....
Tel No: [REDACTED]	Tel No: .....
Mobile No: [REDACTED]	Mobile No: .....
Email: [REDACTED]	Email: .....

Signature: [REDACTED] Date: 12/3/19

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

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

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

Yes (via email)

No

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

## RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

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

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

Telephone: **01744 676190**

## NEXT STEPS

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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.**

## ART B - YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>IT IS NOT JUSTIFIED BECAUSE THERE IS AN ABUNDANCE OF BROWN FIELD SITES THAT COULD BE BUILT ON</p> <p>IT IS NOT EFFECTIVE BECAUSE IT WILL HAVE MORE OF A DETRIMENTAL IMPACT ON THE LOCAL AREA, FOR THE REASONS LISTED OVERLEAF IN QUESTION 7</p>

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

- ① GREEN FIELD SITES SHOULD NEVER BE USED WHEN THERE IS AN ABUNDANCE OF BROWN FIELD SITES WHICH COULD BE USED IN THE AREA. EVEN CONTAMINATED LAND COULD BE CLEANED UP AND USED
- ② AGRICULTURAL LAND MAY BE MORE IN NEED IN THE FUTURE ESPECIALLY AFTER BREXIT.
- ③ THIS LAND IN GARSWOOD HAS BEEN THE HABITAT FOR LAPWINGS FOR OVER 40 YEARS - WE COULD LOSE THEM FROM OUR AREA FOREVER TOGETHER WITH MANY MORE ANIMALS AND BIRDS.
- ④ IT WILL RESULT IN EVEN MORE TRAFFIC AND POLLUTION ON OUR ROADS. THAT ARE ALREADY CONGESTED.
- ⑤ THE CURRENT VILLAGE OF GARSWOOD WOULD BECOME JUST A HUGE HOUSING ESTATE, SIMILAR TO NEARBY WINSTANLEY, LOSING ANY VILLAGE CHARACTER THAT MOST RESIDENTS MOVED HERE FOR. WE WOULD LOSE OUR COUNTRY WALKING AREA.
- ⑥ SCHOOLS + DOCTORS WOULD STRUGGLE TO COPE.
- ⑦ OUR HOUSES WOULD DEPRECIATE IN VALUE AND MANY RETIRED RESIDENTS COULDN'T AFFORD TO MOVE TO A COUNTRY VILLAGE THAT THEY CHOSE TO LIVE IN.

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:**

N/A.

**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

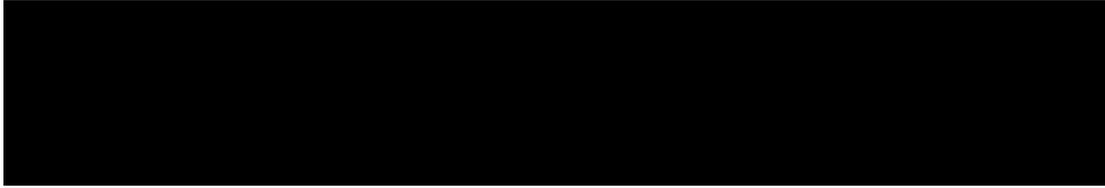
**Thank you for taking the time to complete and return this response form.**

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

PO1419



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.

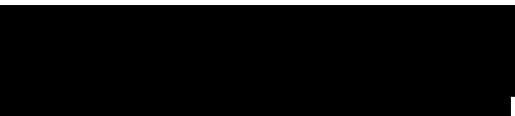
Please confirm receipt.

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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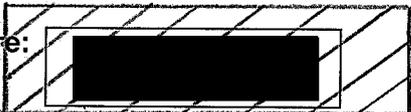
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**Part A** – Personal Details  
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Please note that you must complete Parts A and B of this form.

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

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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

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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.

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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.

09

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.

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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.

11

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.

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**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.

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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).

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

In recent years, CPRE has undertaken considerable research to show that housing assessments

16

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. <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4158-set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside>.

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

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. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for..."

We note the Andy Burnham, the Mayor of Greater Manchester, was reported by the Manchester Evening News, in February, as taking issue with Kit Malthouse the Minister for Housing, over which set of housing projections Greater Manchester should use. Mr. Burnham maintained that Greater Manchester were told by senior civil servants in the MHCLG how they must calculate their figures and pointed to official government guidance. However, Mr. Malthouse denied that the government's targets were mandatory. 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 from the Minister should allow St Helens, with its important Green Belt setting, to evidence exceptional circumstances and make a strong case for lower housing numbers.

We rubbish the Government's standard approach, as the process for the estimation of local housing demand is deeply flawed. In our response to the Government's consultation that closed in December 2018 on its proposal to retain the use of the 2014-based household projections we said it "is a fudge of staggering ineptitude". We maintain this view as whilst the Government is entitled to its policies, it should "play with a straight bat". In accordance with Government's own best practice, it should rely on relevant and up to date evidence. Indeed it sets this out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence". The Government ought not to cheat on the growth projections more recently identified based on actual statistical data. In essence the Government is requiring local authorities to plan for excessive housing numbers, but then falsely claiming local authorities are to blame for the release of Green Belt, which is a blatant attempt to deceive the public.

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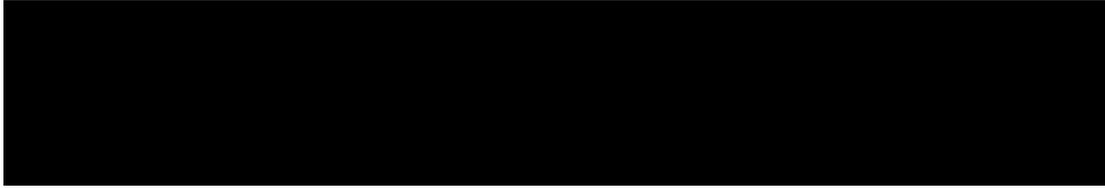
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19

PO1420



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

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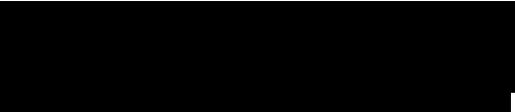
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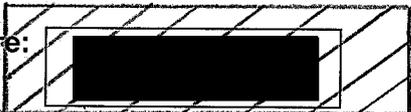
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Title: Ms	Title:
First Name: Jackie	First name:
Last Name: Copley MRTPI MA BA(Hons) PgCert	Last Name:
Organisation/company: CPRE Lancashire	Organisation/company:
Address: PO Box 1386, PRESTON,	Address:
Postcode: PR2 0WU	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature:  Date:

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PO1421



Representation - Local plan 2020-2035

Gill SCUTT

to:

planningpolicy@sthelens.gov.uk

09/04/2019 15:17



1 Attachment



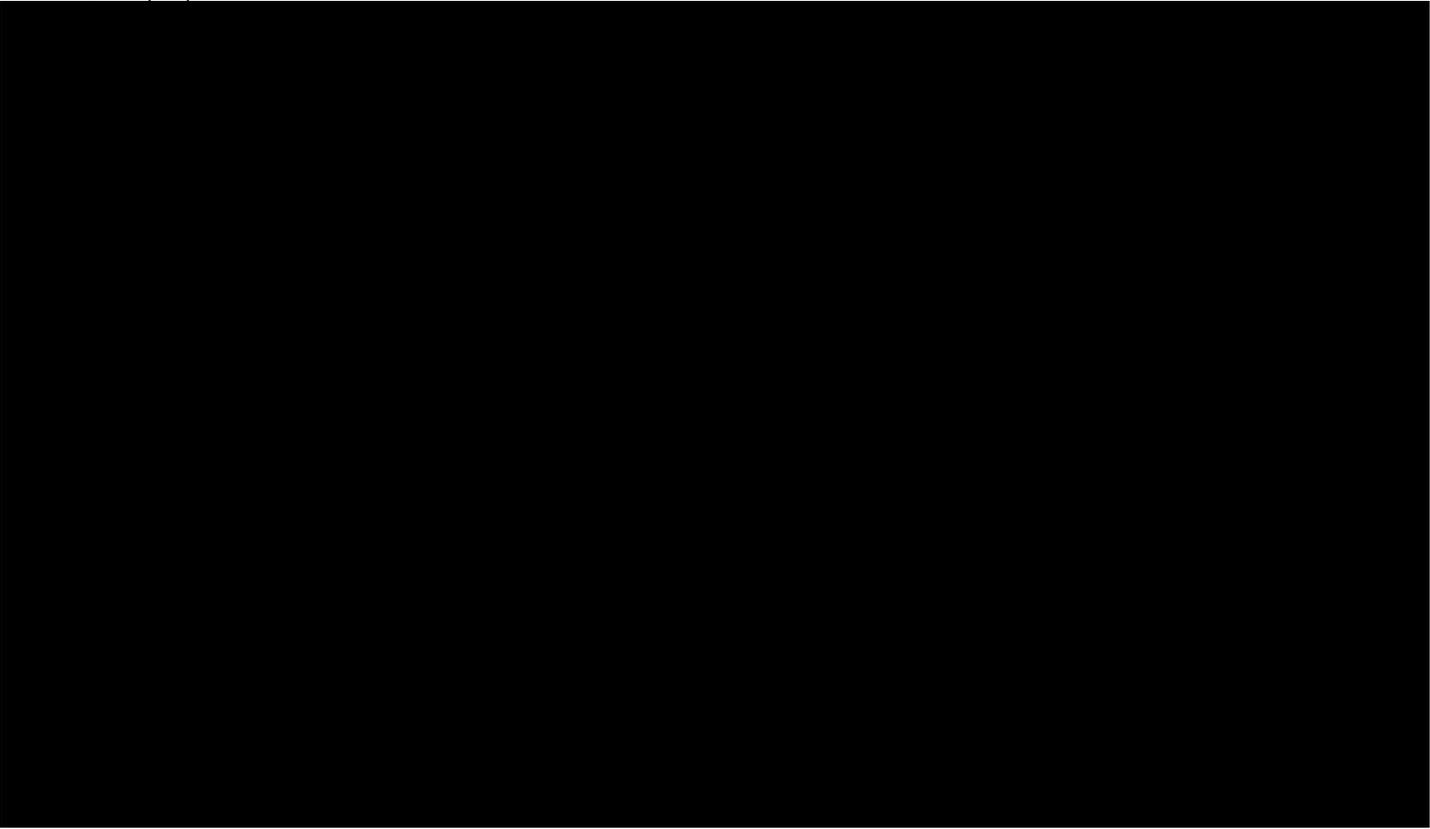
Gill Scutt Local plan - representation-form.doc

Dear Sir/Madam

Please see attached my representation form regarding the Local plan 2020 - 2035

Yours faithfully

Gill Scutt (Ms)



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 Le contenu de ce message peut etre protege et / ou confidentiel. Si vous avez recu ou avez  
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Title: Ms	Title:
First Name: Gill	
Last Name: Scutt	Last Name:
Organisation/company: n/a	Organisation/company:
Address: 150 Kiln Lane, Eccleston, St Helens	Address:
Postcode: WA10 4RB	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

<b>Signature:</b> [REDACTED]	<b>Date:</b> 09/04/2019
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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)

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

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

Please tick as appropriate

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

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

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based upon flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018

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

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

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

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

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

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

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

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

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

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

The Plan is not effective.

Please continue on a separate sheet if necessary

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

Retain all Green belt areas for the future of our communities, wildlife and the environment.

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

brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating existing brownfield sites. Building on green belt will increase the risk of flooding and pollute our environment beyond redemption.

All other opportunities to bring back into use any dis-used property – domestic and industrial - and land should be sought before taking the irresponsible move to build on green belt land

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

PO1422



{In Archive} LOCAL PLAN

roughley pamela

to:

planningpolicy

20/02/2019 20:24



1 Attachment



formECRA.doc

SITE 8HS

① LPA05

② LPA02

③ LPA04

④ LPA06

⑤ IDP

Please find attached a completed Representation Form - my apologies if I have now sent this twice - finger-trouble.

P. ROUGHLEY



St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name: P	First name:
Last Name: ROUGHLEY	Last Name:
Organisation/company:	Organisation/company:
Address: 24 MILLFIELDS ECCLESTON	Address:
Postcode: WA10 5NS	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED]	Date: <input type="text" value="20/02/2019"/>
-----------------------	---

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

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

Yes **YES**  (Via Email) No

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

## **RETURN DETAILS**

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

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

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

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**Telephone:** 01744 676190

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

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

### **PART B – YOUR REPRESENTATION**

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

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

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

Please tick as appropriate

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

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

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

The housing needs assessment does not use Standard Methodology and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS(2016) predicts that 383 houses/yr will be required to meet housing needs in St.helens. The council are using an older forecast(2014) of 486.

The plan does not mention Brownfield and Previously Developed Land that is not (yet)

] ①  
 ] ①  
 ] ②

PO1423

EF0093



{In Archive} Representation forms  
David Traynor  
to:  
planningpolicy  
21/02/2019 11:00

Stns 1HA, 1HS  
+ 2HA

- ① Policy LPA05
- ② Para 1.7-2
- ③ LPA06



3 Attachments



St Helens Comment form LPA05-1HA safeguarded DT.pdf



St Helens Comment form LPA05-1HS smocklane DT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing DT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
D Traynor



St. Helens Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mr	Title: .....
First Name: David	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive	Address: .....
Garswood	.....
Postcode: WN4 0SJ	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20 Feb 2019

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

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

- Yes (via email)
- No

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

## RETURN DETAILS

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post to:

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

or by hand delivery to:

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## NEXT STEPS

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**Now please complete PART B of this form,  
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**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 1HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
The release of Greenbelt land causes significant harm to the purpose of the Greenbelt	} ① } ② } ①
The council needs to prove its population estimates as the population of St Helens has been declining since 1981	
Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services	
There is no statement of common ground with neighbouring Authorities	
One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this	

Please continue on a separate sheet if necessary

## 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 2HA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
<p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

1  
2  
1

PO1424

EFO094



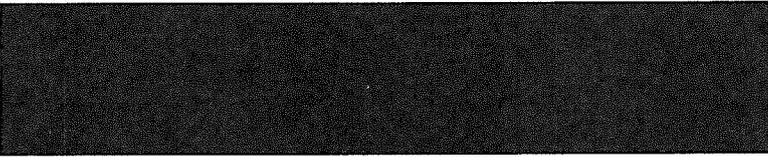
{In Archive} Representation

Ken Roughley

to:

planningpolicy

21/02/2019 16:27



Site 8HS

① - LPA02

② - LPA04

③ - LPA05

④ - LPA06

⑤ - IDP

1 Attachment



lpsd-representation-form (3).mht

Dear Sirs,

Please find attached my representation form.

Thank You

KenR



St. Helens  
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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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: Kenneth	First name:
Last Name: Roughley	Last Name:
Organisation/company: [REDACTED]	Organisation/company:
Address: 13 Rainford Road Dentons Green St Helens	Address:
Postcode: WA10 6BT	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

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

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

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

Yes  (Via Email) Yes

No

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

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

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

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

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

Please tick as appropriate

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

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

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

Sustainable housing, targets proposed are based on aspirational employment growth predictions.  
 Effective land use by concentrating on Green Space development over town centre development with higher densities.  
 This version does not satisfy the requirement for sustainable development.  
 Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan

} 0  
} 2

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

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

The loss of Grade 1 and 2 Agricultural Land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. ] ④ ⑤

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

The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF(2016) ] ④ ⑤

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



Please continue on a separate sheet if necessary

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

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

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

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

Please continue on a separate sheet if necessary

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

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

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

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

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.**

PO1425

EFO095

SITES - 2EA, 5EA, 6EA  
114, 115 + 214



{In Archive} Representation forms  
Luke Traynor  
to:  
planningpolicy@sthelens.gov.uk  
21/02/2019 20:27



- ① LPA04
- ② PARA 1.7.2
- ③ LPA05
- ④ LPA06

3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse LT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse LT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse LT.pdf

Please find attached 3 of 6 representation forms

Luke Traynor

Sent from [Mail](#) for Windows 10



{In Archive} Representation forms  
Luke Traynor  
to:  
planningpolicy@sthelens.gov.uk  
21/02/2019 20:28



3 Attachments



St Helens Comment form LPA05-1HA safeguarded LT.pdf



St Helens Comment form LPA05-1HS smocklane LT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing LT.pdf

Please find attached 3 of 6 representation forms

Regards Luke Traynor

Sent from Mail for Windows 10



St. Helens Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

**Part A - Personal Details**

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

## PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: .....
First Name: <u>Luke</u>	First name: .....
Last Name: <u>Traynor</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>192 Victoria Road</u> <u>Garswood</u>	Address: .....
Postcode: <u>WN4 0RG</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 20 Feb 2019

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

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

Yes (via email)  No

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

## RETURN DETAILS

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

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

or by hand delivery to:

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

or by email to:

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

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

## FURTHER INFORMATION

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

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

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

Telephone: **01744 676190**

## NEXT STEPS

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

## DATA PROTECTION

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

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

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

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

## PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 1HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to set out your comments.	
<p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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

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

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

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 2HA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
The release of Greenbelt land causes significant harm to the purpose of the Greenbelt	<div style="border: 1px solid black; padding: 5px; display: inline-block;">3</div> <div style="border: 1px solid black; padding: 5px; display: inline-block;">2</div> <div style="border: 1px solid black; padding: 5px; display: inline-block;">1</div>
The council needs to prove its population estimates as the population of St Helens has been declining since 1981	
Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services	
There is no statement of common ground with neighbouring Authorities	
One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this	

Please continue on a separate sheet if necessary

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

Delete this land from the proposed removal from the Greenbelt

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

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

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

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

PO1426

EL0009



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

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



2 Attachments



St Helens Local Plan 2020-35 Reprs.pdf 150827 TS Site A Rev 2 - Reduced.pdf

Please find attached representations on the Local Plan Submission Draft.

Regards

Andrew

**Andrew Windress MA MRTPI**  
Director



a: 9 York Place, Leeds, LS1 2DS

w: [www.idplanning.co.uk](http://www.idplanning.co.uk)



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## 4.0 Representations to the St. Helens Borough Local Plan 2020-2035 Submission Draft

- 4.1 The comments below are provided in respect of the individual policies quoted.

### Spatial Vision

- 4.2 We wish to support the Council's commitment to the effective use of the Borough's stock of brownfield land to help meet housing needs, as well as its commitment to the location of housing development where it is well connected to employment areas. ] ①

### Policy LPA02

- 4.3 We agree with part 1 of Policy LPA02 which identifies the Key Settlements where sustainable regeneration and growth will be focussed, which includes Haydock. ] ②
- 4.4 Part 4 is also supported in principle. However, it is considered the housing allocations in the proposed Green Belt areas are not appropriate and should include the HPR site. ]
- 4.5 The HPR site is a brownfield site in a sustainable location, adjoining the boundary of one of the Key Settlements listed in part 1 of this policy. It is currently proposed to be removed from the Green Belt and would greatly benefit from a housing allocation in order to encourage the delivery of housing on the site. Furthermore, the scale of development as indicated in previous submissions would be reflective of the surrounding housing development and would preserve the existing trees on the site. Development of this site would also preserve more sensitive and undeveloped sites within the Green Belt. ✓
- 4.6 Paragraph 4.6.7 stresses the Borough's "substantial need for new housing development that is linked to demographic needs and the need to provide sufficient housing to support employment growth." The HPR site is located immediately to the north of a large area of land (Ref: 2ES) which is proposed to be removed from the Green Belt and safeguarded for employment use. As identified in the Draft Local Plan, there is a substantial need to provide new housing to support employment growth and accordingly, the HPR site is well positioned to support employment growth on site 2ES in the future. ✓
- 4.7 Paragraph 4.6.8 establishes the aim for land for new development to be identified "in sustainable locations, generally within, or on the edge of, or close to Key Settlements." As discussed, the HPR site is located on the edge of Haydock, which is identified as a Key Settlement. The Transport Assessment previously submitted to the Council and provided again at Appendix 1 confirms that the site is in a highly accessible and sustainable location with good access to local shops and services including public transport services. ✓

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

**Policy LPA05 and LPA05.1**

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

PO1427



LOCAL PLAN

Nina Finnan

to:

planningpolicy@sthelens.gov.uk

02/03/2019 21:07

Hide Details

From: Nina Finnan <[redacted]>

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

Please respond to [redacted]

E10012

- ① LPA05
- ② LPA02
- ③ IDP
- ④ LPA06

Dear Sirs

I am making a representation as to why I feel the local plan submission draft should be looked at again:

1. The council are using their own figure of 486 houses required rather than the office if national statistics stating 383. ①

2. The council have done nothing to make discounted brownfield sites become available on the brownfield register (such as claiming grants available for decontamination) ②

3. The national planning policy framework 2018 section 13 re protecting greenbelt states all other options should be examined in full before greenbelt is used (for example point 2)

4. Plan does not satisfy sustainability of local infrastructure such as healthcare, education and roads/transport. The only improvements that are being made are for current traffic and number of residents (eg windle Island roadworks, expansion of Bleak Hill School and new doctors surgery on Millfields) ③

5. Food security at risk due to ignoring agricultural land quality

6. Plan does not protect from urban sprawl which is one of the fundamental reasons we need greenbelt land ②

7. Safeguarded land is unjustified as not required now and may not be required in 15 years therefore should remain as greenbelt ④

8. Plan is ineffective as does not address current issue at Windle Island and Haydock such as congestion and accidents

Thankyou for your time

Mrs Nina Cooper

38 Griffin Close Eccleston St Helens WA10 5BL

[Sent from Yahoo Mail on Android](#)

PO1428



FW: Objection to the "St. Helens Borough Local Plan Submission Draft 2020-2035"

Anthony Baron

to:

planningpolicy@sthelens.gov.uk

04/03/2019 15:16

Hide Details

From: Anthony Baron

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

① - LPA08

② - LPA06

Sent: 04 March 2019 14:18

Subject: Objection to the "St. Helens Borough Local Plan Submission Draft 2020-2035"

I wish to object to the above in the following areas.

A) The plan states that a total of 7290 new build dwellings will be required over the 15 year period averaging 486 p.a.

The Office for National Statistics forecast that the population of the Borough will grow from 180708 in 2020 to a figure of 187336 by 2035. A forecast population growth of 6628 persons. At the current average household density of 2.4 persons per dwelling, this equates to a figure of 2762 dwellings. A reduction on the Plan figures of a staggering 263%. Given at present there are 935 long-term empty properties within the Borough, plus new build under construction, plus sites already granted planning permission, this figure would offset any reduction in the present number of residential properties due to demolition, change of use etc. The Housing Market within the Borough is static at present in the private sector, with supply roughly equating demand. All economic indicators show that this is the general trend for the future. The plan also shows that there will be a considerable number of persons migrating to the Borough as a result of "job opportunities" being created who will need housing. This I dispute, given the present mobility of labour, for the bulk of the type of jobs being created in the Warehousing and Distribution Sector. The influx of persons into the Borough would be a relatively small increase. In fact, if the proposed site on the former Parkside Colliery and Greenbelt environs was developed, it would be in far easier reach of the Warrington Borough cachement area rather than St. Helens. Especially if the proposed new road linking the site with the slip road to Junction 22 of the M6 in Warrington Borough and less than 3 kilometres from Warrington town centre was built. These facts, taken into account, show that the proposed amount of new build residential properties stated in the Plan is greatly exaggerated. I propose that the figures be revised to a much lower realistic figure.

This would also alleviate the need to release the proposed amount of greenbelt stated in the Plan, developing Brownfield sites in a more sustainable planning policy.

B)

The proposed safeguard for industrial development for land to the Northeast of Junction 23 of the M6 motorway (Haydock Island).

To remove this site from Greenbelt, without prior consultation and approval from Highways England is against good planning practice.

Also this greenbelt forms a buffer not only between Haydock (St. Helens Borough) and Golborne (Wigan Borough) but also between the Metropolitan Areas of Mersyside and Greater Manchester.

①

②

I propose that this site remains as greenbelt within the lifespan of this Plan and not safeguarded for industrial development, as the Plan states. /

This Plan appears to be flawed in many aspects and in instances appears to contradict the need for an overall National Planning Strategy, of which it is one part. /

Yours Faithfully

Anthony Baron  
2 Johns Avenue  
Haydock.  
WA11 0QB

PO1429



**Housing**  
**STEVEN LAWRENSON** to: planningpolicy

05/03/2019 19:44

From: STEVEN LAWRENSON [REDACTED]  
To: planningpolicy@sthelens.gov.uk

① I live on Crawford street move here [REDACTED] bought my house with a view Ov fields and horses it is my family home i don't want to live on a housing estate I so we move here, when u go out of out back door and then out of the back gate we have plot where we grow veg in peace and tranquillity the view is great it's great belt wat right have the council to ruin peoples lives and take away the very land that has enhances our lives with wild life trees and tranquillity and greenery it is a total disgrace and you should rethink your policies about using green belt and start using brown belt this policy will be the down fall Ov labour

Sent from my iPad Steve

① LPAOS

PO1430

① - LPA05      ③ - IDP      ⑤ - LPA04  
② - LPA06      ④ - GEN

Page 1 of 1  
E0018



LOCAL PLAN RESPONSE

Maureen B

to:

planningpolicy@sthelens.gov.uk

06/03/2019 08:47



1 Attachment



LOCAL PLAN EMB.docx

PLEASE FIND ATTACHED MY RESPONSE TO LOCAL PLAN 2020-2035 SUBMISSION DRAFT

I have chosen to respond by letter as your online form is not user friendly.

