



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

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

PLAN ORDER

PO2401 – PO2500

SEPTEMBER 2020

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PO2401

E0258



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

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

Site GBP-092-A

4 Attachments

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Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

Appendix 4a- Interim Housing Needs Assessment.pdf

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group
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| ㉓ LPC01 | ㉔ LPD02 |
| | ㉕ LPD03 |

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



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



1 Attachment



Appendix 1- Delivery Statement.pdf

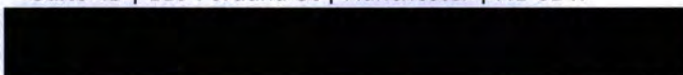
Email 2

Graham Lamb
Associate Planner

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
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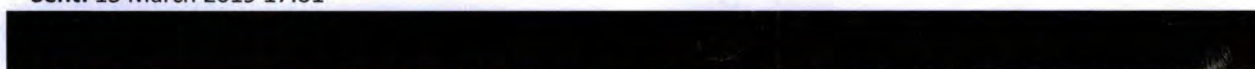
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From: Graham Lamb

Sent: 13 March 2019 17:01



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

Dear Sir/Madam,

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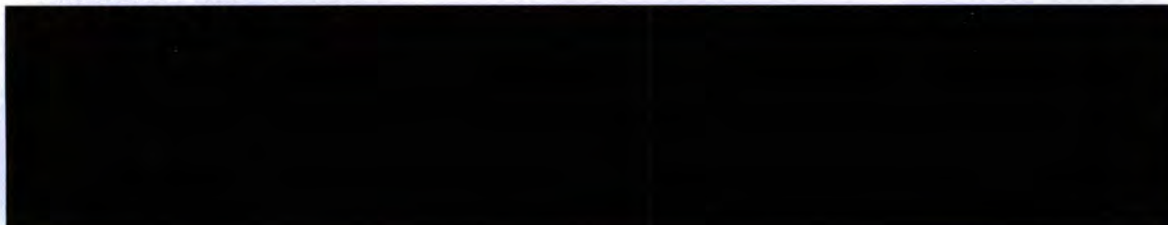
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 <https://i.imgur.com/iHEt88g.jpg>

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



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



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

Email 3

Graham Lamb
Associate Planner

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From: Graham Lamb

Sent: 13 March 2019 17:01

To: planningpolicy@sthelens.gov.uk

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Thanks and kind regards,

Graham Lamb
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13 March 2019

Planning Policy Team
Development Plans Section
St Helens Council
Place Services
Town Hall Annexe
Victoria Square
St Helens
Merseyside
WA10 1HP

Sent via email to: planningpolicy@sthelens.gov.uk

Dear Sir/Madam,

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

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

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

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

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

The need to allocate additional sites

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

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

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

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

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

Yours sincerely,

Graham Lamb
Associate Planner

Encs.





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

**REPRESENTATION BY
REDROW HOMES NORTH WEST**

Date: 13th March 2019

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

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5. MEETING ST HELENS BOROUGH'S HOUSING NEEDS (POLICY LPA05)

- 5.1 This section assesses the proposed housing requirement and general policy provisions within policy LPA05, with further detailed analysis of the proposed allocations and implications on supply in the following sections.

Part 1 - Housing Requirement

- 5.2 Policy LPA05 identifies a net minimum housing requirement of 9,234 dwellings over the period 2016 to 2035, at an average rate of **486 dwellings per annum** (dpa). This marks a 15% decrease from the previous consultation version (Preferred Options–December 2016) which set a housing requirement of 10,830 over the period 2014 to 2033, a rate of 570 dpa.
- 5.3 This 486 dpa requirement is based on an economic scenario set out in the 2018 SHMA update (specifically 'Economic Scenario 2 with sensitivity Option 3'). This is a calculation of the number of dwellings required to support the job growth expected from the proposed employment sites in the plan (based on the Councils ELNA evidence).
- 5.4 So, this is an economic led figure, however it represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa. This figure is derived from the 2014 based household projections across the 10-year period 2019-2029 combined with 2018 affordability ratios and represents the most up to date position under current national guidance (as confirmed in updates to the NPPG on 20th February 2019).
- 5.5 The 570 dpa requirement from the previous Preferred Options plan, was based on a demographic baseline of 451 dpa set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA), with a significant uplift of 20% (90 dpa) to stabilise and increase the population, promote more housing choice and restore pre-recession housebuilding levels. A further uplift of 29 dpa (6.4%) was applied to account for future demolitions. This 570 dpa figure is also the adopted requirement within the St Helens Core Strategy (2012) and the preceding North West RSS (2008) which this was based on, and as such this requirement has been in place since the RSS period began in 2003.
- 5.6 At the outset, we must stress we are surprised and disappointed by this reduction in the requirement figure and are unsure how this represents a positively prepared plan, or how this will address the housing crisis and government ambition to increase the delivery of homes to 300,000 per annum by the mid-2020s.] ①
- 5.7 A critique of the proposed housing requirement and the wider demographic and economic context within St Helens is enclosed at **Appendix 7**.
- 5.8 It had been our intention to provide a detailed Housing Needs Assessment using the Chelmer model to put forward our own housing requirement figure; however, we have held off from doing this at the current time for the following reasons:

- The current uncertainty regarding the standard methodology, with MCHLG formally confirming on 18th February 2019 (and through subsequent updates to the NPPF and NPPG), that planners should revert to the 2014 housing projections whilst the government reviews the formula over the next 18 months; and
- Affordability ratios are due to be updated in April 2019, which will affect the standard methodology calculation and time-period for assessment (will change from 2018-2028 to 2019-2029).

5.9 Therefore, we believe that the position will have moved on by the time of the EIP in summer/autumn 2019 and reserve the right to provide a more comprehensive assessment at that stage. As such the document at **Appendix 7** comprises an interim contextual analysis of demographic and economic trends in St Helens.

5.10 Before looking at the findings of this analysis, we review the current national guidance on assessing housing need, and particularly the circumstances that might support an uplift from the standard methodology.

National Guidance on Housing Need

5.11 Paragraph 60 of the 2019 NPPF confirms that local plan submitted after 24th January 2019 should use the Governments Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.

5.12 However, Paragraph 11 also confirms that for plan-making, the presumption in favour of sustainable development means that:

- Plan should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
- Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

5.13 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. Many other considerations can impact on the final housing requirement figure set out in a Local Plan and this is evident within several paragraphs of the NPPG, including:

- 2a-002-20190220 - The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement.
- 2a-003-20190220 - The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).

- 2a-024-20190220 - The total need for affordable housing will need to be converted into annual flows...An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

5.14 Under the question 'When might it be appropriate to plan for a higher housing need figure than the standard method indicates?' the NPPG states the following (para 2a-010-20190220):

"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

5.15 Paragraph 2a-015-20190220 provides some useful clarification on how this 'exceptional circumstances' test will be applied at examination, confirming the logical assumption that exceptional circumstances are only required to justify a figure that's lower than the standard method:

"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and

that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."

- 5.16 Whilst St Helens are proposing an approach that exceeds the minimum requirement (by 3.8%), it is our strong view that this doesn't adequately reflect current and future demographic trends, and as such a far greater uplift is required, more in line with that proposed in the previous version of the plan and the adopted Core Strategy (570 dpa), for the reasons set out below.

Conclusions from Pegasus Housing Need Assessment

- 5.17 Our contextual analysis drew the following conclusions:

- That whilst St Helens is relatively affordable to live, the ratios have changed little over the last few years, suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to remain high in the long-term to address this issue and reducing the housing target to 486 dpa seems counter-productive to supporting inclusive growth in the Borough.
- Internal migration has been high in St Helens in recent years, indicating a level of demand for new housing in St Helens from people wanting to move into the area.
- St Helens has an ageing population and therefore needs to try and attract more people to live in the area from elsewhere to maintain its future labour supply and general socio-economic balance. A key way of doing this is to provide a sufficient supply of housing to attract new residents to the area.
- Job numbers in the Borough have been on a relatively strong upward trajectory over the last three years and further research is required to model what the implications of this will be for housing numbers. By not taking this issue into account, there is a real risk that the Local Plan as it stands is not giving full consideration to the economic growth potential and competitiveness of St Helens.

- 5.18 Furthermore, whilst the proposed requirement purports to be an economic led figure, it is clear from the supporting text in the 12th December Cabinet Report (paras 2.43 – 2.46) that the choice of this figure, and the reduction from 570 dpa was justified by (and therefore anchored to) the introduction of the standard methodology, rather than any change in the economic evidence:

"2.46 The figure of 486 dwellings per annum is substantially less than the figure of 570 dwellings per annum in the Preferred Options consultation document. This reduction is justified by the change of circumstances which has occurred since 2016, including the introduction of the national standard method, the new NPPF and related planning guidance, and the SHMA Update 2018. Whilst (for reasons stated above) it is not appropriate to rely on the standard method output of 468 dwellings per annum, there is now no robust evidential basis to continue with a figure as high as 570 dwellings per annum."

- 5.19 As such we suggest the Council continue to pursue the **570 dpa** figure to ensure that housing and economic aspirations are fully aligned, to allow St Helens to compete within the wider Liverpool City Region and the Cheshire and Warrington LEP Area.

Part 2 - Housing Supply

- 5.20 This part of the policy identifies the main sources of supply for the delivery of housing, including completions, sites with planning permissions, allocations, sites without permission in the 2017 SHLAA windfall sites and windfall sites, with the calculations set out in more detail in Tables 4.5 – 4.7.
- 5.21 Whilst we do not dispute this overall approach, we do provide a detailed critique of the proposed allocations within section 5 and the overall supply position in section 6.

Part 3 - Density

- 5.22 This policy suggests that new development should achieve minimum densities of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30 dph on sites in local centres, sites that are well served by bus or train services and in other urban areas. It also notes that 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 an area.
- 5.23 We support the need to encourage higher densities, particularly in the most accessible locations, in line with 2019 NPPF; however, it is our view that this policy would benefit from some additional flexibility, to take account local and site characteristics, market aspirations and viability in determining the appropriate density of the site and suggest that this part of the policy is reworded to reflect this. (11)

Part 4 - Monitoring and Supply

- 5.24 Redrow fully endorse the need to monitor housing delivery annually to ensure an ongoing supply (in accordance with the Housing Delivery Test and five-year supply requirements), and the acknowledgement that a partial or full Local Plan review will be considered to allocate safeguarded land sites for housing development where necessary.
- 5.25 However, we suggest that the wording is strengthened here, with clear triggers for when a review is required (i.e. what constitutes 'significantly' below the required level). (12)
- 5.26 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is a made a policy requirement.
- 5.27 In respect of housing an AMR, or equivalent document, should include the following as a minimum:

- Details of annual housing completions (both gross and net) with a list of contributing sites - to allow accurate monitoring of the Council's trajectory in Policy LPA05,
- Details of windfall/ small site delivery – for compliance with NPPF 10% small site requirement and to ensure projected windfall rate remains realistic (see section 7 for further analysis of this).
- Details of affordable completions – to monitor effectiveness of Policy LPC02.
- Proportion of delivery on brownfield/ greenfield sites – to monitor effectiveness of spatial strategy/ Policy LPA02 Part 2.

5.28 The Monitoring Framework at Appendix 4 of the Submission Plan does refer to several of these indicators and refers the Annual SHBC house completion survey as a data source, however as far as we are aware this is not publicly available, as such we would request that this is incorporated into the AMR.

5.29 Finally, in respect of Appendix 4 we would ask the Council to clarify the rationale for trigger in respect of safeguarded land (Policy LPA06) which states that if '10% or more of land safeguarded is granted planning consent, then they will consider an early review of the plan?'

PO2402



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-
Email 1 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:05

① - LPA05

② - LPA02

③ - GBR

④ - S.A.

⑤ - S.O. 4.1

⑥ - S.O. 5.1

⑦ - LPA02 - PARA 3

⑧ - LPA02 - PARA 4

⑨ - LPA03

⑩ - LPA04

4 Attachments



Appendix 1-Site Location Plan-Redrow.pdf Appendix 2 Part 1-Delivery Statement-Redrow.pdf



Representation Form-Redrow-May 19.pdf R005v6 - Repts to Submission Local Plan-Redrow.pdf

Dear Sir/Madam,

We are instructed on behalf of our client, Redrow Homes North West, to submit the attached form and representation (R005) to the Local Plan Submission Draft Consultation. Redrow have land interests in relation to the Burrows Lane, Eccleston site, which is discussed in detail in the attached representation.

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Site Location Plan (attached to this email)
- Appendix 2 - Delivery Statement (Part 1 attached to this email)
- Appendix 3 - Accessibility Statement
- Appendix 4 - Phase 1 Ecology Survey
- Appendix 5 - Agricultural Land Assessment
- Appendix 6 - Detailed Site Pro Forms
- Appendix 7 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 8 - Council's Housing Trajectory
- Appendix 9 - Pegasus Housing Trajectory
- Appendix 10 - Spatial Distribution of Sites

⑪ - LPA05 - PARA 3

⑫ - LPA05 - PARA 4

⑬ - APPENDIX 4

⑭ - TABLE 4.6

⑮ - LPA05.1

⑯ - LPA06

We will follow up this submission by sending a CD in the post which contains the entirety of Redrow's submission to the Local Plan consultation.

⑰ - LPC01

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

⑱ - LPC02

Many thanks and kind regards,

⑲ - LPC03 - PARA 4

⑳ - LPD07

㉑ - LPD02

㉒ - LPD03

㉓ - LPC04

㉔ - LPA07 - PARA 3d

㉕ - LPA07 - PARA 9

㉖ - LPC10

Rebecca Dennis
Principal Planner

Pegasus Group

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 <https://i.imgur.com/ZuAcceY.jpg>

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

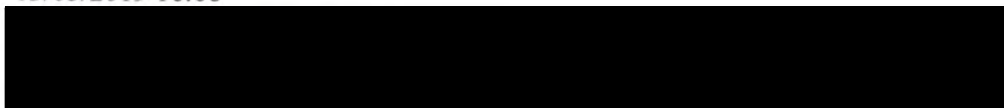
Email 2 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:06



3 Attachments



Appendix 2 Part 2-Delivery Statement-Redrow.pdf



Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

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<https://i.imgur.com/iHE T88g.jpg>



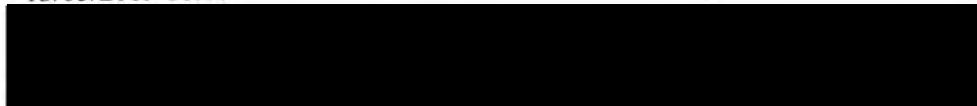
Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-
Email 3 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:07



7 Attachments



Appendix 5-Agricultural Land Classification-Redrow.pdf Appendix 6-Detailed Site Pro Forma-Redrow.pdf



Appendix 8-Council's Housing Trajectory-Redrow.pdf



Appendix 9a-Pegasus Trajectory Best Case Scenario-Redrow.pdf



Appendix 9b-Pegasus Trajectory Worst Case Scenario 9b-Redrow.pdf



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



Appendix 7-Review of Employment-Led Local Plan Housing Requirement-Redrow.pdf

Email 3 of 4 of Redrow representations.

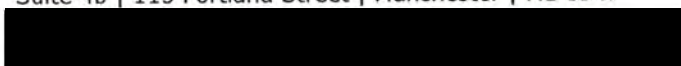
Rebecca Dennis

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-
Email 4 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

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1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

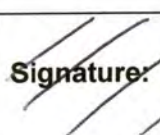
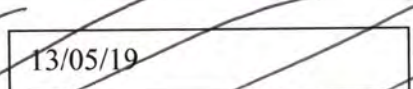
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: | Title: Mr |
| First Name: | First name: Graham |
| Last Name: | Last Name: Lamb |
| Organisation/company: Redrow Homes North West | Organisation/company: Pegasus Group |
| Address: | Address: Suite 4b, 113 Portland Street, Manchester, |
| Postcode: | Postcode: M1 6DW |

| | |
|--|---|
| Signature:  | Date:  13/05/19 |
|--|---|

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

| | | | | | | | | | |
|--|-------|-----------------------------|--|--------------|--|--|--|--------------------------------|--|
| Policy | LPA05 | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

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

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

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

Please tick as appropriate

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

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

| | |
|----------------------------------|--------------------------|
| Positively Prepared? | X |
| Justified? | X |
| Effective? | X |
| 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

REDROW OBJECT TO THE REDUCED HOUSING REQUIREMENT FIGURE OF 486 DWELLINGS PER ANNUM, WHICH LEADS TO THE PLAN NOT BEING POSITIVELY PREPARED, JUSTIFIED OR EFFECTIVE.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this

relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

COUNCIL SHOULD REVERT TO PREVIOUS HOUSING FIGURE OF 570 DWELLINGS PER ANNUM. WE RESERVE THE RIGHT TO COMMENT ON THIS FURTHER AT LATER STAGE IN THE EXAMINATION PROCESS AND PRODUCE A DETAILED CHELMER MODEL.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

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

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

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

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

TO RAISE CONCERNS ABOUT SOUNDNESS OF PLAN AND TO RESERVE RIGHT TO PROVIDE DETAILED CHELMER MODEL ON HOUSING NUMBERS.

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

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



ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

Pegasus Group

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



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5. MEETING ST HELENS BOROUGH'S HOUSING NEEDS (POLICY LPA05)

- 5.1 This section assesses the proposed housing requirement and general policy provisions within policy LPA05, with further detailed analysis of the proposed allocations and implications on supply in the following sections.

Part 1 - Housing Requirement

- 5.2 Policy LPA05 identifies a net minimum housing requirement of 9,234 dwellings over the period 2016 to 2035, at an average rate of **486 dwellings per annum** (dpa). This marks a 15% decrease from the previous consultation version (Preferred Options–December 2016) which set a housing requirement of 10,830 over the period 2014 to 2033, a rate of 570 dpa.
- 5.3 The 570 dpa requirement from the previous Preferred Options plan, was based on a demographic baseline of 451 dpa set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA), with a significant uplift of 20% (90 dpa) to stabilise and increase the population, promote more housing choice and restore pre-recession housebuilding levels. A further uplift of 29 dpa (6.4%) was applied to account for future demolitions. This 570 dpa figure is also the adopted requirement within the St Helens Core Strategy (2012) and the preceding North West RSS (2008) which this was based on, and as such this requirement has been in place since the RSS period began in 2003.
- 5.4 The reduction in the requirement figure is both surprising and disappointing. It does not represent a positively prepared plan, and it is not clear how, if at all, restraining development to these levels will address the housing crisis and government ambition to increase the delivery of homes to 300,000 per annum by the mid-2020s.] ①
- 5.5 The 486 dwelling pa requirement represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa presented by the Council. This figure is derived from the 2014 based household projections across the 10-year period 2019-2029 combined with 2018 affordability ratios and, upon publication, represented the most up to date position under current national guidance (as confirmed in updates to the NPPG on 20th February 2019). It should be noted that since then the 2019 affordability ratios have been published, which for St Helens show slightly improving affordability (from 5.63 down to 5.33). For the 10-year period, this now generates a standard methodology figure of **461** dpa (so the uplift from the latest Standard Methodology is actually 5.4% but still modest overall).
- 5.6 As noted below, national guidance allows for upward additions to the standard methodology, noting that the standard method represents a minimum figure.
- 5.7 The Council's 486 dpa requirement is based on an economic scenario set out in the 2018 SHMA update (specifically 'Economic Scenario 2 with sensitivity Option 3'). As such, this is an economic led figure. In applying such an approach, it is therefore perfectly sensible and reasonable to

determine if the economic growth figures and assumptions used are credible and based on an objective assessment of economic growth within St Helens.

- 5.8 Critically, the Council's scenario is based on a calculation of the number of dwellings required to support the job growth expected from the proposed employment sites in the plan (based on the Council's ELNA evidence). It is one that is directly pinned to the Council's expectations on how quickly its employment sites will come forward. As such, it is a plan led, policy on approach rather than one that looks at objective evidence on economic growth.
- 5.9 A critique of the proposed housing requirement and the wider demographic and economic context within St Helens is enclosed at **Appendix 7**. Within the report, we provide an interim contextual analysis of demographic and economic trends in St Helens. We also consider alternative economic led scenarios in light of the Council's decision to follow an economic led approach in relation to their housing requirement for the Local Plan. In particular, we summarise the initial findings from a Chelmer modelling work which Cambridge Econometrics have undertaken on our behalf. However, a detailed Housing Needs Assessment using the Chelmer model has not been provided at this time pending clarification of the current uncertainty regarding the standard methodology (and/or the procedure for proposing a justified alternative) with MCHLG formally confirming on 18th February 2019 (and through subsequent updates to the NPPF and NPPG), that planners should revert to the 2014 housing projections whilst the government reviews the formula over the next 18 months. Therefore, we believe that the position will have moved on by the time of the EiP in late 2019, once plans submitted under the Revised NPPF start to be examined. As such, we reserve the right to provide a more comprehensive assessment at that stage.
- 5.10 Before looking at the findings of this analysis, we review the current national guidance on assessing housing need, and particularly the circumstances that might support an uplift from the standard methodology.

National Guidance on Housing Need

- 5.11 Paragraph 60 of the 2019 NPPF confirms that local plan submitted after 24th January 2019 should use the Governments Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.
- 5.12 However, Paragraph 11 also confirms that for plan-making, the presumption in favour of sustainable development means that:
- Plan should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
 - Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

5.13 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. Many other considerations can impact on the final housing requirement figure set out in a Local Plan and this is evident within several paragraphs of the NPPG, including:

- 2a-002-20190220 - The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement.
- 2a-003-20190220 - The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).
- 2a-024-20190220 - The total need for affordable housing will need to be converted into annual flows...An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

5.14 Under the question 'When might it be appropriate to plan for a higher housing need figure than the standard method indicates?' the NPPG states the following (para 2a-010-20190220):

"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

5.15 Paragraph 2a-015-20190220 provides some useful clarification on how this 'exceptional circumstances' test will be applied at examination, confirming the logical assumption that



exceptional circumstances are only required to justify a figure that's lower than the standard method:

"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."

- 5.16 Whilst St Helens are proposing an approach that exceeds the minimum requirement (by 3.8%), it is our strong view that this doesn't adequately reflect current and future demographic trends, and as such a far greater uplift is required, more in line with that proposed in the previous version of the plan and the adopted Core Strategy (570 dpa), for the reasons set out below.

Conclusions from Pegasus Housing Need Assessment

- 5.17 Our contextual analysis and initial modelling work drew the following conclusions:
- Whilst St Helens is a relatively affordable area to live in, the ratios have changed little over the last few years, suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to remain high in the long-term to address this issue. Reducing the housing target to 486 dpa is counter-productive and will not support inclusive growth in the Borough.
 - Internal migration has been high in St Helens in recent years, indicating a level of demand for new housing in St Helens from people wanting to move into the area.
 - St Helens has an ageing population and therefore needs to try to attract more people to live in the area from elsewhere. This is necessary to maintain its future labour supply and general socio- economic balance. A key way of doing this is to significantly boost the supply of housing to attract new residents to the area.
 - Job numbers in the Borough have been on a relatively strong upward trajectory over the last three years and further research is required to model what the implications of this will be for housing numbers. By not taking this issue into account, there is a real risk that the Local Plan as it stands is not giving full consideration to the economic growth potential and competitiveness of St Helens.
- 5.18 Furthermore, whilst the proposed requirement purports to be an economic led figure, it is clear from the supporting text in the 12th December Cabinet Report (paras 2.43 – 2.46) that the choice

of this figure, and the reduction from 570 dpa was justified by (and therefore anchored to) the introduction of the standard methodology, rather than any change in the economic evidence:

"2.46 The figure of 486 dwellings per annum is substantially less than the figure of 570 dwellings per annum in the Preferred Options consultation document. This reduction is justified by the change of circumstances which has occurred since 2016, including the introduction of the national standard method, the new NPPF and related planning guidance, and the SHMA Update 2018. Whilst (for reasons stated above) it is not appropriate to rely on the standard method output of 468 dwellings per annum, there is now no robust evidential basis to continue with a figure as high as 570 dwellings per annum."

- 5.19 It is also pertinent that the various employment scenarios put forward in the January 2019 SHMA Update which led to the selection of the 486 dpa figure are all based on meeting the level of economic growth proposed in the plan (i.e. to support the jobs on proposed employment sites); rather than actual projected economic growth for St Helens. As such, these scenarios are plan led and constrained rather than based on credible economic growth projections.
- 5.20 The latest evidence currently before the Council that considered projected growth (i.e. unconstrained) economic growth is within the January 2017 Liverpool City Region SHELMA, based on growth rates provided by the Liverpool LEP. This suggested that a dwelling requirement of 855 dpa would be required to support the level of jobs growth expected over the study period, representing a significant uplift from that proposed in the current plan. Even then, as set out in **Appendix 7**, utilising the Chelmer Model we have been able to ascertain that the economic activity rates used in the SHELMA and Council's SHMA are overly optimistic and an unrealistic basis to determine future dwelling requirements based on an employment led / economic growth. Indeed, our initial modelling suggests a requirement of over 1,000 new homes would be required to achieve the jobs increase outlined in the economic growth scenario of the SHELMA (as opposed to 855).
- 5.21 Whilst we acknowledge that a housing target of the scale set out above could be compounded by wider market and deliverability issues in St Helens (noting that they are far greater than levels of delivery previously achieved in the Borough), this does indicate that the proposed figure of 486 dwellings per annum will fall way short of any economic led projections and associated housing requirement. Indeed, the initial modelling work carried out through the Chelmer model indicates that the Council's housing strategy would only result in an increase of 167 jobs per annum. Coupled with the low housing requirement set within the Local Plan, this is simply not ambitious enough nor does it correlate with recent jobs growth in St Helens.
- 5.22 In light of the above and analysis provided at **Appendix 7**, we suggest the Council should continue to pursue the **570 dpa** figure as a bare minimum with the need for an immediate review of the Plan. This figure is consistent with the previous iteration of the emerging Local Plan and allowed for in the adopted Core Strategy and RSS prior to that.

- 5.23 As such, a minimum target of 570 dpa represents a perfectly reasonable alternative for the Local Plan and associated Sustainability Appraisal to assess. It would allow housing and economic aspirations to become more aligned, deliver more economic growth and help to stem rising house prices beyond an unaffordable ratio for many of St Helen's residents. Indeed, the very purpose of the Standard Methodology was to deliver more housing than achieved before (not less) to achieve greater levels of affordability. To adopt a figure of 486 dpa represents a significant backwards step for St Helens and would not assist in this wider objective and would lead to negative social and economic consequences compared to a development plan based on a requirement for 570 dpa.

Part 2 - Housing Supply

- 5.24 This part of the policy identifies the main sources of supply for the delivery of housing, including completions, sites with planning permissions, allocations, sites without permission in the 2017 SHLAA windfall sites and windfall sites, with the calculations set out in more detail in Tables 4.5 – 4.7.
- 5.25 Whilst we do not dispute this overall approach, we do provide a detailed critique of the proposed allocations within Section 5 and the overall supply position in Section 6.

Part 3 - Density

- 5.26 This policy suggests that new development should achieve minimum densities of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30 dph on sites in local centres, sites that are well served by bus or train services and in other urban areas. It also notes that 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 an area.
- 5.27 We support the need to encourage higher densities, particularly in the most accessible locations, in line with 2019 NPPF; however, it is our view that this policy would benefit from some additional flexibility, to take account local and site characteristics, market aspirations and viability in determining the appropriate density of the site and suggest that this part of the policy is reworded to reflect this.] 11

Part 4 - Monitoring and Supply

- 5.28 Redrow fully endorse the need to monitor housing delivery annually to ensure an ongoing supply (in accordance with the Housing Delivery Test and five-year supply requirements), and the acknowledgement that a partial or full Local Plan review will be considered to allocate safeguarded land sites for housing development where necessary.
- 5.29 However, we suggest that the wording is strengthened here, with clear triggers for when a review is required (i.e. what constitutes 'significantly' below the required level).] 12

- 5.30 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is a made a policy requirement.
- 5.31 In respect of housing an AMR, or equivalent document, should include the following as a minimum:
- Details of annual housing completions (both gross and net) with a list of contributing sites - to allow accurate monitoring of the Council's trajectory in Policy LPA05,
 - Details of windfall/ small site delivery - for compliance with NPPF 10% small site requirement and to ensure projected windfall rate remains realistic (see section 7 for further analysis of this).
 - Details of affordable completions - to monitor effectiveness of Policy LPC02.
 - Proportion of delivery on brownfield/ greenfield sites - to monitor effectiveness of spatial strategy/ Policy LPA02 Part 2.
- 5.32 The Monitoring Framework at Appendix 4 of the Submission Plan does refer to several of these indicators and refers the Annual SHBC house completion survey as a data source, however as far as we are aware this is not publicly available, as such we would request that this is incorporated into the AMR.
- 5.33 Finally, in respect of Appendix 4 we would ask the Council to clarify the rationale for trigger in respect of safeguarded land (Policy LPA06) which states that if '10% or more of land safeguarded is granted planning consent, then they will consider an early review of the plan?'. 13

PO2403

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ELO290B.1.pdf



Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:13

① LPA05

② LPA02

③ GBR

④ SA

⑤ S.O.4.1

⑥ S.O.5.1

⑦ LPA02-PARA 3

3 Attachments



Representation Form-Wallace-May 19.pdf R001v7- Reps to Submission Local Plan-Wallace.pdf



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑧ LPA02-PARA 4

⑨ LPA03

⑩ LPA04

⑪ LPA05-PARA 3

Dear Sir/Madam,

We are instructed on behalf of our client, Wallace Land Investments, to submit the attached form and representation (R001) to the Local Plan Submission Draft Consultation. Wallace have land interests in relation to the Mill Lane, Rainhill site, which is discussed in detail in the attached representation.

⑫ LPA05-PARA 4

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Illustrative Masterplan (attached to this email)
- Appendix 2 - Previously Submitted Documents and Technical Information
- Appendix 3 - Additional Technical Documents (May 2019)
- Appendix 4 - Detailed Site Pro Formas
- Appendix 5 - Council's Stage 3 Green Belt Assessment of Mill Lane Site
- Appendix 6 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 7 - Council's Housing Trajectory
- Appendix 8 - Pegasus Housing Trajectory
- Appendix 9 - Spatial Distribution of Sites

⑬ APPENDIX 4

⑭ LPA05-TABLE 4.6

⑮ LPA05.1

⑯ LPA06

⑰ LPC01

We will follow up this submission by sending a CD in the post which contains the entirety of Wallace's submission to the Local Plan consultation.

⑱ LPC02

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

⑲ LPC04

⑳ LPC03-PARA 4

㉑ LPA07-PARA 3c

㉒ LPA07

㉓ LPA07-PARA 9

㉔ LPA02

㉕ LPC10

㉖ LPA03

Many thanks and kind regards,

Rebecca Dennis

Principal Planner

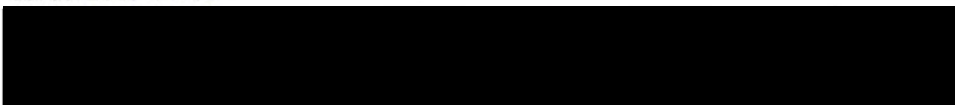
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4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

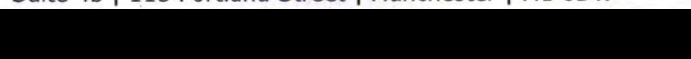
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Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

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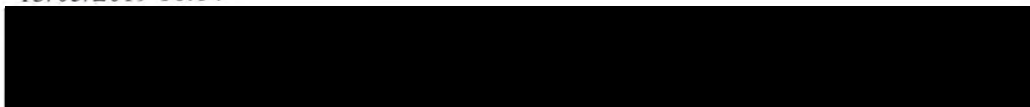
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2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

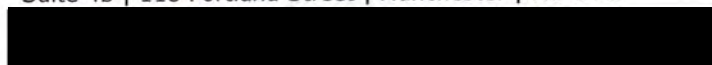
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Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

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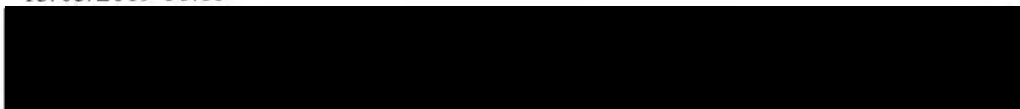
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Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

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7 Attachments



Appendix 4-Detailed Site Pro Formas-Wallace.pdf Appendix 5-Council's Stage 3 Green Belt Assessment-Wallace.pdf



Appendix 7-Council's Housing Trajectory-Wallace.pdf



Appendix 8b-Pegasus Trajectory Worst Case Scenario-Wallace.pdf



Appendix 8c-Summary Supply Trajectory-Wallace.pdf



Appendix 8a-Pegasus trajectory Best Case Scenario-Wallace.pdf



Appendix 6-Review of Employment-Led Local Plan Housing Requirement-Wallace.pdf

Email 7 of 8 of Wallace representations.

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Appendix 9-Spatial Distribution of Sites-Wallace.pdf

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St.Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

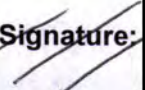
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: | Title: Mr |
| First Name: | First name: Sebastian |
| Last Name: | Last Name: Tibenham |
| Organisation/company: Wallace Land Investments (c/o Agent) | Organisation/company: Pegasus Group |
| Address: | Address: Suite 4b, 113 Portland Street, Manchester |
| Postcode: | Postcode: M1 6DW |



| | |
|--|--|
| Signature:  | Date: 13/05/2019 |
|--|--|

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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Merseyside
WA10 1HP**

or by hand delivery to:

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

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NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

| | |
|--|--|
| 6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u> | |
| If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments | |
| <p>WE OBJECT TO THE REDUCED HOUSING REQUIREMENT FIGURE OF 486 DWELLINGS PER ANNUM, WHICH LEADS TO THE PLAN NOT BEING POSITIVELY PREPARED, JUSTIFIED OR EFFECTIVE.</p> <p>PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.</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.

COUNCIL SHOULD REVERT TO PREVIOUS HOUSING FIGURE OF 570 DWELLINGS PER ANNUM. WE RESERVE THE RIGHT TO COMMENT ON THIS FURTHER AT LATER STAGE IN THE EXAMINATION PROCESS AND PRODUCE A DETAILED CHELMER MODEL.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

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

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

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

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

TO RAISE CONCERNS ABOUT SOUNDNESS OF PLAN AND TO RESERVE RIGHT TO PROVIDE DETAILED CHELMER MODEL ON HOUSING NUMBERS.

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

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

Please keep a copy for future reference.



ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY WALLACE LAND INVESTMENTS

Date: 13th May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

Pegasus Group

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

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5. MEETING ST HELENS BOROUGH'S HOUSING NEEDS (POLICY LPA05)

- 5.1 This section assesses the proposed housing requirement and general policy provisions within Policy LPA05, with further detailed analysis of the proposed allocations and implications on supply in the following sections.

Part 1 - Housing Requirement

- 5.2 Policy LPA05 identifies a net minimum housing requirement of 9,234 dwellings over the period 2016 to 2035, at an average rate of **486 dwellings per annum** (dpa). This marks a 15% decrease from the previous consultation version (Preferred Options–December 2016) which set a housing requirement of 10,830 over the period 2014 to 2033, a rate of 570 dpa.
- 5.3 The 570 dpa requirement from the previous Preferred Options plan, was based on a demographic baseline of 451 dpa set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA), with a significant uplift of 20% (90 dpa) to stabilise and increase the population, promote more housing choice and restore pre-recession housebuilding levels. A further uplift of 29 dpa (6.4%) was applied to account for future demolitions. This 570 dpa figure is also the adopted requirement within the St Helens Core Strategy (2012) and the preceding North West RSS (2008) which this was based on, and as such this requirement has been in place since the RSS period began in 2003.
- 5.4 The reduction in the requirement figure is both surprising and disappointing. It does not represent a positively prepared plan, and it is not clear how, if at all, restraining development to these levels will address the housing crisis and government ambition to increase the delivery of homes to 300,000 per annum by the mid-2020s.
- 5.5 The 486 dwelling pa requirement represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa presented by the Council. This figure is derived from the 2014 based household projections across the 10-year period 2019-2029 combined with 2018 affordability ratios and, upon publication, represented the most up to date position under current national guidance (as confirmed in updates to the NPPG on 20th February 2019). It should be noted that since then the 2019 affordability ratios have been published, which for St Helens show slightly improving affordability (from 5.63 down to 5.33). For the 10-year period, this now generates a standard methodology figure of **461** dpa (so the uplift from the latest Standard Methodology is actually 5.4% but still modest overall).
- 5.6 As noted below, national guidance allows for upward additions to the standard methodology, noting that the standard method represents a minimum figure.
- 5.7 The Council's 486 dpa requirement is based on an economic scenario set out in the 2018 SHMA update (specifically 'Economic Scenario 2 with sensitivity Option 3'). As such, this is an economic led figure. In applying such an approach, it is therefore perfectly sensible and reasonable to

determine if the economic growth figures and assumptions used are credible and based on an objective assessment of economic growth within St Helens.

- 5.8 Critically, the Council's scenario is based on a calculation of the number of dwellings required to support the job growth expected from the proposed employment sites in the plan (based on the Council's ELNA evidence). It is directly pinned to the Council's expectations as to how quickly its employment sites will come forward. As such, it is a plan led, policy on approach rather than one that looks at objective evidence on economic growth.
- 5.9 A critique of the proposed housing requirement and the wider demographic and economic context within St Helens is enclosed at **Appendix 6**. Within the report, we provide an interim contextual analysis of demographic and economic trends in St Helens. We also consider alternative economic led scenarios in light of the Council's decision to follow an economic led approach in relation to their housing requirement for the Local Plan. In particular, we summarise the initial findings from Chelmer modelling work which Cambridge Econometrics have undertaken on our behalf. However, a detailed Housing Needs Assessment using the Chelmer model has not been provided at this time pending clarification of the current uncertainty regarding the standard methodology (and/or the procedure for proposing a justified alternative), with MCHLG formally confirming on 18th February 2019 (and through subsequent updates to the NPPF and NPPG), that planners should revert to the 2014 housing projections whilst the government reviews the formula over the next 18 months. We believe that the position will have moved on by the time of the EiP in late 2019, once plans submitted under the Revised NPPF start to be examined. As such, we reserve the right to provide a more comprehensive assessment at that stage.
- 5.10 Before looking at the findings of this analysis, we review the current national guidance on assessing housing need, and particularly the circumstances that might support an uplift from the standard methodology.

National Guidance on Housing Need

- 5.11 Paragraph 60 of the 2019 NPPF confirms that local plans submitted after 24th January 2019 should use the Government's Standard Method for calculating housing need, unless exceptional circumstances justify an alternative approach.
- 5.12 However, Paragraph 11 also confirms that for plan-making, the presumption in favour of sustainable development means that:
- Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
 - Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

5.13 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. Many other considerations can impact on the final housing requirement figure set out in a Local Plan and this is evident within several paragraphs of the NPPG, including:

- 2a-002-20190220 - The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement.
- 2a-003-20190220 - The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).
- 2a-024-20190220 - The total need for affordable housing will need to be converted into annual flows...An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

5.14 Under the question 'When might it be appropriate to plan for a higher housing need figure than the standard method indicates?' the NPPG states the following (para 2a-010-20190220):

"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

5.15 Paragraph 2a-015-20190220 provides some useful clarification on how this 'exceptional circumstances' test will be applied at examination, confirming the logical assumption that

exceptional circumstances are only required to justify a figure that is lower than the standard method:

"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."

- 5.16 Whilst St Helens are proposing an approach that exceeds the minimum requirement (by 3.8%), it is our view that this does not adequately reflect current and future demographic trends, and as such a far greater uplift is required, more in line with that proposed in the previous version of the plan and the adopted Core Strategy (570 dpa). The reasons for this are set out below. ①

Conclusions from Pegasus Housing Need Assessment

- 5.17 Our contextual analysis and initial modelling work drew the following conclusions:

- Whilst St Helens is a relatively affordable area to live in, the ratios have changed little over the last few years, suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to remain high in the long-term to address this issue. Reducing the housing target to 486 dpa is counter-productive and will not support inclusive growth in the Borough.
- Internal migration has been high in St Helens in recent years, indicating a level of demand for new housing in St Helens from people wanting to move into the area.
- St Helens has an ageing population and therefore needs to try to attract more people to live in the area from elsewhere. This is necessary to maintain its future labour supply and general socio- economic balance. A key way of doing this is to significantly boost the supply of housing to attract new residents to the area.
- Job numbers in the Borough have been on a relatively strong upward trajectory over the last three years and further research is required to model what the implications of this will be for housing numbers. By not taking this issue into account, there is a real risk that the Local Plan as it stands is not giving full consideration to the economic growth potential and competitiveness of St Helens.

- 5.18 Furthermore, whilst the proposed requirement purports to be an economic led figure, it is clear from the supporting text in the 12th December Cabinet Report (paras 2.43 – 2.46) that the choice

of this figure, and the reduction from 570 dpa was justified by (and therefore anchored to) the introduction of the standard methodology, rather than any change in the economic evidence:

"2.46 The figure of 486 dwellings per annum is substantially less than the figure of 570 dwellings per annum in the Preferred Options consultation document. This reduction is justified by the change of circumstances which has occurred since 2016, including the introduction of the national standard method, the new NPPF and related planning guidance, and the SHMA Update 2018. Whilst (for reasons stated above) it is not appropriate to rely on the standard method output of 468 dwellings per annum, there is now no robust evidential basis to continue with a figure as high as 570 dwellings per annum."

- 5.19 It is also pertinent that the various employment scenarios put forward in the January 2019 SHMA Update which led to the selection of the 486 dpa figure are all based on meeting the level of economic growth proposed in the plan (i.e. to support the jobs on proposed employment sites); rather than actual projected economic growth for St Helens. As such, these scenarios are plan led and constrained rather than based on credible economic growth projections.
- 5.20 The latest evidence currently before the Council that considered projected growth (i.e. unconstrained) economic growth is within the January 2017 Liverpool City Region SHELMA, based on growth rates provided by the Liverpool LEP. This suggested that a dwelling requirement of 855 dpa would be required to support the level of jobs growth expected over the study period, representing a significant uplift from that proposed in the current plan. Even then, as set out in **Appendix 6**, utilising the Chelmer Model we have been able to ascertain that the economic activity rates used in the SHELMA and Council's SHMA are overly optimistic and an unrealistic basis to determine future dwelling requirements based on an employment led / economic growth. Indeed, our initial modelling suggests a requirement of over 1,000 new homes would be required to achieve the jobs increase outlined in the economic growth scenario of the SHELMA (as opposed to 855).
- 5.21 Whilst we acknowledge that a housing target of the scale set out above could be compounded by wider market and deliverability issues in St Helens (noting that they are far greater than levels of delivery previously achieved in the Borough), this does indicate that the proposed figure of 486 dwellings per annum will fall way short of any economic led projections and associated housing requirement. Indeed, the initial modelling work carried out through the Chelmer model indicates that the Council's housing strategy would only result in an increase of 167 jobs per annum. Coupled with the low housing requirement set within the Local Plan, this is simply not ambitious enough nor does it correlate with recent jobs growth in St Helens.
- 5.22 In light of the above and analysis provided at **Appendix 6**, we suggest the Council should continue to pursue the **570 dpa** figure as a bare minimum with the need for an immediate review of the Plan. This figure is consistent with the previous iteration of the emerging Local Plan and allowed for in the adopted Core Strategy and RSS prior to that.

- 5.23 As such, a minimum target of 570 dpa represents a perfectly reasonable alternative for the Local Plan and associated Sustainability Appraisal to assess. It would allow housing and economic aspirations to become more aligned, deliver more economic growth and help to stem rising house prices beyond an unaffordable ratio for many of St Helen's residents. Indeed, the very purpose of the Standard Methodology was to deliver more housing than achieved before (not less) to achieve greater levels of affordability. To adopt a figure of 486 dpa represents a significant backwards step for St Helens and would not assist in this wider objective and would lead to negative social and economic consequences compared to a development plan based on a requirement for 570 dpa.

Part 2 - Housing Supply

- 5.24 This part of the policy identifies the main sources of supply for the delivery of housing, including completions, sites with planning permissions, allocations, sites without permission in the 2017 SHLAA windfall sites and windfall sites, with the calculations set out in more detail in Tables 4.5 – 4.7.
- 5.25 Whilst we do not dispute this overall approach, we do provide a detailed critique of the proposed allocations within section 5 and the overall supply position in section 6.

Part 3 - Density

- 5.26 This policy suggests that new development should achieve minimum densities of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30 dph on sites in local centres, sites that are well served by bus or train services and in other urban areas. It also notes that 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 an area.
- 5.27 We support the need to encourage higher densities, particularly in the most accessible locations, in line with 2019 NPPF; however, it is our view that this policy would benefit from some additional flexibility, to take account of local and site characteristics, market aspirations and viability in determining the appropriate density of the site and suggest that this part of the policy is reworded to reflect this.

Part 4 - Monitoring and Supply

- 5.28 Wallace fully endorse the need to monitor housing delivery annually to ensure an ongoing supply (in accordance with the Housing Delivery Test and five-year supply requirements), and the acknowledgement that a partial or full Local Plan review will be considered to allocate safeguarded land sites for housing development where necessary.
- 5.29 However, we suggest that the wording is strengthened here, with clear triggers for when a review is required (i.e. what constitutes 'significantly' below the required level).

- 5.30 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is made a policy requirement.
- 5.31 In respect of housing, an AMR, or equivalent document, should include the following as a minimum:
- Details of annual housing completions (both gross and net) with a list of contributing sites - to allow accurate monitoring of the Council's trajectory in Policy LPA05.
 - Details of windfall/ small site delivery – for compliance with NPPF 10% small site requirement and to ensure projected windfall rate remains realistic (see section 7 for further analysis of this).
 - Details of affordable completions – to monitor effectiveness of Policy LPC02.
 - Proportion of delivery on brownfield/ greenfield sites – to monitor effectiveness of spatial strategy/ Policy LPA02 Part 2.
- 5.32 The Monitoring Framework at Appendix 4 does refer to several of these indicators and refers to the Annual SHBC house completion survey as a data source, however as far as we are aware this is not publicly available, as such we would request that this is incorporated into the AMR.
- 5.33 Finally, in respect of Appendix 4 we would ask the Council to clarify the rationale for trigger in respect of safeguarded land (Policy LPA06), which states that if '10% or more of land safeguarded is granted planning consent, then they will consider an early review of the plan?'. 13

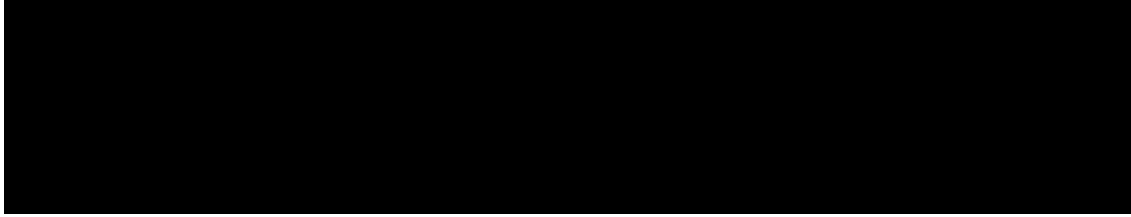
6. HOUSING SUPPLY MATTERS (POLICY LPA05 PART2)

- 6.1 This section looks at the Council's housing supply and trajectory in more detail, assessing total supply across the plan period, taking into account the five-year housing land supply position and the Housing Delivery Test.
- 6.2 This analysis is based on the Table 4.6 'Housing land requirements and supply – 2016 until 2035' and Table 4.7 'Housing Trajectory' within the Submission Plan, and the 2017 SHLAA which forms the most of up to date housing evidence base.
- 6.3 However, at the outset we would highlight the fact that these tables and the SHLAA include various discrepancies and do not allow for direct comparison or the consideration of delivery on individual sites. 11
- 6.4 The SHLAA starts with a 1st April 2017 base date but only provides individual site delivery within the first 5 years (up to 2021/2022), with delivery aggregated into 5 year periods beyond that; whilst the housing trajectory in the plan starts at the year 2020 and provides an annual aggregated 14

PO2404



St Helens Local Plan: Submission Draft Representations: Mulbury (Warrington) Ltd
 Shaun Taylor
 to:
 planningpolicy@sthelens.gov.uk
 13/03/2019 14:21



5 Attachments



Rep to Policy LPA02-Spatial Strategy .pdf



Rep to Policy LPA05-Meeting Housing need.pdf



Rep to Policy LPA06-Safeguarded Land .pdf



Rep to Policy LPC01- Housing Mix.pdf



Reps Report FINAL (with appendices).pdf

Dear Sir

Please find attached representations in relation to the above on behalf of our client, Mulbury (Warrington) Ltd.