Hard copies of the form do not provide sufficient space for considered response.

ELLEN M BARKER  
1 THE NOOK  
WINDLE  
ST HELENS  
WA10 6EN



6 FEBRUARY 2019

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

Dear Sir/Madam

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

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

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

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

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

①

②

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

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Council's own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

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

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.

The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23.

The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues.

The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities.

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal

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document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs!

5

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

YOURS FAITHFULLY

**ELLEN M BARKER (MRS)**

PO1431

①-LPA05 ②-LPA06, 8HS  
③-LPA02

Page 1 of 1  
E10020



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



1 Attachment



local plan cb.docx

---

I have chosen to respond by letter.

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

COLIN BARKER  
1 THE NOOK  
WINDLE  
ST HELENS  
WA10 6EN



6 FEBRUARY 2019

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

Dear Sir/Madam

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

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

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

St Helens Council are using a projected annual house building target of 486, the ONS suggestion for 2014 is 468 and the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. I do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances".

The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development; it is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land.

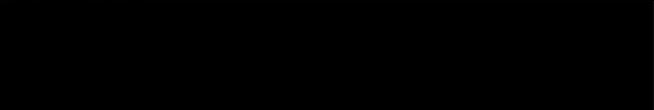
According to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050 whilst agricultural land lost to land degradation is

①

PO1432



St Helens Local Plan Submission Draft Network Rail additional Representations (Parr St)  
TownPlanning LNW  
to:  
planningpolicy@sthelens.gov.uk  
08/03/2019 07:18



1 Attachment



St Helens Central Stn East.pdf

FAO Planning Policy team

Thank you for consulting Network Rail on the emerging Local Plan. In addition to comments submitted separately, we would also urge the Council to consider the inclusion of an additional residential development site within the plan.

The site is located off Parr Street, Central St Helens, as shown on the attached plan.

As you may be aware, there is an ambitious drive to unlock government land to provide for new homes. Bringing this site forward would assist in achieving this target.

We have been actively assessing our estate to locate land surplus to rail requirements, and have identified a linear site within St Helens town centre, as shown on the attached plan.

The 2016 SHLAA identifies the southern part of the site (below Corporation Street) as suitable for housing (Site Ref: 61), however the northern part (Site Ref: 81) was ruled out on the basis that there is a pipeline running through the site and a greenway designation. Detailed assessments have now been undertaken and conclude that the presence of the pipeline is not a barrier to development, and the loss of trees can be mitigated through the provision of a comprehensive landscaping scheme as part of the redevelopment of the site.

Bringing the site forward for residential-led development would help to achieve housing targets and reduce the amount of Green Belt land to be released, and would support the vision for canal-side living set out in the St Helens Town Centre Strategy.

The site has been included on the Council's Brownfield Register (BR016).

Pre-application advice has been sought in relation to this site under Ref: PRE/2018/0269/PREC, with various supporting documents already available on the Council's file.

Should you require any further information to assist in your consideration, please don't hesitate to contact me.

From

**Diane Clarke**  
**Town Planning Technician LNW**  
**Network Rail**



\*\*\*\*\*

The content of this email (and any attachment) is confidential. It may also be legally privileged or otherwise protected from disclosure. This email should not be used by anyone who is not an original intended recipient, nor may it be copied or disclosed to anyone who is not an original intended recipient.

If you have received this email by mistake please notify us by emailing the sender, and then delete the email and any copies from your system.

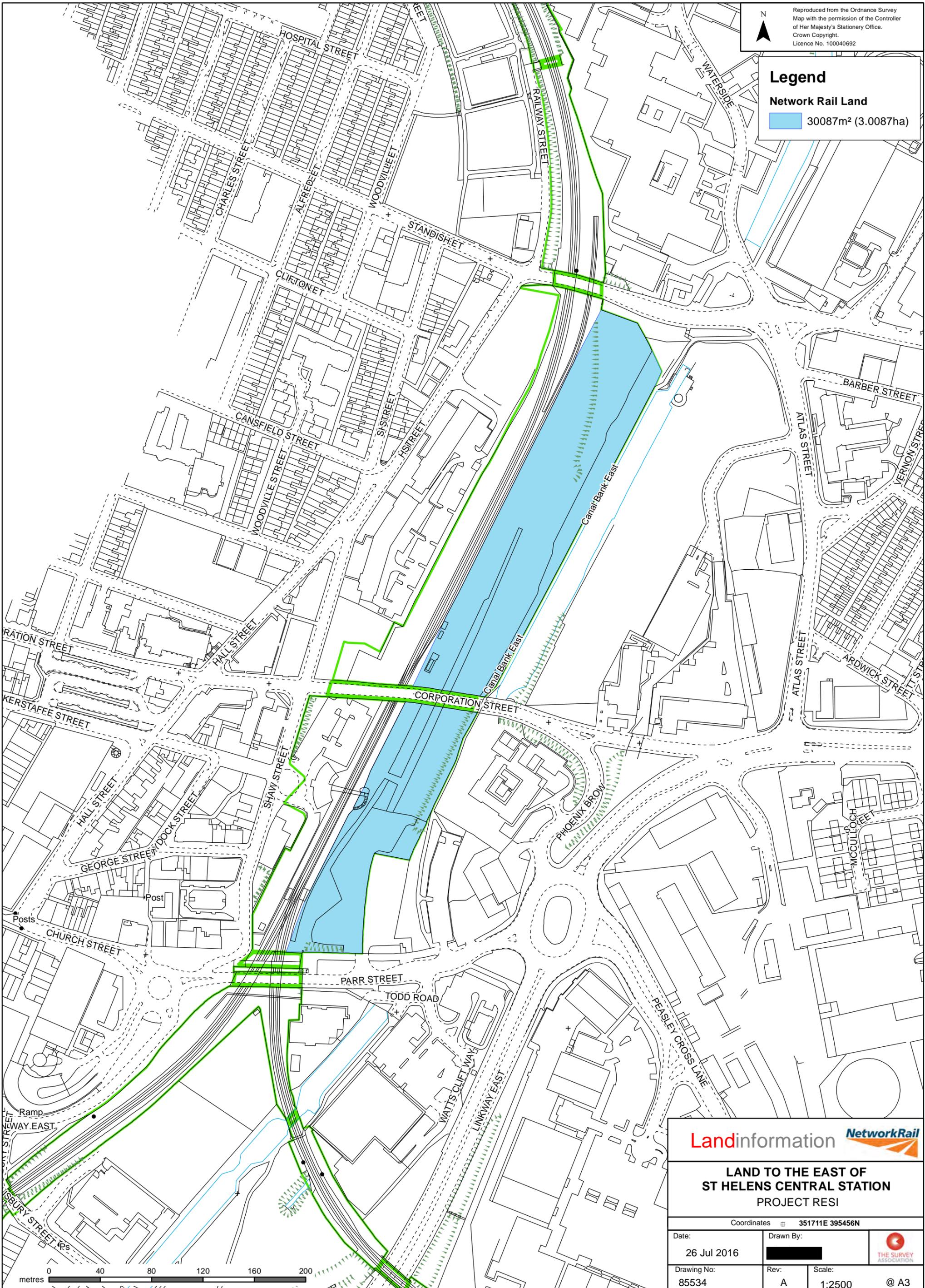
Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail. Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

\*\*\*\*\*



### Legend

**Network Rail Land**  
30087m<sup>2</sup> (3.0087ha)



### LAND TO THE EAST OF ST HELENS CENTRAL STATION PROJECT RES1

Coordinates  $\square$  351711E 395456N

Date: 26 Jul 2016	Drawn By: [REDACTED]	
Drawing No: 85534	Rev: A	

PO1433



**Objection to Planning LPSD Ref 4HA**  
**Tina Standish** to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

08/03/2019 16:17



1 attachment



Objection to local plan.docx

0

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This email has been checked for viruses by Avast antivirus software.  
<https://www.avast.com/antivirus>

58 Gorsey Lane

Clock Face

St Helens

WA9 4XB

[REDACTED]

To Whom It May Concern

**In response to the St Helens Local Plan 2020-2035 LPSD Ref 4HA Land bonded by**

**Reginald Rd / Bold Rd / Travers Entry / Gorsey Lane / Crawford St / Bold I wish to submit my representation/objections to the above planning application. I believe that this plan should not be adopted as the council has failed to take reasonable steps to notify all residents within the 200m radius which is in direct contravention to Regulation 18 of the 2012 Local Planning Regulations 2013 SCI. Letters should have been sent to all residents within 200m of the proposed sites to be removed from the Green Belt and this HAS NOT happened. Many residents DID NOT receive letters and it must be noted that no notices have been displayed on Frenchfields Cres, Crawford St Douglas Ave, or any surrounding streets as required under planning law.**

**Green Belt** – the removal of such a large piece of Green Belt land in one area will have an unprecedented impact on the local environment, there are many species of flora and fauna in this area alongside many birds and animals such as Skylarks, Lapwing, Owls, Yellow Hammer etc and brown hare & greater crested newts have also been recorded in this area.

Clock Face & Bold have also been identified as an area suffering from higher than average numbers of people living in poverty and deprivation and it is common knowledge that people living in this type of economic scale suffer with increased levels of mental health problems, I believe that the removal of such a beautiful and peaceful area enabling people to access established public footpaths and natural open areas will have a negative impact on their health and well being. [REDACTED]

[REDACTED]

**Infrastructure**

The area has limited community areas for people to access, the nearest primary school is oversubscribed there is no community centre or youth club facilities neither is there a GP Surgery or Dentist, the nearest secondary school is miles away. The bus service can be erratic and ceases at Clock Face and many complaints have been made from the residents of Gorsey Lane about the amount of traffic flow which is increasing on the Lane and ignoring the speed limit there. The location does not have the infrastructure to support the building of almost 3000 houses and the impact of the building of these homes will cause irreparable damage and increase pollution rather than minimise it

Volunteers have worked hard to establish a flourishing football and rugby facilities to encourage children & youths of all ages to participate in sport and reduce the level of childhood obesity, 5 years ago they were promised that they could purchase a part of these field in the Green Belt ie at the rear of Crawford St Clock Face so that they could build some sports areas including an all weather pitch however suddenly and without warning this promise was taken back much to their disappointed and the sports clubs are now struggling to flourish – obviously this change of heart was due to a new purchaser who wanted to buy the land for the building of these houses.

Clock Face was fundamentally a mining area and has suffered greatly from the loss of the pits and the residents have felt neglected and undervalued this green belt area has public footpaths established for years and years – locally known as ‘The Strappers’ and the impact of the building of almost 3,000 new homes within a short time scale will have a further devastating impact and cause irreparable damage both to the area’s natural environment and the residents health and mental well being and does not make effective use of the land .

I end by pointing out that in St Helens there is almost 3,000 homes already empty long term and also many substantial amounts of areas known as ‘Brownfield Land’ that could be used first for regeneration and would have a more positive impact on the communities in the near vicinity of these sites rather than destroying the natural beauty of Green Belt Land mentioned in my objections.

Yours faithfully

Tina M Standish

PO1434



Local Plan Representation

J WILLIAMS

to:

planningpolicy@sthelens.gov.uk

09/03/2019 10:33

Hide Details

**St. Helens Borough Local Plan 2020-2035: Submission Draft  
Town and Country Planning (Local Planning) (England) Regulations 2012**

I write to make representation on the above plan, specifically in relation to the proposals to build 259 houses in Rainford.

My name is **John Williams** and I live at **18 Old Lane Rainford WA11 8JE**

I am not responding on the online representations form as I think it is a totally inappropriate and misleading way for any ordinary resident to adequately express their views as to why or why not they support or disagree with the proposals. To ask people whether they think you are legally compliant or unsound is disingenuous.

With that out of the way, I state quite clearly that I support the proposals to build 259 houses in Rainford. The population of Rainford, according to Census figures, is decreasing, from 8344 in 2001 to 7779 in 2011. Rainford has a decreasing and increasingly elderly population and I believe that for the village to continue to thrive, function and flourish, additional families are necessary. The village has a good number of excellently organised community organisations, including sports teams, senior and junior, all in need of new members (with the possible exception of the popular junior football) and a host of well-run groups and societies for all ages, all of which have plenty of scope for new members. All the churches, would I am sure, welcome new parishioners. We have three Primary schools all rated Good by Ofsted (of which I believe there are current, and with the falling birth rate, projected spaces) and a High School also rated Good. 01

I also don't see a great problem in the proposed location. As long as the additional traffic issues are addressed it is a logical extension of housing within the village footprint and does not create a separate enclave detached from the village centre and community activities. At the same time either the Parish or Borough Council urgently need to sort out Car Parking in the village centre. Perhaps making use of the vacant land behind the Golden Lion and the Church would be a good idea – without affecting the cricket club. .

I do have one main area of concern – **Health and GP Services**.

I understand and agree with the concerns of people in Rainford about the increasing demand for GP appointments and am not convinced by the information in the Infrastructure Delivery Plan as follows: *Rainford 8HA - Land South of Higher Lane and East of Rookery Lane, Rainford There are two practices in Rainford. There are 259 new dwellings expected between 2020 – 2035, none of which currently have planning permission There is expected to be sufficient capacity in existing surgeries to cater for increased demand subject to the ability to recruit.* 02

Both surgeries in Rainford are excellent. They are however, both currently and significantly overstretched. I checked on the patient website today (9 March) and the first available appointment at the Rainford Health Centre is 21 March. This will definitely need addressing as 259 houses will clearly generate more patients.

I believe that we need to think about the needs of our village, not just the environment and fields. Issues such as greenbelt and traffic are important but in my view do not override the need to ensure that, for the future, Rainford needs to remain a strong and vibrant community – and a great place to live,

John Williams

9 March 2019

PO1435



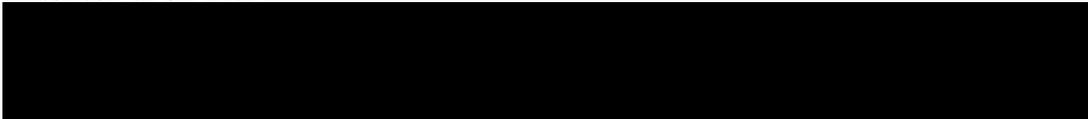
Response to the Local Plan for the Inspector

Sue Dow

to:

planningpolicy@sthelens.gov.uk

09/03/2019 14:51



We would like to register our objections to St Helens Local Plan to remove land from the greenbelt. (8HA Rockery Lane)

We are disturbed about any land being removed from the greenbelt but especially Grade 1 Agricultural Land and land that is actively farmed and provides employment. The St Helens Local Plan is intended to promote employment and economic growth but this will have the opposite effect. Also there has been no consultation with Natural England over the loss of Grade 1 Agricultural land. We need fields to grow crops to feed the people who live here instead of importing so much from Europe and further afield. Not only do we need this land now but we need it in the future, especially as nationally our population is growing. Once greenbelt has been removed it can never be returned. The greenbelt was designed to prevent urban sprawl and over development which so far has worked well but the Local Plan would be detrimental to this.

Greenbelt is also good for the health of residents who can walk along the footpaths enjoying the benefits of being in the fresh air and amongst the fields. This also good for the mental health of the population. St Helens is an area with significant health problems, including heart and lung disease as well as high childhood and adult obesity rates. Diabetes is a huge problem for the UK and as Rainford has few facilities we need our greenbelt.

The Government says Greenbelt land should only be released in exceptional circumstances and there are no exceptional circumstances to change the greenbelt boundaries. St Helens Council has enough brownfield sites to use and these brownfield sites should be used to build homes on and to tidy up the often unsightly areas these sites have become. The Council wants to build 486 houses every year but figures from the Office for National Statistics show St Helens only needs 383 houses per year. If these most recent figures from the ONS are used, the amount of building could be significantly reduced. 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 of common ground.

The Council's brownfield site register reveals there is enough land for 5,818 houses. The Borough has a falling population and very low property prices and the demand for these properties is low.

Building on greenbelt land is not appropriate!

The greenbelt land is a much desired commodity for the developers as it is easy and cheaper to build on than land that needs cleaning up and these are the reasons that the developers push the Council to release it from the greenbelt. These houses are much easier to sell but the prices would be much higher and of course not many homes would be affordable. The property companies are the only winners as their profits are much larger. There would be extra traffic on the roads as each house would probably have two cars and village roads are not built for large volumes of traffic and public transport, both train and bus, is poor.

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and test of soundness.

I would urge you to refuse this Local Plan and insist St Helens Council acts responsibly and uses brownfield land to build on which is readily available and where transport and amenities are more abundant. I hope you encourage the Council to leave the fields for crop growing in order that we can feed the population now and in the future.

Mrs Sue Dow  
55 Heyes Avenue  
Rainford  
St Helens  
Merseyside  
WA11 8AW

Mr Peter Dow  
55 Heyes Avenue  
Rainford  
St Helens  
Merseyside  
WA11 8AW

9 March 2019

PO1436



ST. HELENS BOROUGH LOCAL PLAN 2020-2035 (SUBMISSION DRAFT) - REPRESENTATIONS

marJorie Hart

to:

[REDACTED]/STHMBC

10/03/2019 11:03

[REDACTED]

To Whom It May Concern,

my details:

MISS MARJORIE HART  
123 HIGHER LANE  
RAINFORD  
ST. HELENS  
WA11 8BQ

[REDACTED]  
[REDACTED]

I would like to be kept updated of future stages of the St. Helens Borough Local Plan 2020-2035 via email.

My Comments on 8HA Higher Lane/Rookery Lane, Rainford.

I am concerned about the additional traffic that 259 dwellings on this site would create. The pressure this will create on Doctors Surgeries, Dentists & Schools in the Village. This field is Grade 1 Agricultural Land & has been continually used over the years by our Farmers who live and work in Rainford. This land produces the crops for us to live from & our Farmers to make their living out of, even more so will this land be required for Farming with Brexit. Rainford is predominantly a Farming Community, making it different from the rest of the Borough. This site regularly floods. It is adjacent to Rainford Industrial Estate & so there are issues with Air Quality, Pollution & Noise, which happen on a regular basis. There are also wildlife habitats. The site is also in close proximity to two Listed Buildings.

kind regards  
marJorie Hart

PO1437



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

Angela Liptrot

to:

planningpolicy@sthelens.gov.uk

10/03/2019 16:51

[Redacted]

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

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

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

In respect of the overall figures in the Plan;

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

01

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

02

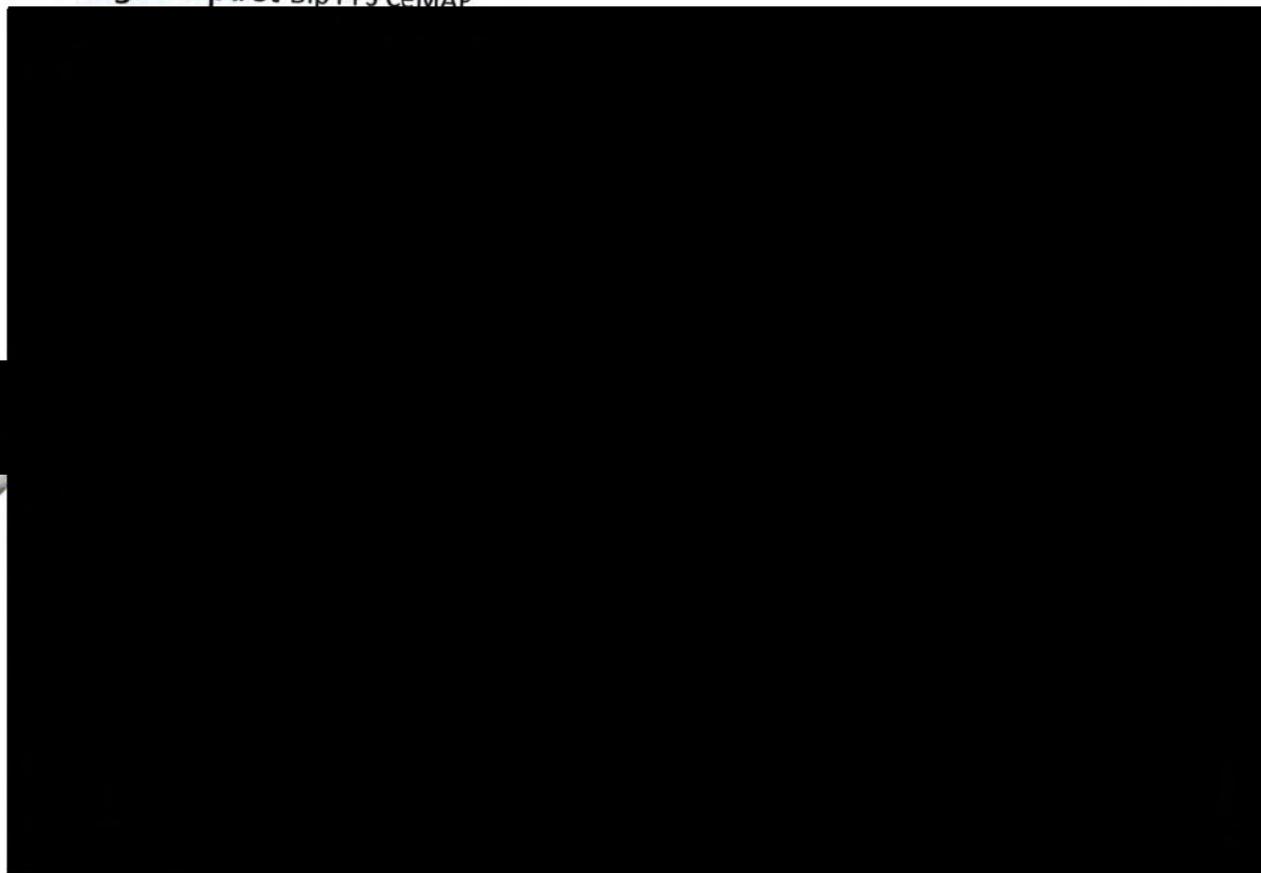
I [Redacted] and am very familiar with the are and the potential impact of this level of development on the surrounding community , landscape and infrastructure.

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

explored.

Kind regards

Angela Liptrot Dip PFS CeMAP



PO1438



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

paul seddon

to:

planningpolicy

10/03/2019 19:57

Hide Details

Hi

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

This e mail is sent by following people

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

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

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

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

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

I would also like to make the following points.

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

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

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

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

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

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

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

In regards to HA8 Rookery lane.

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

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

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

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

I would also like to add that as a [REDACTED] I would love to see the town flourish again. It is in an ideal location for commuters to Liverpool and Manchester, [REDACTED]

However I do not understand how building 250 houses on green belt in Rainford will help this goal apart from the fact they will be very attractive for developers. 02

The public transport to the village is terrible, the roads are too small to support another 500 plus cars and that includes the Rainford bypass, [REDACTED] The railway station is not a lot of use either.

The whole infrastructure needs to be improved to make this viable.

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I dearly hope you will consider my points and I hope a Labour council will listen to its labour voters.

Many thanks

Paul Seddon  
[REDACTED]

PO1439

①-LPA02 ②-LPA05

E10045



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

Dear Sir/madam

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

In respect of the overall figures in the Plan;

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

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

Specific points on site HA8 (Rookery Lane)

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

Kind regards  
 Mrs Lisa Ainsworth  
 53 Pilkington st

Rainford  
St. Helens  
Merseyside  
Wa118hg

PO1440

① - LPA02

② - LPA05

EL0046



## Representations on the revised St. Helens plan

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

11/03/2019 06:13

Dear Sir/madam

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

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- 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
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- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

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- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

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

PO1441



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**

PO1442



Eccleston Parish Council Response to Local Plan  
Eccleston Parish Council  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 10:54



1 Attachment



ECCLESTON PARISH COUNCIL RESPONSE.pdf

Hi

Please find the response from Eccleston Parish Council to the Local Plan.

Regards

Janet Anderson  
Clerk to Eccleston Parish Council

# ECCLESTON PARISH COUNCIL

CLERK TO THE COUNCIL  
Janet Anderson

6 Gorseley Croft  
Eccleston Park  
PRESCOT  
L34 2RT

11 March 2019

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

① - LPA06  
② - LPA04  
③ - LPA05  
④ - IOP  
⑤ - LPA08  
⑥ - Para 17.2 DTC

Please see below comments from Eccleston Parish Council regarding the St Helens Local Plan –  
**PLEASE ACKNOWLEDGE RECEIPT.**

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

- LPA05
- LPA06
- LPA07
- LPA08

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

- *Legally Compliant?* **No**
- *Sound?* **No**
- *Complies with the Duty to Cooperate?* **No**

**Section 5: If you consider the Local Plan is unsound, is it because:**

- *Positively Prepared?* **No** – Plan does not consider Brownfield sites
- *Justified?* **No** – Plan based on flawed methodology
- *Effective?* **No** – Plan is not deliverable
- *Consistent with National Policy?* **No** – Plan does not comply with NPPF 2018

**Section 6 and 7: Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

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

**And**

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

## General Overview

### Positively prepared?

Eccleston Parish Council believes that the 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 in the plan (ONS 2014) should be replaced by the more up-to-date ONS (2016) which uses more current data.

**The Local Plan is unsound because it has not been positively prepared.**

### Justified?

St Helens has more than enough land (previously developed brownfield and contaminated land) to meet local housing need. Therefore, there is no need for the land South of A580 between Houghtons Lane and Crantock Grove (8HS) in Eccleston and Windle & the former Eccleston Park Golf Club site (3HS) to be removed from the Green Belt and so-called "safeguarded".