We have submitted representations in relation to Policies:

- LPA02
- LPA05
- LPA06
- LPC01

In addition to the Representations Proformas, please also find attached report that should be read alongside these representations and made available to the Inspector in due course.

I would be grateful if you could confirm receipt of this email and its contents.

Kind regards
 Shaun



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Shaun Taylor
 Managing Director





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St Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: Mr | Title: Mr |
| First Name: Andy | First name: Shaun |
| Last Name: Brown | Last Name: Taylor |
| Organisation/company: Mulbury (Warrington) Ltd | Organisation/company: SATPLAN LTD |
| Address: Great Oak Farm, Mag Lane, Lymm, | Address: The Bridgewater Complex 36 Canal Street Liverpool |
| Postcode: WA13 0TF | Postcode: L20 8AH |
| Tel No: N/A | |
| Mobile No: N/A | |
| Email: N/A | |

| | | |
|-----------|--|---------|
| Signature | | 13.3.19 |
|-----------|--|---------|

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

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

Yes ☒ (Via Email)No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|---|-------|-----------------------------|--|--------------|--|--|--|--------------------------------|--|
| Policy | LPA05 | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | SHLAA 2017 | | | | | |

| 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 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

Criteria 1

Policy LPA05 sets out that between 2016 to 2035 a minimum of 9,234 net additional dwellings should be provided, at an average of at least 486 dwellings each year. This is a decrease from

03

the previous preferred option consultation which sought a housing requirement of 10,830 over the period 2014 to 2033, at an average rate of 570 dwellings each year.

Mulbury Warrington Ltd appreciates the Council has calculated the Objective Assessed Need (OAN) using the standard methodology for the period 2018-2028 by using the 2014-based household projections which subsequently identifies a figure of 482 dpa for the period. Whilst the SHMA update has 'sense checked' these against a number of economic scenarios, it is disappointing the overall requirement has only been marginally uplifted to 486 dpa. This approach is not ambitious and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the borough. Whilst the Council can opt for a different growth agenda to that set out in the Preferred Options, it is our firm view this Plan will not assist the borough in raising its profile or competing with neighbouring authorities such as Warrington. In this regard the Local Plan as written is backward step and it does not seek to maximise the opportunity for economic and social development within the borough.

Criteria 2

The policy states that the housing requirement will be met from:

- a) Completions;
- b) Sites with planning permission;
- c) Housing allocations shown on the Policies Map and listed in Table 4.5;
- d) Sites without planning permission identified in the Strategic Housing Land Availability Assessment (SHLAA); and
- e) 'Windfall' development, including development on small sites not individually identified in the SHLAA, sub-division of dwellings and conversions / changes of use.

As set out in section 3 of our supporting representations and evidence, we have significant concerns with the content of the Council's 2017 SHLAA which should provide key evidence in relation to the capacity and deliverability of previously developed land. The published evidence within the 2017 SHLAA in relation to PDL is not up to date and the capacity and deliverability assumptions contained within it are overly optimistic.

The Council's assumptions on sites should be realistic based on evidence supported by the development industry who have relevant and up to date knowledge of the viability and deliverability prospects of such sites. Section 3 of our supporting representations provide evidence which concludes the assumed supply of housing on PDL is inaccurate.

The table below provides commentary on several larger sites which are identified as being capable of delivering residential development within the plan period. The table includes questions with regards to some of the assumptions which have been applied to each site and therefore if their inclusion has a realistic prospect of future development.

Large SHLAA sites

| SHLAA Site Ref | Name | Capacity | Time frame | Comments |
|----------------|-------------------------|----------|------------|---|
| 9 | Moss Nook Urban Village | 802 | 6-15 yrs | This site is also an identified housing allocation (Ref 10HA) |

| | | | | | |
|----|--|-----|----------|--|--|
| | | | | | <p>It is well documented this is a heavily contaminated Site that has been previously allocated for housing but has failed to deliver a single dwelling.</p> <p>There are around 14 known coal shafts and areas of shallow coal present within the centre of the site and northern boundary, along with an infilled reservoir and railway cuttings.</p> <p>The Site is in a low market value area which further adds to viability issues for this site given the very extensive remediation that would be required.</p> <p>We do not consider that the site will be fully developed within the plan period – we have seen no evidence to demonstrate the Site can be delivered and we consider it to be unrealistic this site will be developed within the forthcoming plan period.</p> <p>The site should not be subject to an allocation for a yield of 802 homes within 15 years.</p> |
| 25 | Alexandra Park (Former Pilkington HQ) | 162 | 6-10 yrs | | <p>There are significant contamination and ground condition issues associated with this site including shallow coal workings within most of the perceived developable area. There is a fundamental question as to whether this land is suitable for residential development at all based</p> |

| | | | | | |
|-----|---|-----|---------------------------------|--|--|
| | | | | | on the information before us. Remediation costs will be significant and as with the Site at Moss Nook (Site Ref. 9) this is a low market value area and there is no evidence to support the viability and deliverability of this Site. |
| 61 | Land to north and south of Corporation Street | 169 | 6-10 yrs | | This Site has been vacant for many years. It is a difficult Site to develop and given ground conditions a high density development would be needed to provide 169 dwellings. This would need to be in the form of multi-storey apartments and it is clear from our market knowledge there is no market demand for this type of development in this location. As per previous comments for other Sites, there is no evidence to demonstrate the viability and deliverability of this Site during the forthcoming Plan Period. |
| 78 | Former St Helens Glass, Corporation Street | 149 | 6-10 yrs | | This is a heavily contaminated Site. There are also known issues with ground conditions including shallow coal workings. Remediation costs will be significant. Again there is a lack of evidence to demonstrate the viability and deliverability of this Site during the forthcoming Plan Period. |
| 111 | Land east of City Road, Cowley Hill | 813 | 0-15yrs - 410 15 yrs + - 408 | | There are multiple seams of coal at shallow depth. The site has been extensively mined. Soft alluvial deposits are also present to the east of the site and therefore significant and costly foundations would be |

| | | | | |
|--|--|--|--|---|
| | | | | needed which is likely to have an adverse impact on site viability. |
|--|--|--|--|---|

Based on the Sites highlighted above, we consider there is a realistic prospect these Sites will not deliver the quantum of housing envisaged within the life-span of the emerging Local plan. In summary, the published evidence within the 2017 SHLAA in relation to PDL is not up to date and the capacity and deliverability assumptions contained within it are overly optimistic. The inclusion of these Sites within the Housing Land Supply are highly questionable without significant further evidence that takes account of site constraints, developable area and the overall viability of development.

Allocated Sites

In addition, the capacity of sites proposed to be allocated within the plan period are also questionable. The table below sets out our commentary on this issue.

| Allocated Site Ref | Name | Capacity | Time frame | Comments |
|--------------------|--------------------------------------|----------|------------------------|--|
| 2HA | Land at Florida Farm (South of A580) | 522 | Within Plan Period | <p>We understand that Site capacity has now reduced to 400 dwellings – the assumptions concerning capacity for this Site should therefore be reconsidered.</p> <p>As with all Sites in the East Lancashire Road corridor, there are very well known capacity issues at Junction 23 of the M6 motorway at Haydock which will restrict the level of growth in this corridor during the Plan period without very significant improvements at this location.</p> |
| 4HA | Reginald Rd | 2988 | 480 within plan period | <p>This is a new Allocation within this version of the Local Plan. No evidence has been put forward to demonstrate the deliverability credentials of this Site. There are known access issues with this Site and we would raise considerable</p> |

| | | | | |
|------|-------------------------|-----|--------------------|---|
| | | | | concerns regarding the locational sustainability credentials of this Site and whether it should be allocated at all. There is no evidence to demonstrate the Site could deliver 480 dwellings during the forthcoming plan period. |
| | | | | <i>EPGC by contrast is in a highly sustainable location, could deliver up to 1,000 dwellings, including 300 affordable homes, and critically, the Site could easily be delivered prior to 2035.</i> |
| 10HA | Moss Nook Urban Village | 802 | Within Plan Period | See comments above for SHLAA Ref 9. |

Based on the sites highlighted above, we consider these Sites are unlikely to come forward within the plan period at the rates envisaged by the Council. This creates the need for additional allocations to meet the housing requirements set out in the Plan.

Safeguarded Sites

The table below provides some comments regarding two other safeguarded Sites where we are aware of issues that may affect their suitability for Safeguarding.

| LPSD Ref | Name | Notional Capacity | Time frame | Comments |
|----------|--|-------------------|------------|--|
| 1HS | Land south of Leyland Green Rd, Garswood | 291 | Post 2035 | We understand the current landowner does not support the release of the Site and does not wish for it to be developed for housing. |
| 8HS | Land south of A580 between Houghtons Lane and Crantock Drive | 1,027 | Post 2035 | We consider this Site to be significantly constrained by access. The Junction at Windle Island suffers from significant queuing during peak and off- |

| | | | | |
|--|--|--|--|--|
| | | | | peak times despite several highways schemes that have targeted a reduction in queuing traffic. |
|--|--|--|--|--|

We consider there to be a need for further evidence to support the safeguarding of these Sites.

Please continue on a separate sheet if necessary

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

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



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

It will be necessary to verbally explain the strong planning merits in favour of the Eccleston Park Golf Club site to represent our client's site accurately and provide information as required at EIP to the benefit of the Inspector.

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

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

PO2405



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



1 Attachment



Representation Form.pdf

Dear Sir/Madam,

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

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

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

Kind regards,

Hannah

Hannah Payne | Senior Planner



indigo.



RTPI Planning Consultancy of the Year 2017

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



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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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

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

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No ☐

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St.Helens Council
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Merseyside
WA10 1HP**

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

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

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

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

Please tick as appropriate

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

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

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

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indigo.

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St. Helens
Merseyside
WA10 1HP

By email

planningpolicy@sthelens.gov.uk

let.001.NF..21450010

13 March 2019

Dear Sirs

ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

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

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Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

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

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Registered number 2078863 VAT number 849246134



PO2406



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 Hannah Payne
 to:
planningpolicy@sthelens.gov.uk
 13/03/2019 16:22



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Kind regards,

Hannah

Hannah Payne | Senior Planner



indigo.



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St. Helens
Council

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Ref: LPSD

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| Title: | Title: Miss |
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| Address: | Address: St James' Tower, 7 Charlotte Street, Manchester |
| Postcode: | Postcode: M1 4DZ |
| Tel No: | |
| Mobile No: | |
| Email: | |

| | |
|------------|---|
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indigo.

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Registered number 2078863 VAT number 849246134



indigo.

Policy LPA05.1 Strategic Housing Sites

We strongly support the allocation of Land at Florida Farm (South of A580), Slag Lane, Blackbrook (Site ref: 2HA). It is considered suitable for Green Belt release as it forms a natural extension to the settlement of Haydock. The A580 forms a distinctive boundary between the site and open countryside and as such its development for residential use is sustainable in accordance with the NPPF.

15

The site is in a highly accessible location with bus stops situated along the extent of the A599 in proximity to the site, providing up to five services per hour to a number of locations including destinations such as St Helens, Ashton-in-Makerfield and Wigan. Rail services can be accessed from the site combining the use of bus or cycle trips, the closest station to the site are St Helens (3.8km from site); Garswood (3km from site); or Earlestown station (4.3km from the site). It is also well positioned to take advantage of existing walking and cycling routes with connections proposed to existing facilities on Vicarage Road and Slag Lane.

Table 4.5 identifies an indicative site capacity for Land at Florida Farm before 31.03.35 of 400 dwellings and after 31.03.35, 122 dwellings within a total capacity of 522. Based on the work and information Barratt Homes have submitted to the Council to date, that this number should be increased to 600 units reflecting the number they could achieve based on known site constraints / opportunities tied into deliverability.

16

Increasing the yield on this site will also reduce the pressure on the delivery of brownfield sites and 'boost' the housing supply in St Helens.

Barratt Homes is keen to work with the local planning authority to bring forward development proposals to enable much needed homes to be delivered in the short to medium term. On a site of this scale, Barratt Homes is likely to split the development into up to four phases, working from one outlet on each phase (noting that Barratt Homes may sell from two phases at any one time). On this basis, there is scope to deliver between approximately 50 and 60 dwellings per annum during the lifetime of the site's development.

Site capacity in the period before 31.03.35 should therefore be updated to 600 units.

The Council have previously been provided with an Indicative Masterplan for the site alongside initial feasibility studies on sustainability, highways, flood risk and ecology indicate which support deliverability of the site within the suggested timescales.

Policy LPA05.1(2) requires a planning application for development within a Strategic Housing site to be supported by a comprehensive masterplan covering the whole site. This is supported in principle but the requirement to provide a Masterplan must form part of the planning application process and must not unduly delay grant of planning permission or delivery of development on an allocated site.

17

LPA05.1(2)(h) requires "a comprehensive strategy for the provision of all new,

18

PO2407



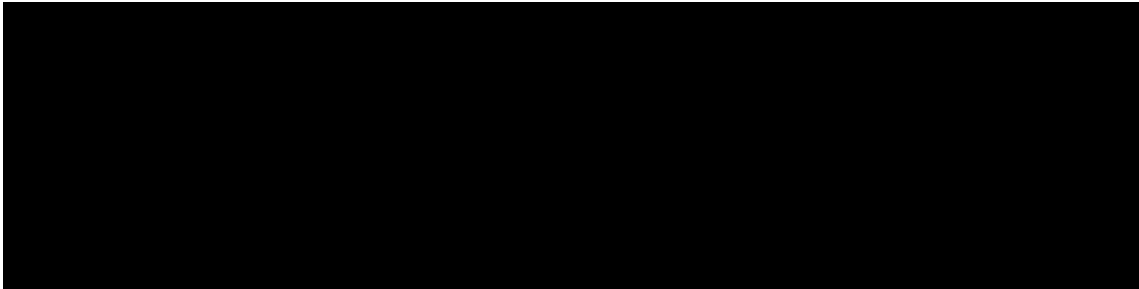
St Helens Local Plan - Site 4HA Bold Forest Garden Suburb

John Grace

to:

[REDACTED] planningpolicy@sthelens.gov.uk

08/05/2019 14:23



3 Attachments



Letter to LP manager Abbotsfield Farm.pdf representation-form Abbotsfield Farm 7-5-19.pdf



Call for Sites Form Abbotsfield Farm.pdf

Dear [REDACTED]

Please find attached a covering letter and completed Representation Form for the St Helens Local Plan, Site 4HA Bold Forest Garden Suburb.

If you require any further information please do not hesitate to contact myself or Bernard Grace copied in this email.

We look forward to hearing from you in due course and would ask if you can kindly acknowledge safe receipt of this email.

Kind regards

John Grace

Mr & Mrs B Grace
Abbotsfield Farm
Gorse Lane
Bold
St Helens
WA9 4SF

Development Plans Manager
Development Plans Section
Place Services
Town Hall Annexe
Victoria Square
St. Helens
WA10 1HP

By post and email to:

Date: 8th May 2019

Dear [REDACTED],

Site 4HA Bold Forest Garden Suburb – land at Abbotsfield Farm

As landowners of the central section of proposed allocation 4HA, we support the Local Plan's proposed allocation of our land and confirm that our land is available, suitable and deliverable for housing development. The extent of our land ownership is shown on the map overleaf.

We question why the Council consider that only 480 dwellings will be delivered by 2035 when housing could be delivered more quickly than this. Our land is available for development immediately and we suggest that table 4.5 on page 41 of the Submission Local Plan should be updated to reflect all of the Garden Suburb site 4HA being developed within the Plan period. We have made formal representations to the Inspector to this effect.

We trust that all landowners will be treated equally and there will be no preferential treatment of any parcels, including any in public ownership. Transparency over this issue will be vital to demonstrate fairness and probity.

To assist delivery of the Garden Suburb, we consider it vital that the Development Requirements for the site set out in Appendix 5 to the Local Plan should be clear on the equalization of timing, housing density, type of housing and developer contributions (pages 233-234 of the Plan). We have made representations to the Inspector to this effect as per the attached form.

We welcome the requirement in part 2 of Policy LPA05.1 Strategic Housing Sites that a comprehensive masterplan must form part of any planning application for development. We ask that the Council involve us in any discussions about the masterplan at an early stage of its preparation.

We [REDACTED] at Abbotsfield Farm in the midst of site 4HA, and therefore all plans will have a direct impact [REDACTED]
[REDACTED]t. For these reasons we wish to be very closely involved in all further work relating to the Bold Forest Garden Suburb and look forward to hearing from you in due course.

Yours sincerely,

[REDACTED]
Bernard and Margaret Grace



St. Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: Mr & Mrs | Title: |
| First Name: Bernard and Margaret and John | First name: |
| Last Name: Grace | Last Name: |
| Organisation/company: | Organisation/company: |
| Address: Abbotsfield Farm Gorse Lane Bold St Helens Postcode: WA9 4SF | Address: Postcode: |
| | Tel No: |
| | Mobile No: |
| | Email: |

| | |
|--|---|
| Signature:  | Date: <input type="text" value="7/5/19"/> |
|--|---|

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|---|----------------|-----------------------------|------------------|---|-----------------|--|--|--------------------------------|
| Policy | LPA05.1 | Paragraph / diagram / table | Table 4.5 | Policies Map | Site 4HA | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment |
| Other documents (please name document and relevant part/section) | | | | Requirements for site 4HA in Appendix 5 (pages 233-234 of the Submission Local 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? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
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|---|-------------------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input type="checkbox"/> |

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

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

We support the proposed allocation of site 4HA Bold Forest Garden Suburb for the following reasons:

- It provides a positively prepared plan that meets the area's housing needs;
- It is justified as a highly appropriate Garden Suburb in this location;
- It is consistent with National Policy in delivering sustainable development.

However, we consider the Local Plan to not be effective in its current form, in particular in relation to the delivery of site 4HA Bold Forest Garden Suburb. The proposed modifications set out in section 7 are necessary to make the Plan sound.

Table 4.5 on page 41 of the Local Plan gives an indicative number of 480 dwellings over the plan period for site 4HA. A far higher number are deliverable.

01

02

There is no reason why all of site 4HA Bold Forest Garden Suburb cannot come forward in the Plan period. Certainly our land at Abbotsfield Farm is available, suitable and immediately deliverable. All landowners comprising the Bold Forest Garden Suburb should be treated equally, with no preferential treatment shown to some landowners over others, including public sector landowners. Transparency over this issue is vital to demonstrate fairness and probity.

To make the Plan effective, it is necessary for the Development Requirements in Local Plan Appendix 5 to be modified regarding the equalization of timing, housing density, type of housing and developer contributions on the site.

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.

Table 4.5 on page 41 of the Local Plan should be amended to show all of site 4HA Bold Forest Garden Suburb being developed by 2035, with the indicative number of dwellings deliverable by 2035 increased from 480 dwellings to 2,988 dwellings.

The site requirements for site 4HA Bold Forest Garden Suburb in Appendix 5 of the Plan (Local Plan pages 233-234) should be amended as follows (new text underlined):

- Add a new bullet point to read: "All land parcels comprising site 4HA Bold Forest Garden Suburb should be treated equally with no favouritism or preferential treatment to be shown to some landowners over others."
- Amend the second bullet point on page 234 to read: "Financial contributions and the provision of on-site infrastructure for education and off-site highway works may be required; these should be equalized between landowners based on acreage and will be subject to further assessment at the master planning stage."
- an additional sentence after the third bullet point on page 234, to read, "Housing density and types of housing should be equalised between the different landholdings comprising the site".

Please continue on a separate sheet if necessary

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

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

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

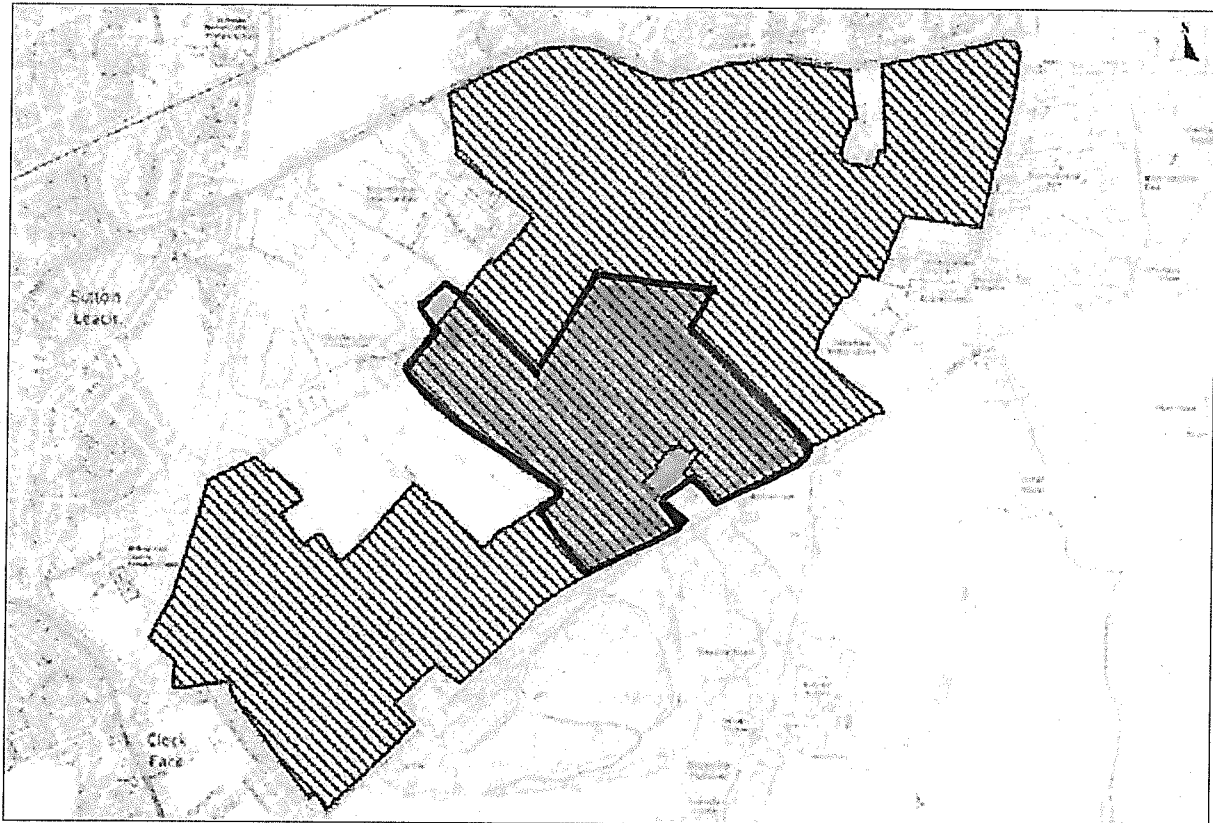
| | | | |
|--------------------------|--|-------------------------------------|--|
| <input type="checkbox"/> | No, I do not wish to participate at the oral examination | <input checked="" type="checkbox"/> | Yes, I wish to participate at the oral examination |
|--------------------------|--|-------------------------------------|--|

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

We [REDACTED] at Abbotsfield Farm in the centre of the proposed Bold Forest Garden Suburb (site 4HA) therefore all plans will have a direct impact on [REDACTED]

[REDACTED] For these reasons we wish to be involved in all discussions regarding the future of this site.

Extent of our landownership outlined in green, overlain on the proposed allocation site 4HA



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.

PO2408



Local Plan
Paul Gerrard
to:
planningpolicy
12/05/2019 16:55



1 Attachment



representation-form 1.doc

Please find attached



St. Helens
Council

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

Ref: LPSD

(For official use only)


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

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

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

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: Mr | Title: |
| First Name: Paul | First name: |
| Last Name: Gerrard | Last Name: |
| Organisation/company: | Organisation/company: |
|  | Address: |
| | Postcode: |
| | Tel No: |
| | Mobile No: |
| | Email: |

Signature:



Date:

10 May 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.

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

| | | | | | | | | | |
|--|-------------------------------------|-----------------------------|-------------------------------------|--------------|-------------------------------------|--|-------------------------------------|--------------------------------|-------------------------------------|
| Policy | <input checked="" type="checkbox"/> | Paragraph / diagram / table | <input checked="" type="checkbox"/> | Policies Map | <input checked="" type="checkbox"/> | Sustainability Appraisal/ Strategic Environmental Assessment | <input checked="" type="checkbox"/> | Habitats Regulation Assessment | <input checked="" type="checkbox"/> |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

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

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

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

Please tick as appropriate

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

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

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

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

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

I wish to object to the Local Plan, with particular regard to the areas marked as 4HA / 5HA. The local Plan will have a massive impact on the residents of Bold Ward, there is no infrastructure in place to accommodate such a largescale Build.
There will be large scale damage to the environment, loss of wildlife habitat and loss of numerous species of fauna and flora. Along with damaging the success of the Bold Forest Park Action Plan by undermining the policies of the plan.
The plan will lead directly to urban sprawl, causing two different areas to become combined into one, Clock Face and Sutton Manor, it will also allow the areas known as Four Acre / Bentley St to expand into 5HA. These areas already suffer high levels of antisocial behaviour.
It will lead to a direct increase in vehicular traffic in the areas having a negative impact on residents of Bold, both health wise and increasing traffic nuisance.

This plan started in 2016 as the preferred plan with protected areas guaranteed till 2035, only to be revisited 2018, and building brought forward. What is to stop this plan being brought forward again once these areas have been populated.

Please continue on a separate sheet if necessary

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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 plan should be reconsidered, and the house numbers, spread across all of the wards evenly giving due consideration to areas that have already been the subject of planning builds over the last few years.

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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.

PO2409



St Helens Local Plan: Submission Draft - Florida Farm North & South
Kathryn Duckworth

to:

planningpolicy

24/02/2019 15:07



1 Attachment



Letter Opposing Planning Consent for Local Plan.doc

Please find my attached representation in relation to the above:

202 Liverpool Road
ASHTON-IN-MAKERFIELD
Wigan
Lancs
WN4 0YT

24th February 2019

St Helens Council
Town Planning
Town Hall
Victoria Square
ST HELENS
Merseyside
WA10 1HP

TO WHOM IT MAY CONCERN

Dear Sir/Madam

**Re: St Helens Borough Local Plan: Submission Draft – Florida Farm
North & South**

I object to the Local Plan proposals in the above areas, for the following reasons:

- Loss of greenbelt/agricultural land – all brownfield land should be cleaned up & utilised for new builds & it should be a mandatory requirement for local authorities to adhere to in order to protect our precious greenbelt land for future generations. If we continue our destruction of greenbelt land, all that our children/grandchildren will be left with is an abundance of urban brownfield land, creating eyesores & in some cases danger for children playing there, as no one will want the hassle & expense of cleaning them up.
- Loss of flora & fauna – it's impossible not to kill a lot of wildlife & reduce their remaining habitat drastically if these proposals succeed. Do you not understand the damage this plan will do to the environment with the ensuing pollution that will occur? We are being told by experts that the way we live our lives at the moment is not sustainable & we are on a precipice – concreting over green belt land should not be allowed, we need green spaces & trees to encourage wildlife.
- Bericote's current warehouse build is an eyesore that the council said would be hidden from view on Liverpool Road with raised banks & trees – not so!, if they're planning to hide it with trees that is a very expensive option or are we having saplings that we take years to grow (which in itself it not what we were led to believe) or is it a case of

1 and 2

2

nothing will be done as you have got what you wanted so to hell with the residents.

- Risk of flooding at Springfield Park & Clipsley Brook again & possibly other areas as well if more land is covered in concrete.
- Proximity to existing residential areas, which could be stressful & result in a devaluation of these properties.
- Noise from vehicles arriving/departing from the proposed 24 hour site operation & the loud reverse warning noise they make.
- Light pollution – has an effect on wildlife, our ecosystem & people who are unfortunate enough to live in close proximity to excessive artificial lighting.
- Road congestion – the proximity of this area to M6 motorway, East Lancs Road & Haydock Industrial Estate has always meant that it is very heavily used & often leads to a congested network of roads. As local residents are fully aware, this whole area becomes grid-locked on a regular basis due to an accident occurring within this road network.
- Pollution from HGV diesel particulates & vehicles used by employees at the proposed development.
- The current levels of noise & vibration from HGVs already has an effect on residents' lives. The vehicles thunder up & down these roads, causing windows to rattle, manhole/grid covers become loose & noisy & having windows open means you can hear the noise inside your home.

land 2

Please do not allow the destruction of any more of our precious greenbelt land by allowing profit orientated developers to dictate how our community should be carved up. There are numerous empty units & brownfield sites across Merseyside & these should & must be the first priority for this development – 'HANDS OFF HAYDOCK GREENBELT – NO MORE DEVELOPMENTS ON FLORIDA FARM'

Yours sincerely

Kathryn Duckworth

PO2410

EL0120



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

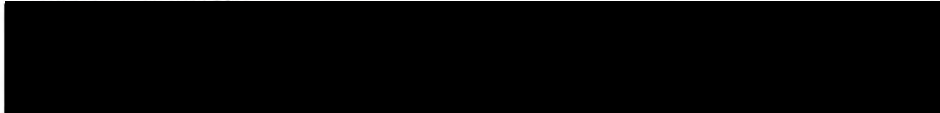
on Behalf of Mr A Jones

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

Architecture + Building Surveying + Town Planning

RTPI NORTH WEST
AWARDS FOR
**PLANNING
EXCELLENCE**

CATEGORY
WINNER
2018

C+A

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



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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: Mr | Title: Mr |
| First Name: Andy | First name: Guy |
| Last Name: Jones | Last Name: Evans |
| Organisation/company: | Organisation/company: Cassidy + Ashton |
| Address: c/o Agent | Address: 10 Hunters Walk, Canal Street, Chester |
| Postcode: | Postcode: CH1 4EB |
| <div style="background-color: black; height: 40px; width: 100%;"></div> | |

| | |
|--|---|
| Signature: <div style="background-color: black; width: 200px; height: 40px; display: inline-block;"></div> | Date: <div style="border: 1px solid black; padding: 2px; display: inline-block;">12.03.2019</div> |
|--|---|

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

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

Yes ☒ (Via Email)

No ☐

RETURN DETAILS

post to:

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

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

FURTHER INFORMATION

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

NEXT STEPS

DATA PROTECTION

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 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

Refer to separately submitted representation / response statement

Please continue on a separate sheet if necessary

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

Refer to separately submitted representation / response statement

Please continue on a separate sheet if necessary

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

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

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

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

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

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

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

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



St. Helens
Council

ST HELENS BOROUGH LOCAL PLAN 2020 - 2035

SUBMISSION DRAFT
JANUARY 2019

A BALANCED PLAN FOR A BETTER FUTURE

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

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

7.7 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.

7.14 It is requested that table 4.5, cross-referenced within Policy LPA05 – Meeting St. Helens Borough’s Housing Needs is altered to include Land off Elton Head Road, as an individual site with an area of 3.70 hectares and an indicative capacity of a minimum of 84 units.] ⑥

7.15 **Policy LPA06 – Safeguarded Land**

7.16 Subject to acceptance of the site as an allocation, it is requested that table 4.8 – Safeguarded Land for Housing is updated to exclude reference 7HS.] ⑦

PO2411



St Helens local plan 2018/19 -concerning the local plan for Rainford Prime grade one agricultural land Higher Lane/Rookery Lane
 Julie Keech
 to:
 planningpolicy@sthelens.gov.uk
 13/03/2019 09:34



Business Name: T Wilson and Sons (Farmers) Ltd


Maggotts Nook Farm, Maggotts Nook Road, Rainford, St Helens, Merseyside, WA11 8PL



12/03/2019

To whom it may concern,

I write as a business in Rainford concerning the local plan that affects the grade one agricultural land Higher Lane/Rookery Lane, I wish to make the following comments:-

- 1) We are a Vegetable and Salad grower based in Rainford farming over 1800 acres of land in the Merseyside area. We farm approx. 850 acres in Rainford, this land is made up of a mixture of owned, rented and tenanted agreements. The Rookery/Higher (HA8 Rookery Lane)land site in question in approx. 30 acres of land we currently rent  We have rented this land for 4 years. This is grade one agricultural land that is currently part of the green belt and accounts for 3.5% of our overall rented area. We understand that we are one of the biggest employers within Rainford.
- 2) The close proximity of this land to the farm is key to the efficient production of the crops that we grow. Once we start to move out of the Rainford area for growing certain crops the cost of production makes us uncompetitive in the market place. In a very competitive industry it is vital that all production costs are kept to minimum. The next area for grade one agricultural land outside of Rainford that is available for us to rent is in Lancashire. There is high demand for good quality land in this area for crop production. We have concerns that we may need to travel out of the area for source good quality land.
- 3) We currently employ close to 100 people from the local area to work on our farm. The contracts for Vegetable and Salad crops are predominantly for Aldi UK. These contracts are tendered and won based on price, quality and service. If we were not able to produce crops efficiency and keep growing costs to a

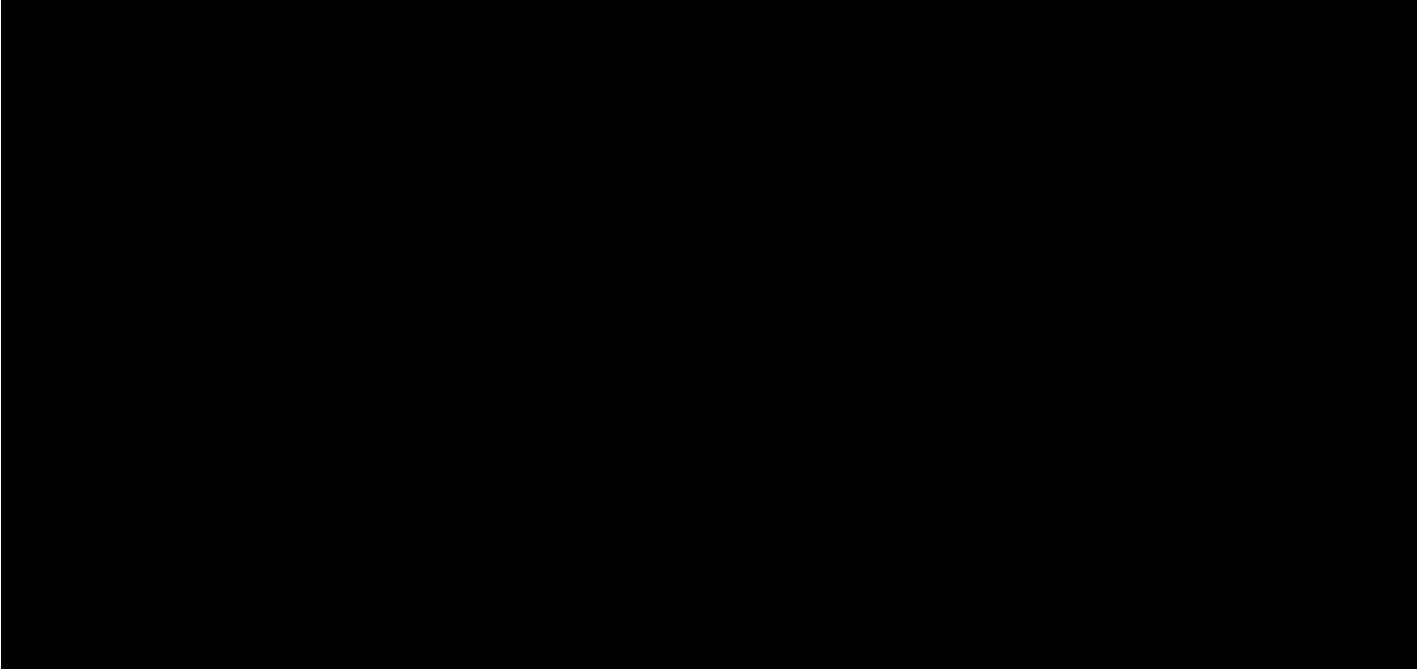
minimum we would not be successful in gaining contracts. Our availability of local land grade one land plays a very important factor in the cost of production of vegetables and salad crops. We have real concerns that if we lose this land we may be looking at making redundancies to the workforce and reduce our overall business. We would estimate that we may need to look to scale the business back by 5-10% if this land is taken out of production. The SHLP is intended to promote employment and economic growth yet this will most certainly have the opposite effect on our business and employees.

- 4) One of the key areas of concern is also the Lancashire plan involves removing grade one land out of production in addition to the agricultural land earmarked by St Helens council . The concern is that increased demand for renting grade one land will force the cost of land rent up in the area hence making the cost of production higher. As far as we are aware there has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.
- 5) Grade one land all over the country is being taken out of production for housing development however only approx. 4 % of all land in England is classified as grade one. We need to protect the best and most versatile agricultural land from inappropriate or unsustainable development proposals and you should use poorer quality land for development. The crops we grow ie, carrots, leeks, cabbage and lettuce can only be grown on grade one land, once this land is removed our ability to grow these crops locally is significantly reduced.
- 6) Our family have been farming the land in and around Rainford for nearly 40 years and worked incredibly hard to grow a sustainable long term business for the future generations. A big part of what we do is nurturing and protecting the structure of the landscape to avoid soil decay and erosion and it seems that almost overnight 30 acres of top quality land is to be removed from Rainford.

Julie Keech

██████████ ████████████████████
 ██████████ ████████████████████
 T. Wilson and Sons (Farmers) Ltd
 Maggots Nook Farm
 Maggots Nook Road
 Rainford
 St. Helens
 Merseyside
 WA11 8PL

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PO2412



Objection to local plan 8HA
Phil Smith to: planningpolicy

13/03/2019 10:47

[REDACTED]

Hi,

My name is Philip Smith and I live at 189 Higher Lane, St. Helens, England, WA11 8NF.

I would like you to take this email as my objection to the proposed development of 8HA in the local plan for the reasons stated below.

The site is currently grade 1 agricultural land and offers employment opportunities for the working of this. Given the current situation in our country, this land should be protected for agricultural use only as it will be required for valuable food production. There are also debatable figures regarding the calculations used for housing requirements in the borough which look to be inflated, there may be no need to use green sites when there is enough brownfield availability.

A major point for consideration is local infrastructure. Higher Lane has very poor and dangerous roadside walkways. [REDACTED]

[REDACTED] we have constant issues with traffic when we are required to actually walk in the road on the bends around the reservoir area. This would certainly need attention should any development go ahead. We have recently seen a large increase in traffic due to the works at Windle and I would expect any development on 8HA to be an increase on the current level. This will be dangerous to local people who walk along Higher Lane. There are also services like doctors, dentists and schools to consider. It is already difficult to get appointments locally.

I hope you will give full consideration to my brief comments and refuse to authorise this unnecessary development.

Regards,

Phil Smith

Sent from my iPhone

PO2413



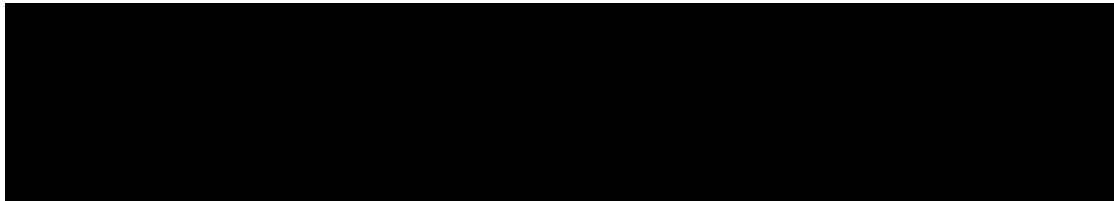
StHelens Borough Local Plan 2020-2035

JANETTE COCKAYNE

to:

planningpolicy@sthelens.gov.uk

13/03/2019 11:05



Dear Sirs

I don't profess to understand the detail and I certainly don't have the time to study all the finer points of the above proposed local plan but I wish to make it known that I object to the extraction of large swathes of green belt land in our borough.

The town centre is on it's knees and surely it is time to rethink the whole of the way forward and set about creating a new living/shopping/socialising modern town the likes of which they have in Scandinavia.

The economics of the proposed local plan is based on a quick fix of out of town industrial units with associated housing estates that have limited benefits to the existing local population.

There are no exceptional circumstances for changing the green belt boundaries and for the justification of the number of houses required. There has not been enough exploration of looking at alternatives for the housing such as the use of brown field sites. The use of lower housing figures and previously used areas would require less new infrastructure.

Specifically with Rainford in mind, it is fair to say that houses will continue to be built but should only be on previously used sites. Small increases that largely go unnoticed have already enlarged the 'village' to the size it is today. I am greatly relieved that there is to be no changes to the green belt at the North End [REDACTED] but it is shocking to think that the council would wish to press ahead with the inclusion of the Rookery Lane site (HA8). It is Grade 1 agricultural land and is farmed as such for the production of edible crops not just for grazing horses like much of the land in the area is now. It provides ongoing employment and is a haven for an abundance of wildlife being bordered by the linear park and the bank of woodland on one side.

In conclusion I hope you will consider the views of the people who already live and work here and make good decisions finding the way forward.

Yours faithfully

Janette Cockayne

Bridge Farm

News Lane

Rainford

StHelens

WA11 7JT

[Sent from Yahoo Mail on Android](#)

PO2414



Local Plan Objection HA8
Andrea Hegarty
to:
planningpolicy
13/03/2019 11:49



Dear Sir

Re HA8 Rookery Lane / Higher Lane in the St Helens Local Plan Objection

I am writing with my objections for the proposed plot for development at Rainford (HA8 Rookery Lane / Higher Lane).

I attended a drop in event in 2018 held by St Helens Council where they explained the damage car pollution can do to public health and how to limit this. However I worry that by having the potential for 100's of houses built in the middle of the village - which will no doubt include at least 2 cars per household - the increased pollution will be impossible to avoid given we have to walk past it to get to places in the village.

I am also unable to understand why this site has been chosen by the sustainability proposal given similar areas were rejected by the council. And also why there is a need to lose grade 1 agricultural land?

I hope these concerns can be taken in to account and the plan be reviewed.

Yours faithfully

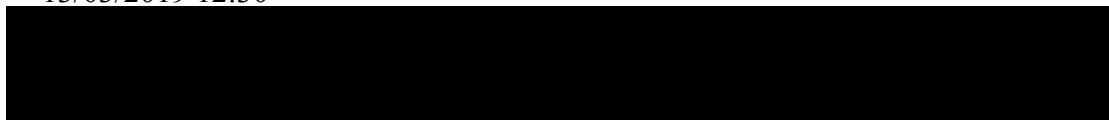
Andrea Hegarty
47 Rookery Lane, Rainford, WA11 8G



PO2415



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



5 Attachments



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



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



Weathercock Hill Farm_Ecological Statement(1.1).pdf



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

Dear Sir/Madam

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

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

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

Kind regards
 Sean

Sean McBride
 Persimmon Homes (North West)



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



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

Representations submitted on behalf of Persimmon Homes North West

March 2019



5.3 Para. 120 of the Framework sets out that planning policies and decisions need to reflect changes in the demand for land; where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in the plan, they should:-

- reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
- Support applications for alternative uses, where the proposed use would contribute to meeting an unmet need for development.

12

5.4 Paragraph 121 further states that Local Planning Authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help meet identified development needs, including the use of retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors.

5.5 Reuse of historic employment sites has been a constant source of housing land supply in St Helens in recent years, as evidenced by the Company's current sites at the former Vulcan Works and Deacon Trading Estate; it should be considered that such sites will continue to form part of the housing land supply in the Plan period.

Policy LPA05: Meeting St Helens Borough's Housing Needs

Housing Requirement

6.1 The Company acknowledges the Council seeking to adopt a housing requirement figure in accordance with the standard method figure, whilst having regard to economic growth projections in the Liverpool City Region Strategic Housing and Employment Land Market Assessment [SHELMA] and the St Helens Employment Land Needs Assessment [ELNA].

6.2 Of concern to the Company however is that the proposed annual requirement of 486 dpa represents a significant drop in housing requirement from the requirement identified within the Preferred Options Plan (2016) and also the currently adopted Core Strategy (2012) of 570 dpa – amounting to 1,680 homes across the plan period.

13

- 6.3 The Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) identifies an OAN range of 397 to 855 dpa for St Helens; the upper range being based on an economic growth scenario, which factors in planned/potential development and regeneration projects whilst the lower figure represents projected growth if economic growth remains stagnant.
- 6.4 It is considered that reducing the Council's currently adopted housing requirement fails to support Government's objective of 'significantly boosting the supply of homes' (para 59 of the Framework) and increasing housing delivery across the Country to 300,000 homes per annum.
- 6.5 The Framework is clear that the standard method figure is a minimum (para 60); PPG also confirming that an uplift to a housing requirement above standard method may be appropriate, where additional growth is likely to occur over the plan period (Ref: 2a-010-20180913).
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SHMA; nor would it seem sensible to allocate sites for development (employment or otherwise) which do not have realistic prospects of coming forward in the Plan period, unless acknowledging that they are safeguarded for development beyond the Plan period.

6.10 It is considered that setting a housing requirement on this basis is contrary to the Framework, which is clear that plans should be 'prepared positively, in a way that is aspirational but deliverable' (para 16).

13

6.11 We would encourage the Council to review its housing requirement and plan for a scale of housing which supports its economic growth aspirations, including delivery of those emerging employment allocations.

Density

6.12 The Company is generally supportive of paragraph 3 of Policy LPA05, which seeks to make efficient use of land, including those sites within or adjacent to key centres or well served by public transport connections.

6.13 We would however discourage adoption of a policy which seeks to place minimum density requirements on housing sites; as such policies fail to reflect individual sites' technical constraints or surrounding settlement context; and further fails to reflect market area or Companies' distinct product range and target market.

14

6.14 It is considered appropriate that density is determined throughout the pre-application and planning application process, informed by appropriate technical and design context.

Maintaining a sufficient housing land supply

6.15 The Company supports paragraph 4 of the policy, which seeks to ensure an adequate supply of housing throughout the Plan period, including a rolling 5 years supply of deliverable housing sites to meet identified needs; and makes provision for a partial or full plan review in the event that deliverable supply falls significantly below required levels.

15

6.16 PPG is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period (Ref: 61-045-201809013); and Local Plans should be reviewed to assess whether they need updating at least once

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- 6.17 The Company supports the Council's approach to meeting its housing requirement and how its housing land supply is sourced, including the release of land from the Green Belt. 16

-
- 6.18 The Company supports the provision of a 15% reduction for non delivery of SHLAA sites and a 20% increase allowance for sites removed from the Green Belt; this being in accordance with the recommendations of the Local Plans Expert Group's (LPEG) Report to the Communities Secretary and to the Minister of Housing and Planning (March 2016).

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- 6.21 As evidenced by the information appended to this representation and the Council's evidence base; the Site is considered to be a logical site to release from the Green Belt, having regard to Green Belt policies set out within the Framework. 17

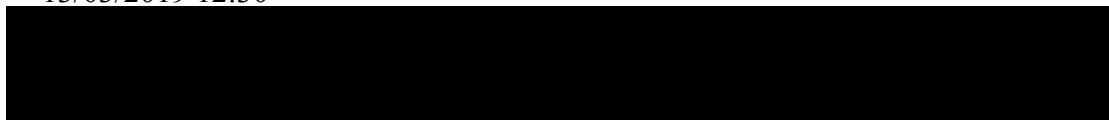
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-
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PO2416



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



5 Attachments



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

Representations submitted on behalf of Persimmon Homes North West

March 2019



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-
- 6.23 The Company supports the increase in indicative capacity of the site from the Preferred Options Local Plan and considers this to represent an efficient use of land, appropriate for

18

the Site's location. There are no technical encumbrances which would prevent the site delivering this scale of homes.

6.24 The Parameters Masterplan appended to this representation demonstrates that the site can accommodate circa 265 new homes, having regard to the site's known physical and technical constraints; and the Council's open space requirements.

18

6.25 It is requested that the indicative site capacity is revised accordingly within table 4.5 to reflect this and to ensure that the Council is making the most efficient use of land.

6.26 Subject to the release of the land from the Green Belt upon adoption of the Local Plan, it is considered that the site can deliver homes early in the Plan period; the Company would welcome the opportunity to work with the Council to provide the necessary assurances to the Local Plan inspector.

Phasing

6.27 As set out at para 4.18.18; the Company supports the council not seeking to phase the release of allocated sites; acknowledging that lead-in times for larger sites will result in delivery occurring later in the Plan period.

19

Policy LPA05.1: Strategic Housing Sites

7.1 The Company supports the Council's approach to housing allocations, including a separate policy for those allocations considered to be strategic in scale (300 homes upwards).

7.2 It is considered appropriate that a range of sites are allocated in order to ensure a continuous and constant supply of homes throughout the Plan period. Sites' such as the Company's at Garswood (1HA) which are not identified as strategic in scale, present the opportunity to make a significant contribution to the Borough's housing supply early in the Plan period and are less likely to be encumbered by the requirement for significant additional supporting infrastructure, complicated land ownership patterns or disputes over land value equalisation.

20

7.3 Site 1HA is within a single private ownership and is controlled and being promoted by a FTSE-100 housebuilder with significant experience of delivering new homes in St Helens; its

PO2417



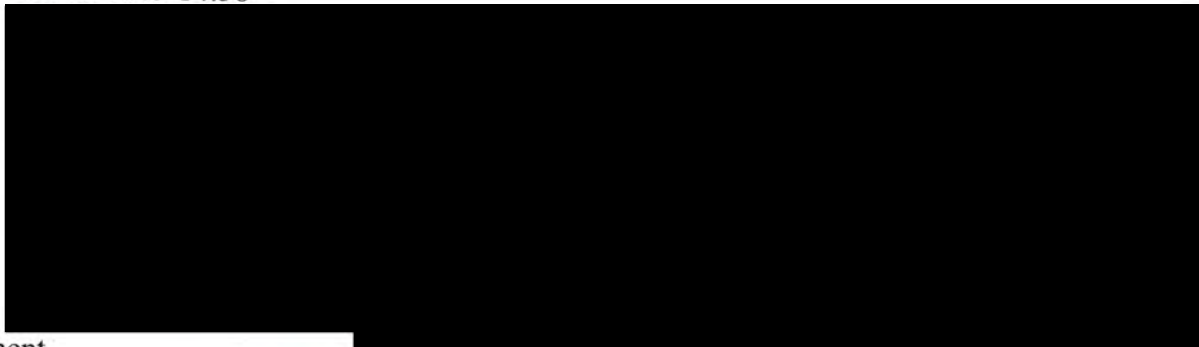
Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 1 of 4 (main representations)

Kennedy, Amy (UK - Manchester)

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:58



1 Attachment



CCfE_reps to St Helens Local Plan_without appendices_March 2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

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

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP

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



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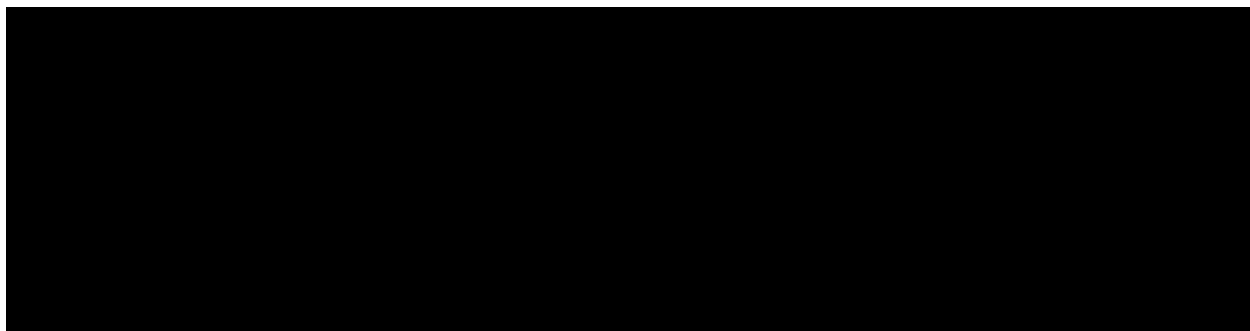
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
2 of 4 (Appendix A)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:01



1 Attachment

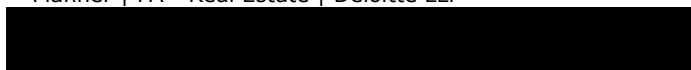


CCfE_reps to St Helens Local Plan_Appendix A_March 2019.pdf

Apologies – now re-sent with attachment.

Amy Kennedy

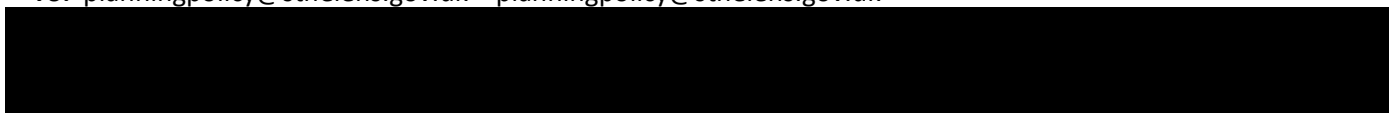
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From: Kennedy, Amy (UK - Manchester)

Sent: 13 March 2019 15:00

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



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

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

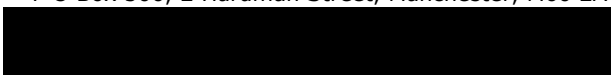
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Yours faithfully

Amy Kennedy

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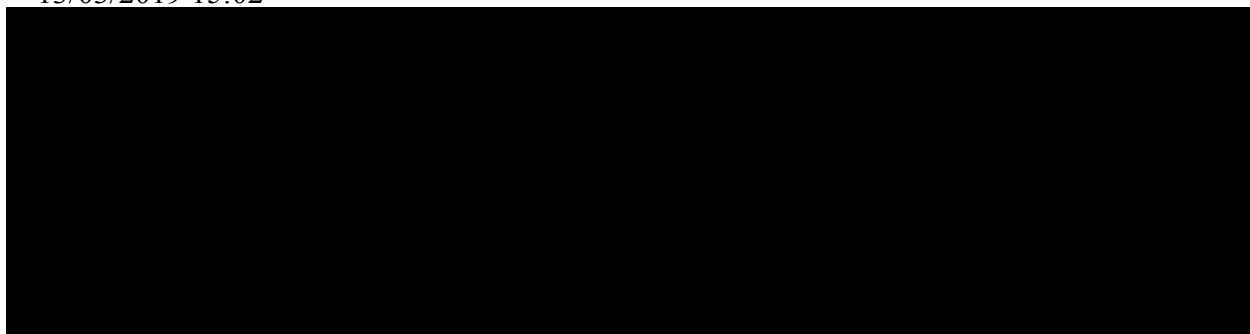
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
3 of 4 (Appendix B)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:02



1 Attachment



CCfE_reps_to_St_Helens_Local_Plan_Appendix_B_March_2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

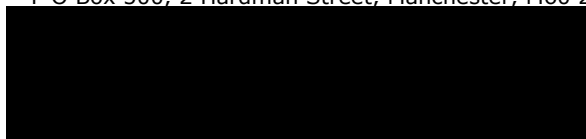
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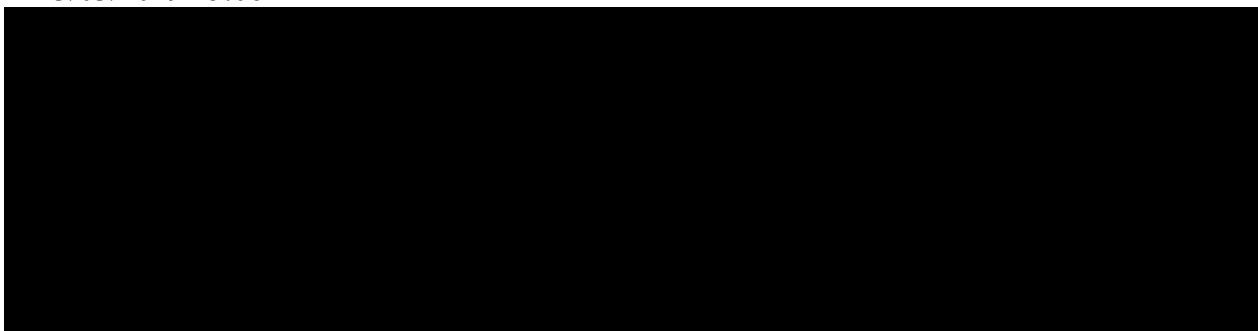
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Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)
 Kennedy, Amy (UK - Manchester)
 to:
planningpolicy@sthelens.gov.uk
 13/03/2019 15:06



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix C_March 2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

March 2019

3 Site Allocations in Rainford

- 3.1 The residential allocations proposed within the Draft Plan are set out at Table 4.5 of the document (p.41) and are shown on the accompanying draft Policies map, alongside the sites which are proposed for safeguarding for future residential development (as set out at Table 4.8 of the Draft Plan on page 51). The Council's evidence base in support of these allocations includes the 2017 SHLAA and the latest Green Belt Review, which was published in December 2018.
- 3.2 This section sets the context for site allocations in Rainford, and justifies why the Commissioners' land at Hydes Brow should be allocated for residential use within the Draft Plan, and why the Commissioners' land to the east of Higher Lane should be safeguarded for future residential development.
- 3.3 The Commissioners have promoted their land interests in Rainford for a number of years, and have played an active role in the plan-making process to date. The Commissioners have also met with the Council to discuss the suitability of their land in relation to the potential for allocation within the Local Plan. On this basis, the Commissioners undertook supporting technical work for Hydes Brow which included a Development Framework for the site. Despite this work and dialogue, we note that the land has not been put forward as an allocation within the Draft Plan.
- 3.4 With regards to Land east of Higher Lane, this site was formerly identified as safeguarded land under Site Ref. HS18 within the St Helens Local Plan Preferred Options document and accompanying Policies Map; however, the Submission Draft of the Local Plan has removed the site's "safeguarded" designation. The Commissioners have instructed OPEN (Masterplanners) and Pell Frischmann (Highways & Transport Consultants) to prepare a Vision Framework (Appendix A), an Initial Access Appraisal Report (Appendix B), and a Landscape and Visual Appraisal (Appendix C) to demonstrate the site's suitability for identification as a safeguarded site for residential development.

Rainford: context and character

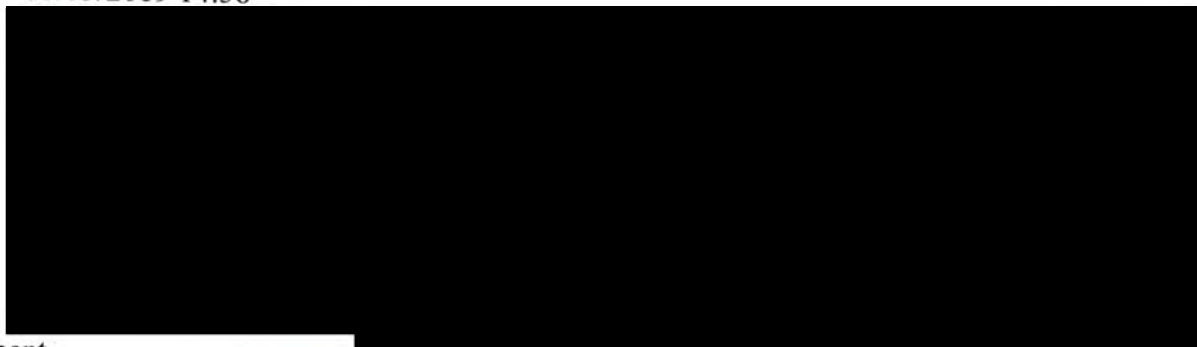
Planning policy context

- 3.5 Rainford is identified as a Local Service Centre in currently adopted local planning policy (St Helens Local Plan Core Strategy 2012 (SHLPCS), Policy CSS1: Overall Spatial Strategy). SHLPCS paragraph 6.5 (p.40) notes that:
In smaller settlements outside the main urban areas, such as Rainhill, Rainford, Garswood and Billinge, there are few opportunities to accommodate new development without encroaching on the Green Belt. Development here in the short to medium term is expected to be small-scale within existing settlement boundaries. In the long term, release of Green Belt land may be required to meet housing needs.
- 3.6 Rainford is also named as a "main [rural] settlement" in the supporting text for SHLPCS Policy CAS5: Rural St Helens (p.84).

PO2418



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



1 Attachment



CCfE_reps to St Helens Local Plan_without appendices_March 2019.pdf

For the attention of: The Planning Policy Team

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Amy Kennedy

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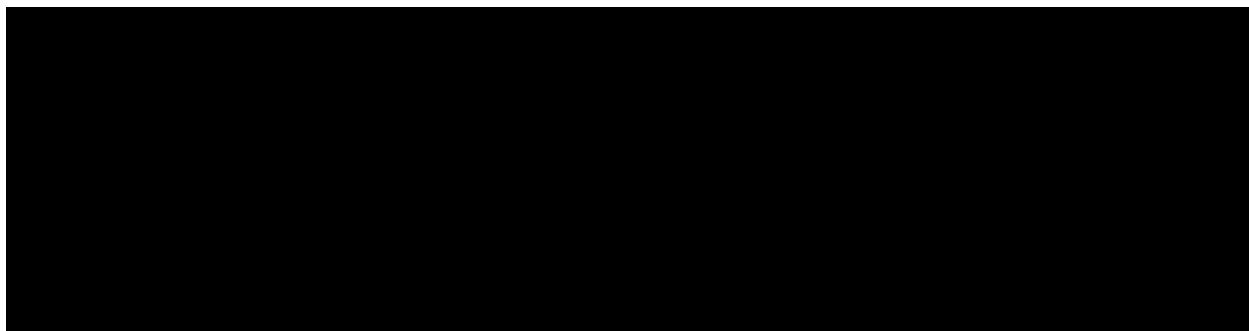
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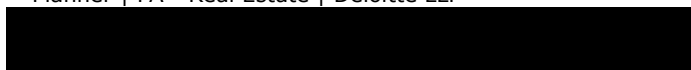


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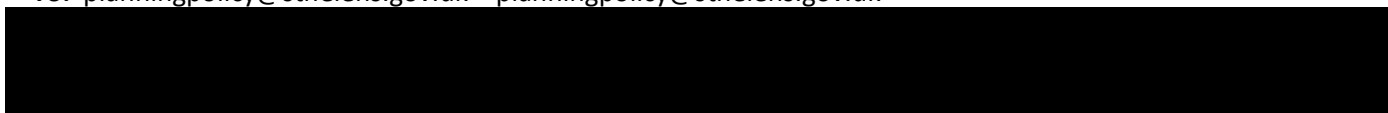
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From: Kennedy, Amy (UK - Manchester)

Sent: 13 March 2019 15:00

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



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

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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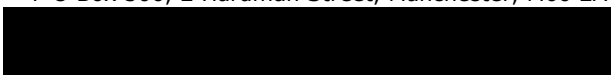
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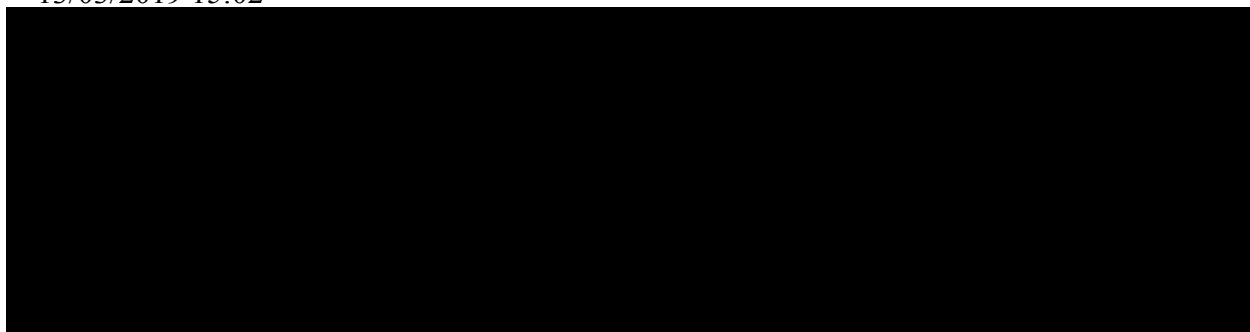
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
3 of 4 (Appendix B)
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13/03/2019 15:02



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For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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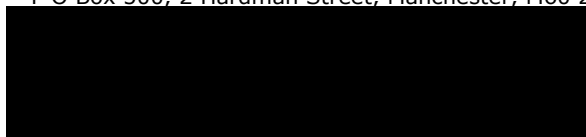
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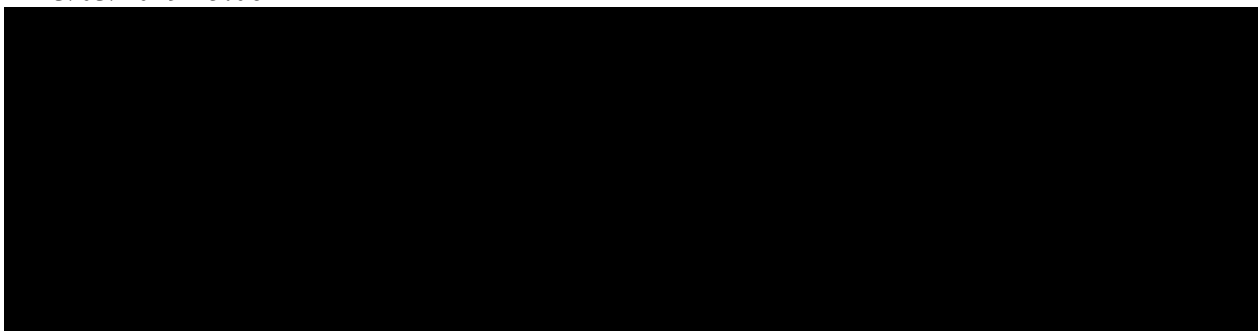
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 13/03/2019 15:06



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For the attention of: The Planning Policy Team

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

March 2019

3.20 Given the lack of an appropriate buffer to the five year supply of deliverable housing sites and the Draft Plan's over-reliance on small and "windfall" sites coming forward to meet identified housing need within the Borough over the Plan period (as discussed within Section 2 of these representations), coupled with Rainford's status as a 'Key Settlement' within the Draft Plan, the Commissioners consider that this approach is unsound as it is not positively prepared and does not comply with national planning policy, particularly Paragraph 67 of the NPPF which states that:

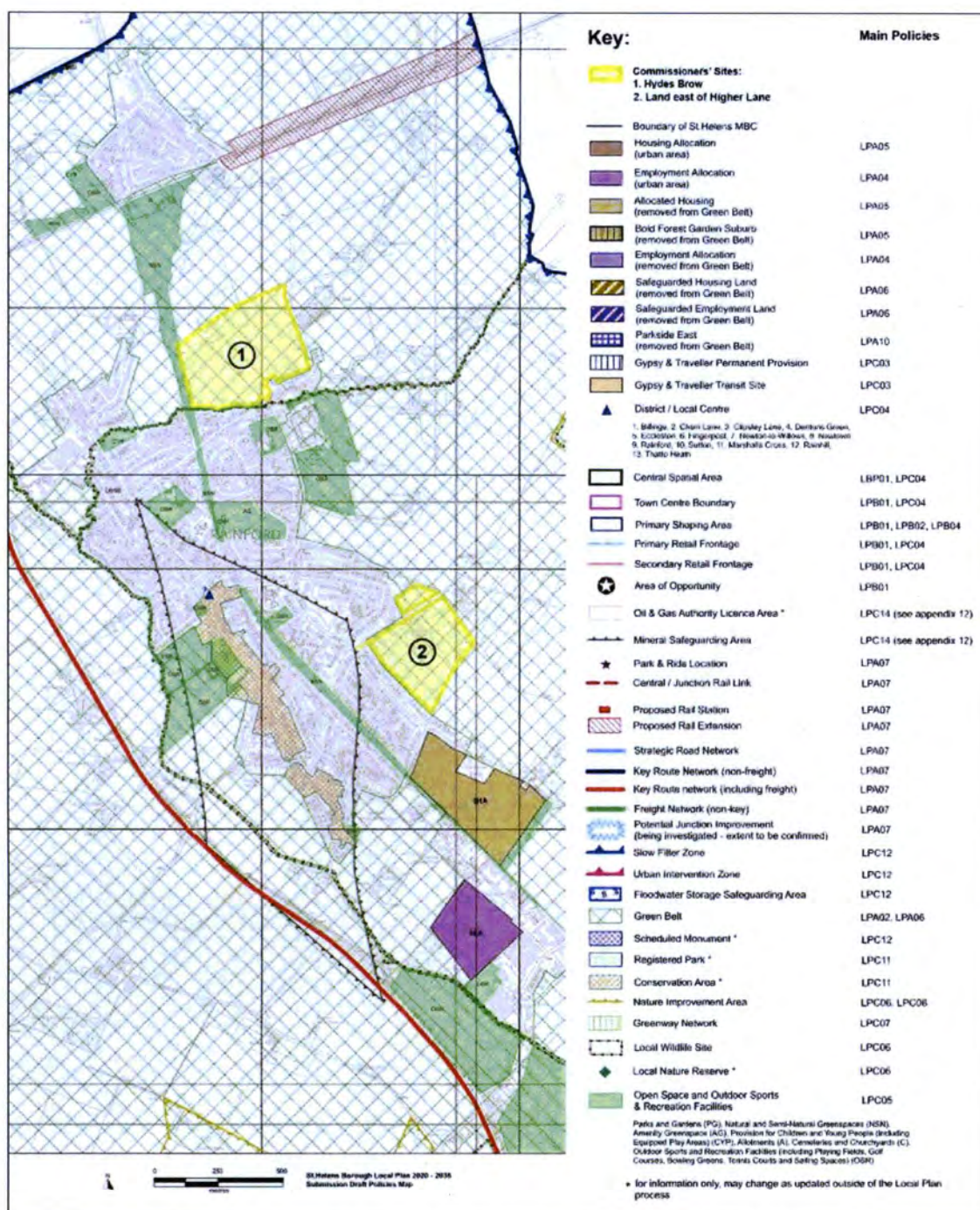


Figure 3: Extract from the St Helens Draft Local Plan Policies Map showing the remaining

allocated site in Rainford (Commissioners' sites highlighted in yellow) (St Helens MBC / Deloitte 2019)

...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.*

- 3.21 Similarly, the Commissioners consider that the Draft Plan's removal of all the safeguarded sites previously identified in Rainford within the 2016 St Helens Local Plan Preferred Options Policies Map results in an approach to planning for future residential development which is not positively prepared and does not comply with national planning policy, and is therefore unsound. Therefore, some sites will need to be identified for safeguarding in Rainford within the Draft Plan.
- 3.22 The Commissioners assert that land within their ownership at Rainford could accommodate residential development of an appropriate scale to meet identified housing need within the Borough over the Plan period and beyond. The Hydes Brow site (Land to the west of News Lane) is suitable for allocation for new residential development within the Draft Plan, and the land east of Higher Lane / South of Muncaster Drive / at White House Lane (formerly identified as safeguarded land under Ref. HS18) is suitable for safeguarding. The suitability of these sites is set out at paragraphs 3.40 to 3.104 below.
- 3.23 These two sites have previously been submitted by the Commissioners for consideration by the Council as appropriate locations for residential development. However, both sites have been rejected following the Council's most recent Green Belt Review (December 2018). The Commissioners object to the approach taken by the Council in assessing these sites in relation to the Green Belt Review. Our objections are set out within the following part of this Section.

St Helen's Green Belt Review

- 3.24 Having identified a shortfall of suitable land within its existing urban areas to meet the needs for housing, employment and other forms of development, the Council undertook a Green Belt Review (published in December 2018) to identify greenfield sites where development could be accommodated with minimal impact the Green Belt. As noted above at paragraph 3.1, the December 2018 Green Belt Review forms part of the evidence base for the site allocations within the Draft Plan.
- 3.25 St Helens has a high proportion of Green Belt, comprising 8,844 ha and covering 65% of the total land area in the Borough. It has been over 30 years since the Green Belt in St Helens was designated, which has been unchanged during this time.
- 3.26 The fundamental aim of Green Belt policy (as defined by the national planning policy at Paragraph 133 of the NPPF) is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. NPPF Paragraph 134 states:

PO2419



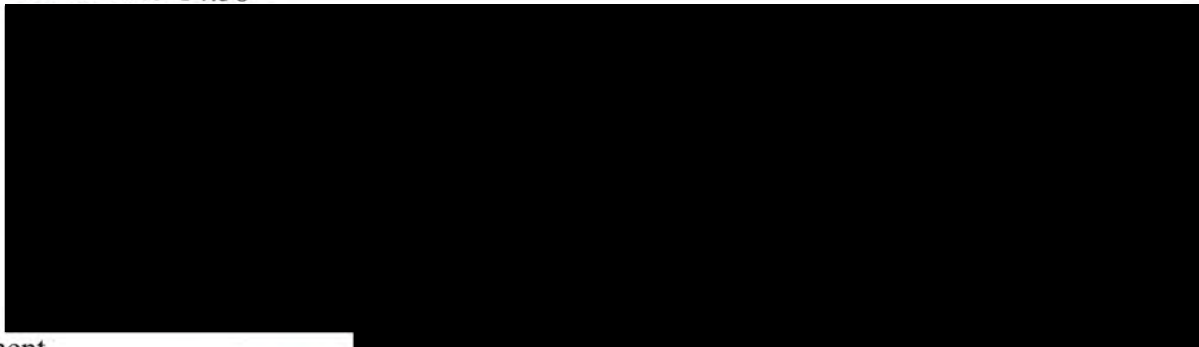
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Kennedy, Amy (UK - Manchester)

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13/03/2019 14:58



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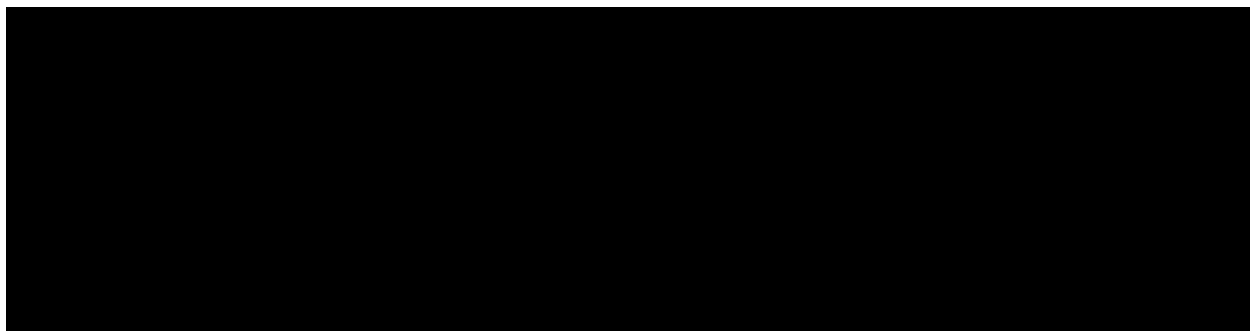
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
2 of 4 (Appendix A)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:01



1 Attachment

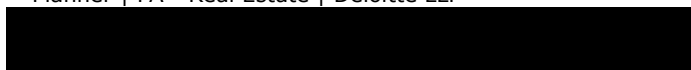


CCfE_reps to St Helens Local Plan_Appendix A_March 2019.pdf

Apologies – now re-sent with attachment.

Amy Kennedy

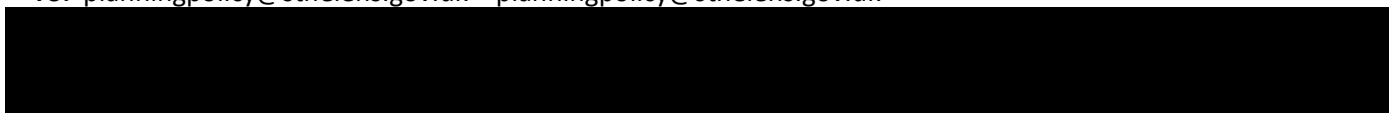
Planner | FA - Real Estate | Deloitte LLP



From: Kennedy, Amy (UK - Manchester)

Sent: 13 March 2019 15:00

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



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

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

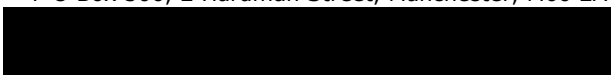
Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Amy Kennedy

Planner | FA - Real Estate | Deloitte LLP

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





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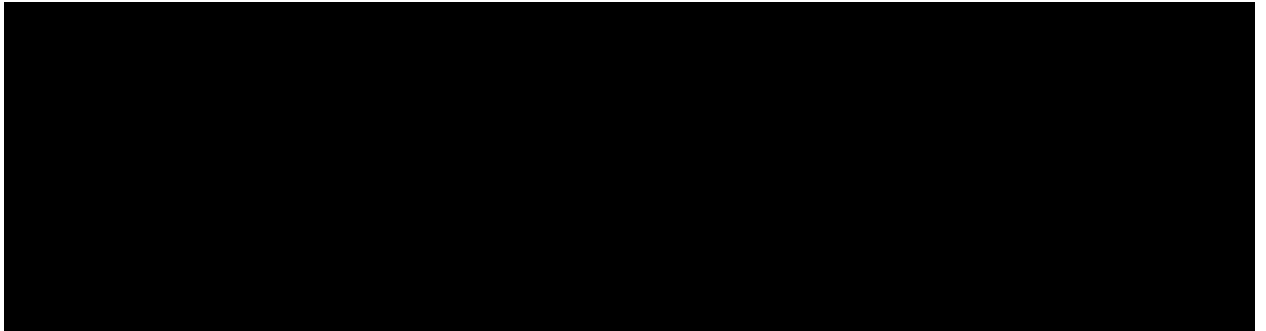
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RE: Representations to the Submission Draft St Helens Borough Local Plan 2020-2035:
3 of 4 (Appendix B)
Kennedy, Amy (UK - Manchester)
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:02



1 Attachment



CCfE_reps_to_St_Helens_Local_Plan_Appendix_B_March_2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

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

Yours faithfully

Amy Kennedy

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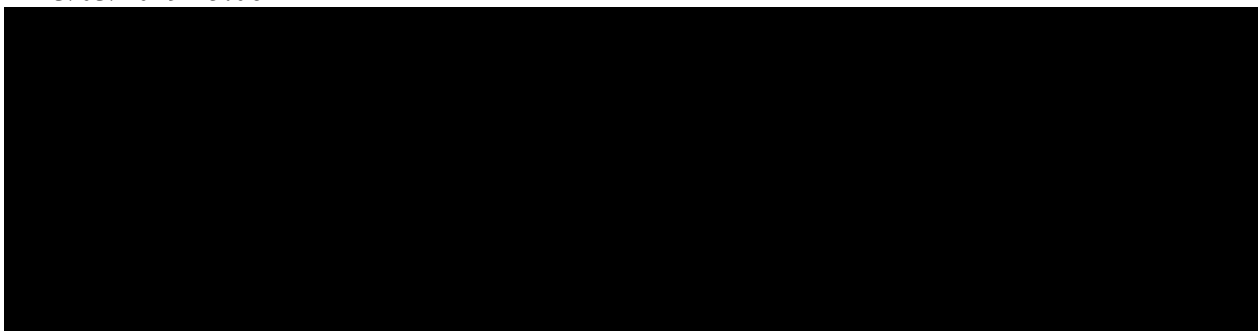
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Representations to the Submission Draft St Helens Borough Local Plan 2020-2035: 4 of 4 (Appendix C)
 Kennedy, Amy (UK - Manchester)
 to:
planningpolicy@sthelens.gov.uk
 13/03/2019 15:06



1 Attachment



CCfE_reps to St Helens Local Plan_Appendix C_March 2019.pdf

For the attention of: The Planning Policy Team

Dear Sir / Madam

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

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

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

Yours faithfully

Amy Kennedy

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

March 2019

it would be possible to develop the lower parts of the site while retaining the sense of openness to the east.

- 3.37 For example, paragraphs 4.4 and 4.5 of the Green Belt Review explain that exceptions have been made for some sites that have scored "High" and "High+", due to being, *"fairly well contained...[and there being] strong evidence of developer interest in providing employment uses."*

- 3.38 The Commissioners therefore object to the approach taken within the Council's assessment of the suitability of these two sites for release from the Green Belt as it is not proportionate and consequently these sites have not been robustly assessed.

- 3.39 The NPPF states at Paragraph 38 that *"Local planning authorities should approach decisions on proposed development in a positive and creative way"*. The Commissioners assert that this has not been done with regards to the Hydes Brow site (Land to the west of News Lane), and the land east of Higher Lane / South of Muncaster Drive / at White House Lane. The next part of this Section sets out the suitability of these sites for allocation for residential development and for safeguarding within the Draft Plan.

16

Hydes Brow (Land to the west of News Lane)

Site Location and Description

- 3.40 As set out within the Development Framework submitted in support of the Commissioners' representations to the St Helens Local Plan Preferred Options in January 2017, the Hydes Brow site comprises a number of arable and pastoral fields and measures a total area of approximately 15.5 ha, with a wider site ownership boundary of 22.8 ha.
- 3.41 The Development Framework identified c.5 ha to be allocated for initial development within the Local Plan (shown as 'Phase One' on the site area plan at Figure 5), and c.10.5 ha to be safeguarded for development subject to a Local Plan Review ('Phase Two').

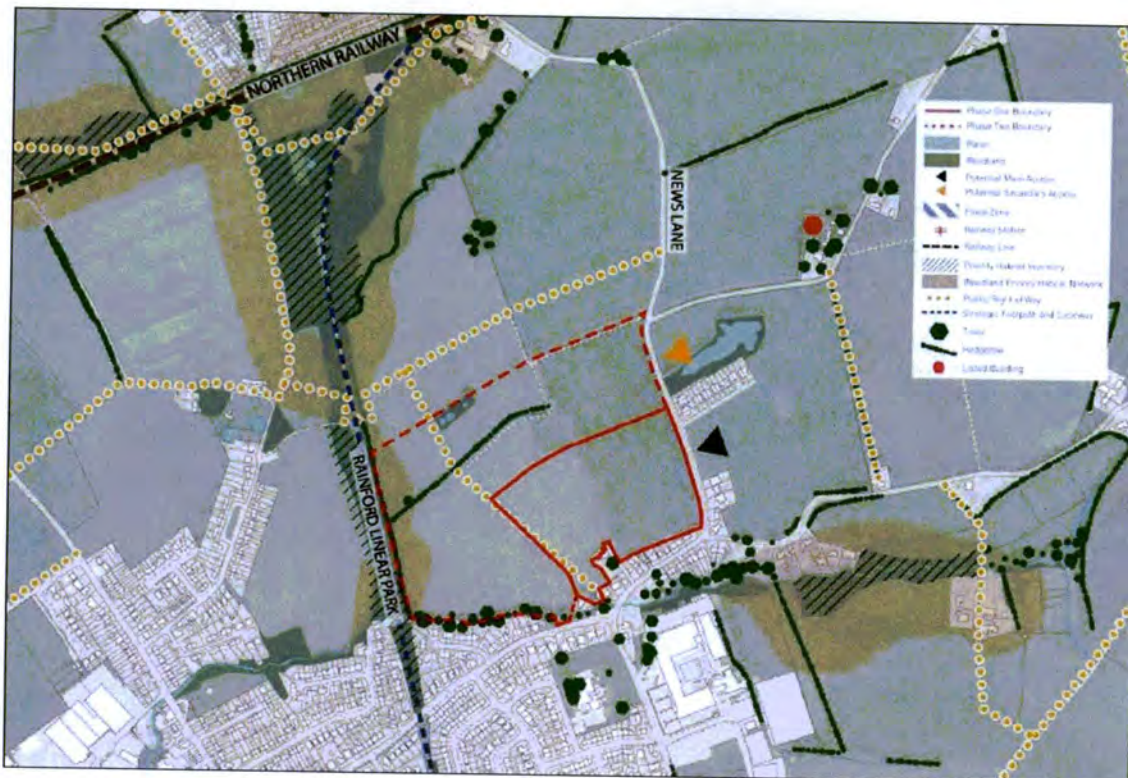


Figure 5: Site area plan showing the Hydes Brow site outlined in red (Barton Willmore, 2017)

- 3.42 The site is relatively flat and the perimeter features (which include streams, hedgerows and woodland) provide useful reference points for containing the edge of the potential development area. Elsewhere within the site there are opportunities to enhance the defensible boundaries.
- 3.43 To the north, the site boundary follows a stream, and sits adjacent to woodland which features in Natural England's Priority Habitat Inventory (PHI). To the west the Site is bound by the Rainford Linear Park (also listed in the PHI), which runs through the centre of Rainford, following a disused railway line. The southern site boundary sits adjacent to existing development, and to the east the boundary follows News Lane.
- 3.44 There are two Public Rights of Way which cross the site, one from the centre of the southern boundary in a north-westerly direction, with the other traversing the site from east to west.
- 3.45 The site is in single ownership, meaning there are no significant obstacles to overcome to ensure delivery of development.

Access

- 3.46 Access to the site is currently obtained from a track located on the eastern boundary directly off News Lane, and from the Public Right of Way located off Hydes Brow on the southern boundary.

Surrounding Area

- 3.47 The site lies to the north of the village of Rainford and abuts the existing urban edge. Hydes Brow and Old Lane are found to the south of the site, with News Lane to the east. Rainford Linear Park is found to the west of the site and beyond this are additional

agricultural fields and Junction Road.

- 3.48 The adjoining urban form is predominantly residential, with a mix of nineteenth and twentieth century housing. The houses fronting Old Lane, to the south of the Site, are predominantly late nineteenth century detached and semi-detached properties, with a number of bungalows. Throughout the village, low stone walls are common features and the use of brick predominates. Rainford Brook Lodge Primary School is found south of Old Lane and Rainford High Technology College is located adjacent to this along Higher Lane.
- 3.49 In addition to local educational facilities, there are a number of other key local services within close proximity of the site, including a supermarket and other local shops, sports facilities, a GP Surgery, and bus and rail connections.

Planning History

- 3.50 A search undertaken through the Council's Public Access website shows no planning applications associated with the Site.

Previous Site Representations

- 3.51 As outlined in Section 1 at paragraphs 1.3 to 1.5, the Commissioners have promoted the land at Hydes Brow for a residential allocation for a number of years. The site was submitted through the "Call for Sites" process in 2011 and was considered within the 2012 SHLAA. The site generally scored positively in this document, which noted that the land:
- Falls within Flood Zone 1 (low probability of flooding);
 - Is not within a Health and Safety Executive Consultation Zone;
 - Does not contain Tree Preservation Orders or areas of high landscape value;
 - Does not have issues of ground conditions or land contamination;
 - Presents no infrastructure issues; and
 - Is located in close proximity to a number of local facilities.
- 3.52 However, the site was not taken forward by the Council at the time given its Green Belt status.
- 3.53 The Commissioners submitted further representations as part of the Council's local plan making process to the public consultations on the "Call for Sites" in September 2014. In 2016 the Council undertook a Green Belt Review, where the land at Hydes Brow was assessed as part of a larger parcel. As a result of this larger parcel, the land scored poorly in this assessment, owing to concerns that development within the northern extent of the parcel could cause a merging of Rainford and Rainford Junction. It appears on this basis that the site was not considered as a proposed allocation, and thus was not included at all within the 2016 SHLAA.
- 3.54 As part of the representations submitted to the St Helens Local Plan Preferred Options in January 2017, the Commissioners objected to the fact that the site was excluded from the 2016 SHLAA and strongly questioned the robustness of the document. It was clear to the Commissioners that the 2016 SHLAA had not been prepared in a comprehensive manner by examining all sites put forward and clearly explaining the reasons why some sites should

come forward and others should not. We therefore requested that the 2016 SHLAA was reconsidered to include all potential development sites.

- 3.55 The January 2017 representations were supported by the Commissioners' own Green Belt Review document, which assessed the Hydes Brow site as making a "Medium" contribution to the purposes of the Green Belt, and as such found the site to be suitable for release from the Green Belt in order to come forward as an allocation within the Draft Plan.

Development Framework

- 3.56 The January 2017 representations were also supported by a Development Framework for the Hydes Brow site, which demonstrated how the site could be sensitively developed to allow for a high-quality residential environment through the provision of approximately 120 dwellings during the current plan period. It also offered a further 230 dwellings as safeguarded land to be released when a Local Plan review is undertaken, amounting to 350 dwellings in total.

Design principles and layout

- 3.57 The Development Framework was informed by design principles which sought to deliver a high quality residential development which reflected the character, scale and density of properties within the local townscape, featuring perimeter blocks and a legible network of streets in order to provide an attractive environment connecting the site with the surrounding environment.
- 3.58 The masterplan showed that existing landscape features would be retained and incorporated into a green infrastructure network (where possible), creating a setting and identity for the new development, whilst protecting biodiversity, increasing recreational opportunities and reducing potential visual impact.

Open Space Network

- 3.59 The proposals also included green spaces and new planting throughout the site to provide attractive, functional and accessible places for leisure and recreation. These spaces varies in appearance, scale and use, from incidental green spaces containing existing landscape features to a more sizable areas centrally and on the southern boundary.

Transport and Access

- 3.60 The Development Framework identified that vehicle access to the site would be delivered from a point to the east of the site from News Lane. A secondary access point was also deemed to be achievable for the area of the site being put forward for safeguarded land. Internally, the masterplan included a primary street linking the two access points and connecting to a sequence of shared surfaces and private drives providing vehicle connectivity throughout the proposed development.
- 3.61 The permeable block structure proposed for the site would also create the opportunity for cyclists and pedestrians to cross the development, linking News Lane with the Rainford Linear Park. A further opportunity to extend local path networks to connect the site to Rainford Junction Railway Station to the north was also identified.

Landscape Considerations

- 3.62 An assessment of Landscape considerations was included within the Development Framework. It concluded that, in landscape and visual terms, the site has potential capacity to accommodate residential development. The pattern of development should follow the linear growth pattern of Rainford along the grain of the south-west facing slopes of the ridgeline. Development within the lower portion of the site would be screened by the tree belt along the disused railway line, and should therefore be retained and reinforced. This is reflected in the masterplan proposals included within the Development Framework.
- 3.63 In considering the Green Belt, the assessment concluded that in combination with a new robust landscape structure, the existing road and vegetation near the site would provide defensible boundaries. These boundaries would be reinforced as part of a robust landscape framework within the site to further enclose development and assimilate the proposed built form into the landscape, using physical features that are readily recognisable and likely to be permanent in compliance with NPPF Paragraph 139.f).
- 3.64 As a result of this enclosure, the new development would further comply with national planning policy in that it would be perceived in the context of existing built form adjacent to the site, resulting in a slight foreshortening of the settlement gap between Rainford Junction and Rainford, without impacting on the openness of the wider Green Belt.

Benefits of Allocating the Site within the Draft Plan

- 3.65 The Development Framework for the Hydes Brow site noted the clear benefits of bringing forward the site for allocation within the Draft Plan. These benefits include:
- Contributing to the housing needs of St Helens Borough;
 - Providing a varied choice of housing, designed to improve local character and built to ensure a high standard of sustainable construction to meet the needs of future generations;
 - Providing a number of economic benefits including job creation (direct and indirect) and increasing the expenditure in the local economy by supporting the continued vitality and vibrancy of existing nearby services and facilities;
 - Improvement of vehicle, pedestrian and cycle connections;
 - Provision of high quality open space; and
 - Contributing to enhancing the landscape character through the provision of high quality green infrastructure.

Summary of the Site's suitability for Allocation within the Draft Plan

- 3.66 In addition to the benefits set out above, the site also has clear advantages in terms of its location, being in close proximity to local services within Rainford and links to St Helens to the south, whilst Rainford Junction is also nearby providing rail connections to locations further afield.
- 3.67 The site also presents a significant opportunity to ensure a larger distribution of housing is provided in Rainford, as a sustainable location which is identified within the Draft Plan as a 'Key Settlement' where new development should be directed. Releasing the Commissioners' land at Hydes Brow from the Green Belt and allocating it for residential development would

help boost housing numbers in Rainford, and would assist with the future growth of the north of the Borough. The additional land identified should then be removed from the Green Belt and safeguarded subject to a Local Plan review.

- 3.68 National Planning Practice Guidance (PPG) advises that sites being put forward for allocations should be assessed according to their suitability, availability and achievability. These criteria are considered below.

- **Suitability**

The Commissioners recognise the importance of ensuring any future proposals are both sustainable and able to successfully mitigate any impacts. Our analysis of the land contained within the appended Development Framework shows that the site can be brought forward without insurmountable technical constraints. The 2012 SHLAA assessment by the Council also confirms this position. The appended Green Belt Assessment also shows that the site is suitable for release from the Green Belt.

- **Availability**

The Commissioners own all of the land that has been identified and so if released from the Green Belt and allocated for residential land, development would be readily deliverable.

- **Achievability**

The Commissioners have the resources and commitment to ensure that development on the land is achievable.

-
- 3.69 To sum up, the Hydes Brow site is deliverable, viable, and suitable for release from the Green Belt. The Commissioners therefore consider that it is an appropriate site for consideration as an allocation for residential development within the Draft Plan, in order to meet identified housing need within the Borough, and to comply with national planning policy in contributing to the achievement of sustainable development within St Helens.
-

Land to the east of Higher Lane / south of Muncaster Drive / at White House Lane

Site Location and Description

- 3.70 The Commissioners' site at Land to the east of Higher Lane / south of Muncaster Drive / at White House Lane ('Land to the east of Higher Lane') comprises approximately 11 ha and is made up of several agricultural fields (Figure 6). White House Farm and associated agricultural structures are located within the western part of the site. A private dwelling (known as 'Primrose Hill') is situated within the eastern element of the site, adjacent to the Public Right of Way which defines the site's south-eastern boundary.
- 3.71 The largest field compartment is immediately to the east of the back gardens of the Higher Lane properties, extending east to the top of slope. Five other smaller field compartments, orientated east to west, are found between White House Farm and Holiday Moss Farm to the north-east. Currently the land is used for arable farming and grazing with some equestrian uses.
- 3.72 Field boundaries are open and defined by post and wire fences. The exception to this is found along White House Lane and Muncaster Drive, both of which are lined with hedgerows. The site is bounded by a series of footpath Public Rights of Way to the north on

PO2420



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

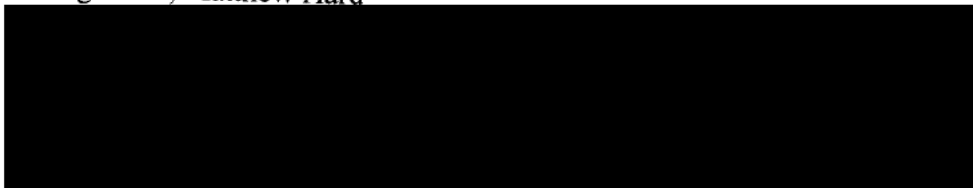
to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:02

Cc:

Doug Hann, Matthew Hard



3 Attachments



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

Dear Sir / Madam

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

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

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

Kind regards

Emer

Emer Cunningham | Planner



indigo.



RTPI Planning Consultancy of the Year 2017

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



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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

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

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

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

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

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

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

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

St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

- 4.18. St Helens has not consistently delivered sufficient housing to meet demand. The borough fell short of housing requirements in 2003/4 and 2006/7. More recent completion rates indicate that in 2013/14 and 2014/15 and 2015/16 there was an improvement but in the years 2016/17 and 2017/18 housing targets were not met.
- 4.19. The 2017 Strategic Housing Land Availability Assessment shows progress of housing delivery against the Core Strategy. This highlights that 1,324 homes have failed to be delivered between 2003 and 2017. 17
- 4.20. The housing requirement of 9,234 dwellings is therefore flawed as it will not resolve the shortfall in housing delivery against the Core Strategy. Notwithstanding increasing the requirement to reflect local and city-region growth objectives, as a minimum the requirement should increase to 10,558 in order to be based on sound evidence and to be positively prepared.
- 4.21. The expected housing supply is miscounted and there are several flaws in the Council's evidence, partly stemming from using a 2017 base-date and partly from errors in the counting. 18
- 4.22. We calculate that there is a need for a further 754 homes to be allocated for residential development within the plan period.
- 4.23. In Section 2 and Appendix 2 of this report, we set out a detailed analysis of the current housing supply which contains and supports our objection to this policy in its current form.
- 4.24. We do however support the description of the housing requirement as a 'minimum' figure in order to ensure that there is some flexibility in planned housing delivery and that housing needs, including for more affordable homes, are adequately addressed in the plan period. 19
- 4.25. We also support that the delivery of housing will be monitored annually over the Plan period as set out in Policy LPA05(4), and support that if delivery or current deliverable land supply falls substantially below the required level, the council will undertake a local plan review to bring forward additional sites such the Leyland Green Farm site (Site Ref. 1HS) under Policy LPA06. However, the plan needs a clearly defined timetable for a definitive local plan review. 20

Policy LPA05.1 Strategic Housing Sites

- 4.26. Policy LPA05.1 highlights the council's identification of other residential allocations in Policy LPA05 which are not large enough to warrant a "strategic" allocation. Although these sites will yield smaller numbers of homes compared to strategic sites, we support that their allocation will support the overall delivery of housing and will play a key part of the supply and balance out the phased delivery which will result from the large strategic housing sites. 21
- 4.27. Therefore, although it is not a strategic housing site, we support the removal of land south of Leyland Green Farm site (ie Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood) (Site Ref. 1HA) from the Green Belt and its proposed housing allocation for an indicative 216 dwellings. We support the council's strategy of delivering more housing in Garswood as the settlement can accommodate further growth. This proposed housing allocation forms a natural extension to the settlement of Garswood. 22
- 4.28. Policy LPA05.1(2) requires a planning application for development within a Strategic Housing site to be supported by a comprehensive masterplan covering the whole site. This is supported in principle but requirement to provide a Masterplan must form part of the planning application process and must not unduly delay grant of planning permission or delivery of development on an allocated site. 23
- 4.29. LPA05.1(2)(h) requires *"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"*. 24

This requirement is vague and it is unclear what is meant by expanded or enhanced infrastructure. It should therefore be removed given the policy and plan as a whole addresses infrastructure requirements adequately.