The very fact that the land is proposed to be "safeguarded" for 15 years supports this statement, with enough land in place to provide this Borough's housing requirement during the Local Plan period (2020 – 2035). There are no exceptional circumstances for the land to be released from the Green Belt and it should remain so, until evidence can be provided to support such exceptional circumstances.

**The Local Plan is unsound because it is not justified.**

### Effective?

The Infrastructure Delivery Plan is particularly weak. In the areas suggested for housing development, there are already school's shortages and major transport problems. In particular, the 8HS and 3HS sites have considerable highways and local infrastructure issues, which are highlighted within the St Helens Green Belt Review 2018 document and as such, no development should be considered on either site.

**The Local Plan is unsound because it is not effective.**

### Consistent with National Policy?

The Plan does not comply with NPPF (2018) as it was written prior to publication. Neither does it consider the more accurate and up-to-date housing and employment statistics in ONS (2016) figures. Furthermore, St Helens Council has not provided any evidence to date that they have satisfied their 'duty to cooperate', which is essential, especially within the context of neighbouring local authorities, who are also bringing forward their own Local Plan's, such as Warrington, West Lancs and the Wirral.

**The Local Plan is unsound because it is not consistent with National Policy.**

### Conclusion

Taking all of the above cumulatively, Eccleston Parish Council believe that the local plan in its current form – when examined by the Planning Inspector, cannot be justified, effective,

consistent with national policy or positively prepared and as a consequence, it would surely follow that it is therefore unsound.

### Policy specific response

#### LPA04 – A Strong and Sustainable Economy

We believe the economic growth scenario outlined in the LPSD is not achievable or sustainable.

St Helens Council's planning policies for the economy are extremely aspirational. These are based on data derived from the Oxford Economics Forecasts. These forecasts are themselves optimistic and contain a circular argument in that they are impacted upon by the input of supply side i.e. land allocations from St Helens Council planners. Assumptions that have not been tested at examination, namely the release of Green Belt land. This is not an objectively assessed need it is a weighted, self-fulfilling circular argument.

#### Modification:

*The economic analysis is flawed and based on over-optimistic assumptions, which mean that the level of land needed is therefore not as high as set out in the Local Plan. Therefore, there are no exceptional circumstances to change Green Belt boundaries. As such, St Helens Council should bring forward more realistic economic growth predictions that are in line with neighbouring local authorities which in turn will have less impact on the environment, lead to less need for new infrastructure and protect Green Belt land from unnecessary development.*

#### LPA05 - Meeting St. Helens Borough's Housing Needs

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The Housing Need assessment does not use Standard Methodology and therefore there is no case for "exceptional circumstances" for Green Belt land such as land at the Eccleston Park Golf Course (Site 3HS) to be released. The expected growth over the period of this Local Plan seems to be completely removed from reality; it is purely aspirational and not realistic, also it does not use the latest figures available.

Why, for instance, are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15-year plan. When making important decisions the best available data should be used and St Helens Council's decision to use this 2014 based data is fundamentally flawed.

The justification for the Greenbelt Review (2018) is an erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt, such as 8HS and 3HS for so-called "safeguarding". We do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances" for the removal of Green Belt land and the 2016 ONS population projection figures should be applied.

#### Modification:

*St Helens Council should adopt the most up-to-date ONS (2016) projection figures, which set a requirement for 383 new homes to be built per annum. This would remove the need for any Green Belt release during the Local Plan period 2020 – 2035, with development concentrated solely on previously developed brownfield sites, of which there are many across St Helens.*

PO1443

ELO052

SHC 8HA

① - LPA0X

② - DIC

③ - S.A.



Response to St Helens Council Local plan

Christine Sterry

to:

planningpolicy@sthelens.gov.uk

11/03/2019 11:21

Hide Details



Response from Mrs Christine Sterry



I would like to be kept updated of future stages of the St Helens borough plan for 2020-2035

I object on the basis of LPA02, LPA05 and 06 of the St Helens Local Plan with specific reference to HA8. (This is all too complicated for me to digest so forgive me if I've got the numbers wrong!)

I believe it to be unsound on the basis that it has not been positively prepared, it is not justified nor effective.

The council has used ONS 2014 statistics to support its plan, when ONS 2016 statistics are available. This is obviously because they suit their needs better. St Helens is a town in population decline, and therefore the only reason for using old statistics is that it suits their higher housing targets. These higher than necessary housing targets mean that the council will use Grade 1 agricultural land from the Greenbelt to build houses purely to generate extra council tax revenues. They are being severely over optimistic in their assumptions on the level of land required to meet their obligations on setting a local plan. Natural England have not been consulted with regard to the loss of Grade 1 agricultural land, which once lost to farming, reduces food crops and loses local farming jobs.

①

No sustainable infrastructure has been identified or planned therefore an already busy and dangerous (form a point of vehicular traffic) village will just get worse. In the Summer of 2017 an elderly lady was mowed down and killed along Church Road, nothing has changed since then in terms of road layout, speed, access to vehicles, and therefore what has happened in the past can happen again. There are no new schools planned, no new doctors surgeries or dentists. 259 houses would put over 1000 extra people into the village which is a 13% increase in size. It would place approximately another 83 people on the doctors waiting lists each week, and extra demands on dentists and schools. None of these could cope.

①

St Helens local plan does not plan to bring high skilled and therefore high paid jobs to the town, therefore houses in Rainford would not address any housing situation for the general populous of St Helens, they would attract more commuters putting more cars onto the Rainford by-pass and the East Lancs Road. Current Windle island improvements have not considered the extra volume of cars that this plan should it be passed would put onto that junction, therefore chaos will reign once again.

①

I do not believe that adequate regional and cross border collaborations has been undertaken. The housing need assessment shows no case for "Exceptional" circumstances by which Greenbelt could be justifiably released. They have failed to co operate with other councils and have not published any statements of common ground.

①

②

St Helens is a former industrial town and until recently the council did not have until recently a register of Brownfield sites. There are many previously developed and currently what is described as "Contaminated" sites that should be considered in full before any Greenbelt be considered. These are reasonable alternatives and would have less impact on the environment and less need for infrastructure (that is not proposed in the plan). St Helens council and Liverpool City Region Combined Authority have no policy for bringing unsuitable sites back into use. These lazy councils don't want to regenerate they'd rather get the "Quick wins" from Greenfield development. What is to happen to these sites if they are not used for housing? They will remain blots on the landscape. I cannot believe that within the next 15 years enough of these sites cannot be remediated to avoid using Greenbelt land.

①

There are at least 900 long term empty homes in St Helens. Whilst I cannot find any information on the numbers that St Helens Council have got back into occupancy, whenever I have enquired I get the response that the council are working with the landlords. There are at least 5 houses that I am aware of in Rainford that are long term empty. 900 houses back into occupancy could eliminated many parcels of Greenbelt land being developed

on. The council are taking the easy route of building in semi-rural Rainford which will yield high council taxes for their coffers rather than concentrating on getting existing houses back into use, which they are already getting council tax for even though empty. ] ①

The Councils own "Sustainability Appraisal" shows 4 sites with negatives, 3 of which have been discarded. HA8 has not, with no explanation of why. Furthermore HA8 is next to an industrial area (which is also planned to be developed further) where a recent fire and explosion took place. Again like the fatality on Church Road, nothing has changed since this occurrence, so the potential for it to happen again remains. Other sites again have been removed on the basis of similar locations and risks. It is obvious that Rainford is being targeted by the Council as it is a high house price, high council tax paying village within the Borough. The council have used scare tactics in announcing masses of Greenbelt land snatching in its original proposal only to settle on HA8. This is scare tactics and best extremely poor conduct of the council. ] ② ] ①

Thank you for reading and considering my objections

Christine Sterry



PO1444

ELOOS6



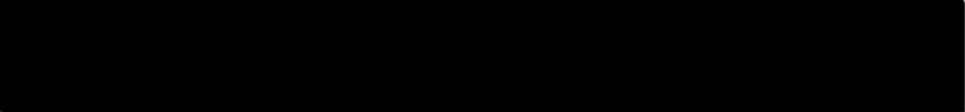
St Helens Local Plan 2020 - 2035, Submission Draft - Representations

Dan Ingram

to:

planningpolicy@sthelens.gov.uk

11/03/2019 13:18



1 Attachment



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

To whom it may concern,

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

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

Kind regards.

Dan Ingram

Senior Planner



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

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

- ① - GEN
- ② - Spatial Vision
- ③ - Objective 4
- ④ - key Diagram
- ⑤ - LPA01
- ⑥ - LPA02
- ⑦ - LPA03
- ⑧ - LPA04
- ⑨ - LPA04.1
- ⑩ - LPA05
- ⑪ - LPA05.1
- ⑫ - LPA06
- ⑬ - LPA08
- ⑭ - LPA09
- ⑮ - LPC01
- ⑯ - LPC02
- ⑰ - LPC07
- ⑱ - LPC09
- ⑲ - Appendix 5



St. Helens Council

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

EF0176

Ref: LPSD  
(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

Signature: [REDACTED] Date: 13/03/19

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

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

Yes  (Via Email) No

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

## PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

PLEASE REFER TO SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

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

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

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# St Helens Borough Local Plan 2020 - 2035

## Submission Draft

Representations on Behalf of Andrew Cotton and Family

March 2019

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

3.22 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 concerns with Policy LPA05 which are detailed below.

Housing Requirement

3.23 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 comes as a significant decrease from the figure provided within 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 570 dwellings per annum.

3.24 This is a cause for concern for our Client as there appears to be little justification for the reduction, especially in the context of a Council who, as outlined above, are allocating an amount of land for employment purposes far greater than the identified need.

3.25 The evidence contained within the Liverpool City Region draft SHELMA, as well as the St Helens ELNA suggest growth within the Borough. This point is bolstered by the amount of land the Council has allocated for employment over the identified need. Our Client is concerned however that at 486 dwellings per annum the Council has not fully considered the impact of this increase in employment within the Borough. Put simply, the Council may not have sufficient housing to accommodate those working within the Borough. The Council should therefore consider increasing the overall provision of new dwellings in order to address what will become a growing need within the Plan period.

3.26 The Council's Vision, Aims and Objectives suggest that the Council will be ambitious within the Plan in order to promote growth and address identified needs within the Borough. Our Client considers however that on the basis of the housing target, and the average rate of delivery resulting from this the Council is not being ambitious and may serve to exacerbate its own housing need in the event that the employment land is delivered.

Housing Supply

- 3.27 The Plan indicates that the 9,234 dwellings provided for within the Plan will come from a variety of sources, including completions, sites with planning permission, housing allocations, SHLAA sites without planning permission and windfall sites.
- 3.28 Our Client has concerns around the sources of supply and the Council's ability to deliver the housing it needs. This is on the basis that out of the 9,234 dwellings identified as being required between 2016 and 2035, 4,085 will be delivered through the allocated sites (with the remainder being anticipated after 2035), with 1,169 granted planning permission and 489 completions (based upon the 2017 SHLAA update). In total therefore this results in 3,491 dwellings to be delivered within the Plan period on windfall sites or SHLAA sites that do not have planning permission. Put another way, approximately one third of the Council's housing requirement remains unaccounted for. Whilst some of this may be provided by windfall sites our Client considers that presently the Council will fail to meet the needs of the Borough by placing too heavy a reliance on windfall sites coming forward.
- 3.29 It is clear that the Council will either have to allocate additional sites for development or review the phasing of the site allocations, as well as provide mechanisms to redress the number of dwellings provided within and beyond the Plan period or provide extensive evidence to demonstrate that the remaining 3,491 dwellings will come forward during the Plan period.
- 3.30 In this regard, our Client welcomes the inclusion of their land within site 4HA as outlines within Table 4.5, forming a larger allocation with an indicative site capacity of 2,988 dwellings. This is the largest allocation in the Plan by some 2,000 dwellings and emphasises the importance of its delivery in order to secure the validity of the Plan. Our Client welcomes the inclusion of their land interest but has some concern over the anticipated delivery rate of the allocation. Table 4.5 outlines that the allocation will only deliver 480 dwellings up to 2035 (i.e. within the next 16 years) with the remaining 2,508 dwellings being delivered after 2035, beyond the Plan Period.

10

- 3.31 This is considered to be an illogical approach, the Bold Forest Garden Suburb presents an opportunity for the Borough to grow, in line with its Vision and Objectives, and yet this phased approach to its delivery restricts that growth. The Garden Suburb also provides an opportunity to attract Government Funding although this funding is awarded on the basis of delivery. Our Client considers that the current approach does not demonstrate the ambition advocated by the Vision, Aims and Objectives of the New Local Plan at the outset.
- 3.32 Our Client considers that the allocation could and should deliver more than 480 dwellings during the plan period given that it is the key allocation with the Plan. In order to facilitate the economic and population growth the Council aspires to our Client considers that mechanisms should be in place to deliver the first phases of this site as soon as possible, during the Plan Period. This may also serve to plug the gap in the Council's supply as outlined previously.
- 3.33 Our Client considers that, presently, the anticipated delivery rate of site 4HA is unrealistically low and unambitious, and does not align well with the Council's aims and objectives. Our Client notes however that the Council could utilise the Bold Forest Garden Suburb allocation, by increasing its expected delivery within the Plan period to meet the shorter-term needs of the Borough.

Density

- 3.34 With regard to density, Policy LPA05 outlines certain density expectations depending upon site characteristics and location. The Policy requires new development to achieve a minimum density of 40 dwellings per hectare on sites within or adjacent to St Helens or Earlestown town centres and at least 30 dwellings per hectare on sites in local centres or that are well served by public transport and in other areas.
- 3.35 Whilst our Client does not object to this Policy they do consider that it could be improved in order to allow developers flexibility to consider site characteristics, market conditions and viability when looking at density on a site-by-site basis. The Policy should provide a mechanism to ensure that densities can be varied on a site-by-site basis should there be a need to deviate from the prescribed densities.

### Monitoring

- 3.36 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 including appropriate buffer.
- 3.37 Our Client also considers however that mechanisms should be put in place throughout the Plan to ensure that sites can continue to be delivered in the event that there is a slump in the Council's supply of housing land. (10)
- 3.38 In summary therefore, whilst our Client is grateful for, and supportive of, their land interest being included with the New Local Plan as a housing allocation, they remain gravely concerned over the wider provision and delivery of housing within the Borough and consider that the Council has failed to fully consider the housing needs resulting from the extensive increase in employment land. Our Client regrets therefore that they are unable to fully endorse Policy LPA05 at this time.

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

- 3.39 Building upon Policy LPA05, this Policy outlines which of the allocated sites will constitute Strategic Housing Sites. Our Client welcomes that their land interest is included within the list of Strategic Sites, under allocation 4HA (Land bounded by Reginald Road / Bold Road / Travers Entry / Gorsey Lane / Crawford Street, Bold). Our Client also welcomes that the Site in which their land interest lies has been branded 'Bold Forest Garden Suburb'. (11)
- 3.40 It is clear that in referring to the allocation as a Garden Suburb the Council recognises both the scale of the site and the importance of its contribution in meeting the needs of the Borough. As such our Client is concerned that there is no mention of the Bold Forest Garden Suburb within the Key Diagram, nor that it is labelled separately as is the case for the strategic rail freight interchange. Our Client considers that a site of such importance within the Plan should be outlined as such from the outset.

## 5.0 CONCLUSIONS

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

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

- The Vision and Plan objectives, in our Client's view broadly reflect national planning policy, and provide for a commitment to the fulfilment of deliverable yet aspirational social and economic goals, our Client does however consider that the delivery of Bold Forest Garden Suburb should be included both within the Vision and as a Strategic Aim in its own right; 1
- 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

- Our Client has numerous concerns around Policy LPA02 relating to the definition of St Helens Core Area, the use of Developer Contributions and the identification of Bold Forest Garden Suburb as a key settlement in its own right. Our Client is concerned that the overall importance of Bold Forest Garden Suburb has been understated throughout the Plan; 6
- In addition to the above there are concerns that the Council are seeking to allocate considerably more employment land that studies suggest is required. Whilst there is no objection to this in itself the Council should increase its housing allocations to meet the population growth this would generate. 10
- Our Client is concerned that whilst being the key housing allocation, and the largest by over 2000 dwellings, there is no site-specific policy relating to its delivery and Council expectations with regard to development parameters or planning obligations, nor is there mention of a subsequent Supplementary Planning Document which may serve to address such matters; 10
- The Council should revisit the housing delivery projections outlined under Policy LPA05. Presently, our Client considers that the delivery of 480 dwellings out of an allocation of over 2500 during the next 16 years is unrealistically low and unambitious. Given the status of the allocation and its importance within the Plan, the Council should be encouraging the delivery of the Site as soon as possible in order to meet the needs of the Borough; 13
- Our Client is concerned that there is a lack of evidence relating to infrastructure requirements and considers that the list of what the Council deems to be required is little more than a wish-list, with little evidence provided to support it. With regard to strategic land allocations the Council should list detailed, site-specific infrastructure requirements within the Plan; and 13
- Our Client remains concerned that the New Local Plan indicates a new Greenway Route running through their land interest but provides no detail on what this entails, who will provide it and when, and how will it be funded. The Council should provide greater clarity on this within the Plan. 17

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

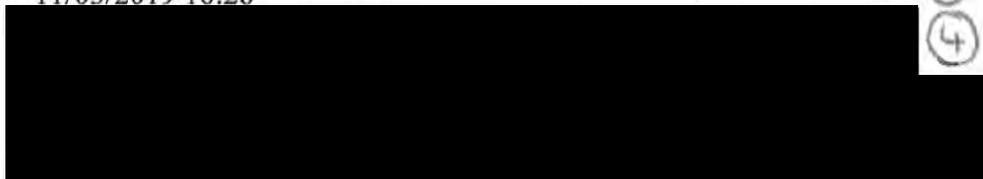
PO1445

ELOO58



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

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



Dear Sir/Madam,

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

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

**Policy LPA02**

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

①

**Policy LPA05 & Appendix 7**

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

②

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

②

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

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

2

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

4

**Policy LPA06**

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

3

Yours faithfully

Gerald Ryder  
74 Deepdale Drive  
Rainhill  
St Helens  
L35 4NW



PO1446



LPSD Ref:8HA land south of higher lane and east of Rookery Lane Rainford.N  
fran newton  
to:  
planningpolicy  
11/03/2019 16:54



I object to the above proposal to build 259 homes on this Grade 1 agricultural land, which is ploughed, planted and harvested each year providing employment and fresh produce for the North West. 259 homes will mean at least 350 cars into an area that is already very busy each morning and evening. A fleet of double decker buses bring in children to Rainford High School their entrance and exit route is Rookery Lane which has a blind bend at the bottom, over the years there have been a number of head on collisions, extra traffic, i.e heavy vehicles will add to the danger. Flooding also on Rookery Lane, has lifted heavy cast iron water main lids up onto the road.

Local Doctor's, Rainford Health Centre and Schools are at full capacity at the present time, where on earth will a possible 2,000 people go?

PO1447



Green belt decimation

Alice Murphy

to:

planningpolicy

11/03/2019 17:21



I am totally opposed to building on green belt land. We are always hearing about climate change and to replace fields with housing or warehouse estates based on concrete is obscene. Brownfield areas are available but potential builders do not want to prepare the land as this would cut their profit.

I live in Bold and am concerned with the building projects planned for my area.  every time I or my neighbours turn onto Neills Rd we are dicing with death. Neill's Rd is narrow, traffic comes flying down from Gorsey Lane at a rate of knots. Speaking of Gorsey Lane, with proposals for lots of building, has anyone checked traffic flow there at peak hours? If there is a problem on the M62 Gorsey Lane becomes a constant lane of traffic. It's too narrow and if it's going to be used I would think it needs to be made into a dual carriage way with traffic deterrents to control speed. There have been quite a lot of instances of cars turning into Neills Rd which have ended up in the bushes and further down Gorsey Lane many cars end up in the fields. It is impossible for two lorries to pass one another as the lanes are too narrow. Also Gorsey Lane is prone to flooding and has been closed to traffic after heavy rain. More houses planned opposite New Bold? This road floods easily and traffic is forced onto the wrong side of the road. Which way are all the residents going to go to get too work? I doubt all off them will work in St Helens, therefore I would presume would use Neills Rd and Gorsey Lane. Please protect our green spaces rather than turning them into concrete jungles.

Alice and Alex (Murphy) 

PO1448



Local Plan  
Louise Robinson  
to:  
planningpolicy  
11/03/2019 17:36

ELO062

① - LPA05

② - LPA04

③ - DEC

④ - SA



Sarah Louise Johnston



I am writing to object to the local plan. Namely:

In respect of the overall figures in the Plan;

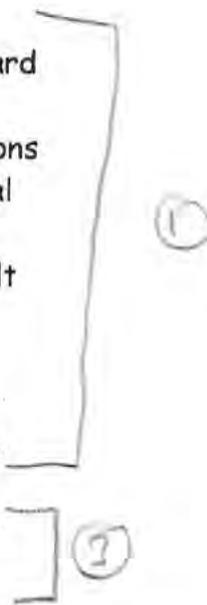
there are no exceptional circumstances to justify not using the standard method to calculate housing need

the economic analysis is flawed and based on over-optimistic assumptions the level of land needed is therefore not as high as set out in the Local Plan

therefore there are no exceptional circumstances to change Green belt boundaries

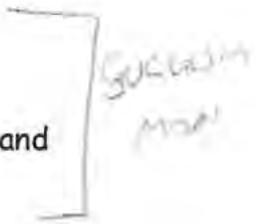
other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land these alternatives will have less impact on the environment and lead to less need for new infrastructure

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



For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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



**Specific points on site HA8 (Rookery Lane)**

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



This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions,

both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land for example see SHLAA 2016 site assessment ref 16m & 142 .

The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

### Specific points on site 9EA - Development of Industrial Area

I question this on Health and Safety grounds.

There are a considerable number of traffic accidents at both ends of Mill Lane. The top of Mill Lane where it meets the Bypass has three blind corners, and makes this stretch of road extremely dangerous for normal car users never mind increased traffic and large volumes are trucks.

The roads are narrow and i am not sure they would even accommodate two lorries passing at the same time

Quite often lorries park at the top of Mill Lane, meaning drivers have no option but to overtake into incoming traffic directly off the bypass. this happens today and i have photo evidence, this is only going to get worse.

The estate is close to housing, there was an explosion last year on the industrial estate and its lucky nobody was injured.

The entrance to the industrial estate from Mill Lane is not sufficient, and more traffic will only increase the risk of injury to those using the road

If this part of the plan goes ahead, then the committee needs to be accountable for personal injury / fatalities as a result as this in my view is a serious risk. I actually cannot believe the council are considering this development and i warn you as a local resident [REDACTED] what is coming and whilst i hope that i am wrong, i will not shy away from making this email known if ever needed as i feel you have been warned.

Many thanks

PO1449

E10064



St Helens Local Plan Representation - site HA8 Rookery Lane Rainford  
Mark Harley  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 18:19

Site 8HA

- ① - LPA05
- ② - DCC
- ③ - S.A.



Hello,

My Wife and myself would like to strongly object to the St Helens Local Plan specifically to site HA8 Rookery Lane Rainford.

Mark Harley & Jacqueline Scott-Harley  
4 Green Lane  
Rainford  
St Helens  
WA11 8EJ

The reasons for our representations and objections are as follows.

In respect of the overall figures in the Plan;

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

①

②

Subs  
mod

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

③

④

259 houses is a huge development. It could put 1,000 extra cars on Rainford's roads with implications for air

pollution, congestion and road safety. Higher Lane is already a busy road and, at certain points, dangerous. The recent Windle Island roadworks at the Rainford bypass/East Lancs Road junction has proven how dangerous this could be with several reports of accidents resulting in death. Rainford Village has also seen a significant increase in traffic which is not sustainable and also dangerous as drivers use the village as a bypass whilst the roadworks are being completed.

This will have a negative impact on local schools, business's, surgeries etc which are already running at more than 100% capacity.

We trust our representations and objections will be reviewed.

I look forward to hearing from you in due course.

Regards,  
Mark Harley & Jacqueline Scott-Harley

①

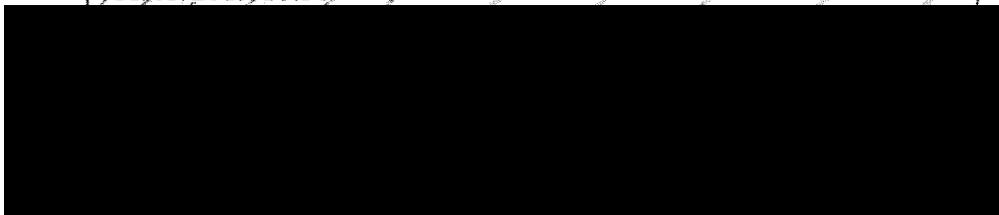
PO1450

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.

①

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.

①

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.

②

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.

②

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 172 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



PO1451



**Representation against StHelens local plan on HA 8 Rainford**  
Didier Huaulme to: planningpolicy

11/03/2019 20:59

Didier Huaulme  
32 Heyes Avenue  
Rainford  
WA11 8AR

Dear Sir

I wish to make representation against the revised St Helens local plan to build houses - specifically the building of 259 houses on HA8 (Rookery Lane) in Rainford.