24

- 4.30. LPA05.1(3) require development proposals which only cover part of a Strategic House Site, to provide contributions in accordance with the comprehensive masterplan for the whole site. This policy should be amended as contributions can only be sought to mitigate the development for which planning permission is being sought for rather than development of a wider site.

25

- 4.31. Murphy Group are strongly promoting their land at Leyland Green Farm (site ref. 1HS) for residential development of up to 291 dwellings within the plan period. Therefore, Murphy Group are seeking that their safeguarded land for housing allocation is upgraded to a housing allocation, which can be delivered in the immediate term. The site is in one ownership and therefore does not suffer from the constraints or potential issues associated with land in multiple ownerships and potential delays in delivery as a result. The site is otherwise unconstrained (apart from existing Core Strategy Green Belt status). The St Helens land at Leyland Green Farm, combined with the Wigan land at Leyland Green Farm (indicative capacity of 210 dwellings), could deliver circa 501 dwellings in total.

26

- 4.32. Initial feasibility studies on sustainability, highways and landscaping indicate that the Leyland Green Farm site (Ref. 1HS) is available, suitable and deliverable and can come forward immediately within the plan period. We consider that it is not appropriate to safeguard this land for housing post 2035 when it can come forward for development within the plan period.

Policy LPA06: Safeguarded Land

- 4.33. Despite Murphy Group's desire for the Leyland Green Farm site (ie land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood) (site ref. 1HS) to be upgraded from safeguarded land for housing to a housing allocation, in the event that this does not occur, we strongly support the removal of the Leyland Green Farm site from the Green Belt and its allocation as safeguarded land for housing, as per Policy LPA06.1.

27

- 4.34. We support that the site is considered suitable for Green Belt release as it forms a natural extension to the settlement of Garswood. Development on the site will be a logical rounding off of the settlement when considered in context with the proposed housing allocation to the south (Site Ref. 1HA).

- 4.35. Table 4.8 identifies an indicative site capacity for 291 dwellings (based on an indicative 75% net developable area and 30 dwellings per hectare). Murphy Group have produced a draft indicative masterplan (contained within the Delivery Statement submitted alongside this representation) which indicates a capacity for 291 new dwellings. As such, this reflects the number of units which could be achieved based on known site constraints / opportunities tied into deliverability. Ensuring this yield on this safeguarded site will also reduce the pressure on the delivery of brownfield sites.

- 4.36. Murphy Group is keen to work with the local planning authority to bring forward development proposals for housing in the immediate term within the plan period (if allocation is upgraded), but in the event it does not, to ensure housing development is delivered beyond 2035. Murphy Group have their own house building division and therefore are equipped to begin house building straight away.

- 4.37. Appendix 7 of the local plan provides requirements for the site. We support the identification of site access via Leyland Green Road and Billinge Road. Murphy Group have instructed Vectos to undertake initial highways work and assess suitable site access locations. The initial transport work is contained within the supporting Delivery Statement submitted alongside this representation. Murphy Group are aware that the site will require a pedestrian and cycleway connections across the site and to connect the site to the wider area.

28

PO2421

GBR-078

EL0227



Representations to Submission Draft St Helens Local Plan on behalf of Muller Property

Group

Helen Binns

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:14

① - LPA05

② - GREEN BELT REVIEW

③ - LPA05.1

④ - LPA06

⑤ LPA05 TABLE 4.5

5 Attachments



Site Location Plan.pdf



Representations form - Part A and B.pdf



13-03-2019 Site Assessment Document.pdf



13-03-2019 St Helens Council - Representations to Submission Draft St Helens Local Plan.pdf



CLO1902_Clockface Comparative Study_Final Report_LR.pdf

Dear Sir / Madam

Please find attached representation to the Submission Draft St Helens Local Plan on behalf of our client Muller Properties Group.

Our submission comprises the following:

- Covering letter;
- Representations form – parts A and B combined;
- Site location plan;
- Site Assessment Document; and
- Comparative Sites Study

I would be grateful of confirmation of receipt of this emails.

Kind regards

Helen

Helen Binns

Principal Consultant

Walsingham Planning

Brandon House, King Street, Knutsford, WA16 6DX



Over 30 years of success and still planning

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SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: | Title: Mr |
| First Name: | First name: Mark |
| Last Name: | Last Name: Krassowski |
| Organisation/company: Muller Property Group | Organisation/company: Walsingham Planning |
| Address: C/O Agent | Address: Brandon House, King Street Knustford |
| Postcode: | Postcode: WA16 6DX |

Signature:

Date:

13/03/2019

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|---|----------------------------------|-----------------------------------|--|--|--|--|--|--------------------------------------|--|
| Policy | LPA 05 and Table 4.5 | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | Meeting St Helens Borough Housing Needs. | | | | | |

| 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 checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

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

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

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

See attached covering letter from Mark Krassowski Walsingham Planning and Supporting documents.

Please continue on a separate sheet if necessary

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

See attached covering letter from Mark Krassowski Walsingham Planning.

Please continue on a separate sheet if necessary

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

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

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

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

☒ Yes, I wish to participate at the oral examination

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

In order to present a comprehensive case and contribute to discussions on other sites.

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

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

**Our Ref: MK/KN0024/19**13th March 2019Brandon House, King Street, Knutsford,
Cheshire WA16 6DXLocal Plan Team
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HPWeb: www.walsinghamplanning.co.uk

Dear Sir/ Madam

Submission Draft – St Helens Borough Local Plan 2020 -2035

Following detailed consideration of the Submission Draft Local Plan, together with relevant supporting documents, we are instructed by Muller Property Group to make representations on their behalf to the draft Plan. Our client considers the draft Plan and in particular, Policy LPA05, LPA05.1 and LPA06 to be unsound and specifically, not justified, not effective and inconsistent with government guidance contained in the NPPF. ✓

In order to make the Plan sound we consider that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be deleted from the Green Belt and allocated for housing under Policy LPA05 Table 4.5 and Policy LPA05.1. Please find appended to this letter a site location plan identifying the extent of the site to be allocated. In the event that the Council consider that there are more suitable sites to allocate for housing to meet housing need over the Plan period, we are of the view that the site should be designated as safeguarded land under Policy LPA06 Table 4.8. Our reasons for this are set out below. ✓

Housing Requirement

Policy LPA05 sets out a housing requirement of 9,234 dwellings for St Helens for the Plan period 2016 -2035. With a residual requirement of 7,245 dwellings, taking account of expected housing completions to April 2020. Table 4.6 which accompanies Policy LPA05 indicates that the Council anticipate the residual housing requirement being met by 5,550 dwellings from sites identified in the SHLAA (of which four sites are proposed to be allocated for housing with a total capacity of 2,029 dwellings) and 2,056 dwellings from six sites removed from the Green Belt and allocated for housing. ✓

The Plan thus proposes that circa 73% of the housing requirement for the Plan period will come from SHLAA sites, of which only 27% are allocated sites, with another 27% of the housing requirement being met by sites removed from the Green Belt and allocated for housing. This means that the Council are reliant upon 46% of their total housing requirement for the Plan period coming from unallocated SHLAA sites. ✓



Our client intends to carry out survey/ assessment work in order to provide more detailed information in respect of the site's development potential which we would be happy to share with the Council. This is likely to include an Ecological Assessment, a Noise Assessment (to robustly identify a developable area), detailed access design with capacity assessment and safety audit, desk-based Ground Investigation, Sub-scan Survey to identify services, Utilities Assessment, Tree Survey, Air Quality Assessment and Landscape and Visual Assessment. Our client also intends to prepare an indicative site layout plan for the site. ✓

More Appropriate Housing Site

Whilst we consider that the Council needs to allocate more land for housing in order to ensure that the Local Plan housing requirement can be met and in particular, that the Plan should allocate smaller sites which will deliver new housing within the first part of the Plan period. In the event that the Council do not allocate additional sites, we consider that a reassessment must be carried out of the sites that are proposed for removal from the Green Belt and allocation for housing or future safeguarding and compared with land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078). 1

It is our view, together with PGLA who have undertaken a Comparative Site Study, that the aforementioned site makes less contribution to the three purposes of including land in the Green Belt than do a number of other parcels of land that are identified for removal from the Green Belt. Indeed, if reference is made to the Site Assessment Proformas for Sites 1HA (GBP_025), 4HA (GBP_074) and 8HA (GBP_019), it is clear that parcels of land within these large sites are considered to make a medium contribution to a number of the purposes of including land in the Green Belt, whereas land south of Clock Face / north of the M62 makes a low contribution to all three purposes. ✓ 1 3 5

It cannot be right, and the Plan cannot in our view be considered to be sound, in circumstances where land which has a more important role to play in terms of the purposes of including land in the Green Belt is proposed for removal, as compared to land which is of less importance. The Plan and in particular, Policy LPA05 and LPA05.1 are thus in our view not justified, not effective and are inconsistent with government guidance contained in the NPPF. We accordingly, consider that these allocations should be omitted either in their entirety or in part, and that land south of Clock Face / north of the M62, Clock face is allocated for housing in their place. 1 3 5

Attention is drawn in particular to allocation 4HA which is located directly to the northeast of the subject site. Large parts of this site (GBP_074A and 074B which comprises circa 70% of the site) have been found to make a medium contribution to one of the three assessed purposes of including land in the Green Belt. Furthermore, this land forms a substantial part of the Bold Forest Park, which is subject to its own Area Action Plan (Bold Forest Area Action Plan) adopted in 2017. The document sets out the following Vision for the area: ✓

"By 2030 Bold Forest Park will be at the heart of a thriving diverse economy, providing a hub for family leisure and adventure sports. The natural environmental and cultural environment will be rich and diverse. A network of open spaces and routes accessible to all connects the Forest Park to the wider countryside and links to our local communities". ✓

Whilst it is acknowledged that the document notes that some land within the AAP area may be required to meet the Borough's housing and employment needs, it is in our view entirely perverse to remove land which has been allocated for leisure, recreation and tourism uses, particularly land that 3



lies within the Green Belt, when there are alternative available, suitable and viable sites within close proximity that could meet the need for housing land over the Plan period. Such a situation is even more perverse when considering there is an alternative site within 570 metres that is less important in terms of the purposes of including land within the Green Belt, is available for development now and is in a more accessible and sustainable location with better access to local shops, facilities and services. ✓

To conclude, we consider Policy LPA05, including Table 4.5 and LPA05.1 to be unsound. Specifically, we consider that sites 1HA (GBP_025), 4HA (GBP_074) and 8HA (GBP_019) should be deleted or at the minimum their boundaries amended such that only land which makes a low contribution to all three purposes of including land in the Green Belt is allocated for housing. Furthermore, we consider that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be allocated for housing (150 dwellings) in Policy LPA05 Table 4.5 and LPA05.1. Contrary to the conclusions of the Green Belt Review, the site is not constrained such that it would substantially limit the development capacity of the site. Indeed, we are confident it could deliver circa 150 dwellings. ✓

Furthermore, it is material to any assessment of alternative sites that our client's site is available for immediate development and as such, could deliver new housing within a relatively short period of time and certainly within five years. It is also worth reiterating at this point that the NPPF is clear in its guidance to LPA's and that they should identify both a sufficient supply and a mix of different types and sizes of sites. To rule out our client's site on the basis of the number of units it might deliver in the absence of any technical assessments to support and evidence this conclusion renders the Council's approach flawed, ineffective and unjustified and therefore the housing policies wholly unsound. ✓

Safeguarded Land Allocation

Policy LPA06 identifies a number of sites that the Plan proposes be removed from the Green Belt and safeguarded for future housing or employment development. In the Preferred Options Local Plan (December 2016), it was proposed that our client's land be removed from the Green Belt and safeguarded for future housing development. ✓

It is our view that the site should be allocated for housing development over the Plan period. The reasons for this are set out above. However, in the event that the Council determine that sufficient land has been allocated for housing and that Policy LPA05 and LPA05.1 of the draft Plan are sound, we believe that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be reallocated as safeguarded housing land. It is however considered that the entire site to the boundary with M62 should be allocated as detailed on the attached site location plan. (4) ✓

It is our view, together with PGLA who have undertaken a Comparative Site Study, that our client's land makes less contribution to the three purposes of including land in the Green Belt than many of the proposed safeguarded housing land sites. As with the proposed housing allocations, if reference is made to the Site Assessment Proformas for Sites 1HS (GBP_025), 2HS (GBP_53), 5HS (GBP_025) and 7HS (GBP_085), it is very clear that these sites make a much greater (medium and high) contribution to the purposes of including land in the Green Belt than our client's site. The remaining sites make an equal (low) contribution to the purposes of including land in the Green Belt and thus perform no better or worse in Green Belt terms than our client's site. (4) ✓

It cannot be right in our view, and indeed such an approach is clearly flawed and unsound, that sites that make a greater and more important contribution to the purposes of including land in the Green Belt are proposed for removal and allocation as safeguarded housing land in advance of land which

PO2422



St.Helens Borough Local Plan 2020-2035 - Group Representation

Adam Onyett

to:

planningpolicy@sthelens.gov.uk

13/03/2019 10:35



2 Attachments



St Helens Local Plan - Representation Form.pdf Group Representation Signatories.pdf

Good morning

Please find our group representation, with my Lead Name, attached regarding the Local Plan.

Regards

Adam Onyett

- ① - LPA05 - TABLE 4-5
- ② - LPA05 - GEN
- ③ - LPA05 - 6HA
- ④ - LPA06
- ⑤ - LPA02
- ⑥ - LPA06 - 3HS
- ⑦ - TIA
- ⑧ - IDP
- ⑨ - para 1.7.2 - DEC.



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;


Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: Mr | Title: |
| First Name: Adam | First name: |
| Last Name: Onyett | Last Name: |
| Organisation/company: N/A | Organisation/company: |
| Address: 37 Wedgewood Gardens St Helens | Address: |
| Postcode: WA9 5GA | Postcode: |
| | Tel No: |
| | Mobile No: |
| | Email: |

| | |
|--|---|
| Signature:  | Date: <input type="text" value="10/03/19"/> |
|--|---|

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

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

Yes ☒ (Via Email)

No ☐

Please 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 | LPA06 | Paragraph / diagram / table | 3HS | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | X | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

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

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

| | | |
|-------------------------------------|--------|----|
| Legally Compliant? | Unsure | |
| Sound? | | No |
| Complies with the Duty to Cooperate | | 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 |
| 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

Having reviewed the St Helens Brownfield Register, it is apparent that there has been some miscalculation. The Register suggests that there are 5,818 dwellings available, yet the Plan states 7,040 dwellings, of which 4,085 will be built within the Plan period. The figures stated do not align and for this reason the Plan is not sound. The figures must be accurate and aligned for the Plan to be sound.

LPA05 states that 486 dwellings per annum (dpa) are required and there have been various projections within the 'Strategic Housing Market Assessment' (GL Hearn), with the

①

②

supporting Ecological Assessment and for the reasons outlined we do not believe the Plan is justified.

Whilst the SHMBC policy states that the land will be 'safeguarded' for housing after 2035 and we are assured that planning would be refused before then, we hold concerns regarding the use of the land over the next 16 years. We believe that the owners (Mulberry Homes) could potentially allow the land to become a derelict 'dumping ground' forcing a potential rethink of policy and potential change to current proposals. It is not unreasonable to be concerned that a developer may look for ways to expedite plans for the site they currently own.

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.

In order for the plan to comply with the National Planning Policy Framework (2019), we believe that the land referred to as 3HS in the Local Plan should remain designated as Greenbelt and not be re-designated as 'safeguarded'. With particular reference to Clauses 136 and 137 of NPPF (2019) which clearly state that Green Belt boundaries should only be altered in exceptional circumstances and bearing in mind the comments made in 6. above, we do not believe that the circumstances to re-designate the land referred as 3HS as 'safeguarded' are 'exceptional' enough to warrant the destruction of Green Belt. The Plan is not consistent with national policy.

Please continue on a separate sheet if necessary

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

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

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

| | | | |
|--|--|--|--|
| | No, I do not 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.**

PO2423



St Helens
Council

398

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

Ref: LPSD

11 MAR 2019

(For official use only)

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PART 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) ALSO ON BEHALF OF |
|--|---|
| Title: <u>MRS</u> | Title: <u>MRS</u> |
| First Name: <u>ALISON</u> | First name: <u>JOAN</u> |
| Last Name: <u>RIDD</u> | Last Name: <u>DAGNALL</u> |
| Organisation/company: | Organisation/company: |
| Address: <u>100, BEECH GARDENS</u> <u>RAINFORD</u> <u>ST. HELENS</u> | Address: <u>14, OLD LANE,</u> <u>RAINFORD</u> <u>ST. HELENS</u> |
| Postcode: <u>WA11 8EB</u> | Postcode: <u>WA11 8JE</u> |

| | |
|--|---------------------|
| Signature: <div style="background-color: black; width: 400px; height: 40px; display: inline-block;"></div> | Date: <u>8/3/19</u> |
|--|---------------------|

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

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

☒ Yes (via email)

☐ No

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

RETURN DETAILS

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)

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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**Please use a separate copy of Part B
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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 | LPA02 LPA05 | Paragraph/ diagram table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulations Assessment | |
| | | 4.6.8 - 4.6.15 Table 4.5 8HA | | | | | | | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

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

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|---|
| <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 our understanding that Green Belt land should only be released for development under exceptional circumstances. With a falling population, these cannot be considered exceptional circumstances. The proposed site 8HA is prime agricultural land and in the current situation of climate change and political uncertainty it would be irresponsible to future generations to give up this land.</p> <p>Building on this land would significantly affect the character and heritage of this area.</p> |

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Please continue on a separate sheet if necessary

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| | | | |
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| |
|--|
| |
|--|

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Please keep a copy for future reference.

PO2424



St Helens
Council

398

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

Ref: LPSD

11 MAR 2019

(For official use only)

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

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.

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Part B - Your Representation(s)

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| First Name: <u>ALISON</u> | First name: <u>JOAN</u> |
| Last Name: <u>RIDD</u> | Last Name: <u>DAGNALL</u> |
| Organisation/company: | Organisation/company: |
| Address: <u>100, BEECH GARDENS</u> <u>RAINFORD</u> <u>ST. HELENS</u> | Address: <u>14, OLD LANE,</u> <u>RAINFORD</u> <u>ST. HELENS</u> |
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WA10 1HP**

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setting out your representation/comment.**

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

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| | | 4.6.8 - 4.6.15 Table 4.5 8HA | | | | | | | |
| 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 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 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 type="checkbox"/> |
| Consistent with National Policy? | <input type="checkbox"/> |

| |
|---|
| <p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <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 our understanding that Green Belt land should only be released for development under exceptional circumstances. With a falling population, these cannot be considered exceptional circumstances. The proposed site 8HA is prime agricultural land and in the current situation of climate change and political uncertainty it would be irresponsible to future generations to give up this land.</p> <p>Building on this land would significantly affect the character and heritage of this area.</p> |
|---|

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

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

| |
|--|
| |
|--|

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

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

Please keep a copy for future reference.

PO2425

Representor Details

| | |
|----------------------|---|
| Web Reference Number | WF0197 |
| Type of Submission | Web submission |
| Full Name | Revd Simon Moore |
| Organisation | Sutton Parish Church of England |
| Address | 225 Gartons Lane Clock Face St Helens Merseyside WA9 4RB |
| Agent Details | |

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

Yes (via e-mail)

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

| | |
|---|------------------------------------|
| Policy | St Helens Borough Local Plan LPA05 |
| Paragraph / diagram / table | Table 4.5 Site 5HA |
| Policies Map | Page 23 |
| Sustainability Appraisal / Strategic Environmental Assessment | |
| Habitats Regulation Assessment | |
| Other documents | |

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

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

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

Justified

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

The present strategic housing plan (5HA) does not include land that St Michaels and All Angels Church has recently confirmed to be its own, plus some presently held land n the exisiting rectory/church site to be included in a modified housing plan.

The certified original will be given to the council on Tuesday 12th March so a copy can be made to go with this submission.

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

For sometime St Michaels and All Angels Church (Liverpool Diocese Church of England) on Gartons Lane has been looking to obtain confirmation that a piece of land to its east measuring 100 yards by 60 yards at present undesignated at the land registry and not in the local plan for housing area 5HA was legally owned by the church. I received a certified copy of this last week. We as a church council of 11th March 2019 voted to request to have the plan modified to include this piece of land and some to the south of the present rectory/church footprint for housing. Therefore the 21.67 hectares of land would be added to. This needs to be reflected on the map on page 23.

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

Yes, I wish to participate at the oral examination

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

So I am able to accurately relay the decision to the church members.

| | |
|---------------|-----------------------|
| Response Date | 3/11/2019 10:49:54 PM |
|---------------|-----------------------|

PO2426

Representor Details

| | |
|----------------------|---|
| Web Reference Number | WF0290 |
| Type of Submission | Web submission |
| Full Name | Mr Frederick Kaye |
| Organisation | Mr |
| Address | 9 Rose Drive Rainford St Helens WA11 8QF |
| Agent Details | |

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

Yes (via e-mail)

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

| | |
|---|---------------------------|
| Policy | LPA05 (and possibly LP08) |
| Paragraph / diagram / table | Table 4.5 |
| Policies Map | 8HA |
| Sustainability Appraisal / Strategic Environmental Assessment | |
| Habitats Regulation Assessment | |
| Other documents | |

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

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

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

Justified, Effective

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

Rainford Site 8HA has been intensively farmed for many years. If used for housing, this will reduce national food production and cause local agricultural unemployment. This is incompatible with Brexit.

Local infrastructure (roads, schools, medical centres etc.) will be unable to cope with the influx of people and cars implied by 259 extra houses.

For example, please note that several local houses with adult children have four cars, all of which leave for work at about the same time.

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

Firstly, the Council should again consider whether the St Helens population increase and thus housing need, predicted by Central government, is realistic. I think not and this view is also held by some local business owners.

We think that, if reconsideration still predicts any large local population increase, such people will have to commute to work and that additional housing should be built closer to the more likely areas of employment or, at least, closer to the possible commuting routes, rather than in Rainford

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

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

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

| | |
|---------------|---------------------|
| Response Date | 3/9/2019 4:50:17 PM |
|---------------|---------------------|

PO2427



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



1 Attachment



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

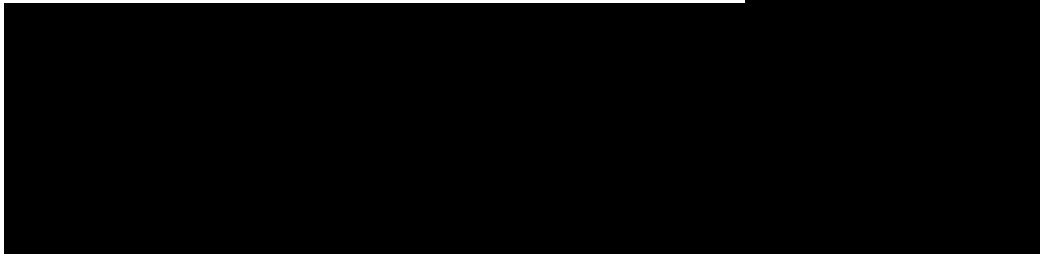
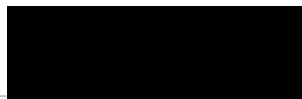
Dear Sir / Madam,

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

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

Kind regards

Ian Gilbert
Planning Associate



Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

-
- 3.43 Density – Policy LPA05 seeks to introduce minimum densities of between 30 – 40 dph; depending on the location of development. We consider that densities should be applied on a site-by-site basis to reflect the character of the site and area, rather than being stipulated as a minimum requirement through policy. 44
- 3.44 Whilst we acknowledge that the Policy does allow for lesser densities in certain circumstances, the appropriate policy approach should simply to require that developments make the most efficient use of land whilst ensuring that development is of the highest quality.
-
- 3.45 Housing Delivery – We support the Council's pragmatic approach to monitoring the housing land supply as set out in Policy LPA05. This approach is intended to ensure that an adequate supply of housing comes forward within the Borough and a 5 year housing land supply is maintained. 45
-
- 3.46 We welcome the inclusion of this mechanism for the Council to undertake a partial or full review of the Local Plan in relation to the identification of additional sites. However, clarification is required as to what is meant by "**considered**" in relation to a partial or full review of the Plan and what constitutes "**significantly below the required level**". This will provide greater certainty to the developer or landowner in relation to the circumstances in which alternative sites will be considered for release. 46
-

Policy LPA08 – Infrastructure Delivery and Funding

- 3.47 Our Client understands the necessity for developer contributions to help secure on-site or off-site infrastructure provision where this is necessary to make development acceptable in planning terms. However, the wording of this policy needs to be clarified because it does not make sufficiently clear the circumstances in which certain contributions will be sought. 47
-
- 3.48 In the first instance, at Part 1 of the policy it is unclear what is meant by 'all forms of infrastructure' that are required to serve the needs of the local community. The Local Plan must be sure to ensure that developers are not required to provide contributions to resolve existing deficiencies or to meet aspirations of the existing communities. 48
- 3.49 Clearly there is a mechanism for the pooling of contributions for wider infrastructure delivery through CIL charging but, we understand, this is not something that the

PO2428



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



2 Attachments



Local Plan Reprs Form.pdf Local Plan Reprs.pdf

Dear Sirs

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

Regards

Tony McAteer
McAteer Associates Ltd



St. Helens
Council

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

Ref: LPSD

(For official use only)

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|--|--|
| Title: Mr | Title: Mr |
| First Name: Mark | First name: Tony |
| Last Name: Fillingham | Last Name: McAteer |
| Organisation/company: EcclestonHomes Ltd | Organisation/company: McAteer Associates Ltd |
| Address: Suite 114 Newton House Bichwood House Warrington | Address: 4 St Johns Wood Lostock Bolton |
| Postcode: WA3 6FW | Postcode: BL6 4FA |

Signature:

Date:

12 March 2019

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|---|--|-----------------------------------|--|------------------------------|--|--|--|--------------------------------------|--|
| Policy LPA02 LPA03 LPA05 LPA06 LPA07 | | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | See Attached representations | | | | | |

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

Please tick as appropriate

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

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

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

Please continue on a separate sheet if necessary

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

See Attached Representations

Please continue on a separate sheet if necessary

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

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

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

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

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

To ensure the representations are fully understood by the Inspector.

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

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

St. HELENS BOROUGH LOCAL PLAN 2020-2035

Representations to the Submission Draft

January 2019

On behalf of

Eccleston Homes Ltd

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

4 Policy LPA05

4.1 Eccleston Homes do not consider the net additional dwelling figure of 9,234 dwellings to be sufficient to meet the housing needs of the Borough up to March 2035 for the reasons set out in the Nexus Planning submissions. They do not consider the figure reflects the housing needs of the Borough, neither does it appear to be in line with the economic aims of the Borough which would call for a higher figure. 06

4.2 Eccleston Homes consider the net dwelling figure should be 12,080 dwellings to reflect both of these factors.

4.3 For the reasons set out in the Nexus Planning submission, Eccleston Homes do not consider the housing allocations set out in Table 4.5 will deliver the number of dwellings stated.

4.4 They are also of the opinion that the proposed allocations will not adequately meet the needs of Haydock, especially in the short to medium term. By seeking to meet all its needs in one large allocation of 400 dwellings this will ensure Haydock's needs will not be met, especially given the need for a comprehensive master plan. Large allocations are notoriously slow in their delivery and it is submitted that at least one additional housing allocation is needed to meet the immediate needs of Haydock. 07

4.5 Eccleston Homes consider their site at Station Road, Haydock (edged red on the attached plan) should be allocated for housing in the plan period for the reasons stated below. This will allow the numerical needs of Haydock to be met, as well as providing a choice of location, as advocated by national planning policy.

4.6 Eccleston Homes consider the Council's statement in point 4 of the policy in respect of ensuring a five year supply of housing land is maintained is essential, but that the mechanism by which any shortfall is to be overcome is cumbersome and time consuming. A review or partial review, of the Plan could only exacerbate under supply and the Council should therefore ensure that additional land is capable of coming forward more quickly. 08

4.7 Eccleston Homes have already stated in their response to Policy LPA02 that Safeguarded Land should be made immediately available to meet any shortfall and consider this an essential change required in the Plan.

4.8 Eccleston Homes consider the land at Station Road, Haydock should be allocated for housing for the following reasons:

4.9 The development would complement the existing residential areas by widening the existing range and choice of housing to meet local needs. It would also provide an element of affordable housing to the benefit of the existing local community.

4.10 It is submitted that the site could be developed for housing without detriment to the character of the area, and that it would represent the kind of small scale Green Belt release envisaged by the emerging Local Plan without detriment to the purposes of Green Belt in the locality as a result of its containment by existing wooded areas.

09

4.11 National planning guidance indicated that a comfortable walking distance to local services as around 10 minutes walk, or 800 1600m. This distance is also considered an appropriate area of search to assess access to public transport. It is considered that the site is well located in relation to shops, community services and facilities.

4.12 The site has a good public transport and non-car mode links to a wide range of services and facilities as advocated by both national and local planning policies.

4.13 There is adequate capacity in the physical infrastructure to accommodate the development. In particular the access into the site can meet the standards of the highway authority, and the adjoining highways can accommodate the traffic generated by the development.

4.14 The site is not recorded by the Environment Agency to be subject to flooding and there are adequate water services and drainage capacity. The site has only limited biodiversity interest and this could be greatly enhanced.

PO2429



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



1 Attachment



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

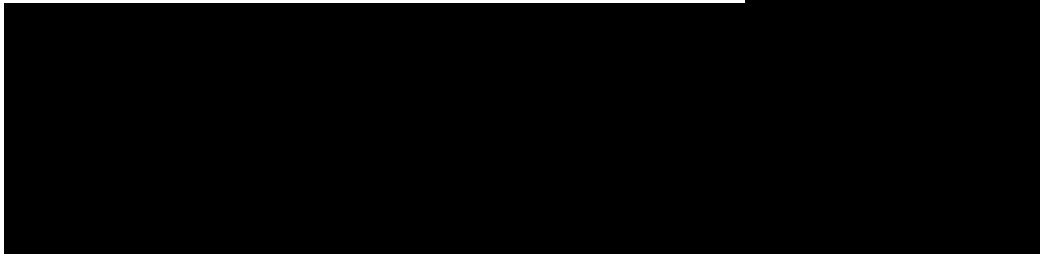
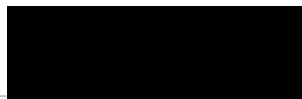
Dear Sir / Madam,

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

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

Kind regards

Ian Gilbert
Planning Associate



Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.32 With regard to the above, and in light of increasing difficulties facing the borough with regard to the affordability, it is considered that an additional uplift should be applied to the Council's housing requirement to boost the supply of housing to help meet affordable housing needs across the borough.

Supply

- 3.33 Our Client has a number of concerns in relation to the housing land supply identified within the Local Plan.

- 3.34 In the first instance, the Council has set out its supply within table 4.6 of the Local Plan in an unnecessarily confusing manner in which many of the identified sources of supply appear to relate to one and other with it being necessary to cross reference a number of footnotes to determine how elements of supply relate to one and other. We consider that it would be helpful for the Council to set out within the Local Plan the housing supply identified by completions, commitments and housing allocations.

- 3.35 Table 4.6 line o) refers to Site Allocation 15HA as forming part of the Green Belt Allocations for the Local Plan. It is not clear what allocation 15HA refers to.

- 3.36 Given the somewhat confusing nature of how the housing supply has been set out, it would be useful to be able to scrutinise the supply of housing sites that Council has identified. On analysis of the Appendices of the SHLAA 2017 it would be useful for the Council to set out when Sites with planning permission (Appendix 3) commenced development (or are proposed to commence), how quickly those Sites will be brought forward and how many units have been delivered prior to the commencement of the plan period.

- 3.37 The Council's Development Trajectory (Appendix 5 of SHLAA 2017) also lacks detail to be useful in scrutinising the deliverability of the housing land supply. The SHLAA relies heavily on brownfield sites coming forward between years 6-10 and 11-15 of the plan period albeit it is not clear what assumptions have been made to determine those Sites cannot start now but are likely to come forward after 6 or 10 years.

- 3.38 Equally, given the extent to which the Council's housing supply is predicated on larger housing allocations coming forward, we would expect the Local Plan to provide an updated schedule of sites proposed to be allocated including evidence of when those

Sites are expected to commence delivery and what assumptions have been made with regard to the phasing and delivery rates on those sites.

38

3.39 The above is particularly pertinent in relation to paragraph 4.18.18 of the Local Plan that notes the delivery of some sites allocated for development is predicated by the need to deliver specific infrastructure to serve the needs of development. Along with site compilation, infrastructure can be a particularly unpredictable barrier to development and it is essential that the Council makes clear the assumptions that it has based its housing trajectory on. This is particularly important on larger sites which the Council are likely to be more reliant on towards the middle and latter end of the plan period. We note the assumptions referenced at paragraph 4.18.19 of the Local Plan, however, we consider that those assumptions should be set out expressly for individual sites which the Council are relying on to deliver its housing trajectory.

39

40

3.40 With regard to the above uncertainty, and notwithstanding the allowance for non-delivery of SHLAA Sites and Green Belt sites, it is considered that the Council have not identified sufficient housing land supply to ensure a flexible and robust supply to meet the overall housing requirement identified. The current buffer of 361 units is inadequate and, to put it in context, is comparable to the 289 units that the Council are relying on coming forward on stalled sites.

41

3.41 Notwithstanding the overall level of supply identified, we also have concerns in relation to the Council's lack of site selection methodology and lack of meaningful distribution of housing amongst the Key Settlements. Paragraph 4.18.12 concludes that the site selection process has constrained the ability of the Local Plan to identify suitable sites in some key settlements. We consider that it is vital for the transparency of the plan that the Local Plan sets out a schedule of development which it seeks to allocate or see delivered within each of those key settlements. As set out earlier within these representations, where shortfalls are identified in key locations, it may be required to re-assess Green Belt Sites in relation to their contribution to the Green Belt relative to the severity of the shortfall of housing in those areas.

42

3.42 As set out later within these representations, we consider that our Client's Site is suitable for development as a previously developed Site within the Green Belt in a parcel of land that makes a negligible contribution to the Green Belt. The Council should add out Client's Site to its supply of housing land for the Plan Period as per previous iterations of the Local Plan.

43

PO2430



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



1 Attachment



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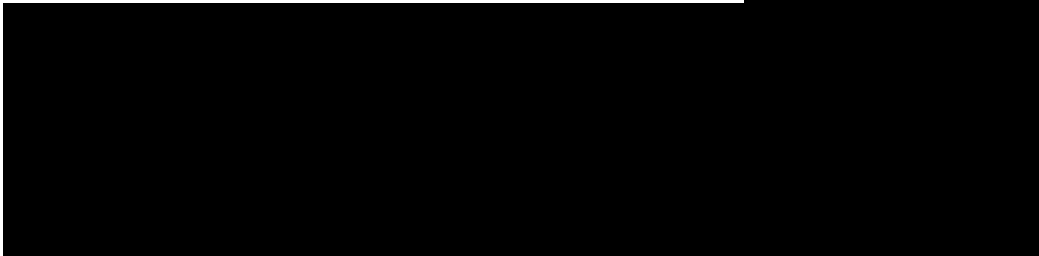
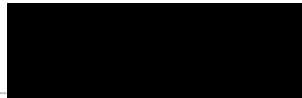
Dear Sir / Madam,

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

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

Kind regards

Ian Gilbert
Planning Associate



Representor Details

| | |
|----------------------|--|
| Web Reference Number | WF0114 |
| Type of Submission | Web submission |
| Full Name | Mr Adam Smith |
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

3.43 Density – Policy LPA05 seeks to introduce minimum densities of between 30 – 40 dph; depending on the location of development. We consider that densities should be applied on a site-by-site basis to reflect the character of the site and area, rather than being stipulated as a minimum requirement through policy. 44

3.44 Whilst we acknowledge that the Policy does allow for lesser densities in certain circumstances, the appropriate policy approach should simply to require that developments make the most efficient use of land whilst ensuring that development is of the highest quality.

3.45 Housing Delivery – We support the Council's pragmatic approach to monitoring the housing land supply as set out in Policy LPA05. This approach is intended to ensure that an adequate supply of housing comes forward within the Borough and a 5 year housing land supply is maintained. 45

3.46 We welcome the inclusion of this mechanism for the Council to undertake a partial or full review of the Local Plan in relation to the identification of additional sites. However, clarification is required as to what is meant by "**considered**" in relation to a partial or full review of the Plan and what constitutes "**significantly below the required level**". This will provide greater certainty to the developer or landowner in relation to the circumstances in which alternative sites will be considered for release. 46

Policy LPA08 – Infrastructure Delivery and Funding

3.47 Our Client understands the necessity for developer contributions to help secure on-site or off-site infrastructure provision where this is necessary to make development acceptable in planning terms. However, the wording of this policy needs to be clarified because it does not make sufficiently clear the circumstances in which certain contributions will be sought. 47

3.48 In the first instance, at Part 1 of the policy it is unclear what is meant by 'all forms of infrastructure' that are required to serve the needs of the local community. The Local Plan must be sure to ensure that developers are not required to provide contributions to resolve existing deficiencies or to meet aspirations of the existing communities. 48

3.49 Clearly there is a mechanism for the pooling of contributions for wider infrastructure delivery through CIL charging but, we understand, this is not something that the

PO2431



St Helens Local Plan - Presubmission consultation
John Fleming
to:
planningpolicy@sthelens.gov.uk
13/03/2019 10:13



2 Attachments



St Helens Local Plan - consultation form.pdf St Helens - Local Plan presubmission - GDL representations.pdf

St Helens Local Plan - Presubmission consultation

Please find attached the response of Gladman Developments to the above consultation.

I would be grateful if you could confirm receipt of this email and its contents.

Yours faithfully,

John Fleming



St.Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: Mr | Title: |
| First Name: John | First name: |
| Last Name: Fleming | Last Name: |
| Organisation/company: Gladman Developments | Organisation/company: |
| Address: Gladman House, Alexandria Way, Congleton | Address: |
| Postcode: CW12 1LB | Postcode: |
| | Tel No: |
| | Mobile No: |
| | Email: |

Signature: [Redacted]

Date:

13th March 2019

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

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

Yes ☐ (Via Email)No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Please see attached representations.

Please continue on a separate sheet if necessary

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Please see attached representations

Please continue on a separate sheet if necessary

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

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

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

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

Please see attached representations

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

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

St Helen's Local Plan
Pre- Submission Version
Gladman Representations



March 2019

terms of housing numbers) to respond to rapid change². The Council must be sure its assessment of housing needs is robust in these regards, by providing an evidence base document to accompany the submission of the Local Plan to ensure that the Plan's objectives as a whole are delivered.

- 4.4.4 Gladman is concerned that the annual housing requirement is only 18dpa higher than the 'baseline line'. It is vital that housing need is not under-estimated and that it is aligned with the economic aspirations of the Plan given the county's role to provide local residents and those from further afield access to the jobs market. It is important that the Plan does not seek to main the current 'status quo' but seeks to build positively on its current position and strengthen the economic viability of the area. 07

Local Plan Review

- 4.4.5 It is noted that should monitoring demonstrate housing land supply falls significantly below the required level, a partial or full review will be considered to bring forward additional sites. Whilst we support the inclusion of the review mechanism in principle, we are concerned that the definition of 'significantly below the required level' is rather ambiguous. Furthermore, should the Council fail to demonstrate a deliverable housing land supply then this policy only requires the local planning authority to 'consider' a review rather than requiring immediate action to address the shortfall. It is therefore essential to the soundness of the Plan that the review be carried out immediately should it become apparent through monitoring that the Council is not meeting its development needs. Gladman recommend that this policy is modified so that if monitoring reveals housing shortfall is occurring or if a request is made to assist a neighbouring authority to accommodate unmet housing needs then a review will be undertaken immediately. 08

4.5 Policy LPA5.1: Strategic Housing Sites

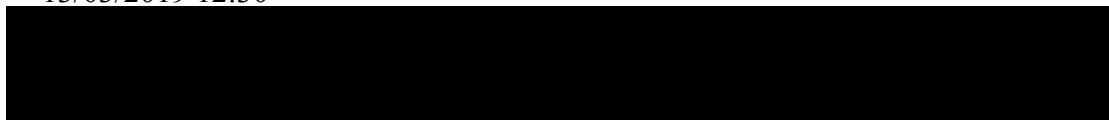
- 4.5.1 Although Gladman does not wish to comment on the proposed allocations, the Council will need to ensure that they have applied realistic assumptions around lead-in times and build-out rates for the allocations, especially given the level of infrastructure requirements associated with them. The Council should be especially 09

² Paragraph 11 a) NPPF (2019)

PO2432



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



5 Attachments



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



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



Weathercock Hill Farm_Ecological Statement(1.1).pdf



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

Dear Sir/Madam

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

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

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

Kind regards
 Sean

Sean McBride
 Persimmon Homes (North West)



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



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As part of our partnership with Team GB, we're **Building Futures**, giving away £1 million to the next generation of stars. [Find out more....](#)

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Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

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

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

Representations submitted on behalf of Persimmon Homes North West

March 2019



5.3 Para. 120 of the Framework sets out that planning policies and decisions need to reflect changes in the demand for land; where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in the plan, they should:-

- reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
- Support applications for alternative uses, where the proposed use would contribute to meeting an unmet need for development.

12

5.4 Paragraph 121 further states that Local Planning Authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help meet identified development needs, including the use of retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors.

5.5 Reuse of historic employment sites has been a constant source of housing land supply in St Helens in recent years, as evidenced by the Company's current sites at the former Vulcan Works and Deacon Trading Estate; it should be considered that such sites will continue to form part of the housing land supply in the Plan period.

Policy LPA05: Meeting St Helens Borough's Housing Needs

Housing Requirement

6.1 The Company acknowledges the Council seeking to adopt a housing requirement figure in accordance with the standard method figure, whilst having regard to economic growth projections in the Liverpool City Region Strategic Housing and Employment Land Market Assessment [SHELMA] and the St Helens Employment Land Needs Assessment [ELNA].

6.2 Of concern to the Company however is that the proposed annual requirement of 486 dpa represents a significant drop in housing requirement from the requirement identified within the Preferred Options Plan (2016) and also the currently adopted Core Strategy (2012) of 570 dpa – amounting to 1,680 homes across the plan period.

13

- 6.3 The Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) identifies an OAN range of 397 to 855 dpa for St Helens; the upper range being based on an economic growth scenario, which factors in planned/potential development and regeneration projects whilst the lower figure represents projected growth if economic growth remains stagnant.
- 6.4 It is considered that reducing the Council's currently adopted housing requirement fails to support Government's objective of 'significantly boosting the supply of homes' (para 59 of the Framework) and increasing housing delivery across the Country to 300,000 homes per annum.
- 6.5 The Framework is clear that the standard method figure is a minimum (para 60); PPG also confirming that an uplift to a housing requirement above standard method may be appropriate, where additional growth is likely to occur over the plan period (Ref: 2a-010-20180913).
- 6.6 PPG further sets out that 'where a strategic policy-making authority can demonstrate an alternative approach identifies a need higher than that identified using the standard method for assessing local housing need, the approach should be considered sound as it will have exceeded the minimum starting point (2a-015-20180913).
- 6.7 Notwithstanding, the Council's Strategic Housing Market Assessment Update 2019 [SHMA] sets out a range of economic growth scenarios, the emerging housing requirement being derived from scenario 2 (Development prioritisation) in the ELNA, which would require a housing OAN in the range of 504 - 514 dpa to support.
- 6.8 This OAN figure has been subject to further sensitivity tests (or options) based on different emerging employment allocations not coming forward in the Plan period, Option 3 reducing the OAN to 486 dpa.
- 6.9 The Company is not aware of any evidence to support the Council's assumptions that emerging employment allocations will not come forward in the Plan period, which would justify a housing requirement figure below the objectively assessed need set out in the

SHMA; nor would it seem sensible to allocate sites for development (employment or otherwise) which do not have realistic prospects of coming forward in the Plan period, unless acknowledging that they are safeguarded for development beyond the Plan period.

6.10 It is considered that setting a housing requirement on this basis is contrary to the Framework, which is clear that plans should be 'prepared positively, in a way that is aspirational but deliverable' (para 16).

13

6.11 We would encourage the Council to review its housing requirement and plan for a scale of housing which supports its economic growth aspirations, including delivery of those emerging employment allocations.

Density

6.12 The Company is generally supportive of paragraph 3 of Policy LPA05, which seeks to make efficient use of land, including those sites within or adjacent to key centres or well served by public transport connections.

6.13 We would however discourage adoption of a policy which seeks to place minimum density requirements on housing sites; as such policies fail to reflect individual sites' technical constraints or surrounding settlement context; and further fails to reflect market area or Companies' distinct product range and target market.

14

6.14 It is considered appropriate that density is determined throughout the pre-application and planning application process, informed by appropriate technical and design context.

Maintaining a sufficient housing land supply

6.15 The Company supports paragraph 4 of the policy, which seeks to ensure an adequate supply of housing throughout the Plan period, including a rolling 5 years supply of deliverable housing sites to meet identified needs; and makes provision for a partial or full plan review in the event that deliverable supply falls significantly below required levels.

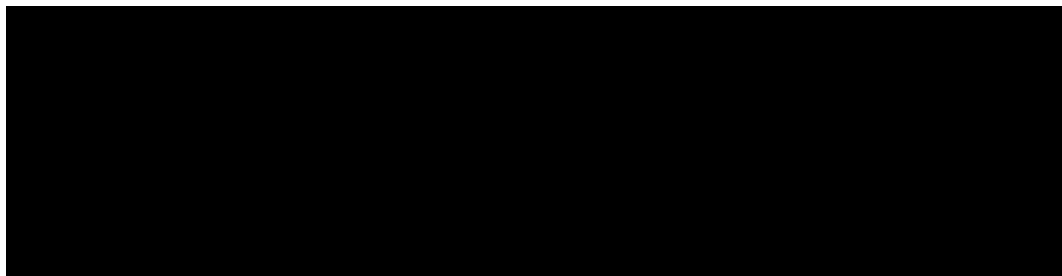
15

6.16 PPG is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period (Ref: 61-045-201809013); and Local Plans should be reviewed to assess whether they need updating at least once

PO2433



Local plan 2018 HA16 now 8HS
Kathryn Rigby
to:
planningpolicy
13/03/2019 12:38



----- Forwarded message -----

From: **Kathryn Rigby** [REDACTED]

Dear Sir/ Madam

My name is Kathryn Rigby and I object in the strongest terms to the proposals that the recently published submission Draft of the local plan 2020 - 2035 referring to the land originally known as HA16 now 8HS has now been reclassified as safeguarded which means removing it from the greenbelt status it holds, putting it in danger of being developed on. I again stand by my original letter, stating why I again strongly appose this submission.

My husband and I chose to live in a semi rural area, so we could enjoy the benefits of the countryside be it through Green belt Land.

We chose to live here under the belief that this would remain semi rural with the knowledge that Green Belt Land should be protected by the fact that derelict and brownfield land is developed upon first i.e (urban areas which are within the Green Belt).

As we are aware Green belt land can only be taken in those of very special circumstances, according to (NPPF) and as far as we are aware housing needs are not under that umbrella. Green Belt land is there to prevent urban sprawl, to prevent settlements merging into one, to preserve the environment and all its natural resources. With the proposed development how far will the urban sprawl stretch in this New Local Plan?. Once the Green belt is taken it is irreversible we cannot retrieve it, it would be sacrificing rich fertile agriculture land. What about the derelict and the brown land within the area, is that to remain undeveloped.

TRAFFIC AND SAFFETY

This area already suffers with traffic congestion, especially at rush hours, it is extremely busy, already a known hazard, not forgetting that this area is abustle with children going and leaving school. Windle Island has just been renovated to make it safer, which will no doubt be impeded upon by the inevitable great increase in local traffic, causing a major health and safety issue. There appears to be no direct route from the development site, to the East Lanes, and seeing that most of all the big amenities such as the supermarkets are in or near St Helens town centre, can only mean the surrounding narrow roads will see a vast increase in the movement of traffic.

Windle has no train station, and the bus service is less frequent than that of other areas.

PUBLIC SERVICES

Windle has a lack of Public Services, there isn't a GP's, a Dentist, residents already have to go out of the ward. The school's are over subscribed a fine example would be that of Bleakhill being forced to become 3 form entry in 2016.

HEALTH

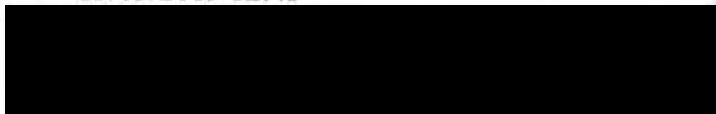
There will be an increase in air pollution, through congestion or waiting traffic, and of course with the increase of traffic, comes an increase of poor road surface.

Yours sincerely
Mrs Rigby
13 Lynton Way
Windle
St Helens
WA10 6EQ

PO2434



Local plan
Harry Platt
to:
planningpolicy
13/03/2019 12:43



I have some points to make about the St. Helens local plan:

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

01

Rainford Specific points (8HA Rookery Lane)

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

02

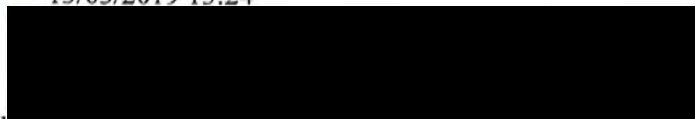
Regards
Harry Platt

111 Bushey Lane,
Rainford,
St helens,
WA11 7TE

PO2435



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



1 Attachment



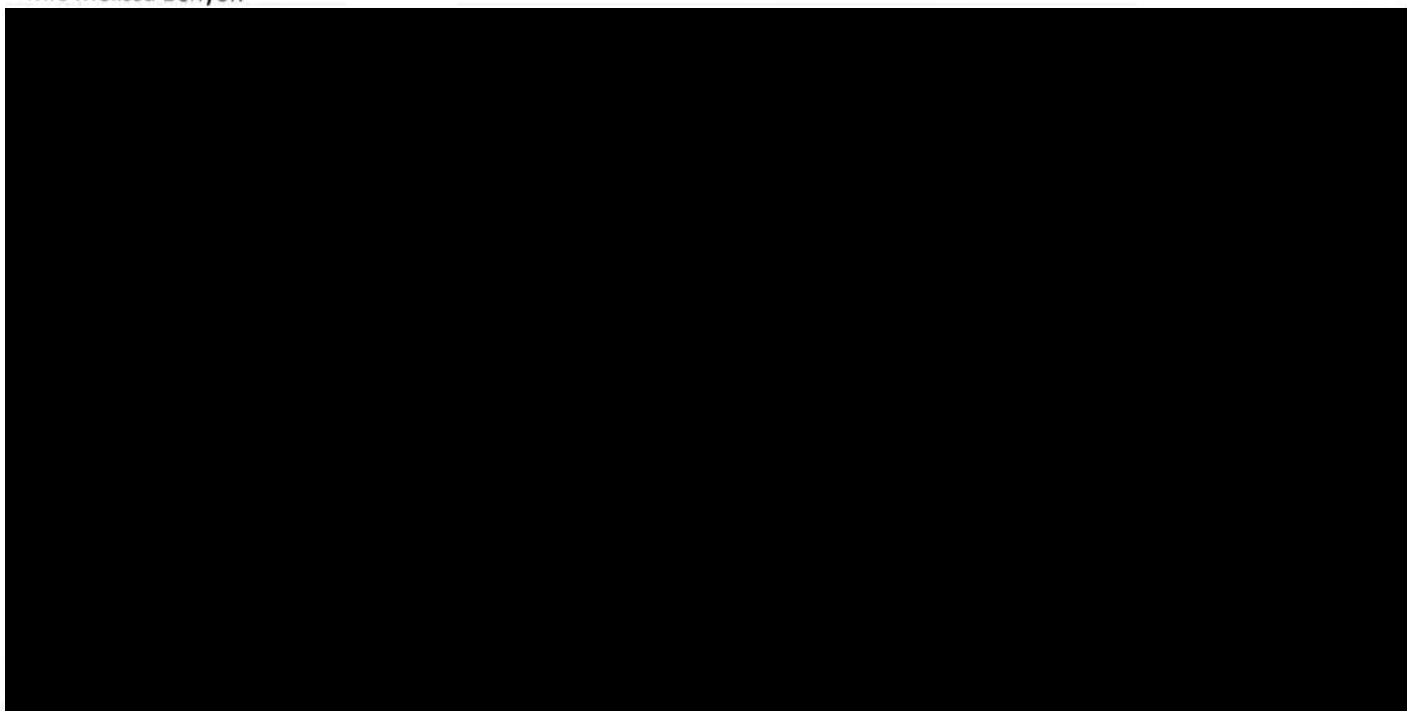
OBJECTION LETTER.docx

Dear Sirs

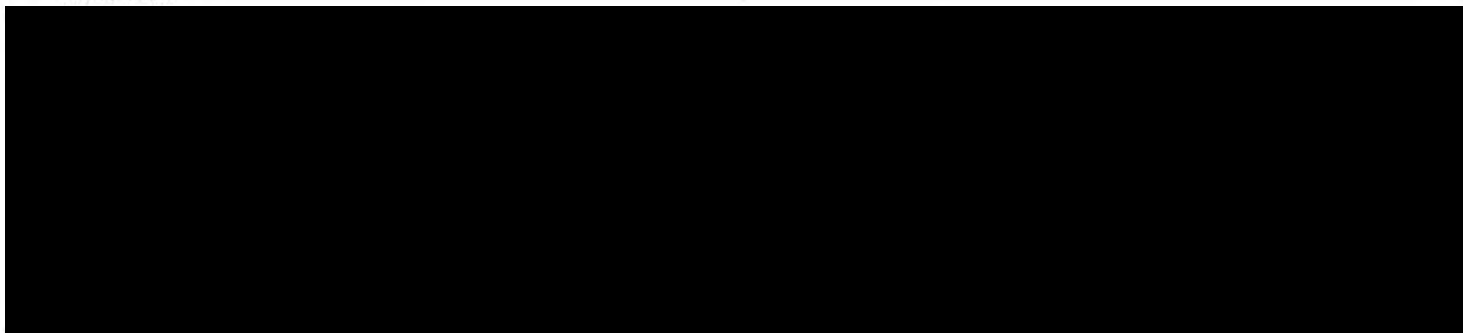
Please find attached my representation for the current Local Plan to development WA10 8HS 'Eccleston Vale'.

Kind regards

Mrs Melissa Benyon



Lancots Lane
Sutton Oak.
St Helens
UK
WA9 3EX



Melissa Benyon
9 Ecclesfield Road
Eccleston
St Helens
WA10 5LU

Reference: St Helens Local Plan

Dear Sirs,

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

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

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

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

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

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

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

A major concern I have with the scale of growth being aspired to within the Local Plan is the infrastructure required to support it, something that St Helens Council are simply not taking into consideration.

The Infrastructure Development Plan (IDP) documents the projects currently underway to attempt to alleviate problems faced today, but seems to lack any substance on what will be done to solve issues of the future that adoption of this plan will bring

07

The plan promotes unsustainable traffic growth, which will cause severe traffic issues that surely cannot satisfy the National Planning Policy Framework (NPPF). The traffic growth will be in the exact areas that the borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, etc. The IDP refers to some of these existing but does not detail how these problems will be solved or funded. It mentions a great deal about 'seeking' or contributions 'will be sought' but there are numerous TBC's and unknowns detailed within IDP.

08

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

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

09

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

The economic growth predictions for St Helens seem to be based on flawed historical data, which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document, it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on Hectares of Grade 1 farmland resulting in the loss of jobs.

10

11

In conclusion, the Local Plan in its current form when examined by the Planning Inspector cannot be considered justified, effective and consistent with National policy. Consequently, it must surely follow that it cannot be considered sound.

Kind regards

Yours faithfully

Melissa Benyon

PO2436



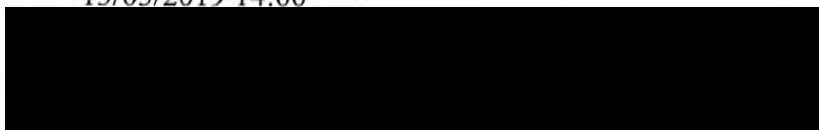
OBJECTION LETTER

Cathrine Benyon

to:

planningpolicy

13/03/2019 14:00



1 Attachment



OBJECTION LETTER.docx

Dear Sirs,

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

Regards,

Cath Benyon

Director

Aidapt Bathrooms Ltd

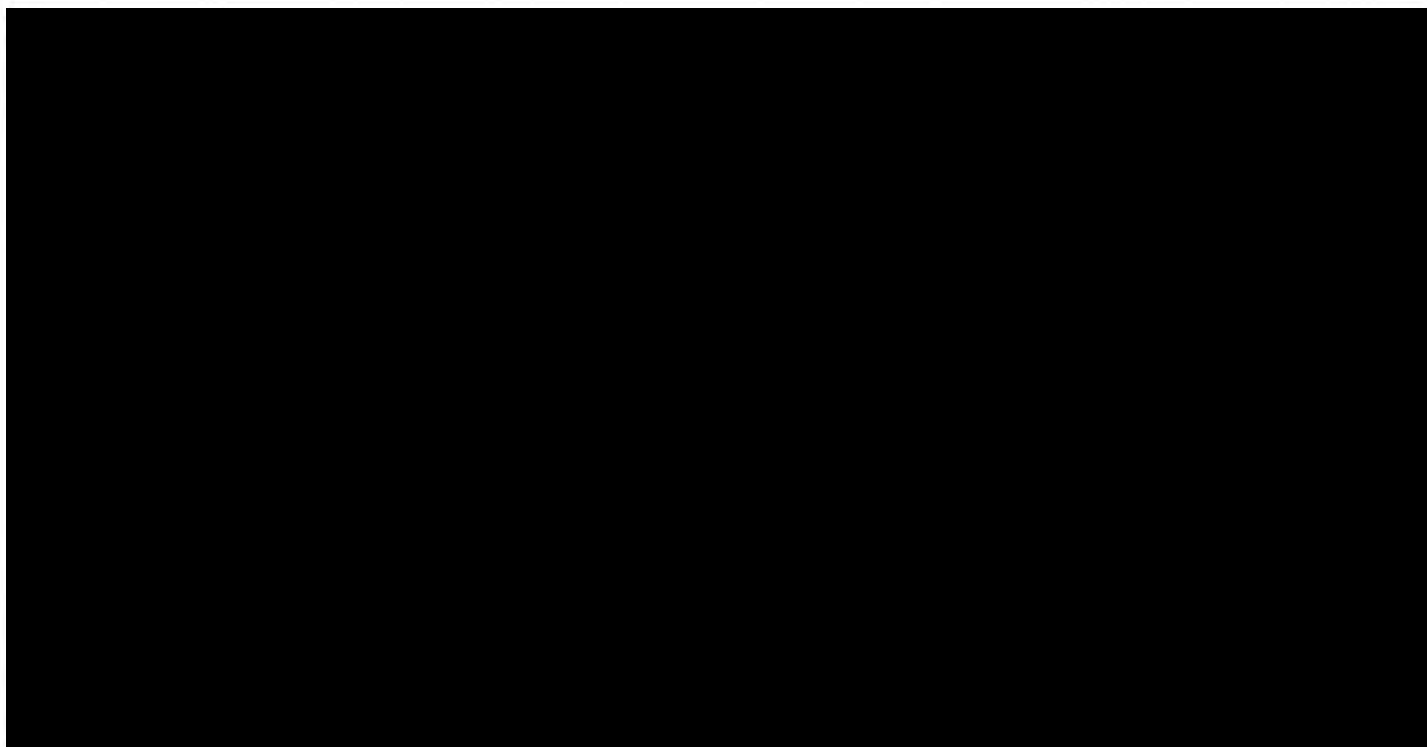
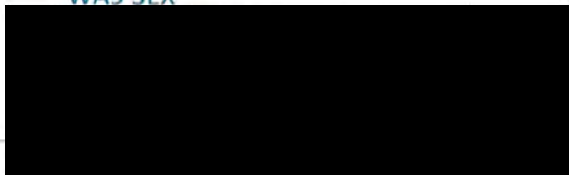
Lancots Lane

Sutton Oak

St Helens

Merseyside

WA9 3EX



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

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Kind regards

Yours faithfully

Catherine Hanwright

PO2437



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

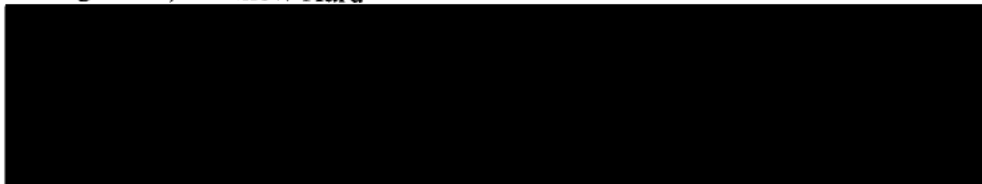
to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:02

Cc:

Doug Hann, Matthew Hard



3 Attachments



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

Dear Sir / Madam

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

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

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

Kind regards

Emer

Emer Cunningham | Planner



indigo.



RTPI Planning Consultancy of the Year 2017

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



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



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

EL 0200A 2.pdf

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

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

| | | | |
|--|--|---|--|
| 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public) | | | |
| | No, I do not wish to participate at the oral examination | ✓ | Yes, I wish to participate at the oral examination |

| | |
|--|--|
| 9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. | |
| <p>The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.</p> | |

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

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

St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

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

Policy LPA04: A Strong and Sustainable Economy

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

Policy LPA05: Meeting St Helens Borough's Housing Needs

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

- 4.18. St Helens has not consistently delivered sufficient housing to meet demand. The borough fell short of housing requirements in 2003/4 and 2006/7. More recent completion rates indicate that in 2013/14 and 2014/15 and 2015/16 there was an improvement but in the years 2016/17 and 2017/18 housing targets were not met.
- 4.19. The 2017 Strategic Housing Land Availability Assessment shows progress of housing delivery against the Core Strategy. This highlights that 1,324 homes have failed to be delivered between 2003 and 2017. 17
- 4.20. The housing requirement of 9,234 dwellings is therefore flawed as it will not resolve the shortfall in housing delivery against the Core Strategy. Notwithstanding increasing the requirement to reflect local and city-region growth objectives, as a minimum the requirement should increase to 10,558 in order to be based on sound evidence and to be positively prepared.
- 4.21. The expected housing supply is miscounted and there are several flaws in the Council's evidence, partly stemming from using a 2017 base-date and partly from errors in the counting. 18
- 4.22. We calculate that there is a need for a further 754 homes to be allocated for residential development within the plan period.
- 4.23. In Section 2 and Appendix 2 of this report, we set out a detailed analysis of the current housing supply which contains and supports our objection to this policy in its current form.
- 4.24. We do however support the description of the housing requirement as a 'minimum' figure in order to ensure that there is some flexibility in planned housing delivery and that housing needs, including for more affordable homes, are adequately addressed in the plan period. 19
- 4.25. We also support that the delivery of housing will be monitored annually over the Plan period as set out in Policy LPA05(4), and support that if delivery or current deliverable land supply falls substantially below the required level, the council will undertake a local plan review to bring forward additional sites such the Leyland Green Farm site (Site Ref. 1HS) under Policy LPA06. However, the plan needs a clearly defined timetable for a definitive local plan review. 20

Policy LPA05.1 Strategic Housing Sites

- 4.26. Policy LPA05.1 highlights the council's identification of other residential allocations in Policy LPA05 which are not large enough to warrant a "strategic" allocation. Although these sites will yield smaller numbers of homes compared to strategic sites, we support that their allocation will support the overall delivery of housing and will play a key part of the supply and balance out the phased delivery which will result from the large strategic housing sites. 21
- 4.27. Therefore, although it is not a strategic housing site, we support the removal of land south of Leyland Green Farm site (ie Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood) (Site Ref. 1HA) from the Green Belt and its proposed housing allocation for an indicative 216 dwellings. We support the council's strategy of delivering more housing in Garswood as the settlement can accommodate further growth. This proposed housing allocation forms a natural extension to the settlement of Garswood. 22
- 4.28. Policy LPA05.1(2) requires a planning application for development within a Strategic Housing site to be supported by a comprehensive masterplan covering the whole site. This is supported in principle but requirement to provide a Masterplan must form part of the planning application process and must not unduly delay grant of planning permission or delivery of development on an allocated site. 23
- 4.29. LPA05.1(2)(h) requires *"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"*. 24

PO2438

E0258



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

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

Site GBP-092-A

4 Attachments

L004- Land at St Helens Road - Reps to Submission Local Plan.pdf Appendix 3- Agricultural Land Report.pdf

Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

Appendix 4a- Interim Housing Needs Assessment.pdf

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

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

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



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



1 Attachment



Appendix 1- Delivery Statement.pdf

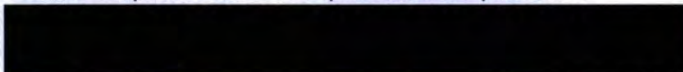
Email 2

Graham Lamb
Associate Planner

Pegasus Group

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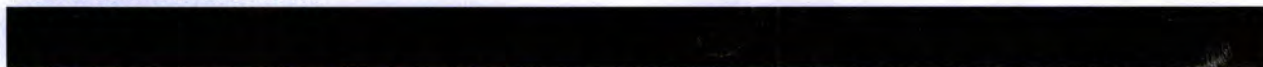
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From: Graham Lamb

Sent: 13 March 2019 17:01



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

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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



Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group

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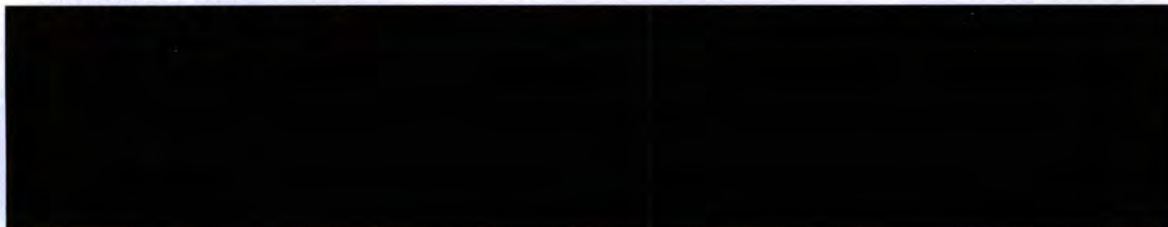
 <https://i.imgur.com/05aES4f.jpg>

 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>



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



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

Email 3

Graham Lamb
Associate Planner

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 Please consider the environment before printing this email message.

From: Graham Lamb

Sent: 13 March 2019 17:01

To: planningpolicy@sthelens.gov.uk

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

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group

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 <https://i.imgur.com/iHEt88g.jpg>

13 March 2019

Planning Policy Team
Development Plans Section
St Helens Council
Place Services
Town Hall Annexe
Victoria Square
St Helens
Merseyside
WA10 1HP

Sent via email to: planningpolicy@sthelens.gov.uk

Dear Sir/Madam,

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

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

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

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

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

The need to allocate additional sites

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

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

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

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

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

Yours sincerely,

Graham Lamb
Associate Planner

Encs.



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

**REPRESENTATION BY
REDROW HOMES NORTH WEST**

Date: 13th March 2019

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

Pegasus Group

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5. MEETING ST HELENS BOROUGH'S HOUSING NEEDS (POLICY LPA05)

- 5.1 This section assesses the proposed housing requirement and general policy provisions within policy LPA05, with further detailed analysis of the proposed allocations and implications on supply in the following sections.

Part 1 - Housing Requirement

- 5.2 Policy LPA05 identifies a net minimum housing requirement of 9,234 dwellings over the period 2016 to 2035, at an average rate of **486 dwellings per annum** (dpa). This marks a 15% decrease from the previous consultation version (Preferred Options-December 2016) which set a housing requirement of 10,830 over the period 2014 to 2033, a rate of 570 dpa.
- 5.3 This 486 dpa requirement is based on an economic scenario set out in the 2018 SHMA update (specifically 'Economic Scenario 2 with sensitivity Option 3'). This is a calculation of the number of dwellings required to support the job growth expected from the proposed employment sites in the plan (based on the Councils ELNA evidence).
- 5.4 So, this is an economic led figure, however it represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa. This figure is derived from the 2014 based household projections across the 10-year period 2019-2029 combined with 2018 affordability ratios and represents the most up to date position under current national guidance (as confirmed in updates to the NPPG on 20th February 2019).
- 5.5 The 570 dpa requirement from the previous Preferred Options plan, was based on a demographic baseline of 451 dpa set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA), with a significant uplift of 20% (90 dpa) to stabilise and increase the population, promote more housing choice and restore pre-recession housebuilding levels. A further uplift of 29 dpa (6.4%) was applied to account for future demolitions. This 570 dpa figure is also the adopted requirement within the St Helens Core Strategy (2012) and the preceding North West RSS (2008) which this was based on, and as such this requirement has been in place since the RSS period began in 2003.
- 5.6 At the outset, we must stress we are surprised and disappointed by this reduction in the requirement figure and are unsure how this represents a positively prepared plan, or how this will address the housing crisis and government ambition to increase the delivery of homes to 300,000 per annum by the mid-2020s.] ①
- 5.7 A critique of the proposed housing requirement and the wider demographic and economic context within St Helens is enclosed at **Appendix 7**.
- 5.8 It had been our intention to provide a detailed Housing Needs Assessment using the Chelmer model to put forward our own housing requirement figure; however, we have held off from doing this at the current time for the following reasons:

- The current uncertainty regarding the standard methodology, with MCHLG formally confirming on 18th February 2019 (and through subsequent updates to the NPPF and NPPG), that planners should revert to the 2014 housing projections whilst the government reviews the formula over the next 18 months; and
- Affordability ratios are due to be updated in April 2019, which will affect the standard methodology calculation and time-period for assessment (will change from 2018-2028 to 2019-2029).

5.9 Therefore, we believe that the position will have moved on by the time of the EIP in summer/autumn 2019 and reserve the right to provide a more comprehensive assessment at that stage. As such the document at **Appendix 7** comprises an interim contextual analysis of demographic and economic trends in St Helens.

5.10 Before looking at the findings of this analysis, we review the current national guidance on assessing housing need, and particularly the circumstances that might support an uplift from the standard methodology.

National Guidance on Housing Need

5.11 Paragraph 60 of the 2019 NPPF confirms that local plan submitted after 24th January 2019 should use the Governments Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.

5.12 However, Paragraph 11 also confirms that for plan-making, the presumption in favour of sustainable development means that:

- Plan should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
- Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

5.13 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. Many other considerations can impact on the final housing requirement figure set out in a Local Plan and this is evident within several paragraphs of the NPPG, including:

- 2a-002-20190220 - The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement.
- 2a-003-20190220 - The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).

- 2a-024-20190220 - The total need for affordable housing will need to be converted into annual flows...An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

5.14 Under the question 'When might it be appropriate to plan for a higher housing need figure than the standard method indicates?' the NPPG states the following (para 2a-010-20190220):

"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

5.15 Paragraph 2a-015-20190220 provides some useful clarification on how this 'exceptional circumstances' test will be applied at examination, confirming the logical assumption that exceptional circumstances are only required to justify a figure that's lower than the standard method:

"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and

that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."

- 5.16 Whilst St Helens are proposing an approach that exceeds the minimum requirement (by 3.8%), it is our strong view that this doesn't adequately reflect current and future demographic trends, and as such a far greater uplift is required, more in line with that proposed in the previous version of the plan and the adopted Core Strategy (570 dpa), for the reasons set out below.

Conclusions from Pegasus Housing Need Assessment

- 5.17 Our contextual analysis drew the following conclusions:

- That whilst St Helens is relatively affordable to live, the ratios have changed little over the last few years, suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to remain high in the long-term to address this issue and reducing the housing target to 486 dpa seems counter-productive to supporting inclusive growth in the Borough.
- Internal migration has been high in St Helens in recent years, indicating a level of demand for new housing in St Helens from people wanting to move into the area.
- St Helens has an ageing population and therefore needs to try and attract more people to live in the area from elsewhere to maintain its future labour supply and general socio-economic balance. A key way of doing this is to provide a sufficient supply of housing to attract new residents to the area.
- Job numbers in the Borough have been on a relatively strong upward trajectory over the last three years and further research is required to model what the implications of this will be for housing numbers. By not taking this issue into account, there is a real risk that the Local Plan as it stands is not giving full consideration to the economic growth potential and competitiveness of St Helens.

- 5.18 Furthermore, whilst the proposed requirement purports to be an economic led figure, it is clear from the supporting text in the 12th December Cabinet Report (paras 2.43 – 2.46) that the choice of this figure, and the reduction from 570 dpa was justified by (and therefore anchored to) the introduction of the standard methodology, rather than any change in the economic evidence:

"2.46 The figure of 486 dwellings per annum is substantially less than the figure of 570 dwellings per annum in the Preferred Options consultation document. This reduction is justified by the change of circumstances which has occurred since 2016, including the introduction of the national standard method, the new NPPF and related planning guidance, and the SHMA Update 2018. Whilst (for reasons stated above) it is not appropriate to rely on the standard method output of 468 dwellings per annum, there is now no robust evidential basis to continue with a figure as high as 570 dwellings per annum."

- 5.19 As such we suggest the Council continue to pursue the **570 dpa** figure to ensure that housing and economic aspirations are fully aligned, to allow St Helens to compete within the wider Liverpool City Region and the Cheshire and Warrington LEP Area.

Part 2 - Housing Supply

- 5.20 This part of the policy identifies the main sources of supply for the delivery of housing, including completions, sites with planning permissions, allocations, sites without permission in the 2017 SHLAA windfall sites and windfall sites, with the calculations set out in more detail in Tables 4.5 – 4.7.
- 5.21 Whilst we do not dispute this overall approach, we do provide a detailed critique of the proposed allocations within section 5 and the overall supply position in section 6.

Part 3 - Density

- 5.22 This policy suggests that new development should achieve minimum densities of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30 dph on sites in local centres, sites that are well served by bus or train services and in other urban areas. It also notes that 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 an area.
- 5.23 We support the need to encourage higher densities, particularly in the most accessible locations, in line with 2019 NPPF; however, it is our view that this policy would benefit from some additional flexibility, to take account local and site characteristics, market aspirations and viability in determining the appropriate density of the site and suggest that this part of the policy is reworded to reflect this. (11)

Part 4 - Monitoring and Supply

- 5.24 Redrow fully endorse the need to monitor housing delivery annually to ensure an ongoing supply (in accordance with the Housing Delivery Test and five-year supply requirements), and the acknowledgement that a partial or full Local Plan review will be considered to allocate safeguarded land sites for housing development where necessary.
- 5.25 However, we suggest that the wording is strengthened here, with clear triggers for when a review is required (i.e. what constitutes 'significantly' below the required level). (12)
- 5.26 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is a made a policy requirement.
- 5.27 In respect of housing an AMR, or equivalent document, should include the following as a minimum:

- Details of annual housing completions (both gross and net) with a list of contributing sites - to allow accurate monitoring of the Council's trajectory in Policy LPA05,
- Details of windfall/ small site delivery – for compliance with NPPF 10% small site requirement and to ensure projected windfall rate remains realistic (see section 7 for further analysis of this).
- Details of affordable completions – to monitor effectiveness of Policy LPC02.
- Proportion of delivery on brownfield/ greenfield sites – to monitor effectiveness of spatial strategy/ Policy LPA02 Part 2.

5.28 The Monitoring Framework at Appendix 4 of the Submission Plan does refer to several of these indicators and refers the Annual SHBC house completion survey as a data source, however as far as we are aware this is not publicly available, as such we would request that this is incorporated into the AMR.

5.29 Finally, in respect of Appendix 4 we would ask the Council to clarify the rationale for trigger in respect of safeguarded land (Policy LPA06) which states that if '10% or more of land safeguarded is granted planning consent, then they will consider an early review of the plan?'

PO2439



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

Email 1 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:05

① - LPA05

② - LPA02

③ - GBR

④ - S.A.

⑤ - S.O. 4.1

⑥ - S.O. 5.1

⑦ - LPA02 - PARA 3

⑧ - LPA02 - PARA 4

⑨ - LPA03

⑩ - LPA04

4 Attachments



Appendix 1-Site Location Plan-Redrow.pdf Appendix 2 Part 1-Delivery Statement-Redrow.pdf



Representation Form-Redrow-May 19.pdf R005v6 - Repts to Submission Local Plan-Redrow.pdf

Dear Sir/Madam,

We are instructed on behalf of our client, Redrow Homes North West, to submit the attached form and representation (R005) to the Local Plan Submission Draft Consultation. Redrow have land interests in relation to the Burrows Lane, Ecclestone site, which is discussed in detail in the attached representation.

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Site Location Plan (attached to this email)
- Appendix 2 - Delivery Statement (Part 1 attached to this email)
- Appendix 3 - Accessibility Statement
- Appendix 4 - Phase 1 Ecology Survey
- Appendix 5 - Agricultural Land Assessment
- Appendix 6 - Detailed Site Pro Forms
- Appendix 7 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 8 - Council's Housing Trajectory
- Appendix 9 - Pegasus Housing Trajectory
- Appendix 10 - Spatial Distribution of Sites

⑪ - LPA05 - PARA 3

⑫ - LPA05 - PARA 4

⑬ - APPENDIX 4

⑭ - TABLE 4.6

⑮ - LPA05.1

⑯ - LPA06

We will follow up this submission by sending a CD in the post which contains the entirety of Redrow's submission to the Local Plan consultation.

⑰ - LPC01

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

⑱ - LPC02

Many thanks and kind regards,

⑲ - LPC03 - PARA 4

⑳ - LPC07

㉑ - LPC02

㉒ - LPC03

㉓ - LPC04

㉔ - LPA07 - PARA 3d

㉕ - LPA07 - PARA 9

㉖ - LPC10

Rebecca Dennis

Principal Planner

Pegasus Group

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 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

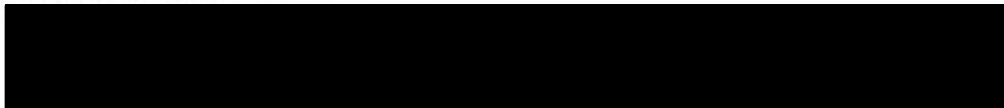
Email 2 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:06



3 Attachments



Appendix 2 Part 2-Delivery Statement-Redrow.pdf



Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

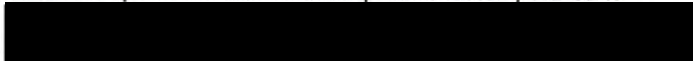
Rebecca Dennis

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<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-
Email 3 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:07



7 Attachments



Appendix 5-Agricultural Land Classification-Redrow.pdf Appendix 6-Detailed Site Pro Forma-Redrow.pdf



Appendix 8-Council's Housing Trajectory-Redrow.pdf



Appendix 9a-Pegasus Trajectory Best Case Scenario-Redrow.pdf



Appendix 9b-Pegasus Trajectory Worst Case Scenario 9b-Redrow.pdf



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



Appendix 7-Review of Employment-Led Local Plan Housing Requirement-Redrow.pdf

Email 3 of 4 of Redrow representations.

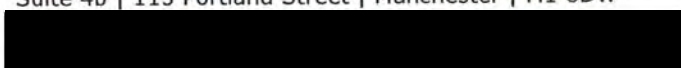
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<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHEt88g.jpg>



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-
Email 4 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:07



1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

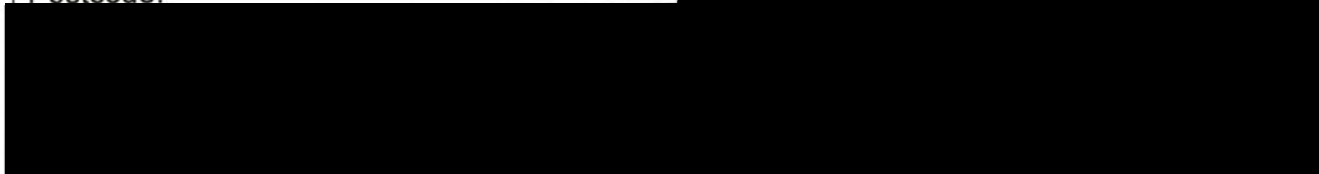
Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

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

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: | Title: Mr |
| First Name: | First name: Graham |
| Last Name: | Last Name: Lamb |
| Organisation/company: Redrow Homes North West | Organisation/company: Pegasus Group |
| Address: | Address: Suite 4b, 113 Portland Street, Manchester, |
| Postcode: | Postcode: M1 6DW |



| | |
|------------|-------|
| Signature: | Date: |
|------------|-------|

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

| | | | | | | | | | |
|--|-------|-----------------------------|--|--------------|--|--|--|--------------------------------|--|
| Policy | LPA05 | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

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

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

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

Please tick as appropriate

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

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

| | |
|----------------------------------|--------------------------|
| Positively Prepared? | X |
| Justified? | X |
| Effective? | X |
| 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

REDROW OBJECT TO THE REDUCED HOUSING REQUIREMENT FIGURE OF 486 DWELLINGS PER ANNUM, WHICH LEADS TO THE PLAN NOT BEING POSITIVELY PREPARED, JUSTIFIED OR EFFECTIVE.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this

relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

COUNCIL SHOULD REVERT TO PREVIOUS HOUSING FIGURE OF 570 DWELLINGS PER ANNUM. WE RESERVE THE RIGHT TO COMMENT ON THIS FURTHER AT LATER STAGE IN THE EXAMINATION PROCESS AND PRODUCE A DETAILED CHELMER MODEL.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

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

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

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

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

TO RAISE CONCERNS ABOUT SOUNDNESS OF PLAN AND TO RESERVE RIGHT TO PROVIDE DETAILED CHELMER MODEL ON HOUSING NUMBERS.

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

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



ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

Pegasus Group

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



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5. MEETING ST HELENS BOROUGH'S HOUSING NEEDS (POLICY LPA05)

- 5.1 This section assesses the proposed housing requirement and general policy provisions within policy LPA05, with further detailed analysis of the proposed allocations and implications on supply in the following sections.

Part 1 - Housing Requirement

- 5.2 Policy LPA05 identifies a net minimum housing requirement of 9,234 dwellings over the period 2016 to 2035, at an average rate of **486 dwellings per annum** (dpa). This marks a 15% decrease from the previous consultation version (Preferred Options–December 2016) which set a housing requirement of 10,830 over the period 2014 to 2033, a rate of 570 dpa.
- 5.3 The 570 dpa requirement from the previous Preferred Options plan, was based on a demographic baseline of 451 dpa set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA), with a significant uplift of 20% (90 dpa) to stabilise and increase the population, promote more housing choice and restore pre-recession housebuilding levels. A further uplift of 29 dpa (6.4%) was applied to account for future demolitions. This 570 dpa figure is also the adopted requirement within the St Helens Core Strategy (2012) and the preceding North West RSS (2008) which this was based on, and as such this requirement has been in place since the RSS period began in 2003.
- 5.4 The reduction in the requirement figure is both surprising and disappointing. It does not represent a positively prepared plan, and it is not clear how, if at all, restraining development to these levels will address the housing crisis and government ambition to increase the delivery of homes to 300,000 per annum by the mid-2020s.] ①
- 5.5 The 486 dwelling pa requirement represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa presented by the Council. This figure is derived from the 2014 based household projections across the 10-year period 2019-2029 combined with 2018 affordability ratios and, upon publication, represented the most up to date position under current national guidance (as confirmed in updates to the NPPG on 20th February 2019). It should be noted that since then the 2019 affordability ratios have been published, which for St Helens show slightly improving affordability (from 5.63 down to 5.33). For the 10-year period, this now generates a standard methodology figure of **461** dpa (so the uplift from the latest Standard Methodology is actually 5.4% but still modest overall).
- 5.6 As noted below, national guidance allows for upward additions to the standard methodology, noting that the standard method represents a minimum figure.
- 5.7 The Council's 486 dpa requirement is based on an economic scenario set out in the 2018 SHMA update (specifically 'Economic Scenario 2 with sensitivity Option 3'). As such, this is an economic led figure. In applying such an approach, it is therefore perfectly sensible and reasonable to

determine if the economic growth figures and assumptions used are credible and based on an objective assessment of economic growth within St Helens.

- 5.8 Critically, the Council's scenario is based on a calculation of the number of dwellings required to support the job growth expected from the proposed employment sites in the plan (based on the Council's ELNA evidence). It is one that is directly pinned to the Council's expectations on how quickly its employment sites will come forward. As such, it is a plan led, policy on approach rather than one that looks at objective evidence on economic growth.
- 5.9 A critique of the proposed housing requirement and the wider demographic and economic context within St Helens is enclosed at **Appendix 7**. Within the report, we provide an interim contextual analysis of demographic and economic trends in St Helens. We also consider alternative economic led scenarios in light of the Council's decision to follow an economic led approach in relation to their housing requirement for the Local Plan. In particular, we summarise the initial findings from a Chelmer modelling work which Cambridge Econometrics have undertaken on our behalf. However, a detailed Housing Needs Assessment using the Chelmer model has not been provided at this time pending clarification of the current uncertainty regarding the standard methodology (and/or the procedure for proposing a justified alternative) with MCHLG formally confirming on 18th February 2019 (and through subsequent updates to the NPPF and NPPG), that planners should revert to the 2014 housing projections whilst the government reviews the formula over the next 18 months. Therefore, we believe that the position will have moved on by the time of the EiP in late 2019, once plans submitted under the Revised NPPF start to be examined. As such, we reserve the right to provide a more comprehensive assessment at that stage.
- 5.10 Before looking at the findings of this analysis, we review the current national guidance on assessing housing need, and particularly the circumstances that might support an uplift from the standard methodology.

National Guidance on Housing Need

- 5.11 Paragraph 60 of the 2019 NPPF confirms that local plan submitted after 24th January 2019 should use the Governments Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.
- 5.12 However, Paragraph 11 also confirms that for plan-making, the presumption in favour of sustainable development means that:
- Plan should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
 - Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

5.13 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. Many other considerations can impact on the final housing requirement figure set out in a Local Plan and this is evident within several paragraphs of the NPPG, including:

- 2a-002-20190220 - The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement.
- 2a-003-20190220 - The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).
- 2a-024-20190220 - The total need for affordable housing will need to be converted into annual flows...An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

5.14 Under the question 'When might it be appropriate to plan for a higher housing need figure than the standard method indicates?' the NPPG states the following (para 2a-010-20190220):

"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

5.15 Paragraph 2a-015-20190220 provides some useful clarification on how this 'exceptional circumstances' test will be applied at examination, confirming the logical assumption that



exceptional circumstances are only required to justify a figure that's lower than the standard method:

"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."

- 5.16 Whilst St Helens are proposing an approach that exceeds the minimum requirement (by 3.8%), it is our strong view that this doesn't adequately reflect current and future demographic trends, and as such a far greater uplift is required, more in line with that proposed in the previous version of the plan and the adopted Core Strategy (570 dpa), for the reasons set out below.

Conclusions from Pegasus Housing Need Assessment

- 5.17 Our contextual analysis and initial modelling work drew the following conclusions:
- Whilst St Helens is a relatively affordable area to live in, the ratios have changed little over the last few years, suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to remain high in the long-term to address this issue. Reducing the housing target to 486 dpa is counter-productive and will not support inclusive growth in the Borough.
 - Internal migration has been high in St Helens in recent years, indicating a level of demand for new housing in St Helens from people wanting to move into the area.
 - St Helens has an ageing population and therefore needs to try to attract more people to live in the area from elsewhere. This is necessary to maintain its future labour supply and general socio- economic balance. A key way of doing this is to significantly boost the supply of housing to attract new residents to the area.
 - Job numbers in the Borough have been on a relatively strong upward trajectory over the last three years and further research is required to model what the implications of this will be for housing numbers. By not taking this issue into account, there is a real risk that the Local Plan as it stands is not giving full consideration to the economic growth potential and competitiveness of St Helens.
- 5.18 Furthermore, whilst the proposed requirement purports to be an economic led figure, it is clear from the supporting text in the 12th December Cabinet Report (paras 2.43 – 2.46) that the choice

of this figure, and the reduction from 570 dpa was justified by (and therefore anchored to) the introduction of the standard methodology, rather than any change in the economic evidence:

"2.46 The figure of 486 dwellings per annum is substantially less than the figure of 570 dwellings per annum in the Preferred Options consultation document. This reduction is justified by the change of circumstances which has occurred since 2016, including the introduction of the national standard method, the new NPPF and related planning guidance, and the SHMA Update 2018. Whilst (for reasons stated above) it is not appropriate to rely on the standard method output of 468 dwellings per annum, there is now no robust evidential basis to continue with a figure as high as 570 dwellings per annum."

- 5.19 It is also pertinent that the various employment scenarios put forward in the January 2019 SHMA Update which led to the selection of the 486 dpa figure are all based on meeting the level of economic growth proposed in the plan (i.e. to support the jobs on proposed employment sites); rather than actual projected economic growth for St Helens. As such, these scenarios are plan led and constrained rather than based on credible economic growth projections.
- 5.20 The latest evidence currently before the Council that considered projected growth (i.e. unconstrained) economic growth is within the January 2017 Liverpool City Region SHELMA, based on growth rates provided by the Liverpool LEP. This suggested that a dwelling requirement of 855 dpa would be required to support the level of jobs growth expected over the study period, representing a significant uplift from that proposed in the current plan. Even then, as set out in **Appendix 7**, utilising the Chelmer Model we have been able to ascertain that the economic activity rates used in the SHELMA and Council's SHMA are overly optimistic and an unrealistic basis to determine future dwelling requirements based on an employment led / economic growth. Indeed, our initial modelling suggests a requirement of over 1,000 new homes would be required to achieve the jobs increase outlined in the economic growth scenario of the SHELMA (as opposed to 855).
- 5.21 Whilst we acknowledge that a housing target of the scale set out above could be compounded by wider market and deliverability issues in St Helens (noting that they are far greater than levels of delivery previously achieved in the Borough), this does indicate that the proposed figure of 486 dwellings per annum will fall way short of any economic led projections and associated housing requirement. Indeed, the initial modelling work carried out through the Chelmer model indicates that the Council's housing strategy would only result in an increase of 167 jobs per annum. Coupled with the low housing requirement set within the Local Plan, this is simply not ambitious enough nor does it correlate with recent jobs growth in St Helens.
- 5.22 In light of the above and analysis provided at **Appendix 7**, we suggest the Council should continue to pursue the **570 dpa** figure as a bare minimum with the need for an immediate review of the Plan. This figure is consistent with the previous iteration of the emerging Local Plan and allowed for in the adopted Core Strategy and RSS prior to that.

- 5.23 As such, a minimum target of 570 dpa represents a perfectly reasonable alternative for the Local Plan and associated Sustainability Appraisal to assess. It would allow housing and economic aspirations to become more aligned, deliver more economic growth and help to stem rising house prices beyond an unaffordable ratio for many of St Helen's residents. Indeed, the very purpose of the Standard Methodology was to deliver more housing than achieved before (not less) to achieve greater levels of affordability. To adopt a figure of 486 dpa represents a significant backwards step for St Helens and would not assist in this wider objective and would lead to negative social and economic consequences compared to a development plan based on a requirement for 570 dpa.

Part 2 - Housing Supply

- 5.24 This part of the policy identifies the main sources of supply for the delivery of housing, including completions, sites with planning permissions, allocations, sites without permission in the 2017 SHLAA windfall sites and windfall sites, with the calculations set out in more detail in Tables 4.5 – 4.7.
- 5.25 Whilst we do not dispute this overall approach, we do provide a detailed critique of the proposed allocations within Section 5 and the overall supply position in Section 6.

Part 3 - Density

- 5.26 This policy suggests that new development should achieve minimum densities of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30 dph on sites in local centres, sites that are well served by bus or train services and in other urban areas. It also notes that 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 an area.
- 5.27 We support the need to encourage higher densities, particularly in the most accessible locations, in line with 2019 NPPF; however, it is our view that this policy would benefit from some additional flexibility, to take account local and site characteristics, market aspirations and viability in determining the appropriate density of the site and suggest that this part of the policy is reworded to reflect this.] 11

Part 4 - Monitoring and Supply

- 5.28 Redrow fully endorse the need to monitor housing delivery annually to ensure an ongoing supply (in accordance with the Housing Delivery Test and five-year supply requirements), and the acknowledgement that a partial or full Local Plan review will be considered to allocate safeguarded land sites for housing development where necessary.
- 5.29 However, we suggest that the wording is strengthened here, with clear triggers for when a review is required (i.e. what constitutes 'significantly' below the required level).] 12

- 5.30 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is a made a policy requirement.
- 5.31 In respect of housing an AMR, or equivalent document, should include the following as a minimum:
- Details of annual housing completions (both gross and net) with a list of contributing sites - to allow accurate monitoring of the Council's trajectory in Policy LPA05,
 - Details of windfall/ small site delivery - for compliance with NPPF 10% small site requirement and to ensure projected windfall rate remains realistic (see section 7 for further analysis of this).
 - Details of affordable completions - to monitor effectiveness of Policy LPC02.
 - Proportion of delivery on brownfield/ greenfield sites - to monitor effectiveness of spatial strategy/ Policy LPA02 Part 2.
- 5.32 The Monitoring Framework at Appendix 4 of the Submission Plan does refer to several of these indicators and refers the Annual SHBC house completion survey as a data source, however as far as we are aware this is not publicly available, as such we would request that this is incorporated into the AMR.
- 5.33 Finally, in respect of Appendix 4 we would ask the Council to clarify the rationale for trigger in respect of safeguarded land (Policy LPA06) which states that if '10% or more of land safeguarded is granted planning consent, then they will consider an early review of the plan?'. 13

PO2440

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ELO290B.1.pdf



Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8
Rebecca Dennis

to:
planningpolicy@sthelens.gov.uk
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① LPA05

② LPA02

③ GBR

④ SA

⑤ S.O.4.1

⑥ S.O.5.1

⑦ LPA02-PARA 3

3 Attachments



Representation Form-Wallace-May 19.pdf R001v7- Reps to Submission Local Plan-Wallace.pdf



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑧ LPA02-PARA 4

⑨ LPA03

⑩ LPA04

⑪ LPA05-PARA 3

Dear Sir/Madam,

We are instructed on behalf of our client, Wallace Land Investments, to submit the attached form and representation (R001) to the Local Plan Submission Draft Consultation. Wallace have land interests in relation to the Mill Lane, Rainhill site, which is discussed in detail in the attached representation.

⑫ LPA05-PARA 4

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Illustrative Masterplan (attached to this email)
- Appendix 2 - Previously Submitted Documents and Technical Information
- Appendix 3 - Additional Technical Documents (May 2019)
- Appendix 4 - Detailed Site Pro Formas
- Appendix 5 - Council's Stage 3 Green Belt Assessment of Mill Lane Site
- Appendix 6 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 7 - Council's Housing Trajectory
- Appendix 8 - Pegasus Housing Trajectory
- Appendix 9 - Spatial Distribution of Sites

⑬ APPENDIX 4

⑭ LPA05-TABLE 4.6

⑮ LPA05.1

⑯ LPA06

⑰ LPC01

We will follow up this submission by sending a CD in the post which contains the entirety of Wallace's submission to the Local Plan consultation.