The proposal is to build houses on grade 1 agricultural land which is currently actively farmed and provides necessary employment. Given the issues that Brexit will cause (regardless of whether a deal is reached or not) the UK will need to become more self reliant for food production. Destroying this agricultural land will not help this situation but rather make it worse. I am not aware that any consultation with Natural England regarding the loss of important agricultural land has taken place.

There is no mention of plans to improve the infrastructure around where these houses are planned. There is no provision for more school places or medical services. It is difficult enough to get a doctor's appointment currently. More households will only exacerbate this problem.

The increase in traffic this will cause will create problems in the village and surrounding roads. The current traffic improvements at Windle island show that this will be a problem because the traffic has increased on higher lane and blind foot road and this is destroying the road surface on these roads so by the time the improvements are finished at Windle island, it will be necessary to repair these roads too. And the increased traffic which the creation of these houses will cause, will negate the necessary improvements which are in the process of being made at Windle island.

The proposed houses are to be built close to an industrial area with all the risks that this brings such as pollution and possible explosion. I understand that other sites have been excluded for this very reason so I do not understand why this hasn't.

The council should consider whether there are more appropriate Brownfield sites which could be used in preference to using green belt land. Utilizing these would have less negative impacts on the environment. Additionally has it actually been established that these houses are necessary? Are there not existing houses standing empty which could be improved? I appreciate that there is an apparent housing shortage in the UK but I question whether the proposed houses will actually be "affordable" housing for the people who need them most.

Kind Regards

Didier Huaulme

PO1452

LLO069

Site BHA

① - LPA05

② - DEC

③ - S.A.



Residential and industrial building within Rainford . Objections to planning .  
lan to: planningpolicy

11/03/2019 21:27



St Helens Council,

I send this email as a follow up to my previous submission. I am disappointed that you have chosen to continue with your chosen path of building within the Rainford area and set out my objections as follows.

I have read with interest your latest version of the Local Plan. It seems to me that St Helens council are being deliberately over optimistic in the requirement for housing within the borough based upon an expectation that the recent declining trend for people to live within the borough will reverse by developments outside of it. However specifically In respect of the overall figures within the Plan;

1. It would appear that you are extolling that there are exceptional circumstances to justify not using the standard method to calculate housing need. There are no exceptional circumstances.

10

2. Therefore your economic analysis appears to be flawed and, based on my previous submission, you make over-optimistic assumptions about the role St Helens will play within the Mersey Gateway. We have, as a borough, continued to see a decline in the numbers of people living, and wanting to live, within St Helens. Therefore, again, the level of land required will be lower than you estimate and certainly lower than set out in the Local Plan.

10

3. It therefore follows on that if the requirement is lower than you artificially inflate, there are no exceptional circumstances to change Green belt boundaries within the borough bearing in mind that, it would appear that other reasonable alternatives have not been fully explored. This would include being realistic in setting lower target figures and using more of the previously developed land that exists within the borough. More work needs to be undertaken on utilising brown field sites before Grade 1 farming land is destroyed.

10

4. There is no doubt that Rainford currently lacks the infrastructure to support another 249 houses of the size that will no doubt be built. The current road structure barely copes with the current traffic, with multiple accidents occurring at Mill Lane/Higher Lane and regular blockages within Pasture Lane. Without significant investment with infrastructure and services, Rainford will cease to be function and those services available will be insufficient for the communities needs.

10

5. Little or no consultation appears to have been undertaken with other locally based Councils in respect of a regional requirement. There are already many building programmes underway in surrounding areas and a massive development envisaged by West Lancashire that will see Rainford more or less joined with areas within their catchment. With very limited infrastructure in these proposed areas, Rainford will be the nearest focal point for people living within this proposed catchment area. I have not seen a statement of common ground that shows good faith as to how this housing and industrial jigsaw will ensure that the over provision of housing and industrial areas will not be out of synchronisation with actual realistic demand.

10

6. In relation to the specific site HA8 (Rookery Lane), I make the following points;

This area is Grade 1 agricultural land, farmed continually and producing valuable resources for the local and national population. In an uncertain time of Brexit, we cannot afford to limit our ability to produce our own food within the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The St Helens 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. (0)

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.

Only four sites score four negatives (red grading) on the Sustainability Appraisal, and the other 3 have all been discarded. So St Helens Borough Councils's own assessment is that HA8 (Rookery Lane/Higher Lane) is the least appropriate Green Belt site allocated for housing in Phase 1. There appear to be double standards being applied, sceptically I would appraise for financial benefit (increased Council Tax revenue). (8)

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.

Thank you.  
Ian Valentine  
3 Sandon Grove  
Rainford  
WA11 8AU

Julie Valentine  
3 Sandon Grove  
Rainford  
WA11 8AU

Sent from my iPad

PO1453

LL0070



local plan HA8 (Rookery Lane Rainford)  
 sarah frodsham  
 to:  
 planningpolicy@sthelens.gov.uk  
 11/03/2019 21:52

SIR 81/1  
 ① - LMA  
 ② - SIR

Dear Sir/ Madam

We are writing to outline our representation to the above mentioned local plan with particular focus on the site HA8, Rookery Lane, Rainford.

Our primary objections are outlined below:

- The housing need as forecasted by the council is not inline with many other figures suggested by other professional bodies and as such there are no exception circumstances that justify not using the standard method to calculate housing need. This has resulted in the figures suggested by the council being wildly over the top
- Thus the economic analysis is flawed being based on over optimistic assumptions, that buck the trend seen in local population growth for well over a decade.
- As such the amount of land needed in the local plan is not as required in reality
- Most importantly, there are absolutely no exceptional circumstances that justify using greenbelt land for development
- There has been little exploration of suitable alternatives including the use of brownfield sites and the delayed publication of a brownfield site register, suggesting the lack of commitment to alternatives from the council, even though these alternatives could provide reduced impact solutions with existing infrastructure

①

Specific focus on HA8

- The other sites that also scored red on the sustainability appraisal have already been discarded. HA8 scores 4 negatives and therefore the councils own assessment must be that HA8 is not suitable for development from a sustainability prospective
- This site is next to an industrial area with a high risk of health and safety concerns for those that may live in such close proximity. There have been incidents of explosions and pollution recorded in the recent past. Similar sites have been discarded for similar reasons
- The land is grade 1 agricultural land which provides employment as well as being a vital source of high quality food produce. It makes no sense that the plan is intended to promote employment and economic growth when the proposal is to destroy something already providing this
- To my knowledge there has been no consultation with natural England over the loss of this high quality agricultural land

②

③

I urge you to take note of the voice of local residents, such ourselves, who are passionate about safeguarding the future of Rainford and its agricultural heritage for future generations. The completion of the plan as currently outlined will destroy the rural character of the village, decimate vital agricultural land and put into jeopardy livelihoods of many employed within the existing agricultural sector.

Kind regards

Sarah Frodsham  
Thomas Wright

11 Festival Road, Rainford, St.Helens WA11 8EP

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PO1454

660071



Local Plan Objection HA8 Rookery/Higher Lane, Rainford  
carol P  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 23:44

JN 814

- ① - LPA05
- ② - DLE
- ③ - S.A.



We write to strongly object against release of Green Belt land in Rainford - specifically Rookery Lane / Higher Lane (HA8).

There are no exceptional circumstances in St Helens housing need to justify destroying the green belt - St Helens Local Plan figures do not justify releasing land from the green belt. The predicted population assumption is greatly flawed and can only be a figure plucked out of nowhere. In addition, there has been no amalgamation of the needs of neighbouring areas such as Wigan and Warrington which is deeply concerning.

] ①  
] ②

In reference to the Sustainability Appraisal, the council's own assessment shows that HA8 is the least appropriate site allocated for housing.

] ③

There are many areas in St Helens which are not designated as Green Belt and which would benefit greatly from considerate development - the council is not adopting a brownfield first policy and I fear those areas which would be enhanced by development will be left to rot and the chance to improve those areas will be lost forever.

] ④

The land at HA8 is next to an industrial area - other sites considered by the council were rejected for being near similar industrial sites.

] ⑤

The land is already used for an important purpose. It is Grade 1 agricultural land which is used to grow food - there are no exceptional circumstances which would warrant a change of use of this land.

] ⑥

The infrastructure of Rainford is already bursting at the seams. The Doctors' Surgeries already have more patients than they can cope with, the schools are full, drainage and flooding is problematic and parking is already extremely challenging in the village.

] ⑦

A more visionary approach to development must be adopted which does not allow the unlawful destruction of this area which is already a complete and attractive successful community. It is the green belt surrounding Rainford which gives it its very identity.

From:  
Carol Pritchard  
David Pritchard  
133 Higher Lane, Rainford, St Helens, WA11 8BJ

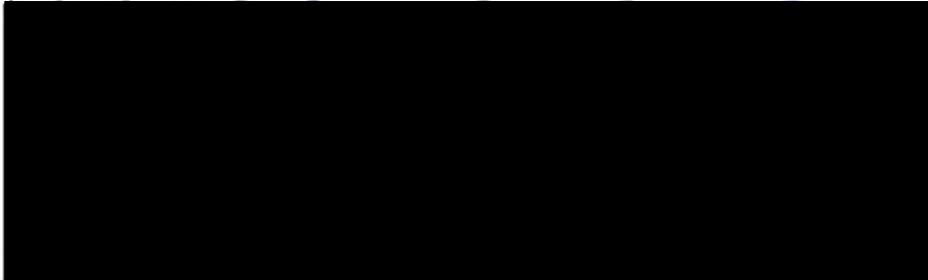
Sent from Outlook

PO1455



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  
10<sup>th</sup> Floor | One St Peters Square | Manchester | M2 3DE



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Date 12<sup>th</sup> March 2019St Helens Council  
Town Hall  
Victoria Square  
St. Helens  
WA10 1HPBy Email ([planningpolicy@sthelens.gov.uk](mailto: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

delays to delivery. We are keen to reemphasise the message that it is essential for early and continued detailed discussions take place over the revised allocations, in a bid to negotiate and agree any measures required to support the delivery of the proposed allocations within the revised draft. We strongly advise that contact is established at the earliest stage, ideally before any land transactions, and certainly prior to any application to explore options early as possible.

As more information becomes available on development proposals such as the approach to surface water drainage and the timing for the delivery of development, which is often only available at the planning application stage, it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure. We therefore request the Local Planning Authority encourages any future developer(s) to contact United Utilities as early as possible to discuss water and wastewater infrastructure requirements for specific sites, to ensure that the delivery of development can be co-ordinated with the delivery of infrastructure. Future discussions must consider wider proposals, such as proposed transport schemes/improvements, to support new development. There is opportunity to co-ordinate the delivery of proposed highway schemes with any new infrastructure United Utilities may require to facilitate wider development in the borough.

There are a number of significant strategic allocations within the Local Plan and it is of the utmost importance that there is infrastructure delivered to sustainably serve these areas beyond the plan period. There is genuine opportunity to leave a positive legacy from new development by ensuring there is infrastructure that will serve not only the allocation but potentially make improvements for the wider area. The reason this is mentioned is that it at times goes beyond the planning system, requiring communication with highway departments or other stakeholders. We wish to work collaboratively alongside stakeholders to ensure the sustainable delivery of new development across the borough.

We wish to highlight our free pre-application service for applicants to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of contacting us as early as possible. Enquiries are encouraged by contacting:

Developer Services - Wastewater



Developer Services – Water



Specific Policies

**Draft Policy LPC12: Flood Risk and Water Management**

UU welcomes the approach taken within Policy LPC12 and specifically clauses 8 – 12 which address sustainable drainage. We do however suggest the following minor amendments to clause 10, please note that your wording is in red, and our suggestions are in blue:

} ①

**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

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environmental drivers. United Utilities requests support for any consequential investment which will be necessary as a result of the growth identified by this draft plan and by any associated development plans. It is therefore requested that local policy is worded to recognise that utility sites, located within the green belt, are appropriate for development for operational purposes. Our preference would be for this principle to be reflected on the proposals map and in development plan policy.

United Utilities requests the Council's support for future investment in infrastructure in order to be able to expediently respond to the needs of St Helens. With regards to those sites situated in the Green Belt, national policy within the NPPF allows for:

- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and
- limited infilling or the partial or complete redevelopment of previously-developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development.

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On this basis, we are of the opinion that National Policy is broadly supportive of the expansion of our key operational sites in the Green Belt. However, we ask for this to be specifically referred to in your future planning policies, and reflected on your proposals map. We recommend a policy based on the following wording.

*'Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs.'*

These amendments would enable us to ensure we can continue to meet the growth and development aspirations of the borough, by ensuring that the fundamental infrastructure requirements of future development can be achieved. OS location plans of our sites for this purpose have been sent as part of previous consultations. The sites are listed below

**Public Water Supply**

**Groundwater Source Protection Zones (SPZ)**

UU acknowledge the reference to groundwater protection within Policy LPD01: Ensuring Quality Development and LPC12: Flood Risk and Water Management. However, owing to the presence of large areas of groundwater protection zones within the borough, UU consider that the Council should give further consideration to SPZs. To address this, UU's preference would be to have a standalone Ground Water Protection Policy in the Local Plan. This is also an important policy consideration in relation to any windfall sites that may take place in SPZ 1 or 2, as it may be necessary for the applicant to submit evidence of a risk assessment and mitigation as part of their application.

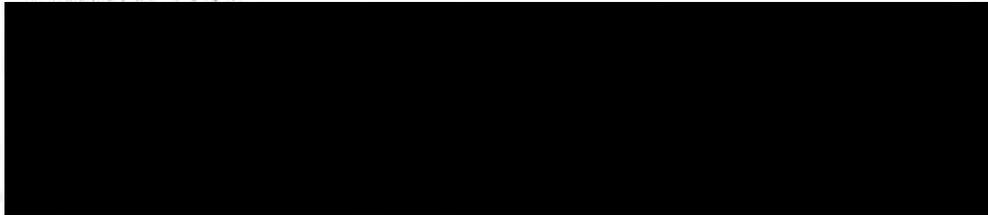
7

As has been raised in previous consultations, the SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The prevention of pollution to drinking water supplies is critical.

PO1456



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



6 Attachments



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



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



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



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



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



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

Good morning

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

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

Kind regards  
Alice Fitton

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



**Turley**

1 New York Street  
Manchester M1 4HD



Linkedin

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St.Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

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

**PART A – YOUR DETAILS**

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

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



<b>Signature:</b> 	<b>Date:</b> <input type="text" value="11/03/2019"/>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)
Yes <input checked="" type="checkbox"/> (Via Email) <span style="margin-left: 200px;">No <input type="checkbox"/></span>



## 2. Moss Nook Urban Village, Watery Lane

### Introduction

- 2.1 Harworth supports the allocation of land at Moss Nook Urban Village, Watery Lane (Site Ref. 10HA), for residential development. National planning policy requires Local Plans to provide for the delivery of a wide choice of new housing in sufficient quantities to meet development needs. ] (5)
- 2.2 This section of the representations will therefore demonstrate how the land at Moss Nook Urban Village is capable of contributing towards meeting the borough's residential development needs. ✓

### Background

- 2.3 Harworth work with a range of partner organisations to create a strategic vision for redundant sites in industrial heartlands in order to create places where people want to live and work. Harworth maximises value by developing the property portfolio and includes taking sites through the development cycle from masterplanning inception through to plot sale and build out. Harworth invest significantly in site enabling and infrastructure to deliver readily developable sites to the market. ✓
- 2.4 The effect of Harworth's developments is profound and long-term, supporting the sustainable growth of local economies. If fully developed, it is anticipated that Harworth's developments could deliver £2.9 billion in Gross Value Added to the national economy; whilst delivering tens of thousands of new homes, millions of square feet of commercial space and over 300MW of installed capacity from low-carbon sources on their land. To date, Harworth has delivered over 12,000 residential plots and nearly 13 millions sq. ft of industrial floorspace. ✓
- 2.5 Harworth entered into an Option Agreement with the former landowners of the majority of the land at Moss Nook in 2016. Following a period of due diligence, Harworth acquired the freehold interest in October 2018, and have recent completed a further acquisition of the former Blockworks to enable a more comprehensive development of the site. Moss Nook is Harworth's first residential development project in the North West of England, building on their positive existing track record elsewhere in the north of England and the Midlands. ✓
- 2.6 Harworth is confident that they can use their market-leading land regeneration expertise to redevelop this challenging but presently dormant site, to support the delivery of essential new homes for St Helens and the wider Liverpool City Region. ✓

### Site Context

- 2.7 Harworth's land ownership extends to c. 54.19ha of land (as identified on the Site Location Plan enclosed at **Appendix 1**). The site comprises a variety of uses, including the former concrete blockworks factory, Beechams playing fields, informal open space, several groups of trees and Sutton Brook. ✓

2.8 The former United Utilities depot, and several existing residential properties (seven dwellings on Watery Lane, two dwellings on Oak Street, and a larger area of housing fronting Morris Street) are all located within the development boundaries although are not included within the masterplan proposals. Conversely, some of the supporting sustainable drainage infrastructure for the site will utilise adjacent land owned by St Helens Council. ✓

2.9 The character of the surrounding area is as follows:

- The site is bound by residential properties to the north which are accessed via Cromdale Grove.
- St Cuthbert's Catholic High School is positioned beyond the eastern boundary of the site.
- Watery Lane forms the south eastern boundary of the site, beyond which are residential dwellings.
- The majority of the southern boundary of the site is formed by Sutton Road, beyond which is mixed use development including industrial and residential dwellings. ✓
- The site is also bound by mixed use development to the west, including a Morrisons Superstore and residential dwellings.

2.10 [ Redevelopment of the site will therefore present an opportunity to make positive use of an underutilised brownfield site, in a sustainable and accessible location, as in accordance with national planning policy. ] (5)

#### Planning History

- 2.11 A hybrid (part full/ part outline) planning permission was granted by the Secretary of State on 18 July 2007 for the '*demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure and engineering works, open space, and erection of new residential development on site*' for the land at Moss Nook (SHBC Ref. P/2003/1574). ✓
- 2.12 The full element of the permission comprised the demolition of existing buildings, provision of sports and recreational facilities, access roads and associated infrastructure, engineering works and open space. The outline element of the permission, with all matters reserved, related to the residential development and commercial uses. ✓
- 2.13 An application under Section 73 of the Town and Country Planning Act 1990 was approved on 22 May 2017 to vary/ remove several of the conditions attached to the original permission, in order to revise the parameters plan and highways requirements associated with the approved development (SHBC Ref. P/2011/0058). ✓
- 2.14 Condition 4 of the extant planning permission requires development to be carried out in accordance with the Parameters Drawing (Ref. HJB/PA511/226a), which restricts ✓

### 3. Representation to Draft Policies

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

#### Core Policies

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

#### Moss Nook Urban Village, St Helens

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

sports pitches and sustainable drainage systems. This land is identified on the Site Location Plan enclosed at **Appendix 1**.

3.9 The approved Parameters Plan (Ref. HJB/PA511/226a) (**Appendix 3**) demonstrates how the land to the north of Sutton Brook will be utilised to accommodate areas of enhanced open space; and the land to the east of Watery Lane will accommodate an area of surface water attenuation as well as enhanced open space, in support of the residential development that is proposed across the majority of the site.

3.10 Condition 13 of the extant planning permission also requires the land to the north of Sutton Brook (in the Cromdale Grove Recreation Ground) to accommodate sports pitches, which must be laid out prior to development commencing at Beechams Playing Field (to the south of Sutton Brook).

3.11 It is therefore evident that the land to the north of Sutton Brook and land to the east of Watery Lane forms a critical element of the wider masterplan for Moss Nook Urban Village and as such the boundaries for Site Ref. 10HA should be amended to reflect the wider, more comprehensive development area, which can be delivered entirely within Harworth's land ownership.

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3.12 Furthermore, since Harworth acquired the site, a full technical team has been appointed to enable the earliest delivery of development, with specialists advising on several matters including ground investigations, ecology, highways, drainage, and utilities.

3.13 Harworth is therefore able to use the latest evidence base to review the Sustainability Appraisal (SA) Scores for the land at Moss Nook, as set out below:

- Harworth do not agree with the SA Score for SA Objective SA1 'To protect and enhance biodiversity'. Development here is currently categorised as having likelihood to generate negative effects due to it containing 288m of Local Wildlife Site (LWS) (Sutton Brook) and is 89m to the nearest TPO. However, the majority of the development at the site will be placed at an appropriate distance from the Brook as to avoid harmful impacts, and any development that will be nearby to the Brook will be appropriately mitigated for. There will be ecological enhancement and management works at the site, including the Brook, which will offset any impacts development may have on the LWS. As the site is 89m from the nearest TPO it is highly unlikely that development here will have any impact on the tree(s) as the development will be contained solely within the site boundary. However, appropriate mitigation will be put in place if there is a risk of impact and it is therefore recommended that the site should be considered 'Amber'<sup>1</sup> in the SA as any potentially negative effects can be mitigated against.
- Harworth do not agree with the SA Score for SA Objective SA2 'Protect and improve land quality' given that the land at Moss Nook currently comprises a derelict site and so the redevelopment for residential dwellings will promote

8

<sup>1</sup> Amber: Potentially negative effects which could be mitigated

positive effects to the land quality and as such should score 'Green'<sup>2</sup> in the SA (as opposed to 'Grey'<sup>3</sup>).

- Harworth agrees with the SA Scores for SA Objectives SA5, SA7a, SA9a, SA12a, SA12b, SA13b, SA14, SA16 and SA20 which all conclude development of the site is likely to promote positive effects on mitigating against climate change, landscape sensitivity, access to open space and green spaces, access to GPs, access to leisure, access to secondary schools, access to employment opportunities, access to housing, and access to services.
- Harworth agrees with the SA Scores for SA Objectives SA4, SA6, SA7b, SA9b, SA13a, SA15, and SA19 which all conclude that development of the site is unlikely to have any effects on sustainably managed water resources, minimising the risk of flooding, distance to a prominent ridgeline, public rights of way, access to primary schools, supporting the local economy, and reducing the need to travel.
- Harworth agrees with the SA Scores for SA Objective SA3 and SA8 which acknowledges that any negative effects on air quality and cultural heritage can be mitigated.

3.14 To summarise, the recent technical studies confirm that there are no environmental, physical or social constraints that would restrict future development on the site. As in accordance with the principle of development that has been approved for the site, the SA demonstrates how development of the site will promote many positive effects on the environment and social wellbeing.

3.15 The allocation of this land will therefore further support the delivery of a sustainable brownfield site, significantly contributing towards the housing needs of the borough.

#### Development Management Considerations

3.16 Harworth supports the principle of having policies to manage the housing mix and the provision of affordable housing within new developments. However, emerging Policies **LPC01 'Housing Mix'** and **LPC02 'Affordable Housing'** should be amended so that they are flexible enough to acknowledge that the different scale, characteristics and density of each development site will vary from site to site.

3.17 As such, Harworth recommends that the policies are more positively prepared, to acknowledge that the provision of a suitable housing mix and affordable housing will be determined by a viability case, to ensure the development sites can be delivered on an individual basis.

3.18 Harworth supports the principle of emerging Policy **LPC13 'Renewable and Low Carbon Energy Development'** which seeks to reduce carbon emissions within the borough. However, this should not be a mandatory requirement for all future developments within the borough and it should be considered suitable when it is viable to do so.

<sup>2</sup> Green: Likely to promote positive effects

<sup>3</sup> Grey: Unlikely to have significant effects

## 4. Conclusions

- 4.1 These representations have been prepared on behalf of Harworth Estates Ltd and have set out Harworth's general support and concerns in relation to the emerging policies and aspirations of the St Helens Borough Local Plan. ✓
- 4.2 In particular, Harworth suggest that the site boundaries for Site Ref. 10HA Moss Nook Urban Village are amended to reflect the principles of development that has been established for the site. ] (3)
- 4.3 Several recommendations have also been provided to ensure the emerging policies are not too prescriptive which would ultimately risk suitable, sustainable and available development sites not being able to deliver development due to viability reasons. ✓
- 4.4 Overall, Harworth supports the proposed allocation for residential development at Moss Nook Urban Village; they look forward to continuing to work with St Helens Borough Council to ensure that residential development is delivered within the plan period, significantly contributing towards the housing needs of the borough. ✓

PO1457



St Helens Borough Local Plan 2020-2035

Godwin Brenda

to:

planningpolicy

12/03/2019 10:27



## ST HELENS BOROUGH LOCAL PLAN

From: Mrs Brenda Godwin

79 Higher Lane

Rainford

St Helens

02/03/2019

Re: Proposed removal from Green Belt of land East of Rookery Lane and South of Higher Lane.

Area: **8HA** (12HA)

### 1) GENERAL

The estimates for the numbers of new houses needed in St Helens are still based on out-dated data. More up-to-date figures show that present plans are an overestimate of the housing needs for a declining population of the borough.

Building in this area is also very unlikely to contribute to the affordable housing that is needed for St Helens. Housing in Rainford is relatively expensive and houses built on this land will inevitably service the needs of commuters to Liverpool and Manchester rather than helping with any shortage of housing for the less wealthy residents of the borough.