⑱ LPC02

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

⑲ LPC04

⑳ LPC03-PARA 4

㉑ LPA07-PARA 3c

㉒ LPA07

㉓ LPA07-PARA 9

㉔ LPA02

㉕ LPC10

㉖ LPA03

Many thanks and kind regards,

Rebecca Dennis
Principal Planner

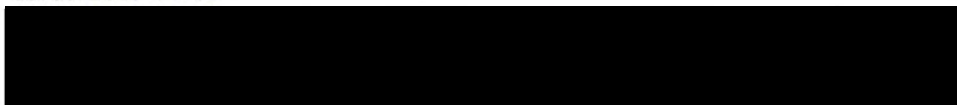
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Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8
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4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

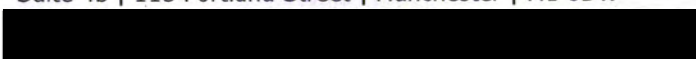
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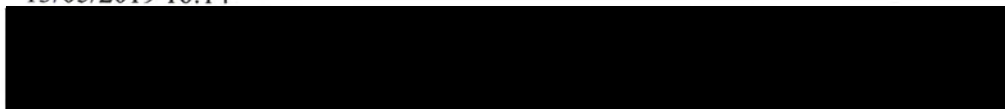
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1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

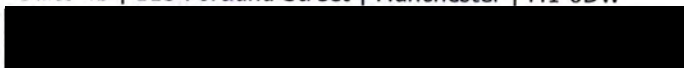
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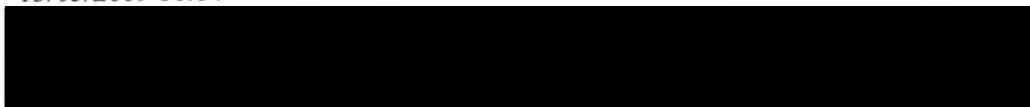
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2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

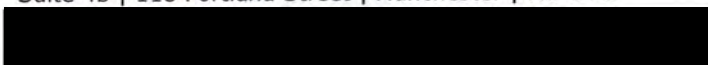
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Principal Planner

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mailto:rebecca.dennis@pegasusgroup.co.uk

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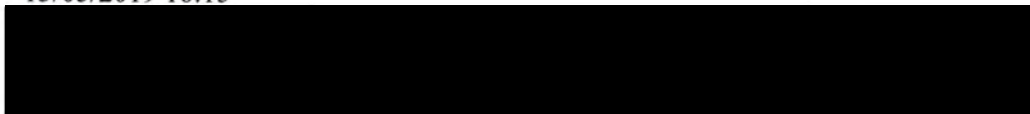
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Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

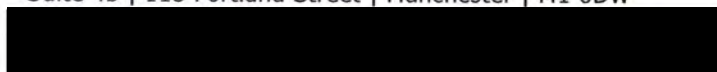
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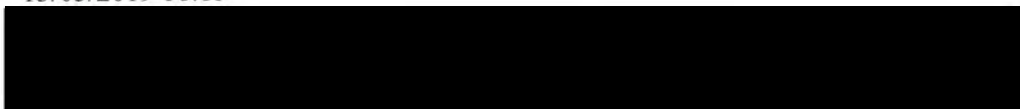
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Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

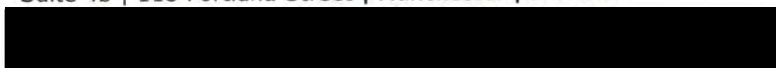
Email 6 of 8 of Wallace representations.

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7 Attachments



Appendix 4-Detailed Site Pro Formas-Wallace.pdf Appendix 5-Council's Stage 3 Green Belt Assessment-Wallace.pdf



Appendix 7-Council's Housing Trajectory-Wallace.pdf



Appendix 8b-Pegasus Trajectory Worst Case Scenario-Wallace.pdf



Appendix 8c-Summary Supply Trajectory-Wallace.pdf



Appendix 8a-Pegasus trajectory Best Case Scenario-Wallace.pdf



Appendix 6-Review of Employment-Led Local Plan Housing Requirement-Wallace.pdf

Email 7 of 8 of Wallace representations.

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Appendix 9-Spatial Distribution of Sites-Wallace.pdf

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St.Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

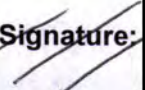
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: | Title: Mr |
| First Name: | First name: Sebastian |
| Last Name: | Last Name: Tibenham |
| Organisation/company: Wallace Land Investments (c/o Agent) | Organisation/company: Pegasus Group |
| Address: | Address: Suite 4b, 113 Portland Street, Manchester |
| Postcode: | Postcode: M1 6DW |



| | |
|--|--|
| Signature:  | Date: 13/05/2019 |
|--|--|

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

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

Yes ☒ (Via Email)

No ☐

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

RETURN DETAILS

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

post to:

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Town Hall
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St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

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

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

FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

| | |
|--|--|
| 6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u> | |
| If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments | |
| <p>WE OBJECT TO THE REDUCED HOUSING REQUIREMENT FIGURE OF 486 DWELLINGS PER ANNUM, WHICH LEADS TO THE PLAN NOT BEING POSITIVELY PREPARED, JUSTIFIED OR EFFECTIVE.</p> <p>PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.</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.

COUNCIL SHOULD REVERT TO PREVIOUS HOUSING FIGURE OF 570 DWELLINGS PER ANNUM. WE RESERVE THE RIGHT TO COMMENT ON THIS FURTHER AT LATER STAGE IN THE EXAMINATION PROCESS AND PRODUCE A DETAILED CHELMER MODEL.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

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

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

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

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

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

TO RAISE CONCERNS ABOUT SOUNDNESS OF PLAN AND TO RESERVE RIGHT TO PROVIDE DETAILED CHELMER MODEL ON HOUSING NUMBERS.

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

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

Please keep a copy for future reference.



ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY WALLACE LAND INVESTMENTS

Date: 13th May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

Pegasus Group

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

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5. MEETING ST HELENS BOROUGH'S HOUSING NEEDS (POLICY LPA05)

- 5.1 This section assesses the proposed housing requirement and general policy provisions within Policy LPA05, with further detailed analysis of the proposed allocations and implications on supply in the following sections.

Part 1 - Housing Requirement

- 5.2 Policy LPA05 identifies a net minimum housing requirement of 9,234 dwellings over the period 2016 to 2035, at an average rate of **486 dwellings per annum** (dpa). This marks a 15% decrease from the previous consultation version (Preferred Options–December 2016) which set a housing requirement of 10,830 over the period 2014 to 2033, a rate of 570 dpa.
- 5.3 The 570 dpa requirement from the previous Preferred Options plan, was based on a demographic baseline of 451 dpa set out in the 2016 Mid-Mersey Strategic Housing Market Assessment (2016 SHMA), with a significant uplift of 20% (90 dpa) to stabilise and increase the population, promote more housing choice and restore pre-recession housebuilding levels. A further uplift of 29 dpa (6.4%) was applied to account for future demolitions. This 570 dpa figure is also the adopted requirement within the St Helens Core Strategy (2012) and the preceding North West RSS (2008) which this was based on, and as such this requirement has been in place since the RSS period began in 2003.
- 5.4 The reduction in the requirement figure is both surprising and disappointing. It does not represent a positively prepared plan, and it is not clear how, if at all, restraining development to these levels will address the housing crisis and government ambition to increase the delivery of homes to 300,000 per annum by the mid-2020s.
- 5.5 The 486 dwelling pa requirement represents a modest uplift of just 18 dpa (3.8%) from the standard methodology figure of 468 dpa presented by the Council. This figure is derived from the 2014 based household projections across the 10-year period 2019-2029 combined with 2018 affordability ratios and, upon publication, represented the most up to date position under current national guidance (as confirmed in updates to the NPPG on 20th February 2019). It should be noted that since then the 2019 affordability ratios have been published, which for St Helens show slightly improving affordability (from 5.63 down to 5.33). For the 10-year period, this now generates a standard methodology figure of **461** dpa (so the uplift from the latest Standard Methodology is actually 5.4% but still modest overall).
- 5.6 As noted below, national guidance allows for upward additions to the standard methodology, noting that the standard method represents a minimum figure.
- 5.7 The Council's 486 dpa requirement is based on an economic scenario set out in the 2018 SHMA update (specifically 'Economic Scenario 2 with sensitivity Option 3'). As such, this is an economic led figure. In applying such an approach, it is therefore perfectly sensible and reasonable to

determine if the economic growth figures and assumptions used are credible and based on an objective assessment of economic growth within St Helens.

- 5.8 Critically, the Council's scenario is based on a calculation of the number of dwellings required to support the job growth expected from the proposed employment sites in the plan (based on the Council's ELNA evidence). It is directly pinned to the Council's expectations as to how quickly its employment sites will come forward. As such, it is a plan led, policy on approach rather than one that looks at objective evidence on economic growth.
- 5.9 A critique of the proposed housing requirement and the wider demographic and economic context within St Helens is enclosed at **Appendix 6**. Within the report, we provide an interim contextual analysis of demographic and economic trends in St Helens. We also consider alternative economic led scenarios in light of the Council's decision to follow an economic led approach in relation to their housing requirement for the Local Plan. In particular, we summarise the initial findings from Chelmer modelling work which Cambridge Econometrics have undertaken on our behalf. However, a detailed Housing Needs Assessment using the Chelmer model has not been provided at this time pending clarification of the current uncertainty regarding the standard methodology (and/or the procedure for proposing a justified alternative), with MCHLG formally confirming on 18th February 2019 (and through subsequent updates to the NPPF and NPPG), that planners should revert to the 2014 housing projections whilst the government reviews the formula over the next 18 months. We believe that the position will have moved on by the time of the EiP in late 2019, once plans submitted under the Revised NPPF start to be examined. As such, we reserve the right to provide a more comprehensive assessment at that stage.
- 5.10 Before looking at the findings of this analysis, we review the current national guidance on assessing housing need, and particularly the circumstances that might support an uplift from the standard methodology.

National Guidance on Housing Need

- 5.11 Paragraph 60 of the 2019 NPPF confirms that local plans submitted after 24th January 2019 should use the Government's Standard Method for calculating housing need, unless exceptional circumstances justify an alternative approach.
- 5.12 However, Paragraph 11 also confirms that for plan-making, the presumption in favour of sustainable development means that:
- Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
 - Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

5.13 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. Many other considerations can impact on the final housing requirement figure set out in a Local Plan and this is evident within several paragraphs of the NPPG, including:

- 2a-002-20190220 - The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement.
- 2a-003-20190220 - The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).
- 2a-024-20190220 - The total need for affordable housing will need to be converted into annual flows...An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

5.14 Under the question 'When might it be appropriate to plan for a higher housing need figure than the standard method indicates?' the NPPG states the following (para 2a-010-20190220):

"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

5.15 Paragraph 2a-015-20190220 provides some useful clarification on how this 'exceptional circumstances' test will be applied at examination, confirming the logical assumption that

exceptional circumstances are only required to justify a figure that is lower than the standard method:

"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."

- 5.16 Whilst St Helens are proposing an approach that exceeds the minimum requirement (by 3.8%), it is our view that this does not adequately reflect current and future demographic trends, and as such a far greater uplift is required, more in line with that proposed in the previous version of the plan and the adopted Core Strategy (570 dpa). The reasons for this are set out below. ①

Conclusions from Pegasus Housing Need Assessment

- 5.17 Our contextual analysis and initial modelling work drew the following conclusions:

- Whilst St Helens is a relatively affordable area to live in, the ratios have changed little over the last few years, suggesting that the housing ladder remains out of reach for a substantial part of the local population. Build rates will therefore need to remain high in the long-term to address this issue. Reducing the housing target to 486 dpa is counter-productive and will not support inclusive growth in the Borough.
- Internal migration has been high in St Helens in recent years, indicating a level of demand for new housing in St Helens from people wanting to move into the area.
- St Helens has an ageing population and therefore needs to try to attract more people to live in the area from elsewhere. This is necessary to maintain its future labour supply and general socio- economic balance. A key way of doing this is to significantly boost the supply of housing to attract new residents to the area.
- Job numbers in the Borough have been on a relatively strong upward trajectory over the last three years and further research is required to model what the implications of this will be for housing numbers. By not taking this issue into account, there is a real risk that the Local Plan as it stands is not giving full consideration to the economic growth potential and competitiveness of St Helens.

- 5.18 Furthermore, whilst the proposed requirement purports to be an economic led figure, it is clear from the supporting text in the 12th December Cabinet Report (paras 2.43 – 2.46) that the choice

of this figure, and the reduction from 570 dpa was justified by (and therefore anchored to) the introduction of the standard methodology, rather than any change in the economic evidence:

"2.46 The figure of 486 dwellings per annum is substantially less than the figure of 570 dwellings per annum in the Preferred Options consultation document. This reduction is justified by the change of circumstances which has occurred since 2016, including the introduction of the national standard method, the new NPPF and related planning guidance, and the SHMA Update 2018. Whilst (for reasons stated above) it is not appropriate to rely on the standard method output of 468 dwellings per annum, there is now no robust evidential basis to continue with a figure as high as 570 dwellings per annum."

- 5.19 It is also pertinent that the various employment scenarios put forward in the January 2019 SHMA Update which led to the selection of the 486 dpa figure are all based on meeting the level of economic growth proposed in the plan (i.e. to support the jobs on proposed employment sites); rather than actual projected economic growth for St Helens. As such, these scenarios are plan led and constrained rather than based on credible economic growth projections.
- 5.20 The latest evidence currently before the Council that considered projected growth (i.e. unconstrained) economic growth is within the January 2017 Liverpool City Region SHELMA, based on growth rates provided by the Liverpool LEP. This suggested that a dwelling requirement of 855 dpa would be required to support the level of jobs growth expected over the study period, representing a significant uplift from that proposed in the current plan. Even then, as set out in **Appendix 6**, utilising the Chelmer Model we have been able to ascertain that the economic activity rates used in the SHELMA and Council's SHMA are overly optimistic and an unrealistic basis to determine future dwelling requirements based on an employment led / economic growth. Indeed, our initial modelling suggests a requirement of over 1,000 new homes would be required to achieve the jobs increase outlined in the economic growth scenario of the SHELMA (as opposed to 855).
- 5.21 Whilst we acknowledge that a housing target of the scale set out above could be compounded by wider market and deliverability issues in St Helens (noting that they are far greater than levels of delivery previously achieved in the Borough), this does indicate that the proposed figure of 486 dwellings per annum will fall way short of any economic led projections and associated housing requirement. Indeed, the initial modelling work carried out through the Chelmer model indicates that the Council's housing strategy would only result in an increase of 167 jobs per annum. Coupled with the low housing requirement set within the Local Plan, this is simply not ambitious enough nor does it correlate with recent jobs growth in St Helens.
- 5.22 In light of the above and analysis provided at **Appendix 6**, we suggest the Council should continue to pursue the **570 dpa** figure as a bare minimum with the need for an immediate review of the Plan. This figure is consistent with the previous iteration of the emerging Local Plan and allowed for in the adopted Core Strategy and RSS prior to that.

- 5.23 As such, a minimum target of 570 dpa represents a perfectly reasonable alternative for the Local Plan and associated Sustainability Appraisal to assess. It would allow housing and economic aspirations to become more aligned, deliver more economic growth and help to stem rising house prices beyond an unaffordable ratio for many of St Helen's residents. Indeed, the very purpose of the Standard Methodology was to deliver more housing than achieved before (not less) to achieve greater levels of affordability. To adopt a figure of 486 dpa represents a significant backwards step for St Helens and would not assist in this wider objective and would lead to negative social and economic consequences compared to a development plan based on a requirement for 570 dpa.

Part 2 - Housing Supply

- 5.24 This part of the policy identifies the main sources of supply for the delivery of housing, including completions, sites with planning permissions, allocations, sites without permission in the 2017 SHLAA windfall sites and windfall sites, with the calculations set out in more detail in Tables 4.5 – 4.7.
- 5.25 Whilst we do not dispute this overall approach, we do provide a detailed critique of the proposed allocations within section 5 and the overall supply position in section 6.

Part 3 - Density

- 5.26 This policy suggests that new development should achieve minimum densities of 40 dwellings per hectare (dph) on sites within or adjacent to St Helens or Earlestown town centres and at least 30 dph on sites in local centres, sites that are well served by bus or train services and in other urban areas. It also notes that 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 an area.
- 5.27 We support the need to encourage higher densities, particularly in the most accessible locations, in line with 2019 NPPF; however, it is our view that this policy would benefit from some additional flexibility, to take account of local and site characteristics, market aspirations and viability in determining the appropriate density of the site and suggest that this part of the policy is reworded to reflect this.

Part 4 - Monitoring and Supply

- 5.28 Wallace fully endorse the need to monitor housing delivery annually to ensure an ongoing supply (in accordance with the Housing Delivery Test and five-year supply requirements), and the acknowledgement that a partial or full Local Plan review will be considered to allocate safeguarded land sites for housing development where necessary.
- 5.29 However, we suggest that the wording is strengthened here, with clear triggers for when a review is required (i.e. what constitutes 'significantly' below the required level).

- 5.30 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is made a policy requirement.
- 5.31 In respect of housing, an AMR, or equivalent document, should include the following as a minimum:
- Details of annual housing completions (both gross and net) with a list of contributing sites - to allow accurate monitoring of the Council's trajectory in Policy LPA05.
 - Details of windfall/ small site delivery – for compliance with NPPF 10% small site requirement and to ensure projected windfall rate remains realistic (see section 7 for further analysis of this).
 - Details of affordable completions – to monitor effectiveness of Policy LPC02.
 - Proportion of delivery on brownfield/ greenfield sites – to monitor effectiveness of spatial strategy/ Policy LPA02 Part 2.
- 5.32 The Monitoring Framework at Appendix 4 does refer to several of these indicators and refers to the Annual SHBC house completion survey as a data source, however as far as we are aware this is not publicly available, as such we would request that this is incorporated into the AMR.
- 5.33 Finally, in respect of Appendix 4 we would ask the Council to clarify the rationale for trigger in respect of safeguarded land (Policy LPA06), which states that if '10% or more of land safeguarded is granted planning consent, then they will consider an early review of the plan?'. 13

6. HOUSING SUPPLY MATTERS (POLICY LPA05 PART2)

- 6.1 This section looks at the Council's housing supply and trajectory in more detail, assessing total supply across the plan period, taking into account the five-year housing land supply position and the Housing Delivery Test.
- 6.2 This analysis is based on the Table 4.6 'Housing land requirements and supply – 2016 until 2035' and Table 4.7 'Housing Trajectory' within the Submission Plan, and the 2017 SHLAA which forms the most of up to date housing evidence base.
- 6.3 However, at the outset we would highlight the fact that these tables and the SHLAA include various discrepancies and do not allow for direct comparison or the consideration of delivery on individual sites. 11
- 6.4 The SHLAA starts with a 1st April 2017 base date but only provides individual site delivery within the first 5 years (up to 2021/2022), with delivery aggregated into 5 year periods beyond that; whilst the housing trajectory in the plan starts at the year 2020 and provides an annual aggregated 14

PO2441



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



1 Attachment



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

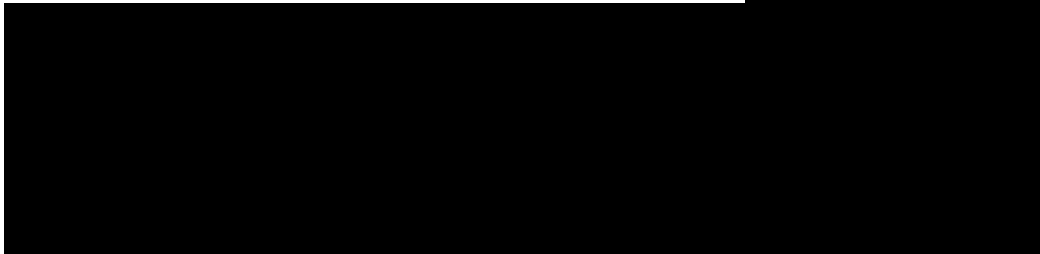
Dear Sir / Madam,

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

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

Kind regards

Ian Gilbert
Planning Associate



Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

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

PO2442



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



1 Attachment



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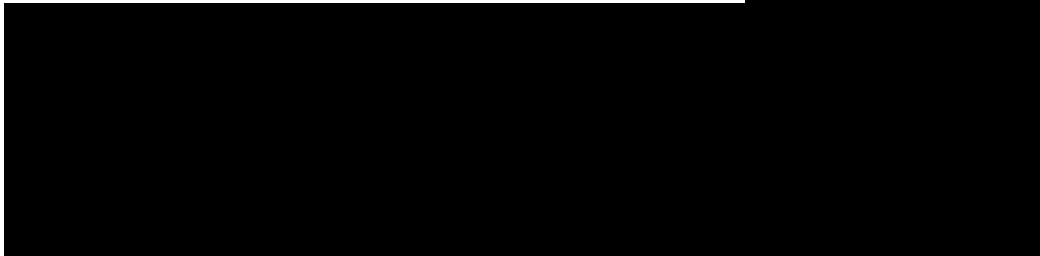
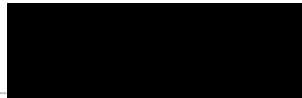
Dear Sir / Madam,

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

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

Kind regards

Ian Gilbert
Planning Associate



Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

Please see accompanying representations

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

Please see accompanying representations

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

Yes, I wish to participate at the oral examination

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

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
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St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.32 With regard to the above, and in light of increasing difficulties facing the borough with regard to the affordability, it is considered that an additional uplift should be applied to the Council's housing requirement to boost the supply of housing to help meet affordable housing needs across the borough.

Supply

- 3.33 Our Client has a number of concerns in relation to the housing land supply identified within the Local Plan.

- 3.34 In the first instance, the Council has set out its supply within table 4.6 of the Local Plan in an unnecessarily confusing manner in which many of the identified sources of supply appear to relate to one and other with it being necessary to cross reference a number of footnotes to determine how elements of supply relate to one and other. We consider that it would be helpful for the Council to set out within the Local Plan the housing supply identified by completions, commitments and housing allocations.

- 3.35 Table 4.6 line o) refers to Site Allocation 15HA as forming part of the Green Belt Allocations for the Local Plan. It is not clear what allocation 15HA refers to.

- 3.36 Given the somewhat confusing nature of how the housing supply has been set out, it would be useful to be able to scrutinise the supply of housing sites that Council has identified. On analysis of the Appendices of the SHLAA 2017 it would be useful for the Council to set out when Sites with planning permission (Appendix 3) commenced development (or are proposed to commence), how quickly those Sites will be brought forward and how many units have been delivered prior to the commencement of the plan period.

- 3.37 The Council's Development Trajectory (Appendix 5 of SHLAA 2017) also lacks detail to be useful in scrutinising the deliverability of the housing land supply. The SHLAA relies heavily on brownfield sites coming forward between years 6-10 and 11-15 of the plan period albeit it is not clear what assumptions have been made to determine those Sites cannot start now but are likely to come forward after 6 or 10 years.

- 3.38 Equally, given the extent to which the Council's housing supply is predicated on larger housing allocations coming forward, we would expect the Local Plan to provide an updated schedule of sites proposed to be allocated including evidence of when those

PO2443



St Helens Local Plan - Presubmission consultation
John Fleming
to:
planningpolicy@sthelens.gov.uk
13/03/2019 10:13



2 Attachments



St Helens Local Plan - consultation form.pdf St Helens - Local Plan presubmission - GDL representations.pdf

St Helens Local Plan - Presubmission consultation

Please find attached the response of Gladman Developments to the above consultation.

I would be grateful if you could confirm receipt of this email and its contents.

Yours faithfully,

John Fleming



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: Mr | Title: |
| First Name: John | First name: |
| Last Name: Fleming | Last Name: |
| Organisation/company: Gladman Developments | Organisation/company: |
| Address: Gladman House, Alexandria Way, Congleton | Address: |
| Postcode: CW12 1LB | Postcode: |
| | Tel No: |
| | Mobile No: |
| | Email: |

Signature:

Date:

13th March 2019

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

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

Yes ☐ (Via Email)No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Please see attached representations.

Please continue on a separate sheet if necessary

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

Please see attached representations

Please continue on a separate sheet if necessary

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

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

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

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

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

Please see attached representations

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

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

St Helen's Local Plan
Pre- Submission Version
Gladman Representations



March 2019

that the SHLP contains policies that positively and proactively encourage the scale of development that is required to support sustainable economic growth and in doing so help contribute towards building a strong, competitive economy both locally and nationally. A clear economic vision and strategy is needed to be put in place. This should reflect local business needs and be responsive to any wider opportunities that will allow the area to build on its strengths, counter any weaknesses and address future challenges. The policies of the local plan should therefore match the economic strategy for the area and encourage the local and inward investment that is required to meet anticipated needs over the plan period. Furthermore, it is vital that local policies are responsive to changing circumstances and that they are suitably flexible to ensure that sufficient land of the right type is made available in the right places and do not act as an impediment to additional sustainable growth opportunities that may come forward over the plan period.

06

- 4.3.3 However, it is important that the Council's economic aspirations are matched with its housing need to enable the town to grow and ensure the future prosperity of the borough, as well as the wider LCR region.

4.4 Policy LPA05: Meeting St. Helens Borough's housing needs

- 4.4.1 The above policy seeks to deliver, as a minimum, 9,234 net additional dwellings over the period 2016-2035. This equates to an average of at least 486 dwellings per annum.
- 4.4.2 Whilst the housing requirement contained within the Local Plan follows the three-step process outlined in the PPG for undertaking the standard method, it is important to note that the standardised methodology only represents the minimum demographic starting point and is still subject to change and may have implications for the progression of the Local Plan if new projections/methodology is released prior to the commencement of the examination in public.
- 4.4.3 The Council's ambitions for future economic growth, reducing the affordability gap and accommodation of any unmet housing needs from neighbouring authorities must be considered through a separate exercise when determining the housing requirement. The Council will also need to ensure that the plan is sufficiently flexible (in

07

terms of housing numbers) to respond to rapid change². The Council must be sure its assessment of housing needs is robust in these regards, by providing an evidence base document to accompany the submission of the Local Plan to ensure that the Plan's objectives as a whole are delivered.

- 4.4.4 Gladman is concerned that the annual housing requirement is only 18dpa higher than the 'baseline line. It is vital that housing need is not under-estimated and that it is aligned with the economic aspirations of the Plan given the county's role to provide local residents and those from further afield access to the jobs market. It is important that the Plan does not seek to main the current 'status quo' but seeks to build positively on its current position and strengthen the economic viability of the area.

Local Plan Review

- 4.4.5 It is noted that should monitoring demonstrate housing land supply falls significantly below the required level, a partial or full review will be considered to bring forward additional sites. Whilst we support the inclusion of the review mechanism in principle, we are concerned that the definition of 'significantly below the required level' is rather ambiguous. Furthermore, should the Council fail to demonstrate a deliverable housing land supply then this policy only requires the local planning authority to 'consider' a review rather than requiring immediate action to address the shortfall. It is therefore essential to the soundness of the Plan that the review be carried out immediately should it become apparent through monitoring that the Council is not meeting its development needs. Gladman recommend that this policy is modified so that if monitoring reveals housing shortfall is occurring or if a request is made to assist a neighbouring authority to accommodate unmet housing needs then a review will be undertaken immediately.

4.5 Policy LPA5.1: Strategic Housing Sites

- 4.5.1 Although Gladman does not wish to comment on the proposed allocations, the Council will need to ensure that they have applied realistic assumptions around lead-in times and build-out rates for the allocations, especially given the level of infrastructure requirements associated with them. The Council should be especially

² Paragraph 11 a) NPPF (2019)

PO2444



St Helens Local Plan - Presubmission consultation
John Fleming
to:
planningpolicy@sthelens.gov.uk
13/03/2019 10:13



2 Attachments



St Helens Local Plan - consultation form.pdf St Helens - Local Plan presubmission - GDL representations.pdf

St Helens Local Plan - Presubmission consultation

Please find attached the response of Gladman Developments to the above consultation.

I would be grateful if you could confirm receipt of this email and its contents.

Yours faithfully,

John Fleming



St.Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: Mr | Title: |
| First Name: John | First name: |
| Last Name: Fleming | Last Name: |
| Organisation/company: Gladman Developments | Organisation/company: |
| Address: Gladman House, Alexandria Way, Congleton | Address: |
| Postcode: CW12 1LB | Postcode: |
| | Tel No: |
| | Mobile No: |
| | Email: |

Signature:

Date:

13th March 2019

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

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

Yes ☐ (Via Email)No ☐

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by e-mail to:

planningpolicy@sthelens.gov.uk

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Please see attached representations.

Please continue on a separate sheet if necessary

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

Please see attached representations

Please continue on a separate sheet if necessary

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

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

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

Please see attached representations

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

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

St Helen's Local Plan
Pre- Submission Version
Gladman Representations



March 2019

5 HOUSING LAND SUPPLY

5.1 Context

- 5.1.1 Gladman note that an updated Housing Land Supply (HLS) assessment has not been prepared to support the pre-submission Local Plan. In addition, the Housing Trajectory contained in the Plan only provides limited information on the anticipated annual completion figures and does not break these figures down individually to illustrate the anticipated annual delivery rates for each individual site allocated in the SHLP.
- 5.1.2 In light of the lack of evidence prepared, Gladman advise the Council to apply the Sedgefield approach for the purposes of calculating HLS as this is the most common approach advocated by the Planning Inspectorate. It is more closely aligned with the need to significantly boost the supply of housing by attempting to deal with any historic shortfall within the first five years of the plan. It is also important that the suggested delivery timescales are realistic given that a number of sites proposed in the Plan are SUEs or located on PDL and these sites may not come forward at the expected rate due to infrastructure demands and constraints or accommodate the numbers stated. 12
- 5.1.3 Furthermore, Gladman remind the Council that the definition of 'deliverable' has been updated as part of the changes to the NPPF. Importantly, the new definition places the onus on the local planning authority to demonstrate that sites within its HLS are capable of coming forward within the next five years. As this information is notably absent from the consultation documents it is therefore difficult to provide an in-depth response on the Council's HLS position. Gladman therefore reserve the right to comment on this issue until further evidence is made available.

PO2445



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

to:

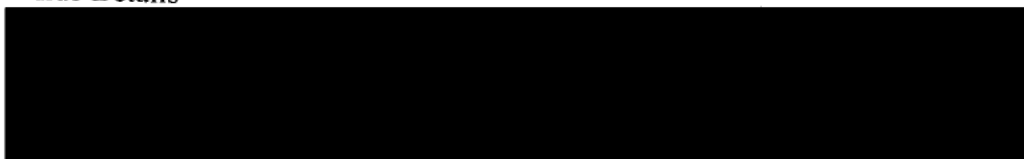
planningpolicy@sthelens.gov.uk

13/03/2019 15:02

Cc:

Doug Hann, Matthew Hard

Hide Details



3 Attachments



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

Dear Sir / Madam

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

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

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

Kind regards

Emer

Emer Cunningham | Planner

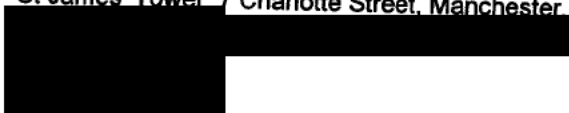


indigo.



RTPI Planning Consultancy of the Year 2017

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



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St. Helens
Council

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

Ref: LPSD

(For official use only)

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Part B – Your Representation(s).

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

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

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

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Yes ☒ (Via Email)

No ☐

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

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

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EL 0200A 2.pdf

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

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|---|-------------------------------------|-----------------------------|-------------------------------------|---|-------------------------------------|--|--------------------------------|
| Policy | <input checked="" type="checkbox"/> | Paragraph / diagram / table | <input checked="" type="checkbox"/> | Policies Map | <input checked="" type="checkbox"/> | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats Regulation Assessment |
| Other documents (please name document and relevant part/section) | | | | 2017 Strategic Housing Land Availability Assessment | | | |

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

Please tick as appropriate

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

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

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

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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. | |
| <p>The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.</p> | |

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

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

St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

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

Policy LPA04: A Strong and Sustainable Economy

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

Policy LPA05: Meeting St Helens Borough's Housing Needs

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


- 4.18. St Helens has not consistently delivered sufficient housing to meet demand. The borough fell short of housing requirements in 2003/4 and 2006/7. More recent completion rates indicate that in 2013/14 and 2014/15 and 2015/16 there was an improvement but in the years 2016/17 and 2017/18 housing targets were not met.
- 4.19. The 2017 Strategic Housing Land Availability Assessment shows progress of housing delivery against the Core Strategy. This highlights that 1,324 homes have failed to be delivered between 2003 and 2017. 17
- 4.20. The housing requirement of 9,234 dwellings is therefore flawed as it will not resolve the shortfall in housing delivery against the Core Strategy. Notwithstanding increasing the requirement to reflect local and city-region growth objectives, as a minimum the requirement should increase to 10,558 in order to be based on sound evidence and to be positively prepared.
- 4.21. The expected housing supply is miscounted and there are several flaws in the Council's evidence, partly stemming from using a 2017 base-date and partly from errors in the counting. 18
- 4.22. We calculate that there is a need for a further 754 homes to be allocated for residential development within the plan period.
- 4.23. In Section 2 and Appendix 2 of this report, we set out a detailed analysis of the current housing supply which contains and supports our objection to this policy in its current form.
- 4.24. We do however support the description of the housing requirement as a 'minimum' figure in order to ensure that there is some flexibility in planned housing delivery and that housing needs, including for more affordable homes, are adequately addressed in the plan period. 19
- 4.25. We also support that the delivery of housing will be monitored annually over the Plan period as set out in Policy LPA05(4), and support that if delivery or current deliverable land supply falls substantially below the required level, the council will undertake a local plan review to bring forward additional sites such the Leyland Green Farm site (Site Ref. 1HS) under Policy LPA06. However, the plan needs a clearly defined timetable for a definitive local plan review. 20

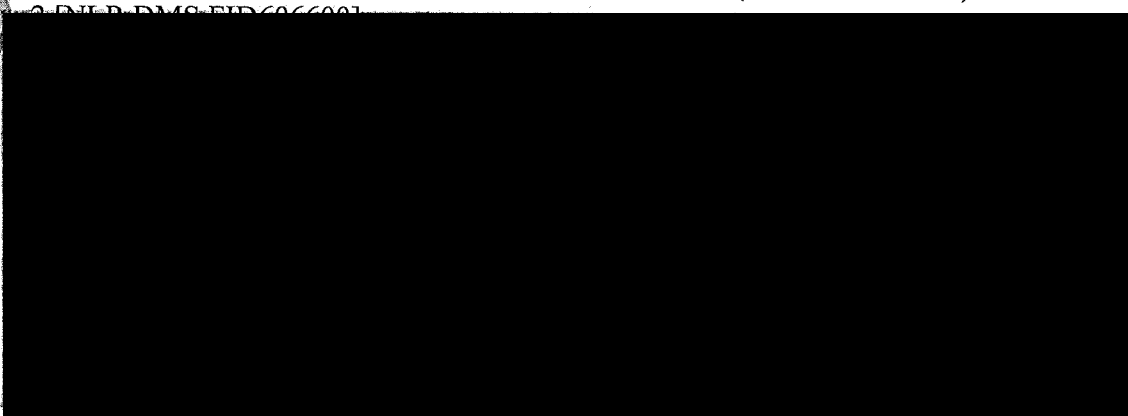
Policy LPA05.1 Strategic Housing Sites

- 4.26. Policy LPA05.1 highlights the council's identification of other residential allocations in Policy LPA05 which are not large enough to warrant a "strategic" allocation. Although these sites will yield smaller numbers of homes compared to strategic sites, we support that their allocation will support the overall delivery of housing and will play a key part of the supply and balance out the phased delivery which will result from the large strategic housing sites. 21
- 4.27. Therefore, although it is not a strategic housing site, we support the removal of land south of Leyland Green Farm site (ie Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood) (Site Ref. 1HA) from the Green Belt and its proposed housing allocation for an indicative 216 dwellings. We support the council's strategy of delivering more housing in Garswood as the settlement can accommodate further growth. This proposed housing allocation forms a natural extension to the settlement of Garswood. 22
- 4.28. Policy LPA05.1(2) requires a planning application for development within a Strategic Housing site to be supported by a comprehensive masterplan covering the whole site. This is supported in principle but requirement to provide a Masterplan must form part of the planning application process and must not unduly delay grant of planning permission or delivery of development on an allocated site. 23
- 4.29. LPA05.1(2)(h) requires *"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"*. 24

PO2446

ELO211


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


 1 Attachment


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

Sir/Madam,

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

Kind regards,
Melissa
Melissa Wilson
Senior Planner

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

(10) LPA07

(11) LPA08

(12) LPA09

(13) LPA11

(22) LPC17

(23) LPD01

(24) LPD01

(25) LPD01

(31) GBR

(32) EVA

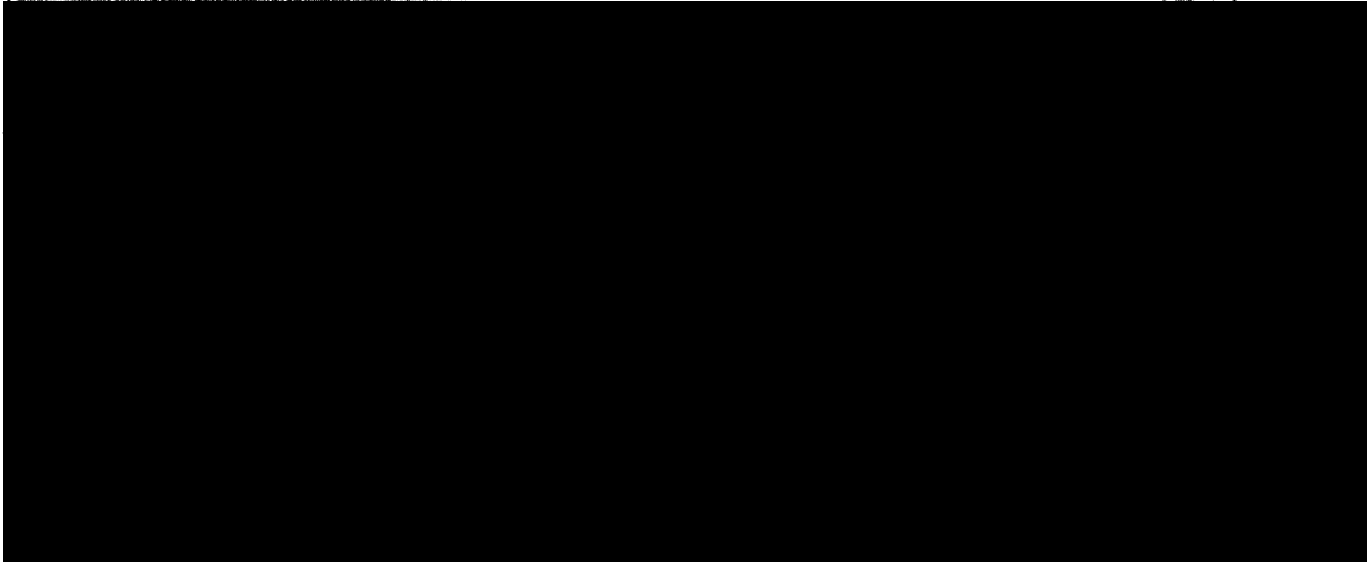
(26) LPD01

(27) LPD02

(28) LPD03

(29) LPD07

(30) SHMA


 Sir/Madam,

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

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

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

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

Kind regards
Brian

Brian O'Connor
Associate Director

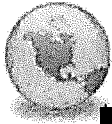
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

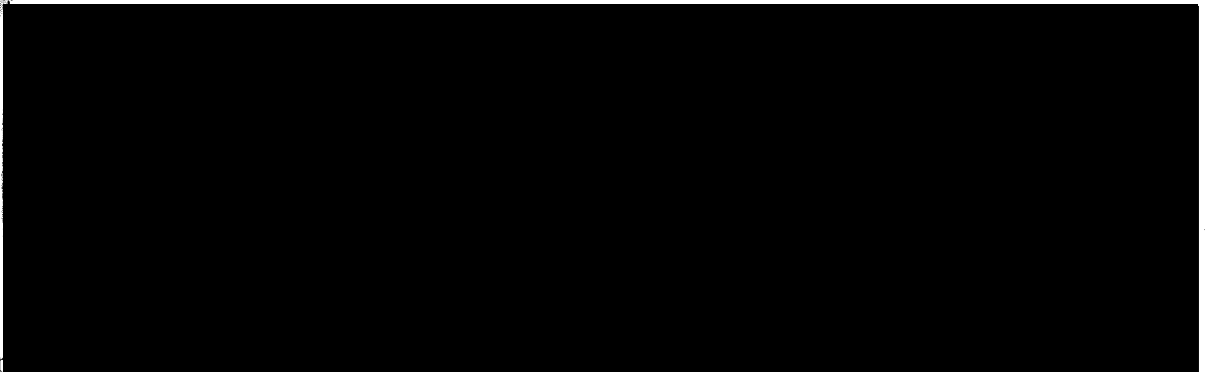
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Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2
[NLP-DMS.FID606600]
Brian O'Connor



1 Attachment



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

Sir / Madam

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

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

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

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

Kind regards
Brian

Brian O'Connor
Associate Director

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

lichfields.uk

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



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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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

| | |
|------------------------------|-------------------------|
| Signature: [REDACTED] | Date: 13/03/2019 |
|------------------------------|-------------------------|

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

See supporting Representations and Appendices

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

See supporting Representations and Appendices

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

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

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

| | | | |
|--|--|--|---|
| | | | Yes, I wish to participate at the oral examination |
|--|--|--|---|

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

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

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

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

EL0211

St Helens Local Plan Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

41874/03/SPM/MWI
17081285v8
17081285v8

6.0

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

4HA
5HA

Introduction

6.1

Policy LPA05 sets out the requirement for St Helens to deliver a wide choice of new housing in sufficient quantities to meet local needs; to align with the objectively assessed need [OAN] for the Borough.

Consideration of Policy

6.2

TW acknowledges the Council's efforts to meet its identified housing requirement through the allocation of housing sites however, it has concerns relating to the justification of Policy LPA05 in ensuring that the employment and housing need targets in the Borough are aligned.

6.3

Subject to a minor amendment to the allocation boundary TW strongly supports the allocation of the following sites for new housing development and welcomes the Council's acknowledgement that they are suitable, achievable and deliverable:

- Land at Gorsey Lane (Site reference: 4HA-Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb); and,
- Land at Gartons Lane (Site reference: 5HA – Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold).

6.4

Taylor Wimpey requests that the proposed Gartons Lane allocation boundary is amended to include the land currently occupied by the farm buildings fronting Gartons Lane. This small parcel of land is also controlled by Taylor Wimpey and should be included in the overall allocation to ensure a comprehensive masterplan can be delivered for the entire site. Call for Sites forms have previously been submitted in relation to this parcel of land and there are no reasons why it cannot be delivered in conjunction with the wider allocation.

6.5

TW previously submitted call for Sites forms and representations on earlier iterations of the Local Plan, supported by Development Statements relating to the Gorsey Lane site, the Gartons Lane site and the Vista Road site. Updated masterplans for each of Taylor Wimpey's sites in St Helens were prepared following discussions with the LPA and are attached to these representations (Appendix 3). The information submitted in relation to each of the above sites demonstrates that they should be allocated as housing sites on the basis that they:

- 1 No longer fulfil their Green Belt purpose and should be removed and allocated for housing development for future development needs;
- 2 Residential development of the site would constitute sustainable development and perform a positive economic, social and environmental role aligning with the principle of the Framework; and,
- 3 There are no technical constraints preventing the future development of the sites and the sites are fully deliverable.

Objectively Assessed Housing Need

6.6

The Framework is clear that local authorities must use their evidence base to ensure their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.

5

6.7

The Council has identified a housing requirement of 9,234 net additional dwellings, which equates to 486 dpa over the plan period. The figure is derived from the St Helens SHMA update 2019 [SHMA update], which updated the 2016 Mid Mersey SHMA. This is based on using the 2014-based SNHP as a demographic starting point; which TW agree is acceptable. Lichfields, on behalf of TW has reviewed the content of the SHMA (Appendix 1) and has concerns regarding the methodology and modelling as set out below; if the objective of employment growth is to be realised (based on scenarios identified in the ELNA) then it will generally need to be supported by an adequate supply of suitable housing:

- 1 Section 3.0 of the SHMA models a new scenario which takes account of the Mid-Year Estimates [MYE] and applies these to its 2016-based SNPP scenario modelling; however this was not done for the 2014-based SNPP and this would likely have increased the housing need under this scenario.
- 2 There are inconsistencies in the timeframes between the SHMA (up to 2033) and the Local Plan (up to 2035) and it is not clear how this has been addressed.
- 3 Job projections in the ELNA exclude B-Class job growth in 2016 and 2017 from the modelling. During this time there has been strong economic growth and the inclusion of these figures is likely to increase overall job growth; and housing need would need to respond accordingly.
- 4 Inconsistencies in the methodology set out in Section 4.0 of the SHMA which undermines the reliability of the modelling. There is a suggestion that only 40% of B-Class employment jobs will be taken up by local residents, with the remainder taken up by people commuting into St Helens. This relates directly to the 10 strategic employment sites and is considered a pessimistic stance, with job growth relating to these sites and associated housing more likely to increase above 40%.
- 5 It is unclear how the exclusion of the Omega South site has been modelling in the SHMA and the ELNA; it is therefore suggested that the modelling should recognise that local residents will still take up a significant proportion of the jobs on offer at this site which would increase housing need accordingly.
- 6 The PPG is clear that where previous housing delivery has exceeded the minimum need it should be considered whether the level of delivery is indicative of greater housing need. In the past 5 years; housing delivery has exceeded the OAN figure of 486dpa. As such it is clear that the borough can absorb these quantities of housing.

6.8

TW considers that there is a misalignment between the housing and employment land requirements. This positive and proactive approach to employment land is not consistent with the approach that has been taken towards calculating local housing need. Failure to align its housing requirement with its economic growth aspirations in Policy LPA04 will lead to barriers to achieving economic growth and unsustainable levels of inward commuting.

6.9

Furthermore, considering the errors in the demographic analysis and taking account of previous housing completions, TW consider there to be an argument to further review the OAN requirement. On this basis it is considered that the Council should opt for a higher housing figure, based on refined evidence in the SHMA to encourage a reasonable level of housing to support economic growth aspirations.

6.10

Taylor Wimpey reserves the right to comment on any future changes to the OAN requirement and associated evidence base and, if necessary undertake demographic modelling to inform representations to later iterations of the Plan.

PO2447

Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

01

02

03

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yes, I wish to participate at the oral examination

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

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

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

PO2448

Representor Details

| | |
|----------------------|---|
| Web Reference Number | WF0210 |
| Type of Submission | Web submission |
| Full Name | Councillor Rob Reynolds |
| Organisation | |
| Address | 10 The Spinney, Rainford, Lancashire WA11 8AS |
| Agent Details | |

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective

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

In page 2 of the council's guidance on this form (https://www.sthelens.gov.uk/media/9460/lpsd-representation-form_guidance-note.pdf) under the heading "Legal compliance and duty to cooperate" they say that "The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI)".

The SCI is available here: <https://www.sthelens.gov.uk/media/3195/statement-of-community-involvement-november-2013.pdf>

The SCI says that "evidence gathering" and "community involvement" must precede the decision to adopt the plan; however I believe that the Councillors in charge of the process had made their minds up before the consultation began. I believe this can be demonstrated by consideration of the facts. The consultation was announced shortly before Christmas and ran over the Christmas break, this made press coverage and opposition difficult. Despite this the council was obviously overwhelmed by the response. This is evidenced by their repeated failure to meet their own deadlines.

At the beginning of the local plan process St Helens Council did not have a brown field register and when pressed to prepare one by opposition councillors they refused saying they did not need one. They have since been forced to prepare one by the government, but again I think this shows that the minds of the councillors in charge of the process were made up before the consultation even began. They wanted more council tax and business rates and they had an overwhelming majority on the council to force this through, evidence was unnecessary and greenbelt land was expendable.

01

Senior Councillors from the ruling group have made numerous statements which suggest that their minds were made up prior to the consultation. One example is the comment by the then leader of the council on 1/05/2017 that one group of residents opposing the plan were "#nimbys". Bizarrely this comment was posted at 1.40am. [REDACTED] said that "As I say you are #nimbys it's ok to build just not in my back yard." While this was after the consultation I believe this makes his mindset and his attitude to the plan and to disagreement with it very clear.

[REDACTED] went on to say that "People forget that as a council we have had £90m cuts. We must do something to bring in money. I support jobs and investment any day over nimbyism." In my view the reference to the reduction in the council's central government grant shows that his principle interest was in generating a greater income for the council from council tax and non-domestic rates. While this is not an unreasonable position for him to take it is not one that justifies the release of large areas of greenbelt land. His comments can be read here:

<https://www.sthelensstar.co.uk/news/15257511.star-readers-react-to-nimby-comments-by-council-leader-towards-green-belt-group/>

On page 12 of the SCI at paragraph 3.5 it says that the council will "foster good relations between people in a diverse community". I do not believe they can possibly have complied with this when the then leader of the council resorted to childish personal insults in the early hours of the morning, to residents of the borough he was meant to be leading.

In November 2017 [REDACTED] (who was then a member of the council's executive) said that "Some of that green belt like at Florida Farm used to be pit head. Some of it used to be coal mines. It's not as if we are talking about the rolling hills of Shropshire here. But then there are other parts of St Helens that are also listed as green belt that are absolutely outstanding and deserve protection." He was dismissing the concerns of local residents about the loss of their greenbelt land because in his view it isn't as pristine as land in Shropshire. This comment shows that his thinking was being influenced by factors that were totally irrelevant to the decision. His comment can be found using the link below, you will note that St Helens Council failed to respond to resident's concerns about [REDACTED] views: <https://www.sthelensreporter.co.uk/news/protest-groups-seek-clarification-on-councillor-s-greenbelt-remarks-1-8863709>

[REDACTED] was initially the council executive member with responsibility for the local plan, however he was sacked during infighting within the ruling group. He was replaced by [REDACTED] who had clashed with opponents of the plan on social media and had in his own words given "vocal support to the Local Plan and other planning applications."

[REDACTED] said that "It is not fair on the council that the objections that this has attracted should overshadow the delivery of an ambitious Local Plan that this council deserves." I believe this shows that [REDACTED] mind was made up and that he was more concerned about the interests of the ruling group of the council and what he felt they deserved than he was about local residents. [REDACTED] resigned a week later after being served with an official notice by police which set out an allegation of harassment against him (he denied any link between the notice and his resignation). I cannot believe that [REDACTED] was the right person for the role given his antagonistic relationship with opponents of the local plan and the fact that the council's standards committee had already ruled against him once. He was replaced by the man he had himself replaced a week earlier, [REDACTED] ([https://www.theboltonnews.co.uk/news/15289535.\[REDACTED\]_resigns_from_growth_role_after_a_week/](https://www.theboltonnews.co.uk/news/15289535.[REDACTED]_resigns_from_growth_role_after_a_week/)).

A further illustration of [REDACTED] behaviour and his relationship with opponents is found in the fact that he was subsequently censured for comments made between November 2016 (before the consultation) and September 2017 "related to various campaign groups"

<https://www.wigantoday.net/news/politics/councillor-accused-of-sending-phallic-symbol-to-campaign-group-1-8911889> Again referring back to paragraph 3.5 of the SCI, given his behaviour the appointment of [REDACTED] could not but harm efforts to "foster good relations between people in a diverse community".

the new leader of the Council refused to defend the local plan in our meeting of 21/12/2018 saying that "As council leader, I became one of the unpaid council representatives on the long-standing partnership set up to regenerate the former Parkside Colliery site. For openness and transparency, I will follow my usual practice and make a declaration of interest and follow the convention of leaving the room for that item." If [REDACTED] was too conflicted to vote on the decision to adopt the plan should he not have removed himself from the process of developing it? Either he had a conflict of interests or he did not, this cannot be a sort of Schrodinger's conflict of interests which applies when it suits him does but not when it does not

<https://www.sthelensreporter.co.uk/news/politics/st-helens-council-leader-slams-opposition-vote-against-local-plan-1-9504626>

It is my belief that this local plan is not legally compliant as the council have failed to comply with their own Statement of Community Involvement. My belief that they have failed in this duty is founded on my view that senior members of the ruling group made their minds up based on factors that are irrelevant to the process and that they never took the consultation process seriously. I believe I have demonstrated this through my comments above.

Soundness of the local plan

The council's own guidance says that the plan has to be "prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs". As I have set out above I believe that senior members of the council's ruling group, including two members who had been in charge of the plan and the then leader of the council have shown that they were being influenced by irrelevant factors. These factors include the desire to increase the council's income from council tax and business rates, a feeling that the council "deserved" the local plan and the fact that some of the land affected was not as pristine as "the rolling hills of Shropshire". This is what the senior councillors in charge of the process were willing to say in public. I cannot begin to imagine what they were saying in private.

I have also set out above some of my concerns relating to the attitude to consultation and the decision making process. Additionally when the question of whether the council should adopt this plan was finally brought to Councillors they called a special meeting for the 20th of December, less than a week before Christmas. Opposition councillors were only given two weeks to consider the plan before this meeting, members of the ruling group were briefed a week earlier. Most councillors are not professionals, many of us have jobs and commitments to our friends and families. Many of us had long standing plans in the run up to Christmas that we could not cancel.

The decision to hold an extra meeting at such short notice and give us so little time to prepare was totally unjustified and really quite outrageous. No apology was made for this and no explanation offered, we had a council meeting planned for January and no reason has ever been offered as to why this could not have waited until then. The decision to give Councillors from the ruling group a briefing a week before opposition members is, in my view, an appalling abuse of power. Especially given the timescales involved. If the plan was sound I do not believe the council would have made decisions which made opposition so difficult. They should have been willing to give opponents a fair chance to set out their views and then listened with an open mind.

The council has departed from the standard method to calculate housing need and there are no exceptional circumstances to justify this. The population projections used are overly optimistic about population growth in the borough. I fear that the land released from our greenbelt will be developed first as it is easier and cheaper than development on brownfield sites and that at the end of the process the population will not have increased by as much as expected. In this scenario we would have lost our green spaces and would be left with undeveloped brownfield sites. There is therefore, in my view, no "exceptional circumstances" justifying the release of greenbelt land.

The vision section of the local plan "high quality new employment development", but the only sector I could see specifically mentioned in a section on "Economy and skills" is logistics. The whole economic development side of the plan seems to be based on warehouses. The figures for how the land allocated for economic development will be used send a clear message; office space 10-15

hectares, research and development 1-4, light industry 15-20 hectares, storage and distribution is 110-155 hectares. Out of 190-239 hectares in total; more than half of that land is to be allocated to warehouses. Again I believe that the council's estimate of how many jobs "logistics" will create are an absurd over estimation.

Talk of "a diverse portfolio of accessible employment" is a fig leaf to hide an over reliance on one sector, a sector of poorly paid unskilled jobs and one that is increasingly automated. This is not long-term strategic thinking, it is a sign of how intellectually bankrupt this plan is and just how badly it would fail our Borough. St Helens has low paid jobs, we need a much greater diversity in employment that this plan would not deliver.

With respect to site 8HA in my own ward (and home) of Rainford. This site floods almost every winter and is obviously unsuitable for development. It slopes down towards a stream that runs through an area of the Borough called Blackbrook. Blackbrook regularly floods in heavy rain and both the Council and the Environment Agency have acknowledged the role that these fields play in slowing down the flow of water into the brook and therefore in reducing the peak flow of water in the stream. To build on these fields is an obvious folly that can only make this situation worse. The land is also grade one agricultural land and intensively farmed. Road access to the site is, in my view, inadequate for the addition of several hundred new cars and the roads could not be expanded without either eating into the site or demolishing houses. Many residents fear the effect that this development would have on doctors surgeries and local schools.

The council say that they want to have some of the land released from the greenbelt without incorporating it into the current local plan. This is in case it might be needed for a future local plan. This is self evidently not an exceptional circumstance.

I apologise for the length of my comments, but I feel very strongly about this and I have tried to the point.

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

To adopt more reasonable population projections which will reduce the requirement for greenbelt land.

To come up with a new economic development plan that is not so heavily focussed on warehousing and which would again reduce the amount of greenbelt land required.

To remove site 8HA from the local plan.

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

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

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

| | |
|---------------|----------------------|
| Response Date | 3/11/2019 8:08:19 PM |
|---------------|----------------------|

PO2449



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



1 Attachment



Representation Form.pdf

Dear Sir/Madam,

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

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

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

Kind regards,

Hannah

Hannah Payne | Senior Planner



indigo.



RTPI Planning Consultancy of the Year 2017

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



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 If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens
Council

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

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|-------------------------------------|--|
| Title: | Title: Miss |
| First Name: | First name: Hannah |
| Last Name: | Last Name: Payne |
| Organisation/company: Barratt Homes | Organisation/company: Indigo Planning Ltd |
| Address: | Address: St James' Tower, 7 Charlotte Street, Manchester |
| Postcode: | Postcode: M1 4DZ |
| Tel No: | |
| Mobile No: | |
| Email: | |

| | |
|------------|---|
| Signature: | Date: <input type="text" value="13/03/2019"/> |
|------------|---|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

| | | | | | | | | | |
|--|--|-----------------------------|--|--------------|--|--|--|--------------------------------|--|
| Policy | | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

| | | |
|-------------------------------------|------------------------------|-----------------------------|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

| | |
|----------------------------------|--------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input type="checkbox"/> |
| Effective? | <input type="checkbox"/> |
| Consistent with National Policy? | <input type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see enclosed representation.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see enclosed representation.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | |
|---|---|
| <input type="checkbox"/> No , I do not wish to participate at the oral examination | <input type="checkbox"/> Yes , I wish to participate at the oral examination |
|---|---|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please see enclosed representation.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

indigo.

St James' Tower,
7 Charlotte Street,
Manchester, M1 4DZ

Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP

By email

planningpolicy@sthelens.gov.uk

let.001.NF..21450010

13 March 2019

Dear Sirs

ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

London • Manchester • Leeds • Birmingham • Dublin

Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E1 1DT
Registered number 2078863 VAT number 849246134



indigo.

the M6 and A580 corridor will ensure that St Helens can take advantage of its strategic location for logistic development. We therefore support the proposed strategic employment sites at Haydock.

09

Policy LPA05: Meeting St Helens Borough's Housing Needs

The number of houses increased from the initial figure of 451dpa suggested in the scoping consultation to 570dpa within the Preferred Options Plan but has been reduced to 486dpa in the Submission Draft Plan.

We consider that this revised figure is too conservative and means that the Council is only just meeting its identified needs with too much reliance placed on the deliverability of brownfield sites. This is contrary to the provisions of the NPPF which requires plans to be 'positively prepared' and to 'boost significantly' the housing supply.

10

The current housing figure utilised in the Submission Draft Local Plan is calculated and set out within the St. Helens Borough Council Strategic Housing Market Assessment Update (January 2019). Based on the 2014 based Household Projections and the latest affordability ratio the OAN is calculated as 486dpa.

In recent years St Helens have not delivered sufficient housing to meet demand. The borough fell short of housing requirements in 2003/4 and 2006/7. More recent completion rates indicate that in 2013/14 and 2014/15 and 2015/16 there was an improvement but in the years 2016/17 and 2017/18 housing targets were again not met.

The Liverpool City Region places emphasis on a commitment to jobs led growth but housing targets in St Helens have reduced. To reflect the ambitions for growth, we consider that this figure should be increased to provide for a degree of flexibility in the event that allocated brownfield sites do not deliver as anticipated on viability grounds.

11

We therefore support the description of the housing requirement as a 'minimum' figure in order to ensure that there is some flexibility in planned housing delivery and that housing needs, including for more affordable homes, are adequately addressed in the plan period.

12

Due to the level of housing required within the borough, we agree with the Council's approach of meeting the housing target firstly with housing allocations followed by sites with existing consents for housing development. This allows the Council to manage the location of housing development strategically.

13

Policy LPA05(3) proposes a minimum of 30dph on sites that are within or adjacent to a district or local centre or in other locations that are well served by frequent bus or train services and on other sites that are within an existing urban area. This proposed density is broadly supported however, density should be considered on a case by case basis as imposing set densities can have negative impacts on delivery of sites.

14

PO2450



St Helens Local Plan Submission Draft Representations - Torus 62 Limited
Ian Gilbert
to:
planningpolicy@sthelens.gov.uk
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

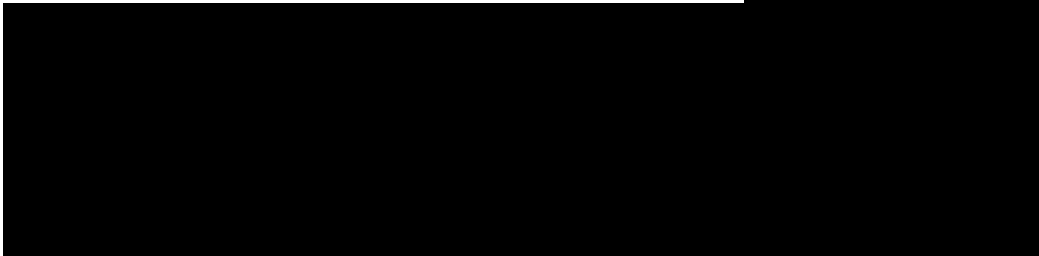
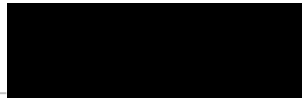
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

Ian Gilbert
Planning Associate



Representor Details

| | |
|----------------------|--|
| Web Reference Number | WF0114 |
| Type of Submission | Web submission |
| Full Name | Mr Adam Smith |
| Organisation | Torus 62 Limited |
| Address | co agent co agent |
| Agent Details | Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| | |
|---|---|
| Policy | Please see accompanying representations |
| Paragraph / diagram / table | Please see accompanying representations |
| Policies Map | Please see accompanying representations |
| Sustainability Appraisal / Strategic Environmental Assessment | Please see accompanying representations |
| Habitats Regulation Assessment | No |
| Other documents | Please see accompanying representations |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| | |
|--------------------------------------|-----|
| Is legally compliant? | Yes |
| Is sound? | No |
| Complies with the duty to cooperate? | Yes |

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

7. Please set out modification(s) you consider are necessary

Please see accompanying representations

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

Strategic Aims and Objectives

- 2.5 Our Client is generally supportive of the proposed Strategic Aims and Objectives to ensure that the Vision is achieved. We support the inclusion of objective 1.3 to ensure that effective use is made of previously developed land. 04 05
- 2.6 We also consider that Strategic Aim 4 (Objective 4.1) should be amended, to include reference to market *and* affordable homes. Whilst we recognise that the Council seeks to deliver sufficient range of new homes, we consider that it is fundamental for the soundness of the Local Plan that the Council plans sufficiently to meet the need for affordable housing across the borough. 06
- 2.7 The introductory chapter of the Local Plan is clear in the difficulties facing the borough with regard to deprivation and the affordability of housing; the Local Plan notes that both of those trends are worsening and something that the Council needs to tackle. The provisions of sufficient affordable homes for those suffering most from that deprivation and worsening affordability will be a key to reversing those trends. Paragraph 2.5.3 of the Local Plan notes addressed affordability of market housing in the borough and notes that lower quartile house prices are over 4 times greater than lower quartile household income.
- 2.8 As set out later in these representations, the Government's Standardised Methodology for calculating Objectively Assessed Needs (SMOAN) for housing does make adjustments for trends in affordability. However, the SMOAN does not seek to establish what the need for affordable housing within the borough is and, therefore, a housing requirement that meets the objectively assessed need for housing overall may underdeliver against a specific need for affordable housing. 01
- 2.9 Lastly, our Client has some concerns in relation to the Local Plan's aspirations for contributing to the growth of the Liverpool City Region (LCR) as a whole. Whilst paragraph 1.7.1 of the Local Plan notes the extent to which St Helens has a close working relationship with the wider LCR on strategic planning matters (including noting the preparation of the Spatial Development Strategy (SDS)). As part of the evidence base for the LCR SDS the Liverpool City Region Combined Authority (LCRCA) prepared a Strategic Housing and Employment Land Availability Assessment 2017 (SHELAA) which sought to assess the likely needs for housing and employment land across the LCR as a whole. 08

PO2451



St Helens Local Plan Submission Draft Representations - Torus 62 Limited
Ian Gilbert
to:
planningpolicy@sthelens.gov.uk
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

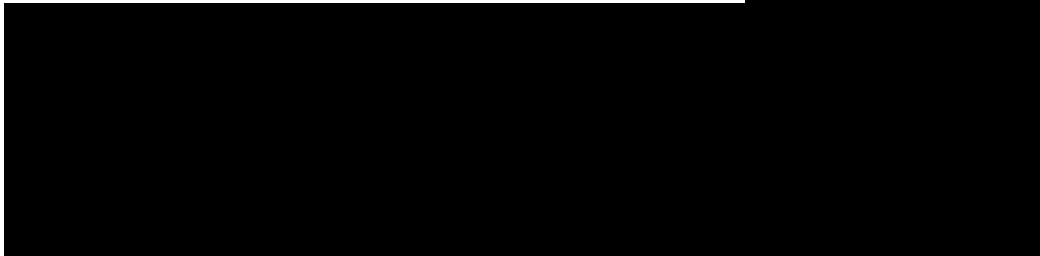
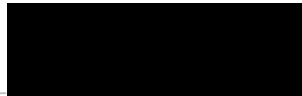
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

Ian Gilbert
Planning Associate



Representor Details

| | |
|----------------------|--|
| Web Reference Number | WF0114 |
| Type of Submission | Web submission |
| Full Name | Mr Adam Smith |
| Organisation | Torus 62 Limited |
| Address | co agent co agent |
| Agent Details | Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| | |
|---|---|
| Policy | Please see accompanying representations |
| Paragraph / diagram / table | Please see accompanying representations |
| Policies Map | Please see accompanying representations |
| Sustainability Appraisal / Strategic Environmental Assessment | Please see accompanying representations |
| Habitats Regulation Assessment | No |
| Other documents | Please see accompanying representations |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| | |
|--------------------------------------|-----|
| Is legally compliant? | Yes |
| Is sound? | No |
| Complies with the duty to cooperate? | Yes |

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

7. Please set out modification(s) you consider are necessary

Please see accompanying representations

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

economic growth scenario set out within the SHELMA, that the borough will not be able to fully contribute towards or take advantage of its position within the LCR.

29

Policy LPA05 – Meeting St Helens' Housing Needs

3.22 Our Client is disappointed to see the proposed reduction in the proposed housing requirement from the Preferred Options Draft of the Local Plan which set out a requirement of 10,830 dwellings from 2014 – 2033; equating to an average requirement of 570dpa. It is worthy of note that such a requirement was the same as set out within the Core Strategy (2012).

30

3.23 The Local Plan now seeks to reduce that housing requirement to a minimum of some 9,234 net additional dwellings between 2016-2035; an average of at least 486dpa.

3.24 In the first instance, as set out above, we consider that the Council should give consideration to increasing its housing requirement to align with the wider aspirations of the LCR as set out within the SHELMA to drive forward economic growth. We would consider that the Council's starting point should at least be to meet the economic growth scenario outlined within the SHELMA of 860dpa.

3.25 If the SHELMA growth scenario is discounted there remains a strong case for the uplift of the housing requirement to go beyond that derived by the Government's SMOAN. We agree with the Local Plan's (paragraph 4.18.5) stated shortfalls of the SMOAN in that it does not take into account increased employment growth from development of additional employment Sites leading to increased housing need. We also agree that long terms trends of declining affordability is likely to present an upward pressure on the outputs of the standard method.

31

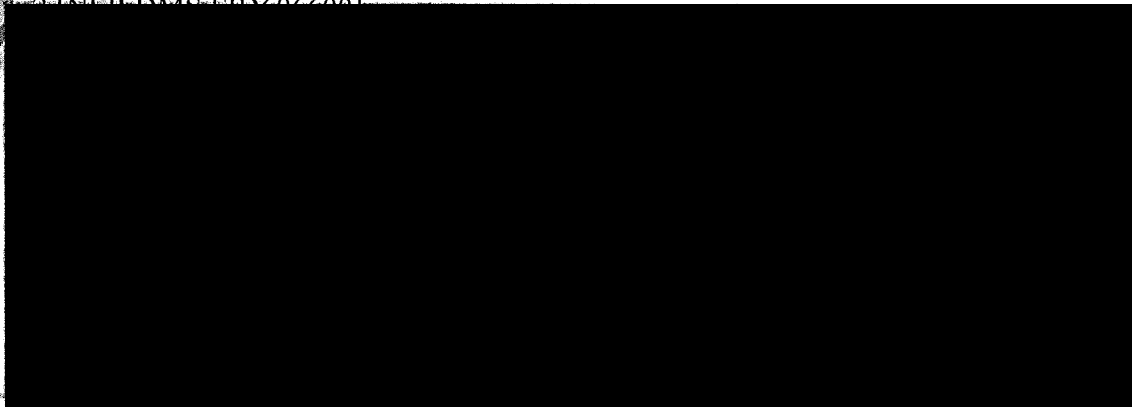
3.26 With regard to the above, we welcome the Council updating its SHMA to provide additional evidence to consider an uplift to the SMOAN; an approach which is considered to be sound in principle. We welcome the SHMA's proposed uplift to account for economic growth over and above what is considered by the SMOAN; i.e. from 468dpa to 486dpa. However, we consider that it is not entirely clear why 486dpa has been selected as the most appropriate housing requirement and we make a number of observations that the uplift applied should be significantly greater.

32

PO2452

ELO211

RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2



① LPA01
② LPA02
③ LPA03
④ LPA04
⑤ LPA05
⑥ LPA05
⑦ LPA05
⑧ LPA05.1
⑨ LPA06

1 Attachment



41575_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

⑩ LPA07

⑪ LPA08

⑫ LPA09

⑬ LPA11

⑭ GBR

⑮ EVA

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,
Melissa

Melissa Wilson
Senior Planner

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

⑭ LPC01/2

⑮ LPC02

⑯ LPC13

⑰ LPD01

⑱ LPC01/3

⑲ LPC05

⑳ LPD01

㉑ LPD02

㉒ LPC01/5

㉓ LPC10

㉔ LPD01

㉕ LPD03

㉖ LPC01/6

㉗ LPC12

㉘ LPD01

㉙ LPD07

㉚ SHMA

Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseYorPfo>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards
Brian

Brian O'Connor
Associate Director

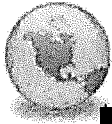
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

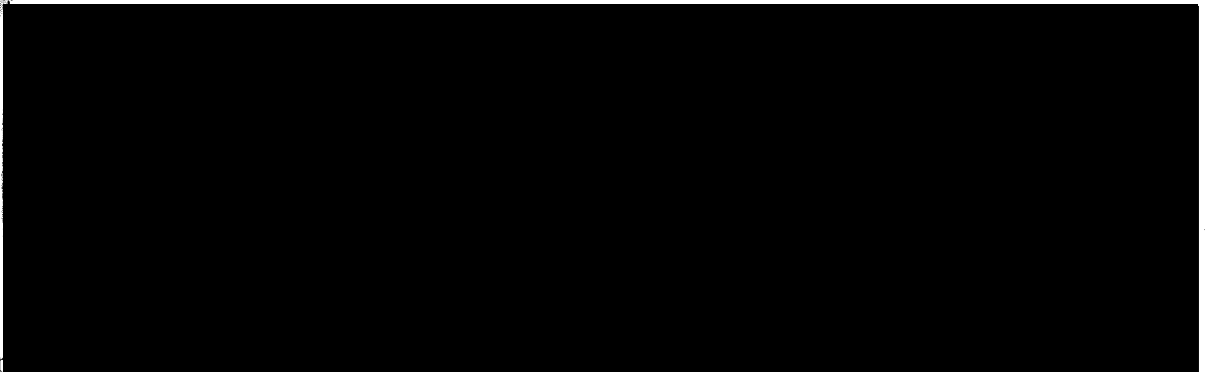
This email is for the use of the addressee. It may contain information which is confidential and exempt from disclosure. If you are not the intended recipient you must not copy, distribute or disseminate this email or attachments to anyone other than the addressee. If you receive this communication in error please advise us by telephone as soon as possible. Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2
[NLP-DMS.FID606600]
Brian O'Connor



1 Attachment



SPLIT 41874_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19_Part_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseY9rPfO>

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Kind regards
Brian

Brian O'Connor
Associate Director

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: Ms | Title: Mr |
| First Name: Kate | First name: Brian |
| Last Name: McClean | Last Name: O'Connor |
| Organisation/company: Taylor Wimpey UK Limited | Organisation/company: Lichfields |
| Address: Ground Floor, Washington House Birchwood | Address: Ship Canal House 98 King Street Manchester |
| Postcode: WA3 6GR | Postcode: M2 4WU |
| Tel No: | Tel No: [REDACTED] |
| Mobile No: | Mobile No: [REDACTED] |
| Email: | Email: [REDACTED] |

| | |
|------------------------------|-------------------------|
| Signature: [REDACTED] | Date: 13/03/2019 |
|------------------------------|-------------------------|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|---|--|-----------------------------|--|---|--|--|--|--------------------------------|--|
| Policy | | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| See cover letter | | See cover letter | | See cover letter | | | | | |
| Other documents (please name document and relevant part/section) | | | | See supporting Representations and Appendices | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|---|--|
| Legally Compliant? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|-------------------------------------|
| Positively Prepared? | <input checked="" type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input checked="" type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See supporting Representations and Appendices

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See supporting Representations and Appendices

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | | | |
|--|--|--|---|
| | | | Yes, I wish to participate at the oral examination |
|--|--|--|---|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

EL0211

St Helens Local Plan Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

41874/03/SPM/MWI
17081285v8
17081285v8

6.0

Policy LPA05: Meeting St. Helens Borough's Housing Needs

4HA
5HA

Introduction

6.1

Policy LPA05 sets out the requirement for St Helens to deliver a wide choice of new housing in sufficient quantities to meet local needs; to align with the objectively assessed need [OAN] for the Borough.

Consideration of Policy

6.2

TW acknowledges the Council's efforts to meet its identified housing requirement through the allocation of housing sites however, it has concerns relating to the justification of Policy LPA05 in ensuring that the employment and housing need targets in the Borough are aligned.

6.3

Subject to a minor amendment to the allocation boundary TW strongly supports the allocation of the following sites for new housing development and welcomes the Council's acknowledgement that they are suitable, achievable and deliverable:

- Land at Gorsey Lane (Site reference: 4HA-Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb); and,
- Land at Gartons Lane (Site reference: 5HA – Land South of Gartons Lane and former St. Theresa's Social Club, Gartons Lane, Bold).

6.4

Taylor Wimpey requests that the proposed Gartons Lane allocation boundary is amended to include the land currently occupied by the farm buildings fronting Gartons Lane. This small parcel of land is also controlled by Taylor Wimpey and should be included in the overall allocation to ensure a comprehensive masterplan can be delivered for the entire site. Call for Sites forms have previously been submitted in relation to this parcel of land and there are no reasons why it cannot be delivered in conjunction with the wider allocation.

6.5

TW previously submitted call for Sites forms and representations on earlier iterations of the Local Plan, supported by Development Statements relating to the Gorsey Lane site, the Gartons Lane site and the Vista Road site. Updated masterplans for each of Taylor Wimpey's sites in St Helens were prepared following discussions with the LPA and are attached to these representations (Appendix 3). The information submitted in relation to each of the above sites demonstrates that they should be allocated as housing sites on the basis that they:

- 1 No longer fulfil their Green Belt purpose and should be removed and allocated for housing development for future development needs;
- 2 Residential development of the site would constitute sustainable development and perform a positive economic, social and environmental role aligning with the principle of the Framework; and,
- 3 There are no technical constraints preventing the future development of the sites and the sites are fully deliverable.

Objectively Assessed Housing Need

6.6

The Framework is clear that local authorities must use their evidence base to ensure their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.

5

6.7

The Council has identified a housing requirement of 9,234 net additional dwellings, which equates to 486 dpa over the plan period. The figure is derived from the St Helens SHMA update 2019 [SHMA update], which updated the 2016 Mid Mersey SHMA. This is based on using the 2014-based SNHP as a demographic starting point; which TW agree is acceptable. Lichfields, on behalf of TW has reviewed the content of the SHMA (Appendix 1) and has concerns regarding the methodology and modelling as set out below; if the objective of employment growth is to be realised (based on scenarios identified in the ELNA) then it will generally need to be supported by an adequate supply of suitable housing:

- 1 Section 3.0 of the SHMA models a new scenario which takes account of the Mid-Year Estimates [MYE] and applies these to its 2016-based SNPP scenario modelling; however this was not done for the 2014-based SNPP and this would likely have increased the housing need under this scenario.
- 2 There are inconsistencies in the timeframes between the SHMA (up to 2033) and the Local Plan (up to 2035) and it is not clear how this has been addressed.
- 3 Job projections in the ELNA exclude B-Class job growth in 2016 and 2017 from the modelling. During this time there has been strong economic growth and the inclusion of these figures is likely to increase overall job growth; and housing need would need to respond accordingly.
- 4 Inconsistencies in the methodology set out in Section 4.0 of the SHMA which undermines the reliability of the modelling. There is a suggestion that only 40% of B-Class employment jobs will be taken up by local residents, with the remainder taken up by people commuting into St Helens. This relates directly to the 10 strategic employment sites and is considered a pessimistic stance, with job growth relating to these sites and associated housing more likely to increase above 40%.
- 5 It is unclear how the exclusion of the Omega South site has been modelling in the SHMA and the ELNA; it is therefore suggested that the modelling should recognise that local residents will still take up a significant proportion of the jobs on offer at this site which would increase housing need accordingly.
- 6 The PPG is clear that where previous housing delivery has exceeded the minimum need it should be considered whether the level of delivery is indicative of greater housing need. In the past 5 years; housing delivery has exceeded the OAN figure of 486dpa. As such it is clear that the borough can absorb these quantities of housing.

6.8

TW considers that there is a misalignment between the housing and employment land requirements. This positive and proactive approach to employment land is not consistent with the approach that has been taken towards calculating local housing need. Failure to align its housing requirement with its economic growth aspirations in Policy LPA04 will lead to barriers to achieving economic growth and unsustainable levels of inward commuting.

6.9

Furthermore, considering the errors in the demographic analysis and taking account of previous housing completions, TW consider there to be an argument to further review the OAN requirement. On this basis it is considered that the Council should opt for a higher housing figure, based on refined evidence in the SHMA to encourage a reasonable level of housing to support economic growth aspirations.

6.10

Taylor Wimpey reserves the right to comment on any future changes to the OAN requirement and associated evidence base and, if necessary undertake demographic modelling to inform representations to later iterations of the Plan.

Density

- 6.11 TW broadly supports the principles set out in Part 3 of the Policy in relation to development density and acknowledges the Council's efforts to ensure the efficient use of land. With regards to strategic sites, consideration needs to be given to the provision of infrastructure and how this might impact on their development density. TW considers that flexibility to increase the density requirements for sites that are required to provide community facilities and social infrastructure, will ensure that land is being used efficiently and could in turn prevent viability issues arising associated with the cost of delivering infrastructure. When increased densities are required, it will generally result in smaller properties being required to meet the aspirations and this must be factored in when determining a housing mix policy. Conversely, flexibility to reduce the densities (across part 3a, b and c) would allow developers to take into account local and site characteristics, market aspirations, viability and landscaping requirements on sites on the urban edge.

5

Housing Supply

- 6.12 TW supports Policy LPA05 Part 4 and the Council's acknowledgement of the importance of maintaining a 5-year supply of deliverable land across the borough in line with the Housing Delivery Test. To further support this, TW suggests that the Local Plan introduces a policy mechanism that allows for the release of 'Plan B' sites on Safeguarded Land to come forward (as has been done in other local authorities adjacent to St Helens, West Lancashire). This will ensure flexibility and accounts for the potential non-delivery of committed sites and any other short comings in its housing land supply.
- 6.13 TW agrees with a small sites windfall allowance but considers that a level of delivery of 93dpa is not fully justified based on previous delivery rates. Furthermore, once the emerging Local Plan is adopted and allocates sites for development, it is reasonable to assume that the delivery of units from windfall sites will reduce. TW therefore requests that the Council identifies sufficient housing land within the Local Plan, so that, once adopted it reduces/diminishes the level of windfall development as a source of supply. Taylor Wimpey agrees with the explanatory text that no windfall allowance should be made for sites above 0.25ha.
- 6.14 TW supports §4.18.11 of the explanatory text that references an allowance of 15% for reduced delivery of SHLAA sites.
- 6.15 Drawing all these points together, whilst it is important that the Council plans for its current plan period, it is inappropriate to assume that the development requirements for the borough will not change. The Council will be required to monitor their housing delivery against its projected housing requirements; this information combined with an updated evidence base will form the basis of calculating the borough's future OAN. The Council should not treat their identified OAN requirement as a ceiling and ensure that a flexible approach is adopted to ensure that it is able to achieve a rolling 5-year supply, as required by the Framework⁸.
- 6.16 TW considers that a plan period between 2020-2035 to cover 15 years as required by the Framework is the minimum that the Council should be pursuing. TW would suggest that the plan period is elongated to account for any delays in the plan making process and to ensure it aligns with the Framework⁹. Taylor Wimpey considers that additional housing and employment allocations will need to be identified to meet the extended plan period.

7

⁸ The Framework 2019 - §73

⁹ The Framework 2019 - §22

PO2453



St Helens Local Plan Submission Draft Representations - Torus 62 Limited
Ian Gilbert
to:
planningpolicy@sthelens.gov.uk
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

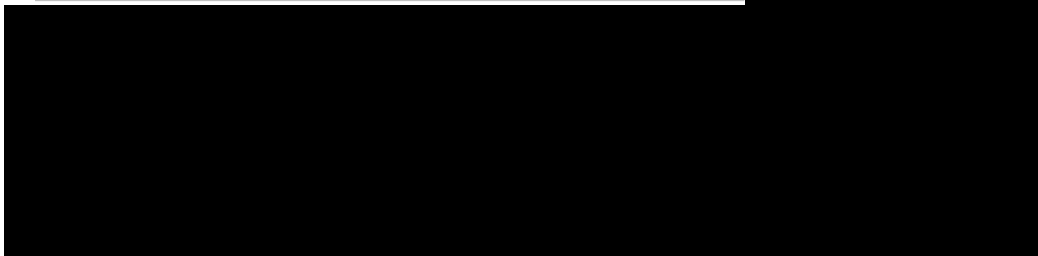
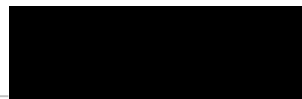
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

Ian Gilbert
Planning Associate



Representor Details

| | |
|----------------------|--|
| Web Reference Number | WF0114 |
| Type of Submission | Web submission |
| Full Name | Mr Adam Smith |
| Organisation | Torus 62 Limited |
| Address | co agent co agent |
| Agent Details | Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| | |
|---|---|
| Policy | Please see accompanying representations |
| Paragraph / diagram / table | Please see accompanying representations |
| Policies Map | Please see accompanying representations |
| Sustainability Appraisal / Strategic Environmental Assessment | Please see accompanying representations |
| Habitats Regulation Assessment | No |
| Other documents | Please see accompanying representations |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| | |
|--------------------------------------|-----|
| Is legally compliant? | Yes |
| Is sound? | No |
| Complies with the duty to cooperate? | Yes |

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

7. Please set out modification(s) you consider are necessary

Please see accompanying representations

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.32 With regard to the above, and in light of increasing difficulties facing the borough with regard to the affordability, it is considered that an additional uplift should be applied to the Council's housing requirement to boost the supply of housing to help meet affordable housing needs across the borough.

Supply

- 3.33 Our Client has a number of concerns in relation to the housing land supply identified within the Local Plan.

- 3.34 In the first instance, the Council has set out its supply within table 4.6 of the Local Plan in an unnecessarily confusing manner in which many of the identified sources of supply appear to relate to one and other with it being necessary to cross reference a number of footnotes to determine how elements of supply relate to one and other. We consider that it would be helpful for the Council to set out within the Local Plan the housing supply identified by completions, commitments and housing allocations.

- 3.35 Table 4.6 line o) refers to Site Allocation 15HA as forming part of the Green Belt Allocations for the Local Plan. It is not clear what allocation 15HA refers to.

- 3.36 Given the somewhat confusing nature of how the housing supply has been set out, it would be useful to be able to scrutinise the supply of housing sites that Council has identified. On analysis of the Appendices of the SHLAA 2017 it would be useful for the Council to set out when Sites with planning permission (Appendix 3) commenced development (or are proposed to commence), how quickly those Sites will be brought forward and how many units have been delivered prior to the commencement of the plan period.

- 3.37 The Council's Development Trajectory (Appendix 5 of SHLAA 2017) also lacks detail to be useful in scrutinising the deliverability of the housing land supply. The SHLAA relies heavily on brownfield sites coming forward between years 6-10 and 11-15 of the plan period albeit it is not clear what assumptions have been made to determine those Sites cannot start now but are likely to come forward after 6 or 10 years.

- 3.38 Equally, given the extent to which the Council's housing supply is predicated on larger housing allocations coming forward, we would expect the Local Plan to provide an updated schedule of sites proposed to be allocated including evidence of when those

Sites are expected to commence delivery and what assumptions have been made with regard to the phasing and delivery rates on those sites.

38

3.39 The above is particularly pertinent in relation to paragraph 4.18.18 of the Local Plan that notes the delivery of some sites allocated for development is predicated by the need to deliver specific infrastructure to serve the needs of development. Along with site compilation, infrastructure can be a particularly unpredictable barrier to development and it is essential that the Council makes clear the assumptions that it has based its housing trajectory on. This is particularly important on larger sites which the Council are likely to be more reliant on towards the middle and latter end of the plan period. We note the assumptions referenced at paragraph 4.18.19 of the Local Plan, however, we consider that those assumptions should be set out expressly for individual sites which the Council are relying on to deliver its housing trajectory.

39

40

3.40 With regard to the above uncertainty, and notwithstanding the allowance for non-delivery of SHLAA Sites and Green Belt sites, it is considered that the Council have not identified sufficient housing land supply to ensure a flexible and robust supply to meet the overall housing requirement identified. The current buffer of 361 units is inadequate and, to put it in context, is comparable to the 289 units that the Council are relying on coming forward on stalled sites.

41

3.41 Notwithstanding the overall level of supply identified, we also have concerns in relation to the Council's lack of site selection methodology and lack of meaningful distribution of housing amongst the Key Settlements. Paragraph 4.18.12 concludes that the site selection process has constrained the ability of the Local Plan to identify suitable sites in some key settlements. We consider that it is vital for the transparency of the plan that the Local Plan sets out a schedule of development which it seeks to allocate or see delivered within each of those key settlements. As set out earlier within these representations, where shortfalls are identified in key locations, it may be required to re-assess Green Belt Sites in relation to their contribution to the Green Belt relative to the severity of the shortfall of housing in those areas.

42

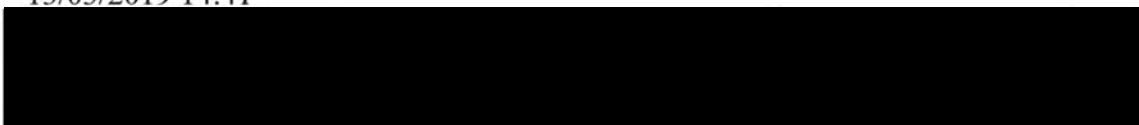
3.42 As set out later within these representations, we consider that our Client's Site is suitable for development as a previously developed Site within the Green Belt in a parcel of land that makes a negligible contribution to the Green Belt. The Council should add out Client's Site to its supply of housing land for the Plan Period as per previous iterations of the Local Plan.

43

PO2454



St Helens Borough Local Plan - Submission Draft - Representations on Behalf of Redrow Homes
Graham Trehwella
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:41



1 Attachment



1335 - Representation on Behalf of Redrow Homes Ltd Rev A 130319..pdf

REFERENCE EML-OUT/1335/20190313-143112-915

Dear Sirs

Please find attached a report which sets out our representations to the Submission Draft Local Plan. I would be grateful if you could confirm that it has been received.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) * Please note: e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

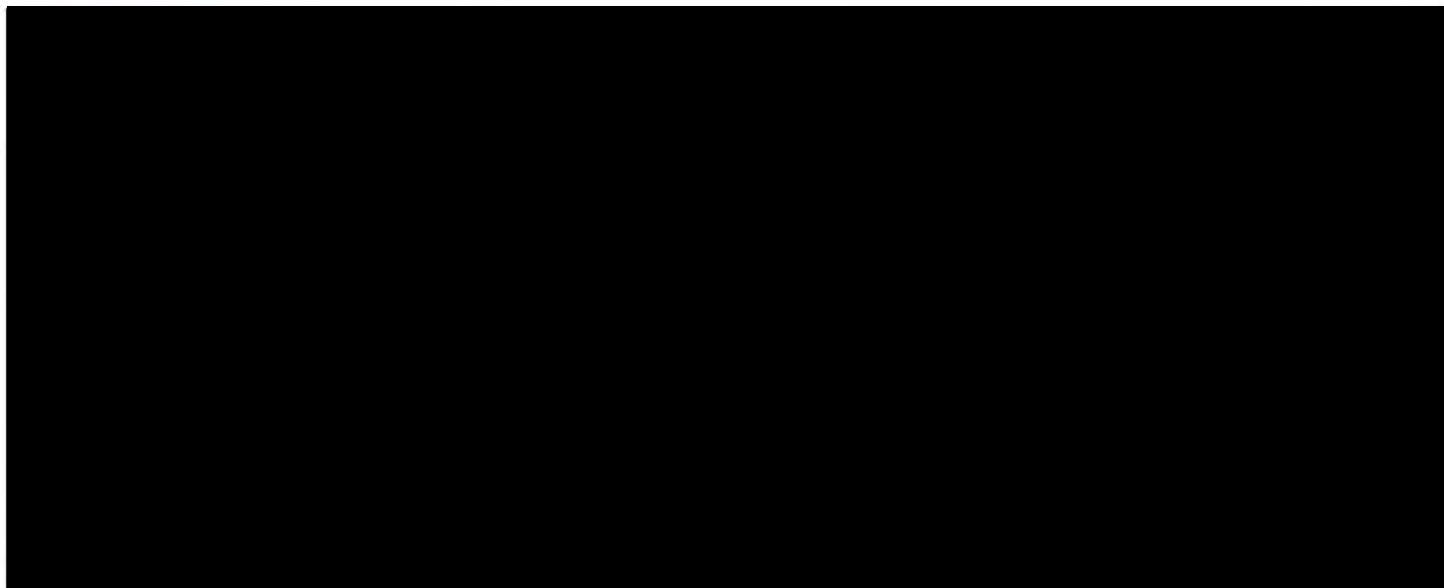
Yes (via e-mail)

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

Best regards,

Graham Trehwella
Director



Cass
associates

architecture
masterplanning
planning
landscape
conservation

ST HELENS BOROUGH LOCAL PLAN 2020-2035

SUBMISSION DRAFT

REPRESENTATIONS ON BEHALF OF REDROW HOMES LTD

on behalf of  **REDROW**

Cass Associates

Studio 204B
The Tea Factory
82 Wood Street
Liverpool
L1 4DQ

March 2019

Distribution of Housing

- 2.25 The distribution of housing needs to be based in a clearly defined objective to secure a balanced pattern of development based on the principle of achieving the most sustainable forms of development.
 - 2.26 The Key Settlements are the most sustainable locations for development. These should be the focus for the significant majority of new housing. As well as this, there is a need for balance between the northern and southern sectors of the borough of St Helens and a need to meet aspirations for different types and sizes of houses.
 - 2.27 In terms of land allocated for housing, there is a bias towards the southern sector of St Helens, dominated by the Bold Forest Garden Suburb and the Moss Nook urban village. 04
 - 2.28 In order to achieve a balance in the distribution of new housing and the types of housing to be brought forward there is a strong case to focus any additional housing at and around the Key Settlements in the northern sector of the borough. The strengthening of housing land provisions across the northern Key Settlements of the Borough is further justified by the proposed strategic employment allocations at Haydock. It has been established that there is a direct link between employment growth and the need for housing. The future economic development along the A580 and M6 corridors will underpin the requirement for more housing in places such as Rainford.
-

Conclusions on Meeting Housing Needs

- 2.29 The overall housing requirement needs further consideration to ensure that housing is closely aligned with the ambitions for economic growth. A higher uplift in the housing requirement figure is needed to ensure a better balance between economic development and new homes across the plan period. There needs to more ambition in St Helens so that housing need matches the projected expansion of economic activity. The long established requirement of 570dpa remains relevant and appropriate.
- 2.30 The uplift in housing requirements brings into play other sites for new homes. To achieve an improved, and better balanced and more sustainable distribution of housing there is justification for more development in the northern Key Settlements of the borough. The assertion is strengthened by the potential difficulties that surround the delivery of housing in the Plan period on a range of urban sites where there are considerable impediments to overcome. More flexibility is needed to account for delays in delivery or sites that might prove uneconomic to development and to add choice and competition to the St Helens housing market.
- 2.31 Rainford is a Key Settlement which is well placed to accommodate a higher level of growth. It has been demonstrated that the land at Stanley Avenue / Junction Road is a strong candidate for removal from the Green Belt and an allocation for housing. This is the most sustainable location in Rainford. New housing will be highly accessible and is capable of being integrated into the essential fabric of the settlement.

PO2455

Representor Details

| | |
|----------------------|---|
| Web Reference Number | WF0002 |
| Type of Submission | Web submission |
| Full Name | Mr Francis Williams |
| Organisation | St Helens Green Party |
| Address | 7 Parkside Avenue Sutton Manor St. Helens WA9 4DT |
| Agent Details | |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

| | |
|---|--|
| Policy | |
| Paragraph / diagram / table | |
| Policies Map | |
| Sustainability Appraisal / Strategic Environmental Assessment | |
| Habitats Regulation Assessment | |
| Other documents | |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| | |
|--------------------------------------|----|
| Is legally compliant? | No |
| Is sound? | No |
| Complies with the duty to cooperate? | No |

5. If you consider the Local Plan is unsound, it because it is not:

Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Green Party SHLP response

There must be exceptional circumstances for removing land from the Green Belt. The Borough has failed to base its future needs in terms of trends established from previous demand data, instead it has based its needs on an aspirational view of future needs which intends to stimulate development by making land available for building, rather than responding to actual need: the exceptional circumstances are not fully evidenced and justified in accordance with para. 136 National Planning Policy Framework, nor is aspirational assessment of future need objectively assessed as required by para. 11(b) NPPF.

The Borough contains a large proportion of previously-developed land and has suffered much despoliation since the start of the industrial revolution, and whilst the borough has policies for gradual assessment of contaminated and unsuitable sites, it does not have a policy for remediating these sites and making them available for development. In view of the large amount of previously developed land that is not available for development, policy that fails to make such land available, yet consigns large areas of virgin land for development, cannot be viewed as sustainable. It fails to preserve land for future generations, whilst not bringing land currently unavailable through contamination or other current unavailability forward for development. Using Green Belt land will have deleterious effects on food production, wildlife, recreation and the ecosystem.

01

02

03

As there has been such extensive scarring of the local landscape historically by industry, virgin land, whether or not in agricultural production, should be conserved at all costs, and all realistic alternatives should be considered. Land that is taken for development, particularly on the urban fringe, reduces access to the countryside, with its health and recreational benefits.

03

Land used for warehousing has an ever-shrinking capacity for employment as technology introduces more and more labour-saving devices to reduce employment costs. The same is likely to apply with freight transport when driverless vehicles are introduced. A policy sacrificing large tracts of productive agricultural land for a rapidly-diminishing yield in employment is neither a sustainable use of land, nor does it provide sustainable employment. Furthermore, large warehousing has a commensurately large take of land, so under the plan, large tracts of land would be urbanized and taken out of food production at a time when the UK has a growing population.

04

Land has been Safeguarded for future development. St Helens Green Party believes that the SHLPSD does not accord with the principles of sustainability, that is, it earmarks agricultural land that is currently Green Belt land development, not under the new plan but the one following it. We suggest that the land in question should remain in the Green Belt, and periodic reviews of the local plan should consider needs current at the time. Safeguarding large areas does not accord with para. 11(a), which states: "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;". A plan that designates large areas of land as being for future development cannot be deemed flexible. What, for example, if food production becomes a priority in the next few years? The plan has to be reviewed every five years, there is no need to safeguard any land. Decisions can thus be taken nearer the time, with more accurate data available.

05

To accord with the principles of sustainability, new housing development should be close to centres of employment or as close as possible to existing transport hubs. Housing development should be within easy reach of the employment centres or close to transport hubs.

As the borough's policy seems to be to promote warehousing, the bulk of such employment being low-skill with corresponding remuneration, housing development on greenfield sites distant from employment centres is unlikely to be predominantly of a type which is affordable for those on low incomes, nor is it sustainable from a transport perspective, making travel by bus lengthy or motor-transport dependent. The optimal locations for housing development are close to the town centre.