### 2) FARMING LAND

This area is prime farming land presently farmed by TWS. They have made it clear that the loss of this land will inevitably lead to job losses. As one of the aims of the plan is to maintain and increase employment this goes directly against one of its aims

Also at this time with the uncertainties of Brexit , we are being told that this country needs to produce more of its

own food. How can taking land out of food production, at this time, be a sensible po

### 3) EFFECT ON RAINFORD

#### a) Traffic

The building of 259 houses in this area is likely to lead to approximately 400 cars on this development. The plan calls for SAFE exits on to Rookery Lane and Higher Lane without any indication as to how this could be achieved. There seems very little prospect of this, especially into Rookery Lane. Considering that the vast majority of these homes will have two wage earners we have the prospect of the vast majority trying to leave at a very similar time on the morning of a working day. The majority of these cars are likely to be travelling through the junction at Windle, The improvements being made at this junction at present are based on present traffic not on traffic numbers inflated by this development. It is likely therefore, that there will still be problems at this junction.

#### b) Primary Schools

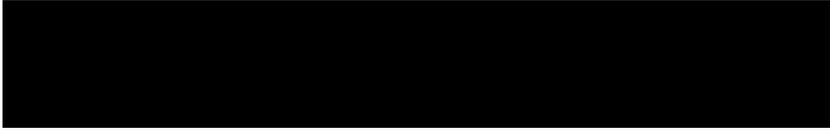
This development would clearly add a large number of children of primary school age to the population of Rainford. These numbers would clearly not be sufficient for the building of a new school. So all of these children would have to be incorporated into the present three primaries, as it is clearly unacceptable for them to be required to travel out of the village. There seems to be no possibility of Rainford C of E expanding. Even if it was possible for Brook Lodge to do so, which seems unlikely, any addition to the present traffic chaos in this area caused by Rainford High and Brook Lodge is surely unacceptable. There may be a few spare places at Corpus Christie but any expansion here is unlikely to help as it is a Catholic school and unlikely to be acceptable to the majority of parents.

**In conclusion this proposal appears to call for houses which are unnecessary, will do nothing to address the real needs of St Helens' residents, remove prime farming land from the nations stock, causing unemployment in the process, lead to travel chaos, at the very least on working mornings and cause huge problems for primary education in Rainford**

PO1458



Local plan 2020-2035  
Paul Godwin  
to:  
planningpolicy  
12/03/2019 10:28



## ST HELENS BOROUGH LOCAL PLAN

From: Mr Paul Godwin

79 Higher Lane

Rainford

St Helens

02/03/2019

Re: Proposed removal from Green Belt of land East of Rookery Lane and South of Higher Lane.

Area: **8HA** (12HA)

[if !supportLists-->1) <!--[endif]-->GENERAL

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Also at this time with the uncertainties of Brexit , we are being told that this country needs to produce more of its own food. How can taking land out of food production, at this time, be a sensible po

## EFFECT ON RAINFORD

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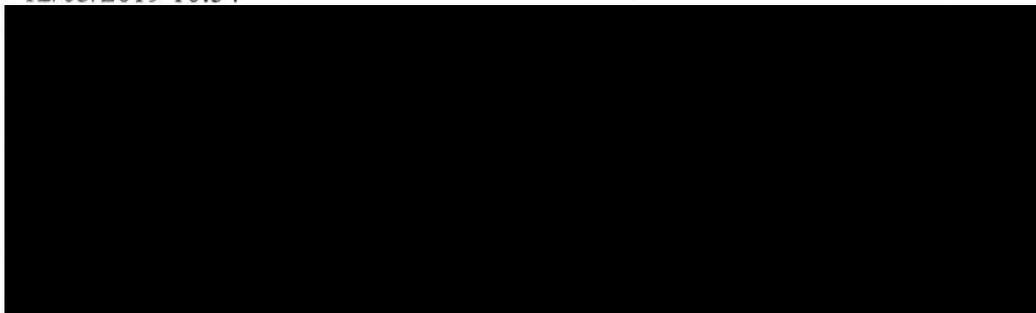
residents, remove prime farming land from the nations stock, causing unemployment in the process, lead to travel chaos, at the very least on working mornings and cause huge problems for primary education in Rainford

PO1459

E10081



St Helens Borough Local Plan 2020-2035: Submission Draft  
Bannister, Edward  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 10:54



1 Attachment



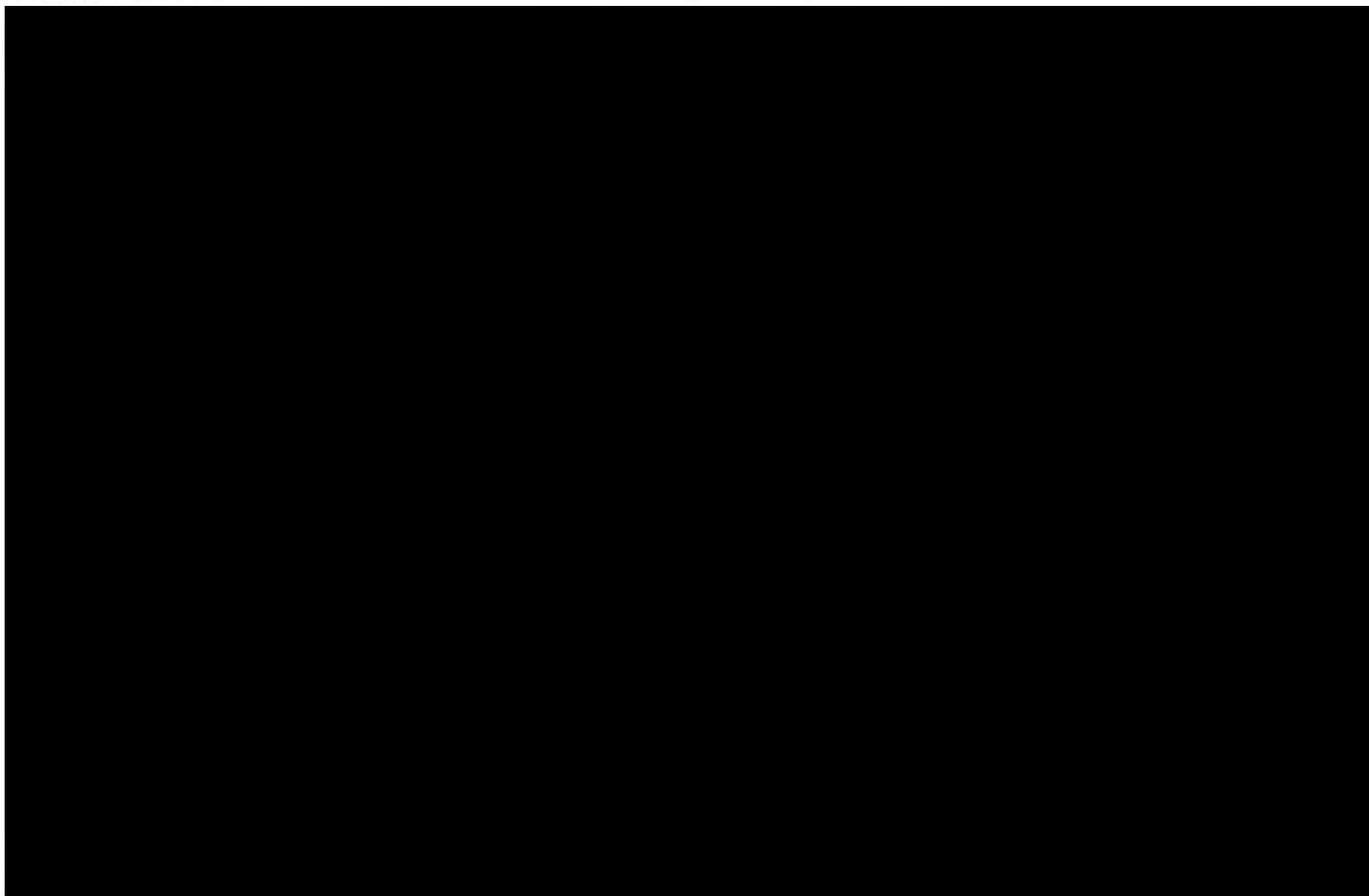
St Helens Draft Submission\_KMBC\_Response.Mar19.docx



Dear 

Please find attached Knowsley Council's representation to the St Helens Borough Local Plan 2020-2035 Submission Draft. I would be grateful if you could confirm safe receipt.

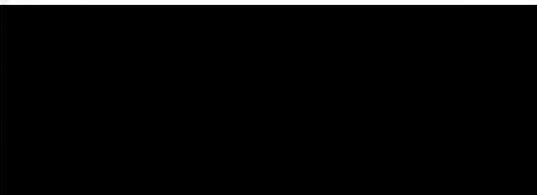
With best regards,  
Edward



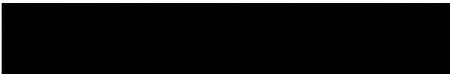


**Knowsley Council**

Please ask for:  
Tel No:  
Email:



EL0081



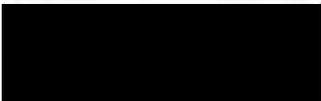
Development Plans Manager  
St Helens MBC  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP

Our Ref: n/a  
Your Ref: n/a

- ① = LPA 04
- ② = LPA 06 - EMPLOY
- ③ = LPA 06 - HOUSING
- ④ = LPA 05 (4HA)
- ⑤ = GEN

Date: 13 March 2019

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



**RE: St Helens Borough Local Plan 2020-2035 Submission Draft**

Thank you for your email of 18 January concerning the above. We are pleased to set out our consultation response in accordance with the Duty to Cooperate.

Knowsley Council's representations on strategic elements of the Plan and other factors are set out below, our comments are mainly centred on housing and employment, since these are the two most important issues facing the production of any Local Plan.

**Strategic matters**

In general, we note the reduction in the overall level of growth proposed since the publication of the Local Plan Preferred Options document in 2016.

Housing

We acknowledge the fact that the status of the former Eccleston Park Golf Club site has been downgraded, having previously been proposed for allocation at the Preferred Options stage.

The proposed development of the Bold Forest site (for housing) is not of particular concern from Knowsley Council's point of view, as we believe that it is unlikely to adversely impact on Knowsley's ability to achieve our own target of delivering 450 homes per annum, and our objective of rebalancing the housing market. The implications of this growth on the strong commuting and migration links between Knowsley and St. Helens, as well as our closely aligned housing markets, will require continued cross border collaboration between the two boroughs which we very much welcome.

Employment

We would agree that the policy to exceed the residual employment land requirement identified seems reasonably necessary, owing to the relative lack of take-up in previous

} LPA 04  
①

- Community infrastructure impacts (including education and health care); and
- Housing market competition.

3

*Former Eccleston Park Golf Club*

The scale of any development at the former Eccleston Park Golf Club (956 homes) post 2035 would undoubtedly generate a significant uplift in local traffic, and you will be aware that officers from our respective highways departments previously met (in May 2018), to discuss this issue further. At this time we simply wish to reiterate our concerns over the potential impact of developing this site around the sensitive local road network, and we would welcome discussions in due course with a view to identifying specific points of action, in order to minimise the potential impacts both on the highway network and local residents, should the site end up being safeguarded in the eventual adopted Local Plan.

3

Notwithstanding the above, we consider it unlikely that the former Golf Club site would be in direct competition with the similarly large development sites available in Knowsley given the relative disparities in the anticipated development commencement dates now that the site is no longer proposed for immediate allocation in the Submission Draft.

*Bold Forest Garden Suburb*

Coupled with the fact that fewer than 500 housing completions are anticipated before the end of the plan period in 2035, the site's location towards the eastern side of St.Helens borough means its allocation and development would be unlikely to have direct negative impacts on Knowsley residents. Nor would it be in direct competition with any of Knowsley's strategic housing sites, not least the Halsnead Garden Village.

4

*Other sites*

The other proposed residential and employment land allocations would have fewer significant impacts, either due to their distance from Knowsley or due to the time period for which they are allocated for development. Again, however, we request that the Local Plan ensures that any potential negative impacts on Knowsley are identified appropriately and suitably mitigated.

4

Overall, it is encouraging to see that many of the concerns we identified in our response to the Preferred Options consultation have been addressed in the Submission Draft, and we look forward to working with you to ensure that our remaining issues are addressed as the new Local Plan moves towards adoption in 2020. We propose to continue to do this in the positive, clear way which we have been able to do up to now, and we remain committed to supporting our neighbouring authority towards a sound Local Plan which benefits the whole Liverpool City Region, while mitigating the potentially negative impacts on our borough.

5

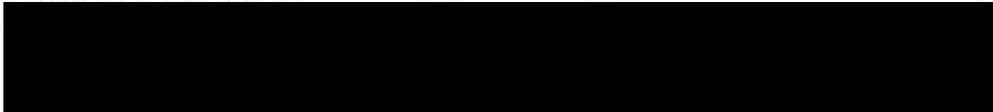
PO1460

ELOOS5



Local Plan Submission Draft  
pat Kitto  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 12:14

SITE SH3  
① - LAND  
② - DFC  
③ - S. E.



My Names is Pat Kitto of 10 Rookery Lane, Rainford, St Helens, WA11 8EF and I wish to make the foillowing representation on the Local Plan Submission draft:

In respect of the overall figures in the Plan:

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

①  
②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

SUB  
WOP

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.

③  
①

Thank you for your consideration

Pat Kitto

PO1461

EL0087



LOCAL PLAN SUBMISSION DRAFT

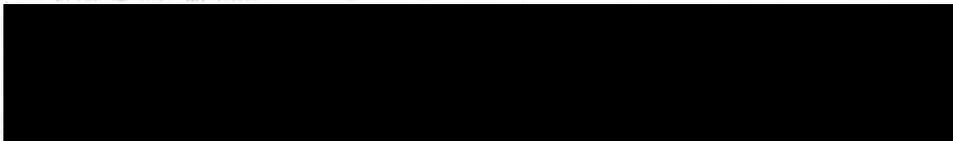
Nick ffrench

to:

planningpolicy@sthelens.gov.uk

12/03/2019 12:24

- ① - LPA01
- ② - DEC
- ③ - S.A.



My Names is Nick ffrench of 10 Rookery Lane, Rainford, St Helens, WA11 8EF and I wish to make the following representation on the Local Plan Submission draft:

In respect of the overall figures in the Plan:

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

①

②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

SUG  
MOD

Specific points on site HA8 (Rookery Lane)

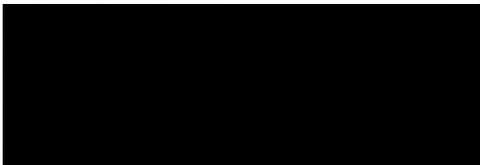
- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated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

③

①

Thank you for your consideration

Nick ffrench



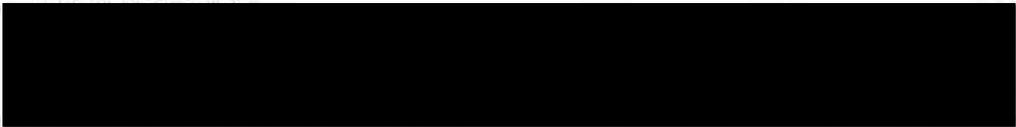
PO1462

LL0089



St Helens Borough Local Plan 2020-2035 (Submission Draft) LPA02 - Site 8HA  
Ian Burslem  
to:  
'planningpolicy@sthelens.gov.uk'  
12/03/2019 12:29

Site 8HA  
① - LPA02  
② - SA



Dear Sir,

I am writing to formally register my objections to the building of 259 new houses on Site 8HA

The 2 main reasons are simply that it is not necessary to build on this green belt land when there are other sites more suitable or brownfield sites that can be used and secondly Rainford does not have the facilities to cope with another 259 houses adding approximately another 500 cars.

The reasons for requiring extra housing in Rainford / St Helens has been shown to be based on figures that are too high and actually that amount of housing is not needed.

The figures are flawed and therefore why is Green Belt land being used and taken away ?

There are no exceptional circumstances to do this.

Surely other reasonable alternatives should be fully explored, including brownfield sites and other more suitable sites.

①

Site HA8 (Rookery Lane) is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector.

This is obviously threatened by the proposed removal of this site from the Green Belt which goes against the councils strategy to promote employment and economic growth.

Initially 6 sites around Rainford were proposed and only 4 sites scored 4 negatives on the Sustainability Appraisal and the other 3 have all been discarded so surely HA8 is one of the least appropriate Green Belt sites allocated for housing in Phase 1.

②

The site is also next to industrial employment land and other sites have been excluded because of similar situations to this.

In addition figures show that 936 houses in the borough were classed as being long-term empty in the most recently recorded figures in October 2017.

Council tax figures from October stated there were a total of 2,853 unused homes in the borough.

Surely a priority should be to lower these figures and build less on current Green Belt land.

①

The building planned at the old St Helens Car Auctions site by Carr Mill Dam is a great example of using existing land to build on and improve the area instead of building on existing farming Green Belt land which is just not necessary.

This site should be removed just for all the above reasons.

In addition however, the facilities in Rainford cannot cope with this additional housing, this includes the lack of doctors and dentists and also the increased traffic it brings to the small centre which has extremely minimal parking anyway and also the increased traffic to Rookery Lane and also Thickwood Moss Lane which will now become a dangerous, major cut through to the Rainford ByPass.

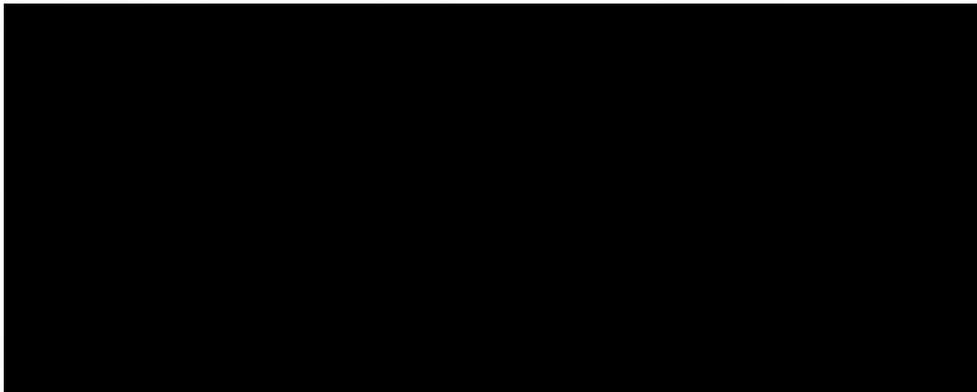
There are also much better places to add additional housing around St Helens, closer to the centre, with better access to public transport and the road network as opposed to building in Rainford itself.

In summary there is no need to build on farming Green Belt when there are much better alternatives to

provide additional housing in the area.

Best Regards  
Ian Burslem

1 Rookery Drive  
Rainford  
Merseyside  
WA11 8BB



PO1463



HA8

[REDACTED]  
to:

planningpolicy

12/03/2019 13:06  
[REDACTED]

Hi

As a former resident of Rookery Lane and [REDACTED] I am objecting to the proposed HA8 use of Green belt land for the purpose of building new homes as this 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.

Regards

Tim Murphy

48 Halewood Avenue  
Golborne  
Warrington  
WA3 3RG

PO1464



Local Plan 2020-2035  
Shaun Gallagher to: planningpolicy

12/03/2019 13:43

Dear [REDACTED]

I wish to register my objections to elements of proposed release of Green belt in Haydock area. In particular the Area defined 2HA.

Traffic around Blackbrook and Haydock are almost at Saturation point, particularly during rush hour periods.

I have raised the issue with my local councillor, [REDACTED] over the last two years the problem with trying to cross the road on footn at Vicarage Rd near Vicarage Drive to get to Tesco shop, post box and bus stop on Westend Rd. my request for a refuge island was declined. it is also very difficult getting out of Vicarage Drive by car, particularly turning right towards new bypass.

To build Houses or anything else on the land marked 2HA and place a roundabout, or any other access at the junction of Vicarage Road and Liverpool Rd, would greatly exacerbate an already horrendous traffic situation on Vicarage Rd and Haydock area in general. As well as make even more difficult to cross the road near Tesco express, it would make it almost impossible to turn right out of Vicarage Drive by car. It would force traffic to turn left and use Westend Rd rather than the Bypass. Therefore undermining the purpose of the Blackbrook bypass in the first place.

Yours Sincerely  
Shaun Gallagher  
43 Clipsley Crescent  
Haydock  
St.Helens  
WA11 0UH

Sent from my iPad

PO1465

110093



St Helens Borough Local Plan 2020-2035 (Submission Draft) LPA02 - Site 8HA

Kathryn Drewitt

to:

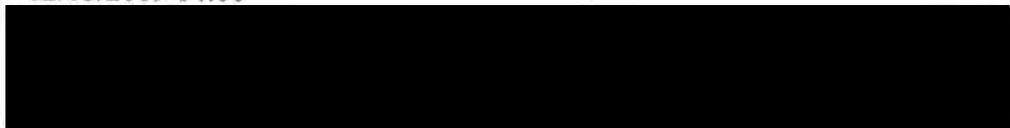
'planningpolicy@sthelens.gov.uk'

12/03/2019 14:00

Site 8HA

① - Wind

② - SN



Dear Sir,

I am writing to formally register my objections to the building of 259 new houses on Site 8HA

The 2 main reasons are simply that it is not necessary to build on this green belt land when there are other sites more suitable or brownfield sites that can be used and secondly Rainford does not have the facilities to cope with another 259 houses adding approximately another 500 cars.

} ①

The reasons for requiring extra housing in Rainford / St Helens has been shown to be based on figures that are too high and actually that amount of housing is not needed.

The figures are flawed and therefore why is Green Belt land being used and taken away ?

} ①

There are no exceptional circumstances to do this.

Surely other reasonable alternatives should be fully explored, including brownfield sites and other more suitable sites.

Site HA8 (Rookery Lane) is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector.

} ①

This is obviously threatened by the proposed removal of this site from the Green Belt which goes against the councils strategy to promote employment and economic growth.

Initially 6 sites around Rainford were proposed and only 4 sites scored 4 negatives on the Sustainability Appraisal and the other 3 have all been discarded so surely HA8 is one of the least appropriate Green Belt sites allocated for housing in Phase 1.

} ②

The site is also next to industrial employment land and other sites have been excluded because of similar situations to this.

In addition figures show that 936 houses in the borough were classed as being long-term empty in the most recently recorded figures in October 2017.

Council tax figures from October stated there were a total of 2,853 unused homes in the borough.

Surely a priority should be to lower these figures and build less on current Green Belt land.

} ①

The building planned at the old St Helens Car Auctions site by Carr Mill Dam is a great example of using existing land to build on and improve the area instead of building on existing farming Green Belt land which is just not necessary.

} ①

This site should be removed just for all the above reasons.

In addition however, the facilities in Rainford cannot cope with this additional housing, this includes the lack of doctors and dentists and also the increased traffic it brings to the small centre which has extremely minimal parking anyway and also the increased traffic to Rookery Lane and also Thickwood Moss Lane which will now become a dangerous, major cut through to the Rainford ByPass.

} ①

There are also much better places to add additional housing around St Helens, closer to the centre, with better access to public transport and the road network as opposed to building in Rainford itself.

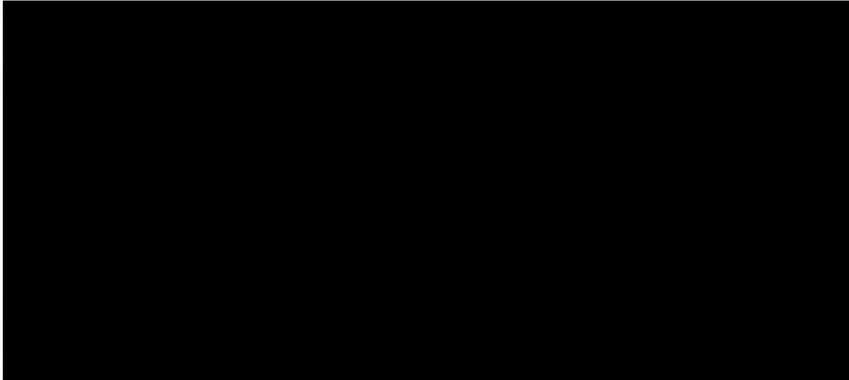
In summary there is no need to build on farming Green Belt when there are much better alternatives to

} ①

provide additional housing in the area.

Regards

Kathryn Drewitt  
1 Rookery Drive  
Rainford  
Merseyside  
WA11 8BB

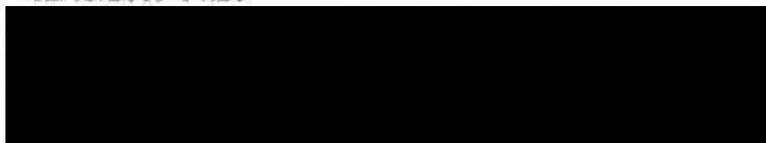


PO1466

ELO095



local plan  
D HULL  
to:  
planningpolicy  
12/03/2019 14:20



8111 8111

- ① - LPA05
- ② - LPD01
- ③ - LPA11

In response to the St Helens Council Local Plan 2020-2035.

This statement relates to site 8HA in Rainford.

This site is an area of grade one agricultural land being used by a local farmer for crop cultivation and supplying local supermarkets.

It lies within the green belt surrounding the village.

National policy guidelines relating to green belt land state that this land should be released for development only in EXCEPTIONAL circumstances.

There are no EXCEPTIONAL circumstances in this case.

St Helens has a falling population and house prices within the area are below the national and local average. There are also a significant number of empty properties within the borough.

There are a number of brownfield sites within the borough. Enough to achieve the Council's targets for house supply now and well into the future.

Choosing this greenbelt land 8HA for development negates 4 out of 7 of the Council's initial aims and objectives.

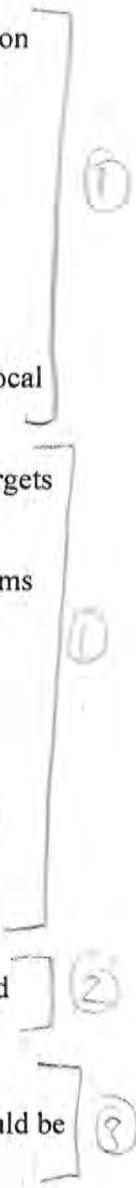
- \* It does NOT ensure strong,sustainable economy.
- \*It will NOT enhance quality of life for local residents.
- \*No extra resources or infrastructure will be allocated to the village to cope with the increase in population.
- \*It does not promote sustainable transport.

LPD01 states that any development should avoid causing harm to amenities of the local area and surrounding residential and other land users and occupiers.

LPA11 states that any development should maximise levels of accessibility between homes, educational establishments, jobs,public transport services, health and other services. There should be no negative effects on air quality and no increase in pollution.

This development fails to deliver the stated criteria in all these areas. It should not be passed.

Margaret Hull.



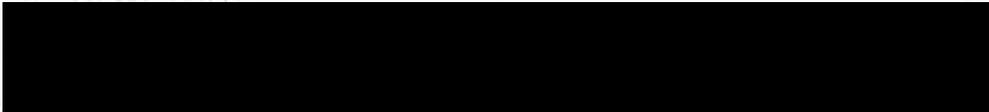
PO1467

1510096



Policy No. LPA05 and LPA06  
Sharon O'Connor  
to:  
'planningpolicy@sthelens.gov.uk'  
12/03/2019 14:23

Site 8/14  
① - LPA05  
② - DEC  
③ - S.A



TO WHOM IT MAY CONCERN

I would like to make my comments of the above policy numbers.

In respect of the overall figures in the Plan;

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

} ①  
②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

} Site Asses

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.

} ③  
①

Kind regards  
SHARON OCONNOR  
12 MILL LANE  
RAINFORD  
ST HELENS  
MERSEYSIDE  
WA11 8LW

PO1468

660099

SITE 8HA

① - LPA05

② - S.A.



Revised St Helens Local Plan  
Linda Collins  
to:  
planningpolicy  
12/03/2019 15:59



Please find my comments on the Revised Local Plan.

1. The economic analysis is flawed and based on over optimistic assumptions.
2. The standard method of calculating housing need has not been used and there appears to be no exceptional circumstances to justify this.
3. Due to points 1&2 above, the level of land needed for housing is not as high as that set out in the Local Plan.
4. There appear to be no exceptional circumstances to change the present Green Belt boundaries.
5. Other reasonable alternatives to using Green Belt land have not been explored fully. Previously developed land has not been taken into account and fully explored by the council and there are many sites in the St Helens area.
5. If previously developed sites are used there will be less impact on the environment and less need for new infrastructure.
6. For all these reasons above (1-5) the Plan should fail the test of soundness.

} ①

In relation to site HA8 (Rookery Lane/Higher Lane)

1. The site is next to an industrial area and would be subject to risks associated with industrial activity such as pollution and explosions (which have happened recently). Other sites excluded during the site assessment period of the initial Local Plan were excluded for exactly those reasons.
2. The site scored 4 negatives on the Sustainability Appraisal as with another 3 sites, which have since been discarded by the Local Authority, as least appropriate Green Belt site allocated for housing.
3. The site is Grade 1 Agricultural Land and actively farmed. It provides employment which will be threatened if the site is removed from the Green Belt.
4. As population increases it will become more important to ensure land is kept for agriculture and Grade 1 land cannot get any better for growing produce.

} ②  
①

Regards  
Linda Collins  
117a Higher Lane  
Rainford  
St Helens  
WA118B



Sent from AOL Mobile Mail  
Get the new AOL app: [mail.mobile.aol.com](http://mail.mobile.aol.com)

PO1469

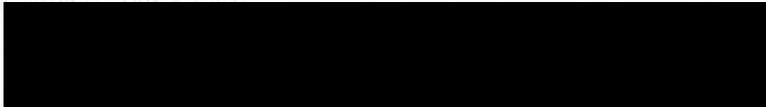
ELO102

SIX PHA

① - LPA05



Objection to Local Plan (specifically release of greenbelt)  
MAKrights  
to:  
planningpolicy  
12/03/2019 16:19



It's vital I object to this plan, despite it having undergone a rewrite the objections made to the initial plan.

In summary

There seem to be circumstances which would justify the local plan not using the standard method to calculate housing requirements, rather than the one used and as such the plan overestimates the quantity of land to be released from the green belt

} ①

Reasonable alternatives seem to have been rejected out of hand, or at the very least have not been properly pursued

} ①

St Helens local plan is intended to promote growth and employment and yet removal or farming land from the greenbelt for housing will cost jobs.

Specific to site (HA8) 8HA

Environmental impact, across the borough fertile, productive farmland is to be released from green belt to meet a housing need (which as stated above appears to be based on unsound reasoning).

By the councils own assessment HA8 is the least appropriate Green Belt site allocated for housing in Phase 1

There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land

} ①

Cutting food miles and the environmental impact that cars have are vital for the health and wellbeing of our communities, yet the proposal suggests building on farm land in areas where public transport provides insufficient reach to connect to areas of high employment, almost guaranteeing a significant increase in road traffic, and the pollution which goes with it. Coupled with sites in semi-rural communities where the roads are unsuitable for such increases in traffic it appears that retaining these green belt sites is the only option for a council who value the health and safety of their community and the children thereof.

} ①

The plan should be amended by removing green belt from the local plan, reducing the assesment of housing required, use more previously developed land. Consult more closely with other local authorities to ensure a joined up plan.

} suggestions  
nos

--  
Mark A. Knights  
90 Lowbank Road  
Ashton in Makerfield  
Wigan  
WN4 9RZ

PO1470

① - GENERAL

② - LPA06

③ - LPA05  
12/03/2019 16:23



Local plan  
John Oakes to: planningpolicy

From: [Redacted]  
To: [Redacted]

Mr John oakes, 11 Padstow Drive Windle St Helens Merseyside Wa10 6EL tel: [Redacted]  
I wish to submit my representation against the St. Helens local plan particularly for the removal of the green belt and specifically for the land known as 8HS between the A580, Crantock grove, Ecclesfield Rd and houghtons lane . I consider the plan not to be sound because it is not justified, effective or consistent with national policy ( NPPF 2018 ) - The latter because it promotes unsustainable traffic growth causing exacerbated traffic issues. The plan's targets are based on older forecasts for example of housing needs ( 2014 ) , and aspirational employment predictions. It ignores the need for grade 1 and 2 agricultural land in a future Brexit and the increasing demand for local produce ; it is not justified as there is sufficient brownfield sites within the borough that would satisfy the needs for housing in areas that are better served by public transport and there should be a policy by the LRCA and the council to bring 'unsuitable ' sites outside the brownfield register back to use . It is not effective as it concentrates on green space development over town centre development with higher densities . We have already seen how out of centre retail developments has been the death of St. Helens town centres and again how this promotes car dependency . The plan is not in line with sustainable development or the revitalisation of brownfield sites

① & ②

②

①

Sent from my iPhone

PO1471

ELO104

SITE 8HA

① - LPA05



Comments/representations regarding the local plan  
Amy Humphreys to: planningpolicy@sthelens.gov.uk

12/03/2019 16:33



To whom it may concern,

Please find below my comments relating to the local plan particularly the ✓  
removal of HAS from green belt to create 259 houses.

8HA  
HAS appears to be the least appropriate green belt site for building houses on, as it scored 4 negatives on the sustainability appraisal. The other 3 that scored 4 have been discarded, why should HAS continue to be utilised?

If houses are built on this field, they will be next to an Industrial area. The homes will be at risk of pollution and explosions, both of which have been recorded recently. Again, other sites have been excluded during the assessment phase due to being next to similar industrial employment land, so why has HAS not been discarded for the same reasons?

This field is Grade 1 agricultural land, and there has been no consultation with Natural England over the development of this field. How can this be appropriate?

In relation to the plan as a whole, I am concerned as to why the standard method for calculating housing need has not been utilised when there appears to be no exceptional circumstances to justify this?

The economic analysis is flawed as it is based on over optimistic assumptions, therefore the amount of land that is proposed as required is inaccurately high. If the correct numbers were used there would be no need to change the green belt boundaries.

Surely other alternatives should first be explored including use of previously developed land? The current infrastructure would then not need modification and there would be less impact on the environment.

I would be grateful if you could consider these comments when making a ✓  
final decisions relating to this plan.

Yours sincerely

Amy Humphreys  
8 Leyland road  
Rainford  
St. Helens  
WA11 8HF

①  
①

PO1472

① - LPA05      ③ - IDP      ⑤ - LPA04  
② - LPA06      ④ - GEN

ELO105



Local plan  
Lorna Chana  
to:  
planningpolicy  
12/03/2019 16:36



58 Springfield Lane  
Eccleston  
St Helens  
WA105HA

11 March 2019

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 being realistic or use of the latest figures.

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

①

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

②

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 doesn't even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

①

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any

exceptional circumstances to justify the destruction of Green Belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply can't be considered sound.

①

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

③

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.

The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

④

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues.

③

The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities.

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs!

⑤

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

Yours Sincerely,

Lorna Chana

PO1473

EL0107



st helens local plan

to: [redacted]  
planningpolicy  
12/03/2019 17:03

Hide Details

From: [redacted]  
To: planningpolicy@sthelens.gov.uk

① - LPA04  
② - LPA05

Dear Sirs,

The local plan mentions developments at Haydock and Parkside that will increase traffic where I live in Newton-le-willows. There will also be increased house building which will again further increase the traffic.

As the plan points out

*Currently there are has four AQMAs, where levels of nitrogen dioxide have been found to exceed those set by the Government, within St.HelensBorough as follows:*

•*High Street AQMA includes part of the A49 in Newton-le-Willows between its junctions with Ashton Road and Church Street;*

We already have a problems with air quality and what is proposed will make it worse. We live just off the High Street at 27 the Parchments so are concerned about our health plus [redacted] health.

Lots of children also walk in this area to attend Hope Academy on Ashton Road - It cannot be good for them walking in such a polluted area and it will get worse.

Regards,  
Hazel Kelly

}  
①  
②

PO1474

EL 0108



st helens local plan

david kelly

to:

planningpolicy

12/03/2019 17:07

Hide Details

From: david kelly [REDACTED]

To: planningpolicy@sthelens.gov.uk

① - LPA04

② - LPA05

Dear Sirs,

The local plan mentions developments at Haydock and Parkside that will increase traffic where I live in Newton-le-willows. There will also be increased house building which will again further increase the traffic.

As the plan points out

Currently there are has four AQMAs, where levels of nitrogen dioxide have been found to exceed those set by the Government, within St.HelensBorough as follows:

- High Street AQMA includes part of the A49 in Newton-le-Willows between its junctions with Ashton Road and Church Street;

We already have a problems with air quality and what is proposed will make it worse. We live just off the High Street at 27 the Parchments so are concerned about our health plus [REDACTED] health. [REDACTED] on the High Street and this cannot be good for them but have to put up with this pollution.

Lots of children also walk in this area to attend Hope Academy on Ashton Road - It cannot be good for them walking in such a polluted area and it will get worse.

Regards,  
David Kelly

①  
②

PO1475

① - LPA05      ② - LPA06, 8HS  
③ - LPA02



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



1 Attachment



Stephen Haw response to Local Plan.docx

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

Kind regards  
Stephen Haw

St Helens Council  
Local Plan 2020 – 2035 'Submission Draft' (LPSD)  
Planning Department  
Victoria Square  
St Helens  
WA10 1HP

Date: 13 March 2019

**Reference: St Helens Local Plan 2020 -2035**

Dear Sir or Madam,

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

St Helens Council are using a projected annual house building target of 486, the ONS suggestion for 2014 is 468 and the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. I do not consider an over-ambitious and aspirational housing target to be "*exceptional circumstances*".

The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development; it is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land.

According to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050 whilst agricultural land lost to land degradation is estimated at 12M hectares p.a. (23 hectares/minute, 1 hectare = 2.47 acres); enough to produce up to 20M tonnes of grain. Furthermore, the overall trend of steadily declining agricultural yields will be subject to widely fluctuating yields in the UK and worldwide due to the growing incidence of extreme weather events, such as storms, floods and heatwaves. For example, total UK cereal production had significant dips in 2001, 2007, 2012 and 2013 linked to adverse weather conditions in those years (source: Defra, 2015).

Food security is an economic, social and environmental issue. It is about consumers having access at all times to sufficient, safe and nutritious food for an active and healthy life at affordable prices. To achieve this, our food supply must be reliable and resilient to shocks and crises. Food must also be produced in a way that is environmentally sustainable or we will be storing up problems for the medium to long term.

Protecting food security has to run in parallel with other priorities such as tackling climate change (2015 was the warmest year on record since record keeping began in 1880, NASA 2016) and securing a healthy natural environment. These collectively are likely to be the most pressing economic and social factors affecting the UK in the 21st Century. The question is not IF food security will become a serious issue but WHEN.

The loss of any greenbelt should not be taken lightly. I can only comment on one area of greenbelt mentioned in the local plan as this is the only one that I use. The land referred to is 8HS and is south of the A580 adjacent to Windle Island. The land concerned is grade 1 and

①

②

PO1476

EL0111



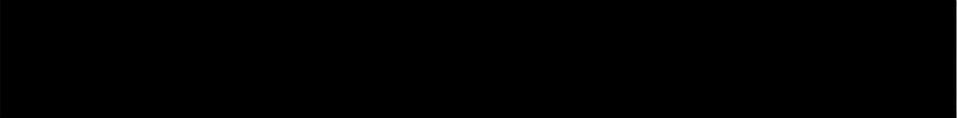
Representation on the Local Plan Submission Draft

Stephen Hoyle

to:

planningpolicy@sthelens.gov.uk

12/03/2019 17:24



Site SHA

① LPA05

② Para 1.7.2

③ S.A.

Dear Sir

I am writing with my comments on the above matter.

In general I am wholly against the development of any land currently designated as Green Belt. This land must be protected for future generations to enjoy and farm. Based on the factual evidence below, there is no justification for the development of any Green Belt land in St.Helens.

In respect of the overall figures in the Plan;

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

①  
②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness. St.Helens Borough Council should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site <sup>SHA</sup> HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So St.Helens Borough Council's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite

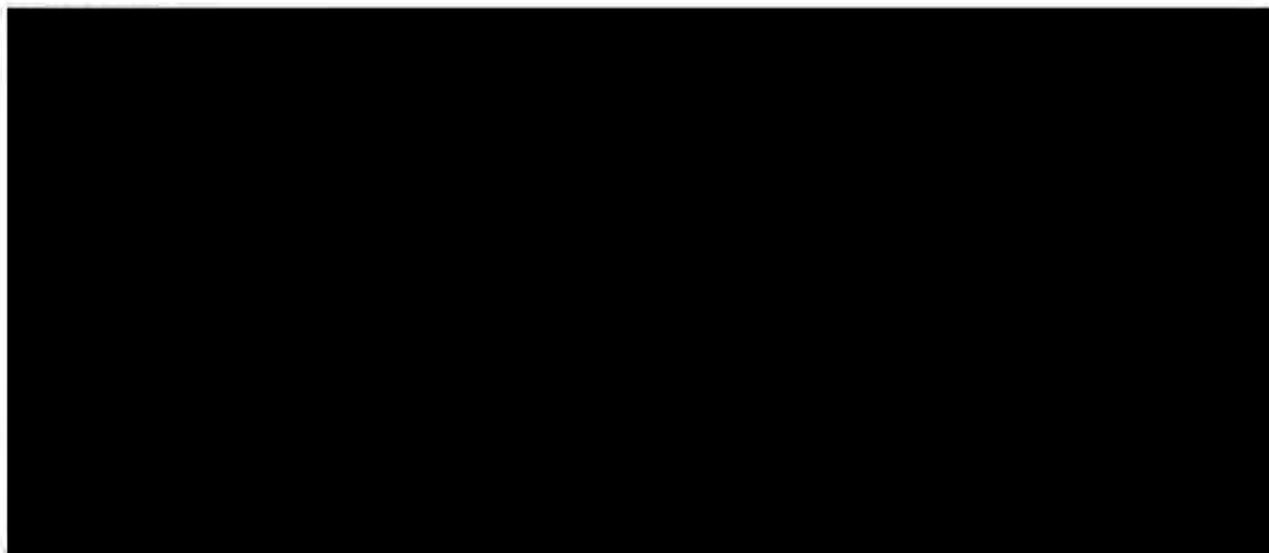
③  
④

effect.

- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

Yours faithfully

Mr Stephen Hoyle  
174 Higher Lane  
Rainford  
St. Helens  
WA11 8BH



PO1477

ELO112



HBF response to St Helens Local Plan Submission

Joanne Harding

to:

planningpolicy@sthelens.gov.uk

12/03/2019 17:26



① - STRATEGICAL AIMS & OBJECTIVES

② - LPA05

③ - LPA05 - PARA. 3

④ - LPA05 - PARA 4

2 Attachments



19-03-13 St Helens Local Plan Submission.docx HBF lpsd-representation-form-signed.pdf

⑤ - LPA07 - PART 3C

⑥ - LPA07 - PART 9

⑦ - LPC01 - PART 1

⑧ - LPC01 - PART 2

⑨ - LPC01 - PART 3

⑩ - LPC01 - PART 4

⑪ - LPC02

⑫ - LPC10

⑬ - LPC13

⑭ - LPD07

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI

Local Plans Manager - North

HOME BUILDERS FEDERATION

This e-mail is confidential, and may be legally privileged. If you are not the intended recipient, do not copy, use or disclose its content, but contact the sender immediately.

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St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

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

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House 27 Broadwall London	Address:
Postcode: SE1 9PL	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: 13/03/2019
-----------------------	------------------

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

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



## **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)				Please see separately attached letter.			

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

Please see separately attached letter.

Please continue on a separate sheet if necessary

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

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

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

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

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

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

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



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

SENT BY EMAIL  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
13/12/2018

Dear Sir / Madam,

### ST HELENS LOCAL PLAN SUBMISSION DRAFT

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members. ✓

#### Vision and Objectives

*The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:*

The HBF support the part of the vision which states that 'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as set out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply. (1)

The HBF considers that the policy should be modified as follows:

- 4.1 To enable the delivery of sustainable communities by identifying land to increase the supply ~~for a sufficient number~~ and range of new dwellings.

### **Policy LPA05: Meeting Housing Needs**

The HBF does not consider that Policy LPA05 is sound, as it is not positively prepared, justified, or consistent with national policy for the following reasons:

#### Part 1: Housing Requirement

This policy states that over the period 2016 to 2035 a minimum of 9,234 net additional dwellings should be provided, at an average of at least 486 dwellings each year. However, this is a decrease from the previous consultation version of the document which sought a housing requirement of 10,830 over the period 2014 to 2033, at an average rate of 570 dwellings each year, which does lead to queries as to why the sudden change in housing requirement. ✓

The 2017 draft SHELMA identified a range of OANs for St Helens from 397 (economic baseline) to 855 (economic growth) dwellings each year, with a demographic based need of 416 dwellings each year. The Economic Growth reflects the jobs growth which could result from development projects and policies which are expected to be implemented over the study period. ✓

The 2019 SHMA Update calculates the OAN using the standard methodology for the period 2018-2028 utilising the 2014-based household projections it identifies a figure of 482 dpa for the period. It is noted this has decreased from the 504 indicative housing need identified by the standard methodology for the period 2016-2026. ✓

The 2019 SHMA Update also considers a number of economic scenarios aligned with planned economic growth in the Borough, as set out in the St Helens ELNA. The ELNA identified a number of growth scenarios two of which – Scenario 2 and Scenario 3 – were considered most likely to come forward and are therefore considered in the SHMA. Economic Scenario 2 results in a need for 514 dpa, whilst Economic Scenario 3 results in a need for 479 dpa (for the period 2016 to 2033). ✓

The HBF consider that given the evidence contained within the draft SHELMA and the St Helens ELNA, and the Liverpool City Region Growth Deal<sup>1</sup> that the Council should consider an uplift in the housing figure above that provided by the Standard Methodology. ] ②

It is noted that in February 2019 MHCLG published updates to national planning policy and guidance including the standard method for assessing housing need. The standard method proposes to continue to use the 2014-based data, adjusted to take account of affordability to calculate a minimum annual housing need figure. The Government has continued to reiterate its aspiration to significantly boost the supply of homes and to support a housing market that delivers 300,000 homes. The HBF would therefore recommend the Council to take an approach that continues to

<sup>1</sup> The HBF also notes evidence collated by AMION on behalf of one of our members also identifies higher levels of jobs growth than that set out in the Council's evidence.

ensure flexibility, adaptability and ensure that the Council is appropriately contributing to the Government's aspiration to boost the housing land supply and delivery of homes.

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

- *Further consideration is given to the housing requirement to ensure it provides an appropriate balance between jobs and homes and supports the Government's aspirations for housing delivery.*

#### Density

This policy looks for new development to achieve a minimum density of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30dph on sites in local centres, sites that are well served by bus or train services and in other urban areas.

The HBF consider that this part of the policy would benefit from an element of flexibility allowing developers to take into account local and site characteristics, market aspirations and viability in determining the appropriate density of the site.

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

~~*'Densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of the area'*~~ **Densities below those set out above may be considered appropriate where local variations in housing need, local characteristics, site-specific circumstances or scheme viability indicate a different density is required in order to achieve local plan objectives'**

#### Monitoring and Supply

The HBF support the Council in monitoring the delivery of new homes annually to ensure that there is an adequate supply of new housing in accordance with the Housing Delivery Test and sufficient supply to provide the relevant 5-year supply plus the appropriate buffer.

#### Allocations and Supply

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on matters in relation to housing delivery and would be keen to work proactively with the Council on this issue. ✓

The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure. ] (2)

#### **Policy LPA07: Transport and Travel**

*The HBF does not consider that Policy LPA07 is sound, as it is not justified or effective for the following reasons:*

Part 3c of this policy states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst the HBF do not oppose the provision of electric charging points, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others. ] (5)

The HBF also have concerns that part 9 states that further details of the operation of this policy including standards for vehicle charging provision will be set out in a Supplementary Planning Document (SPD). It is not considered appropriate to set out in SPD elements of policy, namely the number of charging points that would be 'appropriate provision', that will have a direct role in the determination of a planning application. The HBF consider that these elements should be set out in policy and open for debate at the Examination in Public, without these details it is impossible to consider the impact of these policies on viability or whether they are justified and effective. The HBF would encourage the Council to work with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require. ] (6)

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

- Further consideration is given to what the Council consider to be 'appropriate provision' supported by evidence.
- That additional standards for electric charging point provision are not included within an SPD that will not be tested at examination. ✓

#### **Policy LPC01: Housing Mix**

*The HBF does not consider that Policy LPC01 is sound, justified, effective or consistent with national policy for the following reasons:*

PO1478

ELO112



HBF response to St Helens Local Plan Submission  
Joanne Harding  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 17:26



① - STRATEGICAL AIMS & OBJECTIVES

② - LPA05

③ - LPA05 - PARA. 3

④ - LPA05 - PARA 4

2 Attachments



19-03-13 St Helens Local Plan Submission.docx HBF Ipsd-representation-form-signed.pdf

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI

Local Plans Manager - North

HOME BUILDERS FEDERATION



⑤ - LPA07 - PART 3C

⑥ - LPA07 - PART 9

⑦ - LPC01 - PART 1

⑧ - LPC01 - PART 2

⑨ - LPC01 - PART 3

⑩ - LPC01 - PART 4

⑪ - LPC02

⑫ - LPC10

⑬ - LPC13

⑭ - LPD07

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St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

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

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House 27 Broadwall London	Address:
Postcode: SE1 9PL	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: 13/03/2019
-----------------------	------------------

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

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



## **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)				Please see separately attached letter.			

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

Please tick as appropriate

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

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

Please continue on a separate sheet if necessary

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

Please see separately attached letter.

Please continue on a separate sheet if necessary

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

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

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

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

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

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

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

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

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

SENT BY EMAIL  
[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
13/12/2018

Dear Sir / Madam,

### **ST HELENS LOCAL PLAN SUBMISSION DRAFT**

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members. ✓

#### **Vision and Objectives**

*The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:*

The HBF support the part of the vision which states that 'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as set out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply. ] (1)

ensure flexibility, adaptability and ensure that the Council is appropriately contributing to the Government's aspiration to boost the housing land supply and delivery of homes.

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

- *Further consideration is given to the housing requirement to ensure it provides an appropriate balance between jobs and homes and supports the Government's aspirations for housing delivery.*

#### Density

This policy looks for new development to achieve a minimum density of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30dph on sites in local centres, sites that are well served by bus or train services and in other urban areas.

The HBF consider that this part of the policy would benefit from an element of flexibility allowing developers to take into account local and site characteristics, market aspirations and viability in determining the appropriate density of the site.

*The HBF considers that the policy should be modified as follows in order to make the document sound:*

~~*'Densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of the area'*~~ **Densities below those set out above may be considered appropriate where local variations in housing need, local characteristics, site-specific circumstances or scheme viability indicate a different density is required in order to achieve local plan objectives'**

#### Monitoring and Supply

The HBF support the Council in monitoring the delivery of new homes annually to ensure that there is an adequate supply of new housing in accordance with the Housing Delivery Test and sufficient supply to provide the relevant 5-year supply plus the appropriate buffer.

#### Allocations and Supply

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

PO1479

ELO115



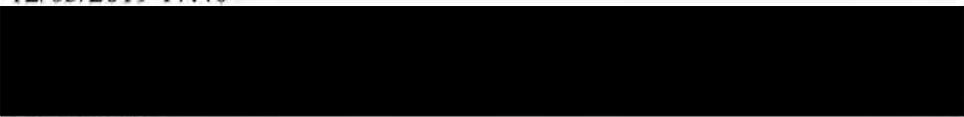
St Helens Borough Local Plan 2020-2035, representations/comments  
Joseph Worsley  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 17:40

Site PHA

① LPA08

② para 1.72

③ S.A.



To whom it may concern:-

Name:- Joe Worsley

Address:- 344 Ormskirk Rd, Rainford, St Helens, WA11 7ST



**My representation/comment with regards to the St Helens Borough Local Plan 2020-2035**

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 used is flawed and based on over-optimistic assumptions. And because of this, the level of land needed is therefore not as high as set out in the Local Plan.

So exceptional circumstances to change Green belt boundaries are not existing.

We have found that other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land. These alternatives will have less impact on the environment and lead to less need for new infrastructure.

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

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

Specific points on site HA8 (Rookery Lane):-

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

• 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.

①

②

SUBSTANTIAL MOD.

③

①

I am therefore against the local plan as it stands until it has been shown to prove that figures have been updated/calculated using up to date data and all avenues with regards to preserving the Green Belt and using up brownfield sites, have been addressed.

KR - Mr J Worsley

PO1480

EL0116

SITE PHA

①-LPA05



Representation against the revised St Helens Local Plan (SHLP)

Julie Brown

to:

planningpolicy

12/03/2019 17:40



From: Julie Brown, 32 Heyes Avenue, Rainford, WA11 8AR

Dear Sir/Madam

I wish to make representation against the revised St Helens Local Plan (SHLP) to build houses - specifically the building of 259 houses on HAB (Rookery Lane) in Rainford.

8 HA

The proposal is to build houses on grade 1 agricultural land which is currently actively farmed and provides necessary employment. Given the issues that brexit will cause (regardless of whether a deal is reached or not) the UK will need to become more self-reliant for food production. Destroying this agricultural land will not help this situation but rather make it worse. I am not aware that any consultation with Natural England regarding the loss of important agricultural land has taken place to date.

①

There is no mention of plans to improve the infrastructure around where these houses are planned. There is no provision for more school places or medical services. It is difficult enough to get a doctor's appointment currently. More households will only exacerbate this problem.

The increase in traffic this will cause will create problems in the village and surrounding roads. The current traffic improvements at Windle Island show that this will be a problem because the traffic has increased on higher lane and blind foot road and this is destroying the road surface on these roads so by the time the improvements are finished at Windle island, it will be necessary to repair these roads too. And the increased traffic which the creation of these houses will cause, will negate the necessary improvements which are in the process of being made at Windle island.

①

The proposed houses are to be built close to an industrial area with all the risks that this brings such as pollution and possible explosion. I understand that other sites have been excluded for this very reason, so I do not understand why this hasn't.

The council should consider whether there are more appropriate Brownfield sites which could be used in preference to using green belt land. Utilising these would have less negative impacts on the environment. Additionally, has it actually been established that these houses are necessary? Are there not existing houses standing empty which could be improved? I appreciate that there is an apparent housing shortage in the UK, but I question whether the proposed houses will actually be "affordable" housing for the people who need them most.

①

Kind regards

Julie Brown

PO1481

ELO117



Representations concerning the St Helens Borough Local Plan 2020-2035  
 Greg Leyland  
 to:  
 planningpolicy  
 12/03/2019 17:43  
 Cc:

STIC 4HS

- ① GBR
- ④ LPA04
- ⑦ LPA09
- ⑩ LPA09
- ② LPA06
- ⑤ LPA05
- ⑧ LPB01
- ⑪ S.A.
- ⑬ Sus. TIA  
Reps.
- ③ LPA03
- ⑥ LPA07
- ⑨ LPC09
- ⑫ TIA



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

*In this paragraph alone, the word 'likely' is used three times. If these assumptions are incorrect the requirement for an increased number of houses will also be incorrect. Basing requirements on assumptions whose impacts will potentially affect the status of green belt land is not a valid approach.*

*4.18.6, 4.18.7, 4.18.8 and 4.18.9 try to explain / justify the plan's calculated requirement of 486 new dwelling completions per annum. However, these are based on 'scenarios' which may or may not come to fruition. I believe that green belt status should only be reassessed when genuine requirements can be supported by factual evidence – it is too important to get wrong.*

5

## 4.25 Policy LPA07: Transport and Travel

1. The Council's strategic priorities for the transport network are to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions. To achieve these priorities it will seek to:

a) **Secure the delivery of new or improved road, walking, cycling, and / or bus infrastructure where required;**

*If EPGC is developed into a housing estate there is little scope to improve the road on Portico Lane in terms of capacity – it simply could not cope with the additional traffic generated by a large (500 – 900+ home) housing estate. I've already provided further comment in this area in an earlier comment.*

*With regards walking, very few people walk to the shops and even less to work. (This is borne out by the high levels of obesity in St Helens, which, incidentally, the plan does not seem to address.) Whilst I would encourage everyone to walk wherever possible, the plan doesn't make clear what 'improved walking' actually means or how it will be achieved in general but more specifically for the EPGC land. Similarly, the plan doesn't make clear what 'improved cycling' actually means or how it will be achieved. (I would note that there is an increasing trend for cyclists to ride on footpaths. This is dangerous and doesn't encourage anyone to walk for fear of being hit by a cyclist. Unfortunately neither the Council or the Police appear to take any interest in this.)*

6

3. New development will only be permitted if it would:

a) **maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network;**

*Should a housing development go ahead on the EPGC land, an additional c.1800 cars per day travelling in the Eccleston Park and Rainhill areas will cause severe harm to the highway network in terms of safety and efficiency. The Rainhill section of Warrington Road is particularly bad (over capacity) at most times of the day and St Helens Road in Eccleston Park is very busy during rush hours.*

6

## 4.31 Policy LPA09: Green Infrastructure

### Policy LPA09: Green Infrastructure

PO1482

620118



St Helens Borough Local Plan 2020-2035, representations/comments

Marie Worsley

to:

planningpolicy@sthelens.gov.uk

12/03/2019 17:46



Name:- Marie Worsley

Address:- 344 Ormskirk Rd, Rainford, St Helens, WA11 7ST



**My representation/comment with regards to the St Helens Borough Local Plan 2020-2035**

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 used is flawed and based on over-optimistic assumptions. And because of this, the level of land needed is therefore not as high as set out in the Local Plan.

So exceptional circumstances to change Green belt boundaries are not existing.

We have found that other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land. These alternatives will have less impact on the environment and lead to less need for new infrastructure.

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

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

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

Specific points on site HA8 (Rookery Lane):-

HA8  
SHA

<!--[if !supportLists]-->• <!--[endif]-->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.

<!--[if !supportLists]-->• <!--[endif]-->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 .

<!--[if !supportLists]-->• <!--[endif]-->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.

• <!--[endif]-->There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

I am therefore against the local plan as it stands until it has been shown to prove that figures have been updated/calculated using up to date data and all avenues with regards to preserving the Green Belt and using up brownfield sites, have been addressed.

KR - M Worsley

①  
②  
SPL.  
MOA

③  
④

PO1483

ELO119

SITE 8HA

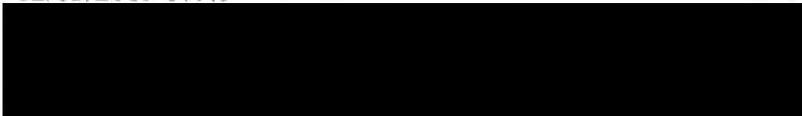
①-LP05

②-Para 1-7.2

③-S.A.



Local plan  
Georgina Wilding  
to:  
planningpolicy  
12/03/2019 17:49



I have some points to make about the St. Helens local plan:

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

} ①  
} ②

Rainford Specific points (HA8 Rookery Lane) <sup>8HA</sup>

- 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.

} ③  
} ①

Regards  
Georgina Wilding

111 Bushey Lane,  
Rainford,  
St helens,  
WA11 7TE

PO1484

EL0120



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

on Behalf of Mr A Jones

Guy Evans

to:

planningpolicy@sthelens.gov.uk

12/03/2019 18:19



① GBR

② LPA05

③ LPA06

④ LPA02

⑤ TABLE 4-6

⑥ TABLE 4-5

⑦ TABLE 4-8

3 Attachments



Appendix 1\_DTA Elton Head Road\_St Helens Council response to preapp Nov2017.pdf



LP submission draft representations v311.03.19.pdf



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

Dear Sir / Madam

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

Confirmation of receipt would be appreciated.

Regards

**Guy Evans** BSc (Hons) MSc MRTPI

**Director**

Chartered Town Planner

**Cassidy+Ashton**

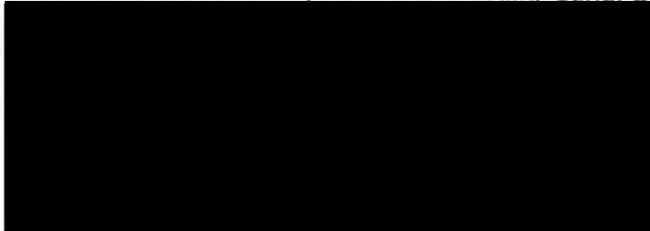
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St. Helens  
Council

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

Ref: LPSD

(For official use only)

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

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

**PART A – YOUR DETAILS**

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Andy	First name: Guy
Last Name: Jones	Last Name: Evans
Organisation/company:	Organisation/company: Cassidy + Ashton
Address: c/o Agent	Address: 10 Hunters Walk, Canal Street, Chester
Postcode:	Postcode: CH1 4EB

Signature: 	Date: <input type="text" value="12.03.2019"/>
--	---

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

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

Yes  (Via Email)

No

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

## **RETURN DETAILS**

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

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

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

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

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

## **FURTHER INFORMATION**

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

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

## **NEXT STEPS**

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

## **DATA PROTECTION**

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

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

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

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

### PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05.1 LPA06 LPA02 LPA05	Paragraph / diagram / table	Table 4.8 Table 4.5	Policies Map	Yes	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

**Refer to separately submitted representation / response statement**

Please continue on a separate sheet if necessary

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

Refer to separately submitted representation / response statement

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

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

# Cassidy+ Ashton

Architecture + Building Surveying + Town Planning

C+A



St. Helens  
Council

ST HELENS BOROUGH LOCAL PLAN 2020 - 2035

SUBMISSION DRAFT  
JANUARY 2019

**A BALANCED PLAN FOR  
A BETTER FUTURE**

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

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

### 3.0 SOUNDNESS

- 3.1 Soundness is explained in paragraph 35 of the National Planning Policy Framework (NPPF) (Feb. 2019). The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy. ✓
- 3.2 **Test 1 - Positively prepared**
- 3.3 This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. ✓
- 3.4 **Test 2 - Justified**
- 3.5 The Plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. ✓
- 3.6 ***Our view is that real alternatives have not properly been considered and the Plan is not clear and consistent in its selection of sites for allocation.*** ] ②
- 3.7 **Test 3 - Effective**
- 3.8 The Plan should be deliverable over the plan period and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by a statement of common ground.
- 3.9 ***Our view is that deliverability of sites (allocations) is key to ensuring the soundness of the Plan. The deliverability of all allocated sites is questioned. In assessing whether the Local Plan is effective the Inspector will assess whether it is deliverable within the timescale set by the Local Plan.*** ] ②
- 3.10 **Test 4 - Consistent with national policy**
- 3.11 The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.
- 3.12 ***Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. It is our view that the Council's approach to strategic allocations is too biased towards large scale sites, which can prove problematic in terms of deliverability. The Jones' land is the only site identified for under 100 units, which sits comfortably*** ] ②

***in the small / medium sized sites definition and so should be prioritised through the Local Plan.***

2

## 4.0 SHLAA AND FIVE YEAR HOUSING LAND SUPPLY

4.1 The Strategic Housing Land Availability Assessment (SHLAA) provides an overview and assessment of how much land has the potential to be available, deliverable and suitable for housing development. It identifies the timeframes for when such sites are likely to be available in addition to identifying potential constraints and how these can be overcome. ✓

4.2 **Paragraph 67** from the NPPF requires that Local Planning Authorities should:

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

*a) specific, deliverable sites for years one to five of the plan period; and*

*b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*

4.3 The latest SHLAA is dated 2017. This is the sixth SHLAA to be prepared for St. Helens, and updates the previous 2016 SHLAA which comprehensively reviewed all conclusions previously reached for sites already within the SHLAA process and assessed new sites. All new sites submitted to the Council by 31st March 2017 have been considered in this update and conclusions updated on existing sites where new information has come to light. ✓

4.4 The SHLAA demonstrates that there are 2.7 years supply of housing land when assessed against the Core Strategy housing requirement, and 5.3 years supply of housing land when assessed against the OAN as set down in the Mid-Mersey SHMA 2016. In accordance with the requirements of the NPPF the Council has identified a supply of specific deliverable sites sufficient to provide 5.3 years' worth of housing against the latest assessment of housing need in the Borough. However, it will be important that this 5.3 years' worth of supply is maintained on an on-going basis, as evidenced by the lack of a 5 year supply against the Core Strategy requirement. Steps need to be taken to identify additional land to meet the requirements as set out at the national planning policy level. ] (2)

4.5 ***Critical analysis of the SHLAA sites leads to the stated numbers to be greatly questioned, which in turn raises questions over deliverability and so the effectiveness of the Plan, i.e. the third test of soundness.*** ] (2)

- 4.6 Sites considered for release from the Green Belt are not included in the SHLAA. They are being considered separately within the Green Belt Review (2018) document. ✓

	likely to use the parcel/sub-parcel to and from (a) the public highway and (b) the strategic road network	identified within LPA Green Belt Review Comments
--	---	--

5.27 The site is exceptionally well located for access to sustainable transport methods and meets all of the recommended guidance. **As such this site must be considered to be awarded a High mark for this element of the Stage 2B assessment.**

5.28 The third and final element of assessment relates to ownership and viability issues. Within this element in the methodology it sets out 3 elements for consideration, these are covered below.

5.29 **Whether there is active developer interest;**

The land owner has been approached repeatedly by house builders including those operating within close proximity to site.

5.30 **Whether similar areas have been successfully developed in recent years;**

Directly to the South and east of the site is a residential development which is currently being built out by Morris Homes. Due to this sites close proximity and ongoing successful build out it is felt that if the proposed site were to be included as an allocation there might be opportunities for the new site to form a final phase for the emerging residential site.

This could give opportunities for shared facilities and infrastructure between the permitted and the new site if allocated

5.31 **Whether there are any known abnormal development costs**

A number of surveys of the site have been completed and none of these have identified any potential abnormal development costs. As this is a green field site and has never been developed there are not expected to be significant abnormal site constraints including contamination or difficult constructions access.

**CONCLUSION OF UPDATED SITE 2B ASSESSMENT**

5.32 The aim of Assessment 2b is to reach overall conclusions on the development potential of each parcel/sub-parcel of land and consider the likelihood that those sites would come forward for development within the plan period if they are release from the Green Belt.

5.33 Site reference 7HS/GBP\_085c is ideally located for Green Belt release and the above independent site assessment clearly sets out that when considered on its own rather than as part of a larger site the only possible score it should be given is High. ✓

**CHARACTERISTICS COMPARED TO OTHER SAFEGUARDED AND ALLOCATED GREEN BELT SITES**

5.1 The allocated and safeguarded sites have been assessed by the Council in a manner based on certain characteristics, which have determined whether they are placed within one tranche or the other. ✓

**Allocated Sites**

5.2 When assessing Land off Elton Head Road as an individual site, it is clear that the characteristics of the site(s) and their good deliverability is much more akin to the allocated rather than the safeguarded sites. ] (2)

5.3 The site area of Land off Elton Head Road at 3.70 hectares is lower than some of the allocated sites (although it is acknowledged that some of these allocated sites are strategic allocated sites, which by their nature are of a significant size). ✓

**Safeguarded Sites**

5.4 In comparison to the other safeguarded sites, the majority of these are significantly larger in area and do not relate as well to existing built forms. In addition, they are often much further away from local services and facilities and would have greater impact upon the landscape and purposes of the Green Belt. ] (3)

5.5 Unlike several safeguarded sites, Land off Elton Head Road site does not score less in terms of deliverability. It has no prohibitive constraints and is under single ownership. There is clearly a positive relationship with the surrounding built forms and the site is in a sustainable location. ] (1)

5.6 The development of the site would not have a detrimental effect on the amenities of neighbouring land uses. The proposed use will complement the neighbouring land uses, which are principally residential. The development of the site would have a limited impact on the character of the wider landscape. The development provides the scope to enhance and create a more appropriate settlement edge to the area. ] (2)

### IMPACT UPON OVERALL SCORE AND SUBSEQUENT IMPACT ON ALLOCATION

- 5.7 The Land owner and the LPA both agree that site 7HS/GBP\_085c should be awarded the best score at stage 1b (Low) and as such be allocated the full 3 points at stage 3. There is a difference in opinion however regarding the stage 2b score. The LPA marked this as medium rather than **High** as the above assessment concludes. Having reviewed the LPA comments it becomes clear that this low score can only be achieved due to the LPA considering it as part of the much wider site rather than considering the site on its own merits. (1)
- 5.8 ***When the site is considered on its own merits it is clear the only correct score can be High with this in mind it should also be allocated the full 3 points at stage 3 resulting in an overall score of 6.*** (1)
- 5.9 As set out above all other sites with a score of 6 have been included as Allocated sites. It is our view that the site, when considered fairly is an incredibly logical piece of land for release from the Green Belt with limited impacts upon the purposes of including land within the Green Belt and also with no known constraints to prohibit efficient delivery of homes. (1) (2) (3)

7.7 **Policy LPA05 – Meeting St. Helens Borough’s Housing Needs**

*"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".*

7.8 The proposed figure of 9,234 for housing provision over the Plan period is too low. The figure for housing provision for the Plan period represents a considerable reduction on any of the proposed figures for Strategic Growth Options put forward at the Preferred Options. (2)

7.9 If presented for Examination in its current format, containing figures as presented, the Council are susceptible to critique by an Inspector on housing land supply, the associated restrictive strategy on the location of future development and the impact upon the delivery of affordable housing. (2)

7.10 It is submitted that, in light of the above comment, the local authority must ensure that the shortfall in the supply of housing land is addressed and that a higher figure of new homes over the course of the plan period sought. (2)

7.11 It is submitted that the housing provision figure now being proposed would not support the Council’s preferred Strategic Growth Option and in turn this would also not support economic growth aspirations within the proposed LP. The figure pursued in the Deposit Plan would not provide housing for levels of population growth in any range over historic periods. (2)

7.12 In simple terms the proposed figure in the Deposit Plan would almost certainly result in a shortfall in housing land supply and will ultimately result in the plan being found ‘unsound’ by a Planning Inspector during Examination.

7.13 Critical analysis of Table 4.6 – housing land requirements and supply 2016 to 2035 raises serious concerns, with particularly reference to the following:

- SHLAA 2017 supply – too strong a reliance on untested sites without the benefit of planning permission and stalled sites that benefit from planning permission. Deliverability of sites is strongly questioned.
- Allocations – too strong a reliance on large-scale strategic sites either currently designated Green Belt or not. Again, deliverability of sites is strongly questioned. (5)
- Safeguarded land - too strong a reliance on large-scale strategic sites. Again, deliverability of sites is strongly questioned.

## 8.0 CONCLUSIONS

- 8.1 Land off Elton Head Road in the ownership of the Jones family, when correctly considered in isolation, is clearly a suitable site for residential development, when assessed against the context of the surrounding land uses, landscape characteristics, impact upon the Green Belt and the housing supply position. However the principal concern is when such development should be brought forward.
- 8.2 For the reasons outlined within this document, it is requested that the site is then transferred from the Safeguarded Sites list (Policy LPA06) to the Allocated Sites list (Policy LPA05), to be brought forward for residential development within the approaching 2020 – 2035 plan period, rather than being reserved for the following 2033 plan period. (2) (3)
- 8.3 With full control over the land and an interest already expressed by housebuilders, it is submitted that the land is 100% deliverable. This deliverability means the site can make a valuable contribution, sooner rather than later to the housing supply within St. Helens.
- 8.4 The question lies as to whether the promotion of the land to the allocations should be done to the detriment of one or more of the sites currently supported for allocation in the submission draft document. Should the housing supply figures be deemed too low, clearly there is justification to simply add the site to the existing allocations. Alternatively, there could be a consideration against one or more of the supported sites and the associated projected delivery numbers, which could be reduced to accommodate the additional allocation so endorsing the effectiveness of the Plan and the associated deliverability of sites over the Plan period. All of which is critical to the Inspector's assessment of soundness of the Plan.

PO1485

E10121

8HIA



**Local Plan - Comments (HA8, Rainford)**

**D Jones** to: planningpolicy

12/03/2019 18:28

From: D Jones [REDACTED]  
To: planningpolicy@sthelens.gov.uk

① LPA05  
② S.A  
③ LPA02

Objections to local plan as follows:

Higher Lane traffic - very busy at peak times now. Additional housing will only make it worse.

Brexit uncertainty - we should be growing more food, rather than building on grade 1 agricultural land. ②

Building on HA8 will have a severe negative impact on nearby listing building.

① Destroying farm land (ha8) threatens 100 local farming jobs.

Building housing so close to industrial space risks public health and safety in terms of noise, pollution, increased HGVs.

There is enough brownfield land available to avoid having this land (ha8) released in phase 1. ③

Windle Island improvement scheme didnt factor growth of additional housing in Rainford - this could lead to more congestion at Windle.

It will ruin local wildlife on HA8.

Regards  
Dave Jones  
150 Higher Lane  
Rainford  
Wall 8bh

Sent from my iPhone

PO1486



REPRESENTATION - ST HELENS BOROUGH LOCAL PLAN 2020-2035

Gill Walker

to:

planningpolicy

12/03/2019 18:29

Hide Details

From: Gill Walker [REDACTED]

To: planningpolicy@sthelens.gov.uk

Site : HA8 Rookery Lane, Rainford, St Helens ①

E10122

8HIA

① LPA05

② S.A

③ LPA02

①

I am writing to express grave concern over the potential development of a large piece of actively farmed Grade A agricultural land on Rookery Lane, Rainford, that is currently earmarked for destruction by St Helens Council – to be replaced (as I understand it) with up to 259 new homes.

In accordance with the Government’s National Planning Policy Framework, I would like to request that you consider very closely this project in order to assess the **EXCEPTIONAL CIRCUMSTANCES** that St Helens Council feel may justify the annihilation of Rainford’s Greenbelt - because once this fertile land has gone – it has gone forever. Any destruction of Greenbelt land – particularly Grade A agricultural land - should surely only be developed as a **very last resort**, when all other possibilities to develop alternative sites, i.e. brownfield sites, under-utilised land, previously-developed land, empty properties, etc. have all been fully exploited, and when St Helens Council can substantiate this together with the viability of their economic analysis relating to this entire project.

②

③

I look forward to receiving confirmation that this email has been received and my comments duly noted and hopefully acted upon.

Many thanks.

Yours faithfully

Gillian Walker  
Pennsylvania Farm  
Holiday Moss  
Rainford  
St Helens WA11 8NP  
Tel : [REDACTED]  
[REDACTED]

PO1487

EC0123

Site SHA

① - LPA05

② - Para 1.7.2

③ - S.A.



Local plan - Rainford  
julie  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 19:16



Dear Sir

I would like to raise some points with regard to the building of a large number of houses on green belt land in Rainford.

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

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

} ①  
} ②

Rainford Specific points (HA8 - 8HA Rookery Lane)

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

} ③

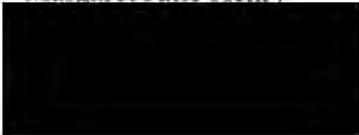
• This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – 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.

} ①

Margaret Julie Henry



PO1488



Local Planning Consultation HA (Rookery Lane)  
pippa wisedale  
to:

SITE 8HA

ELO124

① - LPA05

② - PAR 1.7.2

12/03/2019 19:20



Mrs June P Wisedale  
89 Heyes Avenue  
Rainford  
WA118AP

The site has been selected when it is the least appropriate Green Belt site allocated for housing in Phase 1

Why select land that is near an industrial site, so would be at risk from industrial activity such as pollution, explosions, I also note that other sites have been excluded due to being near similar industrial sites. (SHL22 2016 ref 16M & 142)

The site is grade 1 agricultural land and is actively used, so therefore provides jobs which the plan says is intended to promote employment so this is counterproductive.

Should you not have consulted with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

With regards to the rest of the plan there seems reason why you have not used a standard method to calculate housing need.

The economic analysis is flawed and based on over optimistic assumptions, meaning that the level of land needed is therefore not as high as set out in the local plan. Which means there are no exceptional circumstances to change Green Belt boundaries.

You have failed to fully explore reasonable alternatives such as using previously developed land, which in return would have less impact on the environment and lead to less need for new infrastructure.

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

I wish all my points to be considered before these plans go ahead. Because for all these reasons & unless the plan is significantly modified it should fail both the legal tests it has to pass the tests of soundness.

JP Wisedale  
12/03/2019

PO1489

ELO126



Representation regarding the Submission Draft of the St. Helens Local Plan 2020 - 2035

(January, 2019)

Paul Slater

to:

planningpolicy

12/03/2019 19:53



① - LPA02

② - LPA05

③ - LPA06

1 Attachment



Representation regarding the Submission Draft St. Helen's Local Plan 2020 - 2035 (January, 2019).rtf

45 Greenway Road,  
Speke,  
Liverpool,  
Merseyside L24 7RY.

12 March 2019

Dear Sir/Madam,

please find attached, a copy of my representation regarding the Submission Draft of the St. Helens Local Plan 2020 - 2035 (January, 2019). If you have any difficulty opening the attachment, or viewing it's contents, then please contact me, and I will re-send, in a different format. I would be grateful, if you could acknowledge receipt of this representation, and also keep me informed of the progress of the Local Plan, including any amendments made to the above draft. ✓

Yours faithfully

Paul Slater



45 Greenway Road,  
Speke,  
Liverpool,  
Merseyside L24 7RY.

12 March 2019

Representation regarding the Submission Draft of The St. Helens Borough Local Plan 2020 - 2035 (January, 2019).

### **Representation regarding the St. Helen's Local Plan 2020 -2035**

Dear Sir/Madam,

I am writing to make representation, in regards to the St.Helen's Local Plan Submission Draft (January, 2019). I have concerns at the amount of Green Belt land that is proposed for release. I particularly object to the release of the following sites, that are shown upon the Submission Draft Policy Maps as being proposed for release from the Green Belt:- ✓

Site 1EA (proposed employment site, west of Lingley Mere, Omega Southwestern Extension)

Site 1ES (proposed employment site (north of M62, east of Bold Hall Nursery)

Site 2ES (proposed employment site, to south of Haydock Race Course)

Site 5EA (proposed employment site at Florida Farm North)

Site 6EA (proposed employment site at Florida Farm North)

Site 7EA (proposed employment land at Parkside East)

Site 8EA (proposed employment land at Parkside West)

Site 1HA (proposed housing site, to the west of Garswood)

Site 1HS (proposed housing site, to north-west of Garswood)

Site 2HS (proposed housing site to north-west of Newton-le-Willows)

Site 2HA\_A (proposed housing site at Florida Farm South)

Site 3HS (proposed housing site at Eccleston Park Golf Course)

Site 4HA (proposed housing north of Gorsey Lane)

Site 4HS (proposed housing between railway line and Vulcan Village)

Site 5HS (proposed housing between railway line and Newton-Le-Willows, west of Winwick Road)

Site 5HA (proposed housing south of Garton's Lane, north of Sutton Manor Country Park).

Site 6HS (proposed housing south of Lea Green Industrial Estate, south-east of Chapel Lane).

Site 7HS (proposed housing north-east of Elton Head Hall Farm, south of Elton Head Road)

Site 8HA (proposed housing site, to the south-east of Rainford)

Site 8HS (proposed housing site, north of Windle, east of Houghton's Lane)

The Green Belt land around St. Helens provides an important component of the Merseyside Green Belt, and in addition to achieving, and fulfilling, the five main objectives ]<sup>①</sup> ✓

of the Green Belt, this land, and its status, serves many other roles and functions. Maintaining the boundaries of the Green Belt is noted as being important in protecting and increasing the populations of notable species of wildlife of conservation concern. These include species covered by North Merseyside Biodiversity Action Plans, such as Brown Hare, Skylark and Grey Partridge.

A lot of the Green Belt land, proposed for release, within St. Helen's is actively farmed, and constitutes land of high agricultural quality. It is a resource which should be protected in the national interest. The Green Belt is also greatly valued by local communities, and by many residents of St. Helens and further afield. Therefore, any losses should be kept to an absolute minimum, and better planning used to ensure that new housing is directed to sites of previously developed land, and other suitable, and more sustainable, sites within the existing urban area.

With regards to the housing figures being sought within the Local Plan Submission Draft, I note that the target of 486 dwellings per annum, is above the figure of 468 dwellings per annum, derived by using the Government's standard method (applies to the 2014 based projections). I also note that it is above the 451 dwellings per annum, identified within the Mid-Mersey Strategic Housing Market Assessment (2016).

Over the baseline period of the plan (April 2016 to March 2035), this multiplies out at differences of 342 dwellings and 665 dwellings respectively. These figures could make all the difference regarding the requirement to release certain areas of Green Belt land, in order to meet housing targets.

Also of significance, is Table 29 (page 97) of the Draft Liverpool City Region Strategic Housing and Employment Land Market Assessment (2017) (SHELMA). This Table shows a range of demographic based scenarios. Six figures are given, for projected housing need in St. Helens. These figures range from 245 per annum to 415 per annum. All of the figures given in this range are significantly below the 486 dwellings per annum figure being sought, in the Submission Draft of the St. Helen's Local Plan.

The figure of 486 dwellings per annum sought by the Submission Draft of the St. Helen's Local Plan is considered too high, and should be reduced. The figures for projected housing need given in the Draft Liverpool City Region SHELMA would suggest that based upon a number of demographic based scenarios, there is no requirement to release any land from the Green Belt for housing allocations, within St. Helen's.

I also question the 20% allowance made for land, that is being considered for removal, from out of the Green Belt. This high percentage unnecessarily increases the amount of land being proposed for removal from the Green Belt, in order to meet the already inflated housing targets.

I also do not believe that enough consideration has been given to the implications of the demographics, and likely future demographics, of the borough, upon the type of housing that will be required. Falling household size, more people living alone, and an increase in the elderly population are likely to result in demand for smaller units of housing, along with more specialised housing, which consequently will increase housing density. In this respect density assumptions for previously developed sites, and other sites within the existing urban

area are too cautious, resulting in proposals to remove an excessive amount of land out of Green Belt status. ] ②

Table 6.2 (page 82) of the Draft for Submission St. Helens Local Plan shows the projected increase in elderly people living in the borough, between 2016 and 2033. In addition to the provision of specialist accommodation (which tends to be at higher density), there is also the potential for an increased level of down-sizing, thereby increasing the amount of available dwellings for residents, and potential residents. ✓

The amount of land identified for Safeguarding, in the Submission Draft St. Helen's Local Plan is also considered excessive, and at least some of the proposed sites should be removed from Safeguarded status, and remain within the Green Belt. It is very difficult to forecast with certainty into the future, as to what the requirement may be for housing. Additionally, there may well be other areas of previously developed land, or land that no longer serves its present purpose and function, that will come forward providing potential development land, should this be required. ] ③

There is massive potential for St. Helens town centre to accommodate further housing through high quality schemes of high density, conversion of existing premises, and the re-modelling of certain areas. There is also a lot of under-utilised land around the town centre. Provision of further housing in and around the town centre would also support shops and other small businesses here. ] ②

Yours faithfully

Paul Slater (12 March 2019)

PO1490

ELO127

SITES 4HA & 1EA

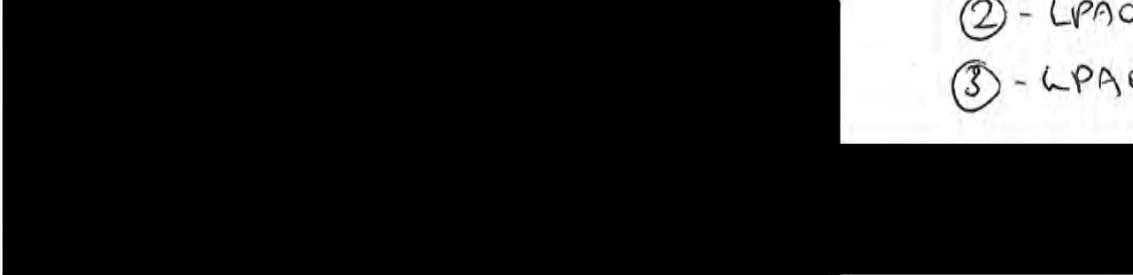
① - LPA05

② - LPA04

③ - LPA06



Comments on St Helens Draft Local Plan  
Ceri Mitchell  
to:  
planningpolicy  
12/03/2019 20:05



Dear Sirs

Here are my objections to the St Helens Draft Local Plan:

1. Bold Forest Garden Suburb. This is a huge development area representing 42% of the housing development in the plan. This is a disproportionately large development in a rural area. Development should be spread over the area of the Plan. There will also be a considerable impact on schools and other services in Burtonwood and Westbrook

①

2. Bold Forest Garden Suburb. Much of the consideration for removing this land from the Greenbelt seems to be that built up areas can be seen from it. However part of the nature of Greenbelt is to protect the separation between built up areas, therefore I do not consider this a valid reason. Taking this land out of Greenbelt and developing it will reduce the rural nature of Burtonwood village and its separation from St Helens

①  
&  
②

3. The traffic predictions in the Plan focus on the impact on St Helens town Centre. I am extremely concerned new traffic linked with Bold Forest Garden Suburb and the Omega extensions will impact greatly on Burtonwood and Westbrook as this will be a route to M62 Junction 8 and onwards to Omega, Gemini and the Westbrook Centre. The road infrastructure surrounding the planned area is poor. There is no detail I can see about measures to protect Burtonwood and Westbrook from this development or predictions of the impact.

③

4. The term "Safeguarded" when used in relation to land removed from Greenbelt status is misleading and a misappropriation of the term. The land is in fact less "safe" from development than if it remained as Greenbelt. Land for future development should be included clearly in the plan or removed if it not to be used in term of the plan.

Kind regards  
Ceri Mitchell  
Parish Councillor, Burtonwood Ward  
Burtonwood and Westbrook Parish Council

PO1491

①-LPA05 ③-IDP ⑤-LPA04

ELO128

②-LPA06 ④-GEN



**URGENT - Representation in response to Local Plan Submission Draft (LPSD)**

**Sue Lea-Jones** to: planningpolicy

12/03/2019 20:28



1 attachment



objections.docx

Please find attached my Representation in respect of the above local plan.  
Please acknowledge safe receipt as I note the deadline is 13th March 2019.

Many thanks

Mrs Lea-Jones

Susan Lea-Jones  
32 Crantock Grove  
Windle  
St Helens  
WA10 6EJ

11<sup>th</sup> March 2019

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 being realistic or use of the latest figures.

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.

Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

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

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

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

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

①

②

①

PO1492



St Helen Local Plan comments for submission  
Carolyn Barton to: planningpolicy

12/03/2019 20:36



1 attachment



image1.jpeg

- ① - LPA05
- ② - PARA 1.7.2
- ③ - S.A.

Dear Sir or Madam,

Please find below my comments that We would like to form our representation for this submission.

In respect of the overall figures in the Plan;

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

①

②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

SUGGESTION MOD

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.

③

- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions (photo attached)

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

①

- 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. ]①

I hope these comments are taken into consideration and acted on appropriately, many thanks for your time /

Mrs Carolyn Barton  
Mr Gregory Barton



232 Higher Lane  
Rainford  
St Helens  
WA11 8NH

PO1493

ELO132



Local Plan Representatioin  
hunt elaine  
to:  
planningpolicy  
12/03/2019 21:28



Site 8HA

① - LPA05

② - PARA 1.7.2

③ - S.A.

1 Attachment



Local Plan letter John Hunt.docx

Please find attached a joint representation regarding the Local Plan.

Mr JA and Mrs E Hunt

Dear Sir/Madam,

Please find below a joint representation on behalf of my family regarding the St Helens Borough Local Plan 2020-2035.

We have noted issues relating to the entire plan but with particular reference to policies LPA02, LPA05 and LPA06 regarding the need for housing and the circumstances surrounding the justification for release of Green Belt Land.

Official government and council policy states that Green Belt land should only be released in exceptional circumstances. This remains a central part of planning law in this country. St Helens is a borough with a falling population with house prices both below the national and regional average. Evidence shows that housing in St Helens is comparatively cheap and in low demand. The council want to build 486 houses per year, however, the figures from the Office of National Statistics show St Helens only needs 383 houses a year. Taking this into account, the economic analysis used to create the plan is flawed and based on over-optimistic assumptions that the need for housing is far greater than is actually required. Therefore, there are no exceptional circumstances to justify not using the standard method to calculate housing need in St Helens. If the council took these into consideration and created the plan appropriately with reasonable housing numbers, there would be no need to release any Green Belt land at all.

A secondary concern is the lack of consideration given to exploring more reasonable alternate options that would be more beneficial to developing St Helens effectively. The council's own register shows there is enough brown field land in St Helens for 5,818 houses. That would support the council's housing supply - even on its inflated figures - for 12 years. Why is this not being utilised? If the council were to lower target figures to the level that is genuinely required and ensured development is placed on previously used or Brown Field sites it would help to expand the town and effectively 'clean up' the areas that do need to be developed. These alternatives would have less impact on the environment and lead to less need for new infrastructure - infrastructure

that would require the release of further land. To add, the council have failed to co-operate with other councils and have failed to publish any statement of common ground.

2

Relating our comments specifically to plot <sup>SHA</sup> HA8 (Higher Lane/Rookery Lane, Rainford) we believe the repercussions of development on this land would be catastrophic. The reasoning behind the release of this piece of land is flawed. The site is next to an industrial area and subject to 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 (see SHLAA 2016 site assessment ref 16m and 142). Plot HA8 is still being considered and yet almost identical plots have been classified as inappropriate. Only 4 sites score 4 negatives on the Sustainability Appraisal. The other 3 have been discarded, however, the council's assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1. Clear anomalies are present.

1

3

It is of great concern that the majority of these Green Belt sites (in particular HA8) are Grade 1 Agricultural Land which is actively used and regularly farmed. HA8 is arguably one of the most fertile lands in the region. This land provides not only food but employment in the agricultural sector which is threatened by the proposed removal of this site from Green Belt protection. The local plan is intended to promote employment and economic growth and yet this will have the opposite effect. At a time when Britain is facing an uncertain financial and economic future (with the prospect of a no-deal Brexit) we should be striving to maintain thriving local business and employment, particularly those areas that provide food supply. To implement a plan that could potentially damage this is ill advised. Efforts should be made to preserve farming land in order to be more self-sufficient.

1

The new Local Plan allocated 259 homes to be build on <sup>SHA</sup> HA8. The original plan allocated just 174 homes for this land. The council have offered no reasoning for such a significant increase in housing or how this would logistically fit. The plot is on a rural road which is struggling to carry the

1

weight of traffic currently using it. Accident figures (with particular reference to the junction at Higher Lane/Mill Lane neighbouring the plot) reveal the danger that the road currently possesses. However, the influx of such a large estate has the capacity to bring 1000+ extra vehicles to these lanes. It would cause higher levels of carbon emissions and toxicity putting health care at risk. This, alongside the issues regarding the potential for an increase in traffic accidents, would deem the area unsafe and put residents at significant risk.

①

As it stands, if the plan is not significantly modified it will not be legally sound and should, therefore, not be allowed to go ahead. The evidence does not support the current plan and certainly does not support the need for loss of Green Belt land. The council should be reducing the housing and employment targets and allocating more previously developed land. If they were to do this, these precious Green Belt areas could remain protected.

We urge you to take into account our representation and its contents.

Yours faithfully,

*J. A Hunt*

Mr John Hunt  
83 Rookery Lane  
Rainford  
St. Helens  
Merseyside  
WA11 8BL

*E Hunt*

Mrs Elaine Hunt  
83 Rookery Lane  
Rainford  
St. Helens  
Merseyside  
WA11 8BL

*T J Hunt*

Mr Thomas Hunt



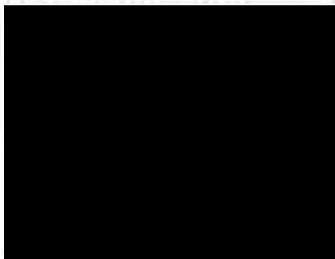
*E J Hunt*

Mr Ethan Hunt



*O J Hunt*

Mr Owen Hunt



PO1494

E10133



jean  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 21:43

Hide Details

From: jean [REDACTED]  
To: "planningpolicy@sthelens.gov.uk" <planningpolicy@sthelens.gov.uk>

13 heyes ave rainford.i wish to register my views regarding issues of building on the greenbelt. ①

1. To ask council to reassess the true numbers of realistic houses required which are affordable or appropriate.

Sent from [Mail](#) for Windows 10

2. Unnecessary and unjustified use of Greenbelt ,
3. Impact of reduced farming on Grade 1 land and the impact of reduced employment. ②
4. Proper calculation of housing need using standard methods.lower target figures,
5. Over optimistic assumptions versus economic analysis
6. Council to co operate with other councils. ③
7. Consultation with Natural England.
8. Level of land not as highly needed as plan suggests.

① LPAOS  
 ② SIA  
 ③ D+C

PO1495

ELO134



Representation on the local plan submission draft  
Kirstie Hoyle  
to:  
planningpolicy  
12/03/2019 21:44

Sine SHA

① - LAADK

② - PRR 1.7.2

③ - S.A



Dear Sir

I am writing with my comments on the above matter.

In general I am wholly against the development of any land currently designated as Green Belt. This land must be protected for future generations to enjoy and farm. Based on the factual evidence below, there is no justification for the development of any Green Belt land in St.Helens.

In respect of the overall figures in the Plan;

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

①  
②

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness. St.Helens Borough Council should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site <sup>SHA</sup> HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So St.Helens Borough Council's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.
- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land – for example see SHLAA 2016 site assessment ref 16m & 142 .
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite

③  
①

effect.

- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

]①

Yours faithfully

Mrs Kirstie Hoyle  
[174 Higher Lane](#)  
[Rainford](#)  
St. Helens  
WA11 8BH

Sent from my iPad

PO1496



Dear sir/ madam

I am sending this email as a resident of Rainford [redacted] In connection with the proposed release of Greenbelt land namely (HA8 Rookery Lane). I would like to make my thoughts known to you as to why I would judge the proposals as being totally inappropriate for Rainford and for the borough. I would ask you to consider my points below.

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

①

②

Rainford Specific points (HA8 Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1
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- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.
- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

③

①

I trust that the correct and logical decision can be made and the above land to be spared any form of development and be preserved as greenbelt, allowing the valuable attributes of the land to be utilised by continuing to farm and produce crops in a sustainable manner, preserving jobs and contributing to the local economy,

Kindest regards

Jeremy Calderbank  
91 Rookery Drive  
Rainford  
St Helens  
WA118BA

PO1497

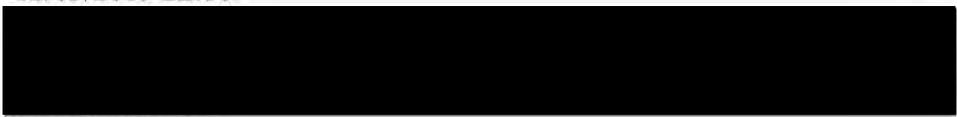
ELO136

Site SHa



Rainford HA8 objection  
Jo Meredith  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 22:10

- ① - LPA05
- ② - PARA 1.7.2
- ③ - S.A.



My full name and address:-

Joanne Michelle Meredith  
19 Mossborough Road  
Rainford  
WA11 8QN

My son's full name and address:-

Joseph Samuel Meredith  
19 Mossborough Road  
Rainford  
WA11 8QN

Dear St Helens Council,

We are writing to object to your plans to build on grade one agricultural land.

Here are our reasons concerning the overall plan:-

- There are no exceptional circumstances to justify not using the standard method to calculate housing need
- The economic analysis is flawed and based on over-optimistic assumptions
- The level of land needed is therefore not as high as set out in the Local Plan
- Therefore there are no exceptional circumstances to change Green belt boundaries
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- The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

} ①

} ②

Here are some Rainford Specific points (HA8 Rookery Lane) regarding our objection:-

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

} ③

for housing in Phase 1

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

Morally, you are wrong to proceed with your plans when there are alternatives available which would avoid building on Grade 1 Agricultural Land.

We look forward to hearing from you with your revised plans.

Yours faithfully,

Joanne and Joseph Meredith  
19 Mossborough Road, WA11 8QN

Get [Outlook for iOS](#)

PO1498

ELO136

Site SHa

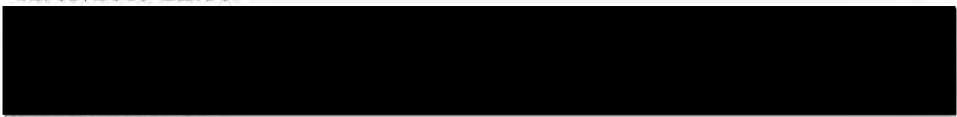
① - LPA05

② - PARA 1.7.2

③ - S.A.



Rainford HA8 objection  
Jo Meredith  
to:  
planningpolicy@sthelens.gov.uk  
12/03/2019 22:10



My full name and address:-

Joanne Michelle Meredith  
19 Mossborough Road  
Rainford  
WA11 8QN

My son's full name and address:-

Joseph Samuel Meredith  
19 Mossborough Road  
Rainford  
WA11 8QN

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} ①  
} ②

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} ③

for housing in Phase 1

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- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

①

Morally, you are wrong to proceed with your plans when there are alternatives available which would avoid building on Grade 1 Agricultural Land.

We look forward to hearing from you with your revised plans.

Yours faithfully,

Joanne and Joseph Meredith  
19 Mossborough Road, WA11 8QN

Get [Outlook for iOS](#)

PO1499

① - LPA05    ③ - IDP    ⑤ - LPA04  
② - LPA06    ④ - GEN

ELO137



Representation in response to local plan

Dave Twentyman

to:

planningpolicy@sthelens.gov.uk

12/03/2019 22:25



Please see below my representation in response to local plan. However, I would just like to express my disappointment in the presentation of the online form. The form is simply not practicable and the terminology used is a deliberate attempt to baffle, confuse and ultimately obstruct ordinary taxpayers from articulating their objections to this plan. It is quite obvious that this is an attempt to reduce the number of objections and no doubt will be quite successful in doing so.

David Lea-Jones

32 Crantock Grove

St Helens

Merseyside

WA10 6EJ

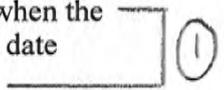
12th March 2019

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 being realistic or use of the latest figures.

Why for instance are figures from 2014 being used in order to forecast 486 houses per year, when the Office for National Statistics estimate from 2016 predicts 383 houses? Surely the most up to date figures should be utilised for something as important as a 15 year plan.



Putting that to one side, the Councils own Brownfield Register suggests land availability for 5808 houses. Given the Table 4.6 of the plan which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower dpa of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figure from that table would still only equate to 1724 houses and 57Ha of land. It makes little sense then why Table 4.5 allocates 288Ha of land for housing.

①

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

②

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 doesn't even begin to look at other sites not on the register due to contamination issues.

The plan makes little to no mention of Brownfield or Previously Developed Land that is not (yet) available or included in the register. The Councils own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 443Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. Just because the Council currently have no policy for bringing these sites back into use, it is completely unreasonable to assume that they cannot be made available within the 15 year plan period.

①

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

A major concern I have with the scale of growth being aspired to within this Local Plan is the infrastructure required to support it, something that St Helens Council are simply not very good at. Their answer to this problem is the Infrastructure Delivery Plan; if you can call it that.

③

The IDP documents quite well the projects currently underway to try to alleviate the problems of today, but seems to lack any substance on what will actually be done to solve the issues of the future that adoption of this plan will bring.

The plan promotes unsustainable traffic growth which will cause severe traffic issues that surely cannot satisfy the NPPF. This traffic growth will be in the exact areas that the Borough already has

④

significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, M6/J23. 4

The IDP refers to some of these existing issues but does not detail how these problems will be solved or even funded. It mentions a great deal about "seeking" or contributions "will be sought" but there are numerous TBC's and unknowns detailed within the IDP.

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and health in general. The IDP does not address these issues. 3

The IDP touches on Healthcare and Education but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it doesn't address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with the long term impacts of the education needs of new and existing communities.

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requires 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on hectares of Grade 1 farmland resulting in the loss of jobs! 5

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

Yours Sincerely,

David Lea-Jones

[Sent from Yahoo Mail for iPhone](#)

PO1500

Sinc 8HA

ELO140



Revised Local Plan representations

to:  
planningpolicy  
12/03/2019 22:41

① - LPAOK

② - PAR 1.7.2

③ - S.A.

Dear Sir , please accept this email as our comments on the revised St Helens Local Plan.

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

③

As far as we are aware the Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

②

We are unaware of exceptional circumstances to justify not using the standard method to calculate housing need, therefore there are no exceptional circumstances to change Green belt boundaries

All available brownfield land , contaminated land and previously developed land should be used before any grade 1 agricultural land is used for housing.....this should be a national requirement.

①

We understand that there has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land. The Council should be required to undertake such a consultation and publish the response.

8HA

The loss of Dial House wood adjacent to HA8 is unacceptable. The Council's statement that this is mitigated for is not accepted. Rainford has very little mature woodland and the removal of this wood is detrimental to the wildlife which need such woodland for survival.

Yours faithfully

Nigel and Helen Powell

13 Mossborough Road

Rainford

WA11 8QN