06

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

| | |
|---------------|----------------------|
| Response Date | 5/13/2019 4:10:28 PM |
|---------------|----------------------|

PO2456



CPRE Lancashire response
jackie.copley
to:
planningpolicy
13/03/2019 09:20



1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

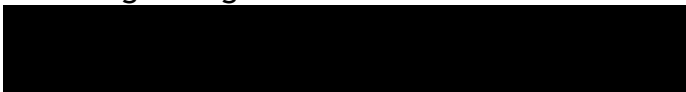
Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

Jackie Copley MRTPI MA BA(Hons) PgCert
Planning Manager



Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

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Registered Charity Number: 1107376

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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

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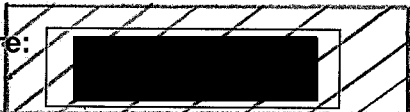
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: Ms | Title: |
| First Name: Jackie | First name: |
| Last Name: Copley MRTPI MA BA(Hons) PgCert | Last Name: |
| Organisation/company: CPRE Lancashire | Organisation/company: |
| Address: PO Box 1386, PRESTON, | Address: |
| Postcode: PR2 0WU | Postcode: |
| Tel No: [REDACTED] | Tel No: |
| Mobile No: [REDACTED] | Mobile No: |
| Email: [REDACTED] | Email: |

| | |
|--|--|
| Signature:  | Date: <input type="text" value="13 March 2019"/> |
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Yes ☒ (Via Email)

No ☐

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PART B – YOUR REPRESENTATION

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| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
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land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However we think that there may be more brownfield sites to be recorded as "suitable" on the Brownfield Register, than is currently the case.

CPRE Lancashire believes there are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is in reality available for development. We hope to engage community members to help identify more brownfield sites in the next few months, and we have developed a Toolkit to support people to engage better with the Council's planners. www.cprelancashire.org.uk/resources/housing-and-planning/planning/item/2483-cpre-lancashire-brownfield-land-register-toolkit?highlight=WyJ0b29sa2l0l10=

We therefore think Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing being allocated in existing Green Belt. We also recommend the Council introduces a brownfield target, to focus activity in regard to a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could achieve such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The gratuitous ambitious targets bear no resemblance to the facts.

We also query whether the minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF by not making effective use of land.

CPRE agrees that adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future would mean that jobs and housing figures can be revised upwards or downwards on the basis of robust analysis at the relevant time.

Policy LPA05.1: Strategic Housing Sites

CPRE Lancashire is opposed to needless release of Green Belt land for housing, we reserve the right to comment on all the housing sites included in LPA05.1 at the examination.

Policy LPA06: Safeguarded Land

St Helens Council is really going for a "slash and burn" approach to the Green Belt. CPRE Lancashire is strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss. This approach is all the more relevant in view of the historically large amounts of land within the Borough which have been despoiled by mining and heavy industry, and the need to place emphasis on saving what remains of the unspoiled land for the benefit of young people and future generations.

CPRE accepts that safeguarded land can be a useful tool, however proposing 85.88 hectares for employment (equal to 39.9% of employment land), and 114.19 hectares for housing (equal to 28.6% of housing land), is hugely excessive.

CPRE Lancashire is concerned that if too much land is allocated all at once, then developers will target that which is most profitable, which tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it, in the case of St Helens large tracts of land to the south east need rejuvenation. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

PO2457



CPRE Lancashire response
jackie.copley
to:
planningpolicy
13/03/2019 09:20



1 Attachment



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2019 03 13 CPRE response to St Helens submission local plan.doc

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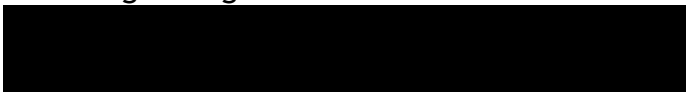
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We wish you well with the progression of the local plan.

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

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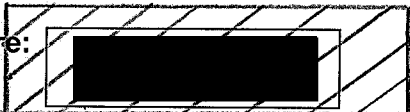
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| | |
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RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

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PO2458



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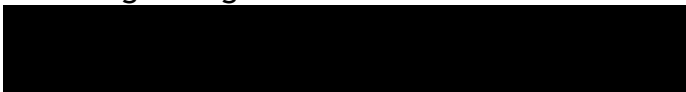
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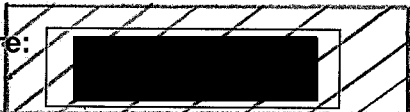
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Expert demographer Mr Piers Elias, (commissioned by St Helens Green Belt Association) demonstrates that the 2016-based data would yield a much reduced figure of 360 dwellings per year. If on the basis of the opinion of expert economist Dr Athey, that the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows that the housing requirement also should be further adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. If allowance is made for expected completions before 2020, this figure for need translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035, a significantly lower figure.

We note that the SHLAA identifies enough housing land to accommodate 7,817 dwellings, and we are pleased to see that a windfall allocation is included. The Brownfield Register 2017 identified enough

land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However we think that there may be more brownfield sites to be recorded as "suitable" on the Brownfield Register, than is currently the case.

CPRE Lancashire believes there are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is in reality available for development. We hope to engage community members to help identify more brownfield sites in the next few months, and we have developed a Toolkit to support people to engage better with the Council's planners. www.cprelancashire.org.uk/resources/housing-and-planning/planning/item/2483-cpre-lancashire-brownfield-land-register-toolkit?highlight=WyJ0b29sa2l0l10=

We therefore think Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing being allocated in existing Green Belt. We also recommend the Council introduces a brownfield target, to focus activity in regard to a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could achieve such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The gratuitous ambitious targets bear no resemblance to the facts.

We also query whether the minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF by not making effective use of land.

CPRE agrees that adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future would mean that jobs and housing figures can be revised upwards or downwards on the basis of robust analysis at the relevant time.

Policy LPA05.1: Strategic Housing Sites

CPRE Lancashire is opposed to needless release of Green Belt land for housing, we reserve the right to comment on all the housing sites included in LPA05.1 at the examination.

Policy LPA06: Safeguarded Land

St Helens Council is really going for a "slash and burn" approach to the Green Belt. CPRE Lancashire is strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss. This approach is all the more relevant in view of the historically large amounts of land within the Borough which have been despoiled by mining and heavy industry, and the need to place emphasis on saving what remains of the unspoiled land for the benefit of young people and future generations.

CPRE accepts that safeguarded land can be a useful tool, however proposing 85.88 hectares for employment (equal to 39.9% of employment land), and 114.19 hectares for housing (equal to 28.6% of housing land), is hugely excessive.

CPRE Lancashire is concerned that if too much land is allocated all at once, then developers will target that which is most profitable, which tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it, in the case of St Helens large tracts of land to the south east need rejuvenation. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

PO2459



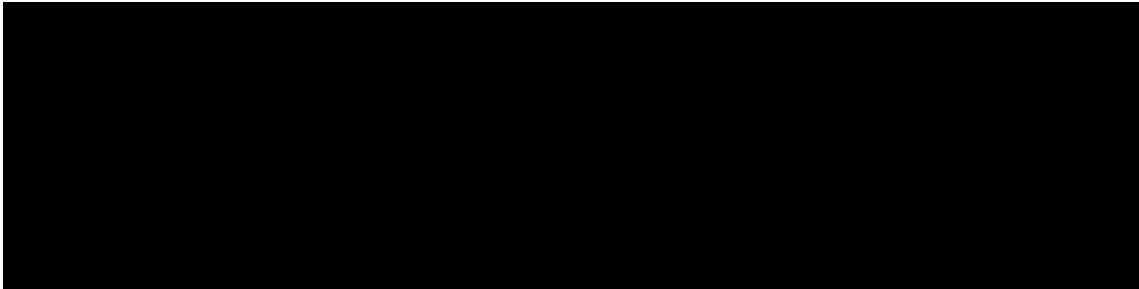
St Helens Local Plan - Site 4HA Bold Forest Garden Suburb

John Grace

to:

[REDACTED] planningpolicy@sthelens.gov.uk

08/05/2019 14:23



3 Attachments



Letter to LP manager Abbotsfield Farm.pdf representation-form Abbotsfield Farm 7-5-19.pdf



Call for Sites Form Abbotsfield Farm.pdf

Dear [REDACTED]

Please find attached a covering letter and completed Representation Form for the St Helens Local Plan, Site 4HA Bold Forest Garden Suburb.

If you require any further information please do not hesitate to contact myself or Bernard Grace copied in this email.

We look forward to hearing from you in due course and would ask if you can kindly acknowledge safe receipt of this email.

Kind regards

John Grace

Mr & Mrs B Grace
Abbotsfield Farm
Gorse Lane
Bold
St Helens
WA9 4SF

Development Plans Manager
Development Plans Section
Place Services
Town Hall Annexe
Victoria Square
St. Helens
WA10 1HP

By post and email to:

Date: 8th May 2019

Dear [REDACTED],

Site 4HA Bold Forest Garden Suburb – land at Abbotsfield Farm

As landowners of the central section of proposed allocation 4HA, we support the Local Plan's proposed allocation of our land and confirm that our land is available, suitable and deliverable for housing development. The extent of our land ownership is shown on the map overleaf.

We question why the Council consider that only 480 dwellings will be delivered by 2035 when housing could be delivered more quickly than this. Our land is available for development immediately and we suggest that table 4.5 on page 41 of the Submission Local Plan should be updated to reflect all of the Garden Suburb site 4HA being developed within the Plan period. We have made formal representations to the Inspector to this effect.

We trust that all landowners will be treated equally and there will be no preferential treatment of any parcels, including any in public ownership. Transparency over this issue will be vital to demonstrate fairness and probity.

To assist delivery of the Garden Suburb, we consider it vital that the Development Requirements for the site set out in Appendix 5 to the Local Plan should be clear on the equalization of timing, housing density, type of housing and developer contributions (pages 233-234 of the Plan). We have made representations to the Inspector to this effect as per the attached form.

We welcome the requirement in part 2 of Policy LPA05.1 Strategic Housing Sites that a comprehensive masterplan must form part of any planning application for development. We ask that the Council involve us in any discussions about the masterplan at an early stage of its preparation.

We [REDACTED] at Abbotsfield Farm in the midst of site 4HA, and therefore all plans will have a direct impact [REDACTED]
[REDACTED]t. For these reasons we wish to be very closely involved in all further work relating to the Bold Forest Garden Suburb and look forward to hearing from you in due course.

Yours sincerely,

[REDACTED]
Bernard and Margaret Grace



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;


Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: Mr & Mrs | Title: |
| First Name: Bernard and Margaret and John | First name: |
| Last Name: Grace | Last Name: |
| Organisation/company: | Organisation/company: |
| Address: Abbotsfield Farm Gorse Lane Bold St Helens Postcode: WA9 4SF | Address: Postcode: |
| | Tel No: |
| | Mobile No: |
| | Email: |

| | |
|--|---|
| Signature:  | Date: <input type="text" value="7/5/19"/> |
|--|---|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | |
|---|----------------|-----------------------------|------------------|---|-----------------|--|--|--------------------------------|
| Policy | LPA05.1 | Paragraph / diagram / table | Table 4.5 | Policies Map | Site 4HA | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment |
| Other documents (please name document and relevant part/section) | | | | Requirements for site 4HA in Appendix 5 (pages 233-234 of the Submission Local 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? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|-------------------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

We support the proposed allocation of site 4HA Bold Forest Garden Suburb for the following reasons:

- It provides a positively prepared plan that meets the area's housing needs;
- It is justified as a highly appropriate Garden Suburb in this location;
- It is consistent with National Policy in delivering sustainable development.

However, we consider the Local Plan to not be effective in its current form, in particular in relation to the delivery of site 4HA Bold Forest Garden Suburb. The proposed modifications set out in section 7 are necessary to make the Plan sound.

Table 4.5 on page 41 of the Local Plan gives an indicative number of 480 dwellings over the plan period for site 4HA. A far higher number are deliverable.

01

02

There is no reason why all of site 4HA Bold Forest Garden Suburb cannot come forward in the Plan period. Certainly our land at Abbotsfield Farm is available, suitable and immediately deliverable. All landowners comprising the Bold Forest Garden Suburb should be treated equally, with no preferential treatment shown to some landowners over others, including public sector landowners. Transparency over this issue is vital to demonstrate fairness and probity.

To make the Plan effective, it is necessary for the Development Requirements in Local Plan Appendix 5 to be modified regarding the equalization of timing, housing density, type of housing and developer contributions on the site.

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.

Table 4.5 on page 41 of the Local Plan should be amended to show all of site 4HA Bold Forest Garden Suburb being developed by 2035, with the indicative number of dwellings deliverable by 2035 increased from 480 dwellings to 2,988 dwellings.

The site requirements for site 4HA Bold Forest Garden Suburb in Appendix 5 of the Plan (Local Plan pages 233-234) should be amended as follows (new text underlined):

- Add a new bullet point to read: "All land parcels comprising site 4HA Bold Forest Garden Suburb should be treated equally with no favouritism or preferential treatment to be shown to some landowners over others."
- Amend the second bullet point on page 234 to read: "Financial contributions and the provision of on-site infrastructure for education and off-site highway works may be required; these should be equalized between landowners based on acreage and will be subject to further assessment at the master planning stage."
- an additional sentence after the third bullet point on page 234, to read, "Housing density and types of housing should be equalised between the different landholdings comprising the site".

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

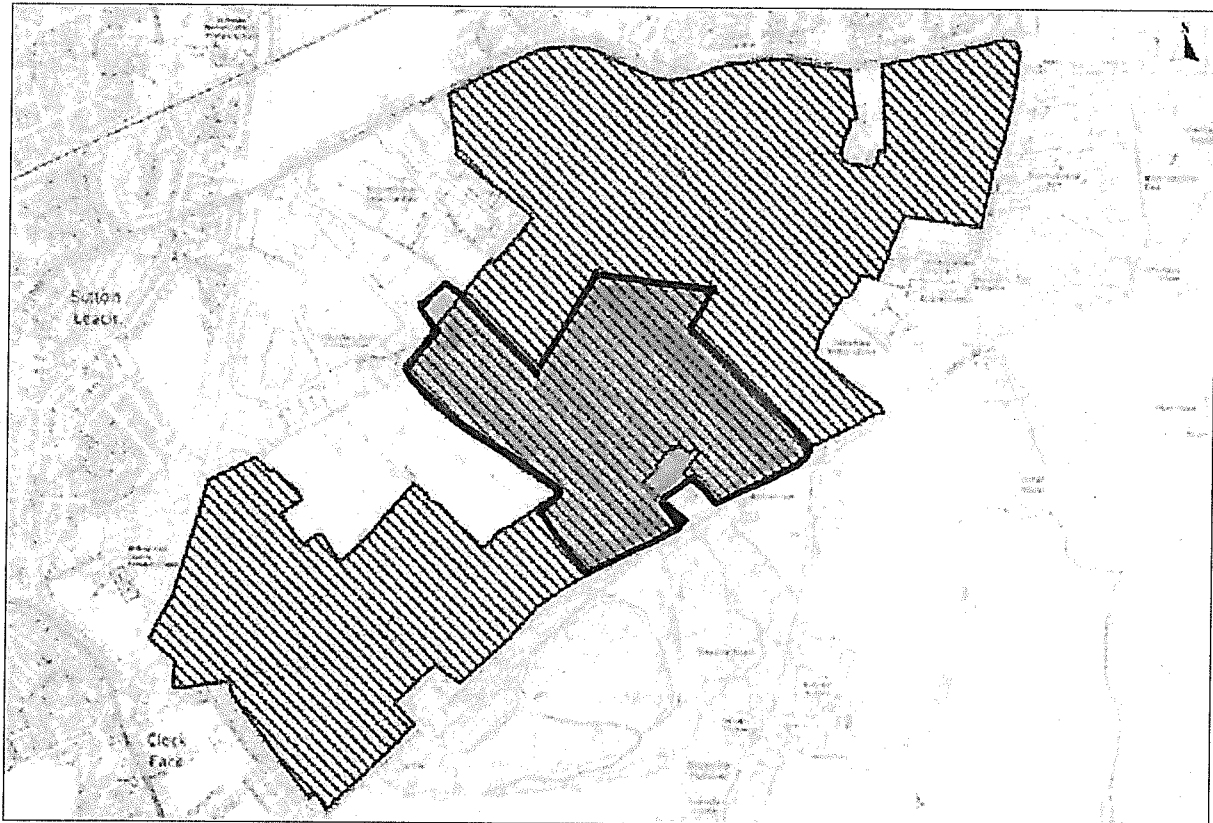
| | | | |
|--|--|---|--|
| | No, I do not wish to participate at the oral examination | ✓ | Yes, I wish to participate at the oral examination |
|--|--|---|--|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We [redacted] at Abbotsfield Farm in the centre of the proposed Bold Forest Garden Suburb (site 4HA) therefore all plans will have a direct impact on [redacted]

[redacted] For these reasons we wish to be involved in all discussions regarding the future of this site.

Extent of our landownership outlined in green, overlain on the proposed allocation site 4HA



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.

PO2460



Objection to plans to build on Ecclestone/Windle Greenbelt land.

Gerard Banks

to:

planningpolicy@sthelens.gov.uk

11/03/2019 09:35



1 Attachment



Planning Objection.pdf

Dear Sir/Madam

Please find attached my objection to your plans to build on Ecclestone/Windle Greenbelt land.

Kind regards

Gerard Banks

54 Ecclesfield Road

Ecclestone



Mr & Mrs G Banks
54 Ecclesfield Road
Eccleston
St Helens
WA10 6BN
[REDACTED]

11 March 2019

Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens, Merseyside
WA10 1HP

Dear Sir or Madam

On behalf of my wife and I, I wish to object to the St Helens Council Local Plan(2018). In particular, we are objecting to the decisions made regarding Housing Need (LPA05) and the Greenbelt Review (2018).

[REDACTED]

Now, to discover that you intend to illegally build and take away the view we have enjoyed for over [REDACTED] years is heartbreaking. I actually do not have the words to describe quite how distressed we are even at the prospect. Not only will our view be destroyed, but all the wildlife that we have enjoyed for so long will disappear, including rabbits, hares, mice, voles, etc., the thought of them being slaughtered is equally distressing. This is Greenbelt land and always have been. It should never be built on. 01

From a technical standpoint, St Helens Council are using a projected annual house building target of 486, the ONS suggestion for 2014 is 468 and the later, more accurate ONS estimate is 383. The St Helens adopted target appears to be incorrect and unexplainable. The justification for the Greenbelt Review (2018) is this erroneous target and is being used by St Helens Council as the reason for "exceptional circumstances" in removing key areas from the Green Belt. We do not consider an over-ambitious and aspirational housing target to be "exceptional circumstances". 02 03

The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development; it is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land. 04

According to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050 whilst agricultural land lost to land degradation is estimated at 12M hectares p.a. (23 hectares/minute, 1 hectare = 2.47 acres); enough to produce up to 20M tonnes of grain. Furthermore, the overall trend of steadily declining agricultural yields will be subject to widely fluctuating yields in the UK and worldwide due to the growing incidence of extreme weather events, such as storms, floods and heatwaves. For example, total UK cereal production had significant dips in 2001, 2007, 2012 and 2013 linked to adverse weather conditions in those years (source: Defra, 2015).

Food security is an economic, social and environmental issue. It is about consumers having access at all times to sufficient, safe and nutritious food for an active and healthy life at affordable prices. To achieve this, our food supply must be reliable and resilient to shocks and crises. Food must also be produced in a way that is environmentally sustainable or we will be storing up problems for the medium to long term. 04

Protecting food security has to run in parallel with other priorities such as tackling climate change (2015 was the warmest year on record since record keeping began in 1880, NASA 2016) and securing a healthy natural environment. These collectively are likely to be the most pressing economic and social factors affecting the UK in the 21st Century. The question is not IF food security will become a serious issue but WHEN.

The loss of any greenbelt should not be taken lightly. I can only comment on one area of greenbelt mentioned in the local plan as this is the only one that I use. The land referred to is 8HS and is south of the A580 adjacent to Windle Island. The land concerned is grade 1 and 2 agricultural land and has been farmed since the 1850's. It is also land that is enjoyed regularly by the residents who use the numerous footpaths.

If this valuable framing land is removed from Green Belt, the nearest green space would then be north of the A580 and people would be trying to cross this road to access open countryside. This is already a very busy road and as part of the Borough's strategy will get even busier.

As the figures taken from the Mott MacDonald business case for the Windle Island Improvement plan show:- 05

"Following consultation with a transport modeler, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB: (Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more:

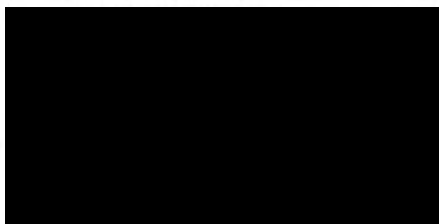
- Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more;
- Daily average speed will change by 10km/hr or more; and
- Peak hour speed will change by 20km/hr or more."

Contaminated brown field sites have not been considered for development; St Helens Council have identified 3,170 hectares of the lowest priority contaminated land but have not proposed a strategy for implementing this. It has been proposed by some Councillors that developers could be made responsible for this and offered this land as an alternative to Green Belt. This has not been seriously considered and, again, shows that there are no "exceptional circumstances" for Green Belt release. 06

Careful reading of the local plan suggests that the release of greenbelt is so that development costs would be reduced thus enabling the affordable housing target to be achieved. Hardly meeting the "exceptional circumstances" justification for releasing greenbelt. 07

For these reasons I would suggest that the Local Plan (2018) is unsound and needs to be modified. Initially the housing target figures should be reduced, secondly the Plan should only consider the fifteen-year target, eliminating any requirement for "safeguarded" sites and finally, the test of "exceptional circumstances" should be carefully and realistically applied to ensure that the precious local Green Belt continues to serve its purpose.

Yours faithfully

A large black rectangular box redacting the signature of Gerard Banks.

Gerard Banks

PO2461

EL0067



Local Plan Response

Steve Muskett

to:



① - IDP

② - GBR

③ - SA

④ - LPAOK

⑤ - LPAOK ^{TABLE} 4-4

⑥ - Pre

1.7.2 - DLC

1 Attachment



LPSD - Submission Document_20190311.pdf

Please find attached my response to the Local Plan.

I would kindly request acknowledgement of this email and receipt/ acceptance of my response to avoid unnecessarily printing and hand delivering to the Town Hall.

Many thanks,

Steve Muskett
12 Hamilton Road
Windle
St Helens
WA10 6HG

St Helens Borough Local Plan 2020-2035 (Submission Draft)

PART A

Title: MR
First Name: STEVE
Last Name: MUSKETT
Address: 12 HAMILTON ROAD, WINDLE
Postcode: WA10 6HG
[REDACTED]

Signature: [REDACTED]

Date: 11th March 2019

Would you like to be kept updated of future stages of the St Helens Borough 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 ☐

No, I do not wish to participate at the oral examination

4. PART B – Table 4.6

- 4.1. Table 4.6 of the LPSD outlines the housing numbers and various contributors to the overall quantity.
- 4.2. Despite some notes on the table, it is not clear where all the numbers come from and not everything correlates to the SHLAA 2017.
- 4.3. Row (b) counts the expected completions by 2020 but presents to evidence or basis of where these come from.
 - 4.3.1. They are accepted at face value but lack of transparency means this could be higher
 - 4.3.2. Additionally, 99 small/windfall sites were delivered in 2016 and as such should be subtracted from the headline figure of 9234.
- 4.4. Row (e) gives the total SHLAA supply from 2017-2035 which apparently consists of (f), (g), (h) & (i).
 - 4.4.1. Those rows however do not total 7817
- 4.5. Row (i) for example details a number of 4107
 - 4.5.1. The balance in the SHLAA is 3763 after having cross-referenced (f), (g) & (h)
- 4.6. The value of 7817 appears to be the 7682 from SHLAA plus 135 units for 2032-2035 from Site-111 at Cowley Hill
- 4.7. Footnote 30 of the table claims the figure to be all site suitable for housing from SHLAA up to 2032 **plus** the small site 'windfall' AND another additional allowance for 2032-2035
 - 4.7.1. It's hard to comprehend how this is possible given the SHLAA alone produces 7682 units
- 4.8. Row (l) is apparently a capacity reduction for non-delivery but no evidence is provided as to whether this is a robust number.
 - 4.8.1. Given that there are only 289 units from the total SHLAA of 7682 that are stalled or not being delivered, 15% seems a huge number
 - 4.8.2. In any event, [REDACTED] advised me these units are not actually 'not ever' delivered, just within the plan period.
 - 4.8.3. So whatever the number here, they should be rolled over into the next period and included in the future plan numbers instead of Safeguarding more land.
 - 4.8.4. Additionally, this percentage is also applied to the small/windfall sites figure of 1395, which the Council themselves have shown proven and robust calculations for delivering. So those 1395 should not be discounted.
- 4.9. Row (o) is a further allowance of 20% for contingencies, such as infrastructure provision
 - 4.9.1. Identified sites are then further reduced to 75% (for instance) NDC during the calculations for land needs
- 4.10. The small/ windfall sites are demonstrated to produce 93 units per annum over a 10 year period
 - 4.10.1. This data however has a significant outlier included for 2010 when the depressed housing market occurred.
 - 4.10.2. Removing that year produces 97 units per annum
 - 4.10.3. Alternatively, taking more recent figures from the past 5 years instead, also produces 97 pa
- 4.11. I have reworked Table 4.6 below, based on the Standard Method numbers since no exceptional circumstance has been demonstrated to deviate from this.
- 4.12. The table should hopefully better demonstrate the origin of the numbers rather than the hidden method used in the LPSD.
- 4.13. The revised table now shows only capacity for 448 dwellings is required which does not present as exceptional circumstances
- 4.14. Moreover, the bulk of 448 is due to the 15% non-delivery figure of 327 or in other words, there is enough land, it just needs to be built on and delivered!

Reworked Table 4.6 (Data and numbers in the original Council Table 4.6 need to be questioned, verified and explained for transparency)

| Requirements | | | | Original STHC Table | Sub-Total Dwellings | Dwellings | Notes/Comments |
|--------------|--|---------------------------------------|------------------------------------|------------------------|------------------------|-----------|---|
| a) | St Helens housing requirement (19 years from 1 Apr 2016 to 31 Mar 2035) at average of 468 per year | Small/Windfall sites delivery 2016/17 | Expected completions by 1 Apr 2020 | 9234 | 19 | 468 | 468 value revised to 468 Standard Method figure as Exceptional circumstances not statified NPPF para 60. |
| b) | Residual requirement over Local Plan period from 1 Apr 2020 to 31 Mar 2035 | Anticipated supply | | 1983 | 39 | 8793 | Source SHLAA 2017 - Figure 3.12 Taken at face value from the LPSD Table 4.6 |
| c) | Residual requirement over Local Plan period from 1 Apr 2020 to 31 Mar 2035 | Anticipated supply | | | | 6804 | |
| d) | Anticipated supply | | | | | | |
| e) | Total SHLAA supply - 1 Apr 2017 until 31 Mar 2035 | | | 7817 | | 8168 | - Table 4.6 of LPSD has figure of 7817 but this does not include small/windfall sites 2032-2035 despite comment saying it does - 7817 appears to be 7682 SHLAA 2017 plus 45pa @ Cowley Hill site 2032-2035 (7682+135=7817) Extracted from SHLAA 2017 fig 4.3 |
| f) | Large sites (0.25ha or 5 units and above) - planning permission not started as of 1 Apr 2017 | | | 1581 | 958 | 1581 | |
| g) | Large sites with planning permission under construction as of 1 Apr 2017 | | | 654 | 614 | 654 | |
| h) | Large sites with planning permission but stalled as of 1 Apr 2017 | | | 289 | 289 | 289 | |
| i) | Large sites - identified by 2017 SHLAA, no planning permission as of 1 Apr 2017 | | | 4107 | 484 | 3763 | |
| j) | Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowances) | | | 1395 | 37 | 1435 | - Table 4.6 of SHLP has figure of 4107 that is in conflict with SHLAA 2017 fig 4.3 - The SHLAA fig is used here. |
| k) | Site-111 (Cowley Hill) will yield units beyond 2032 but within plan to 2035 | | | | 15 | | SHLAA 2017 Fig 3.12 demonstrates 33 pa. - Removing outlier from calculations for 2010 depressed housing market makes 9 year average of 37pa |
| l) | Small sites (below 0.25ha / 5 units) (small sites / "windfall") (allowance 2032-2035) | | | | 3 | 37 | - Using most recent data (last 5 year average) also demonstrates 37pa - Remaining capacity post 2032 to be completed at Cowley Hill Site-111 - 276 units carried forward to next plan period reducing safeguarding need Robust data of small/windfall sites should be continued through 2032-35 |
| m) | Estimated SHLAA supply - (Appendix 5) - 1 Apr 2017 until 31 Mar 2020 | | | 6344 | 1134 | 6683 | - SHLAA 2017 Appendix 5 shows 1134 units planned for completion by 1 Apr 2020 |
| n) | SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18) | | | | 3 | 37 | - Small/windfall sites also delivered in this period: 3 years at windfall rate - 15% non-delivery is excessive given there are only 289 of 7682 sites 'stalled' in SHLAA 2017 (3.8%) - reduced to 7.5% (SHLAA 2017 fig 4.3 11-15 years) - Whatever number is here is actually delayed delivery rather than non-delivery (Source: Jonathan Clarke) so should be carried forward to next plan period reducing safeguarding need - non-delivery discount should also not be applied to small/windfall sites given the robust data demonstrating delivery of those |
| o) | Required capacity to be found on Green Belt land | | | 5550 | | 6356 | |
| p) | Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (to allow for contingencies e.g., infrastructure provision, delays, lead-in times to start of housing delivery etc.) | | | 1635 | | 448 | row c minus row m |
| q) | Total capacity of sites to be removed from the Green Belt (1 Apr 20 - 31 Mar 35) | | | 2034 | 20% | 538 | |
| r) | Total capacity of sites to be removed from the Green Belt (1 Apr 20 - 31 Mar 35) | | | 2056 | | 538 | Assume number exactly equals required for the purpose of this table |
| s) | Total supply over plan period | | | 7606 | | 6894 | |

PO2462

EL0120



St Helens Borough Local Plan 2020 - 2035 (Submission Draft) - Representations submitted

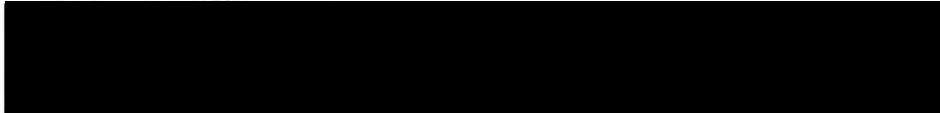
on Behalf of Mr A Jones

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

Architecture + Building Surveying + Town Planning

RTPI NORTH WEST
AWARDS FOR
PLANNING
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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: Mr | Title: Mr |
| First Name: Andy | First name: Guy |
| Last Name: Jones | Last Name: Evans |
| Organisation/company: | Organisation/company: Cassidy + Ashton |
| Address: c/o Agent | Address: 10 Hunters Walk, Canal Street, Chester |
| Postcode: | Postcode: CH1 4EB |
| <div style="background-color: black; height: 40px; width: 100%;"></div> | |

| | |
|--|---|
| Signature: <div style="background-color: black; width: 200px; height: 40px; display: inline-block;"></div> | Date: <div style="border: 1px solid black; padding: 2px; display: inline-block;">12.03.2019</div> |
|--|---|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: **planningpolicy@sthelens.gov.uk**

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|---|--|-----------------------------------|--------------------------------------|--------------|-----|---|--|--------------------------------|--|
| Policy | LPA05.1 LPA06 LPA02 LPA05 | Paragraph / diagram / table | Table 4.8 Table 4.5 | Policies Map | Yes | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|------------------------------|--|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Please tick as appropriate | | |

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|-------------------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input checked="" type="checkbox"/> |

6. Please give details of why you consider the Local Plan is 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

Refer to separately submitted representation / response statement

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Refer to separately submitted representation / response statement

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | | | |
|--------------------------|--|-------------------------------------|--|
| <input type="checkbox"/> | No, I do not wish to participate at the oral examination | <input checked="" type="checkbox"/> | Yes, I wish to participate at the oral examination |
|--------------------------|--|-------------------------------------|--|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Requirement for detailed discussion around housing land supply and the Plan's spatial strategy. Critical analysis of housing land requirements and supply (Table 4.6) required. Critical analysis of Green Belt Review and site selection required.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**



St. Helens
Council

ST HELENS BOROUGH LOCAL PLAN 2020 - 2035

SUBMISSION DRAFT
JANUARY 2019

A BALANCED PLAN FOR A BETTER FUTURE

**St. Helens Borough Local Plan
Submission Draft Consultation
Response Statement on behalf of the
Jones Family – Land off Elton Head Road**

CASSIDY + ASHTON | 10 Hunters Walk, Canal Street, Chester, CH1 4EB

7.7 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.

PO2463



St Helens Local Plan Submission Draft Representations - Torus 62 Limited
Ian Gilbert
to:
planningpolicy@sthelens.gov.uk
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

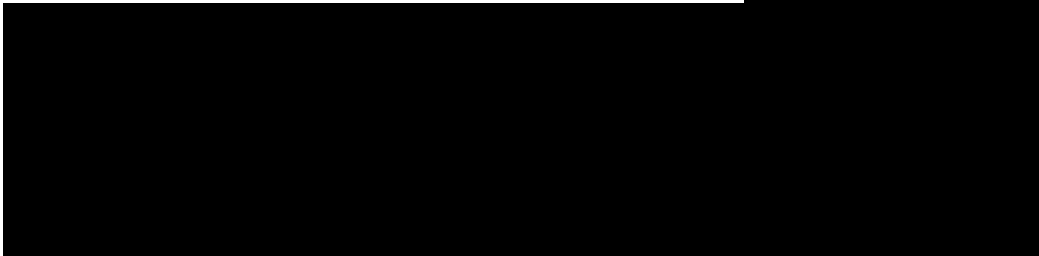
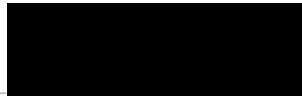
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

Ian Gilbert
Planning Associate



Representor Details

| | |
|----------------------|--|
| Web Reference Number | WF0114 |
| Type of Submission | Web submission |
| Full Name | Mr Adam Smith |
| Organisation | Torus 62 Limited |
| Address | co agent co agent |
| Agent Details | Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| | |
|---|---|
| Policy | Please see accompanying representations |
| Paragraph / diagram / table | Please see accompanying representations |
| Policies Map | Please see accompanying representations |
| Sustainability Appraisal / Strategic Environmental Assessment | Please see accompanying representations |
| Habitats Regulation Assessment | No |
| Other documents | Please see accompanying representations |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| | |
|--------------------------------------|-----|
| Is legally compliant? | Yes |
| Is sound? | No |
| Complies with the duty to cooperate? | Yes |

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

7. Please set out modification(s) you consider are necessary

Please see accompanying representations

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.32 With regard to the above, and in light of increasing difficulties facing the borough with regard to the affordability, it is considered that an additional uplift should be applied to the Council's housing requirement to boost the supply of housing to help meet affordable housing needs across the borough.

Supply

- 3.33 Our Client has a number of concerns in relation to the housing land supply identified within the Local Plan.

- 3.34 In the first instance, the Council has set out its supply within table 4.6 of the Local Plan in an unnecessarily confusing manner in which many of the identified sources of supply appear to relate to one and other with it being necessary to cross reference a number of footnotes to determine how elements of supply relate to one and other. We consider that it would be helpful for the Council to set out within the Local Plan the housing supply identified by completions, commitments and housing allocations.

- 3.35 Table 4.6 line o) refers to Site Allocation 15HA as forming part of the Green Belt Allocations for the Local Plan. It is not clear what allocation 15HA refers to.

- 3.36 Given the somewhat confusing nature of how the housing supply has been set out, it would be useful to be able to scrutinise the supply of housing sites that Council has identified. On analysis of the Appendices of the SHLAA 2017 it would be useful for the Council to set out when Sites with planning permission (Appendix 3) commenced development (or are proposed to commence), how quickly those Sites will be brought forward and how many units have been delivered prior to the commencement of the plan period.

- 3.37 The Council's Development Trajectory (Appendix 5 of SHLAA 2017) also lacks detail to be useful in scrutinising the deliverability of the housing land supply. The SHLAA relies heavily on brownfield sites coming forward between years 6-10 and 11-15 of the plan period albeit it is not clear what assumptions have been made to determine those Sites cannot start now but are likely to come forward after 6 or 10 years.

- 3.38 Equally, given the extent to which the Council's housing supply is predicated on larger housing allocations coming forward, we would expect the Local Plan to provide an updated schedule of sites proposed to be allocated including evidence of when those

PO2464



St Helens Local Plan Submission Draft Representations - Torus 62 Limited
Ian Gilbert
to:
planningpolicy@sthelens.gov.uk
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

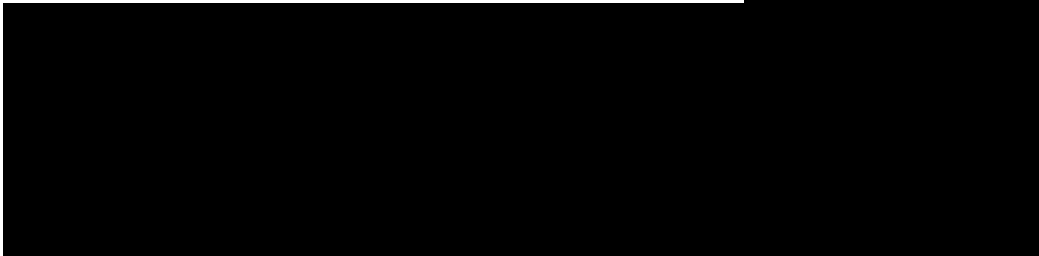
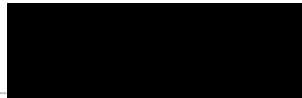
Dear Sir / Madam,

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Please do not hesitate to contact me should you require any further information.

Kind regards

Ian Gilbert
Planning Associate



Representor Details

| | |
|----------------------|--|
| Web Reference Number | WF0114 |
| Type of Submission | Web submission |
| Full Name | Mr Adam Smith |
| Organisation | Torus 62 Limited |
| Address | co agent co agent |
| Agent Details | Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| | |
|---|---|
| Policy | Please see accompanying representations |
| Paragraph / diagram / table | Please see accompanying representations |
| Policies Map | Please see accompanying representations |
| Sustainability Appraisal / Strategic Environmental Assessment | Please see accompanying representations |
| Habitats Regulation Assessment | No |
| Other documents | Please see accompanying representations |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| | |
|--------------------------------------|-----|
| Is legally compliant? | Yes |
| Is sound? | No |
| Complies with the duty to cooperate? | Yes |

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

7. Please set out modification(s) you consider are necessary

Please see accompanying representations

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.32 With regard to the above, and in light of increasing difficulties facing the borough with regard to the affordability, it is considered that an additional uplift should be applied to the Council's housing requirement to boost the supply of housing to help meet affordable housing needs across the borough.

Supply

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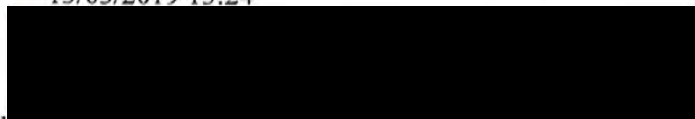
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- 3.38 Equally, given the extent to which the Council's housing supply is predicated on larger housing allocations coming forward, we would expect the Local Plan to provide an updated schedule of sites proposed to be allocated including evidence of when those

PO2465



Re: Representation
Mel Benyon
to:
planningpolicy
13/03/2019 13:24



1 Attachment



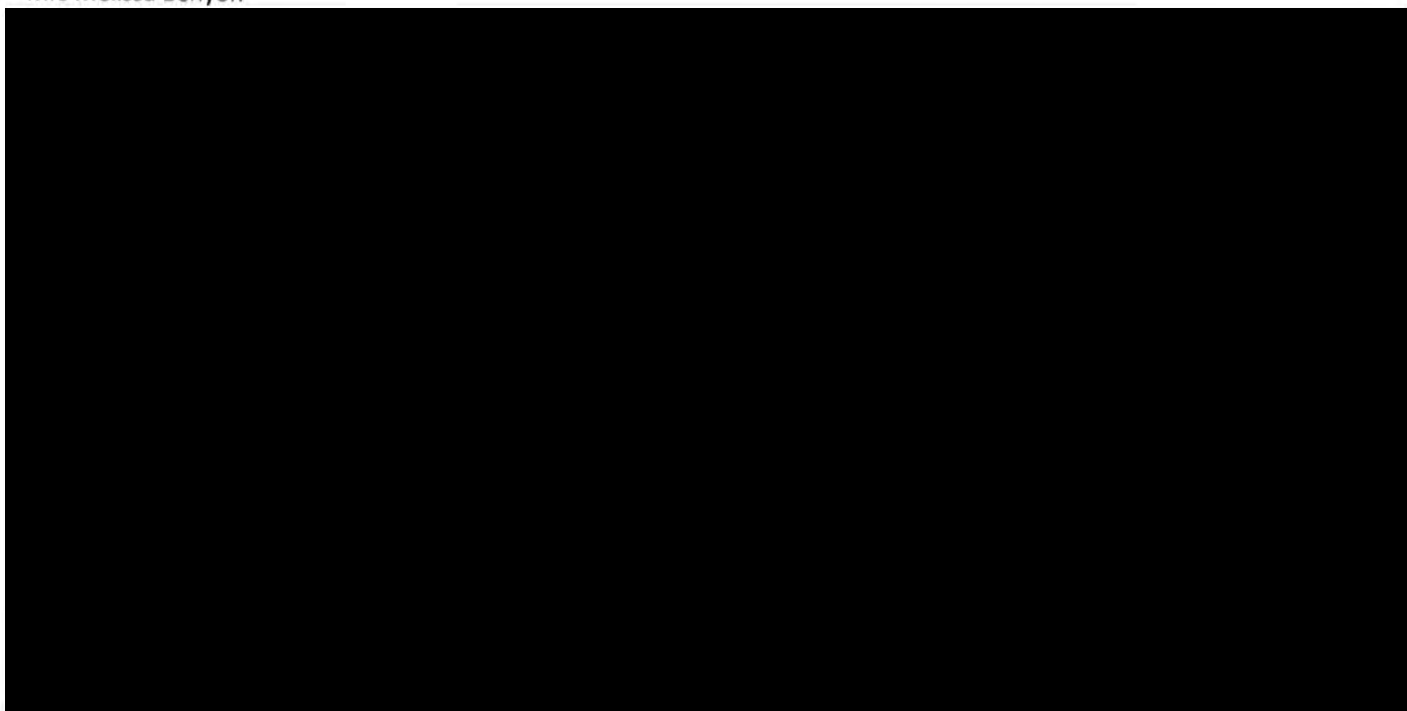
OBJECTION LETTER.docx

Dear Sirs

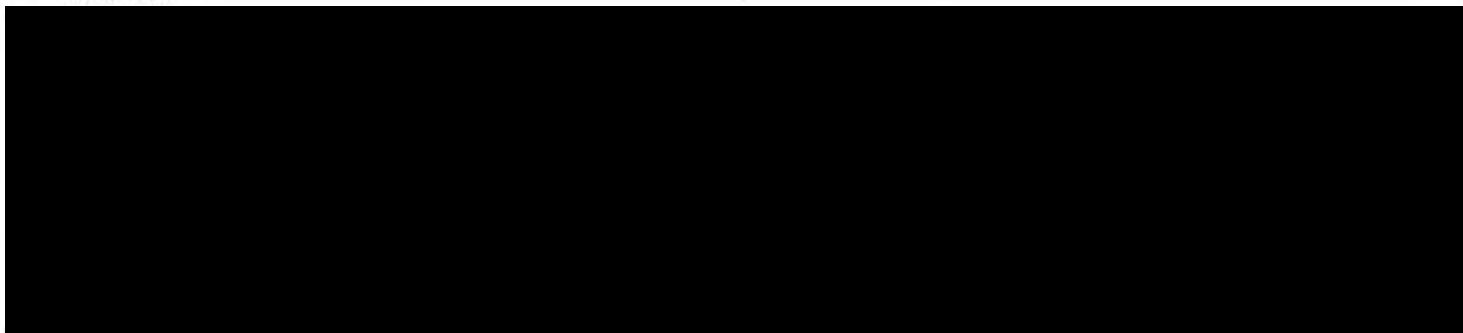
Please find attached my representation for the current Local Plan to development WA10 8HS 'Eccleston Vale'.

Kind regards

Mrs Melissa Benyon



Lancots Lane
Sutton Oak.
St Helens
UK
WA9 3EX



Melissa Benyon
9 Ecclesfield Road
Eccleston
St Helens
WA10 5LU

Reference: St Helens Local Plan

Dear Sirs,

The latest version of the Local Plan appears to contain some fundamentally questionable elements and does not seem to be justified or consistent with National policy. The expected growth over the period of this plan seems to be completely away from reality; it is purely aspirational and not based on current or accurate figures.

It would appear figures from 2014 are being used to forecast 486 houses per year, when the Office for National Statistics estimate from 2016, 383 houses. Surely, the most up to date figures should be utilised for something as important as a 15-year plan. 01

Putting that to one side, the Council's own Brownfield Register suggests land availability for 5808 houses. Given the table 4.6 of the plan, which shows a residual requirement of 7245, this means land being needed for 1437 houses. Based on the lower density of 30, it translates to only 48Ha of land being needed. Even using the 20% inflated figures from that table would still only equate to 1724 houses and 57Ha of land for housing. It makes little sense then why Table 4-5 allocates 288Ha of land for housing. 02

The council further then claims the need to safeguard land to plan for beyond this 15 year Local Plan, but that amount of land would cover 2-3 Local Plans. How can the Council possibly justify safeguarding an additional 155Ha or development beyond 2035? It seems completely irresponsible to remove Green Belt protection from land that might never be required. 03

The reality is the housing requirement should be more like 7277 (383x19) and when subtracting the expected completions by 1st April 2020, the residual need is then 5288; which is more than covered by sites on the existing Brownfield register. That does not even begin to look at other sites not on the register due to contamination issues. 04

The plan makes little to no mention of Brownfield or Previously Developed Land that is not yet available or included in the register. The council's own statement indicates 3170Ha of the lowest priority contaminated land exists in St Helens. How is it even possible to contemplate the removal of 433Ha from Green Belt protection when over 3000Ha exists that could be remediated and brought back into use. It appears the Council have no policy in place for bringing back these sites for use; it is completely unreasonable to assume that they cannot be made available within the 15-year plan period. 05

Given the amount of Brownfield land already available plus the contaminated land that could be brought back into use, there simply does not appear to be any exceptional circumstances to justify the destruction of green belt on this scale. The plan in its current form cannot be justified or deemed to be effective and therefore simply cannot be considered sound. 06

A major concern I have with the scale of growth being aspired to within the Local Plan is the infrastructure required to support it, something that St Helens Council are simply not taking into consideration.

The Infrastructure Development Plan (IDP) documents the projects currently underway to attempt to alleviate problems faced today, but seems to lack any substance on what will be done to solve issues of the future that adoption of this plan will bring

07

The plan promotes unsustainable traffic growth, which will cause severe traffic issues that surely cannot satisfy the National Planning Policy Framework (NPPF). The traffic growth will be in the exact areas that the borough already has significant and intractable problems, at Windle Island, Bleak Hill/Rainford Road, Rainhill, etc. The IDP refers to some of these existing but does not detail how these problems will be solved or funded. It mentions a great deal about 'seeking' or contributions 'will be sought' but there are numerous TBC's and unknowns detailed within IDP.

08

The Local Plan promotes vehicle dependency with many of the developments on edge of town sites, causing urban sprawl into the countryside. This will significantly impact on air quality, noise, tranquillity and general health. The IDP does not address these issues.

The IDP touches on Healthcare and Education, but how these will be funded or managed is vague at best, but generally missing and purely seem to be mentioned just so the subject is included within the IDP. It mentions for instance some expansion plans for Bleak Hill Primary School but that appears to be for current pupil placement issues, it does not address school places that will be required for over 1000 new homes at 8HS for instance. The IDP does not deal with long term impacts of the education needs of new and existing communities.

09

The IDP acknowledges that a high proportion of GP's are over 55. The proposed population increase envisaged requirements 10-16 new GP's plus replacements for those approaching retirement, but the plan does not elaborate on how these will be funded and provided.

The economic growth predictions for St Helens seem to be based on flawed historical data, which does not justify the aspirational targets in the plan. Whilst on the one hand this plan promotes new employment opportunities, it fails to mention the negative impact on farming and distribution jobs that the irreversible loss of Grade 1 agricultural land will have. In the Sustainability Appraisal document, it even uses farmland as a rationale for providing local employment to a new residential development; a development that itself would have just been built on Hectares of Grade 1 farmland resulting in the loss of jobs.

10

11

In conclusion, the Local Plan in its current form when examined by the Planning Inspector cannot be considered justified, effective and consistent with National policy. Consequently, it must surely follow that it cannot be considered sound.

Kind regards

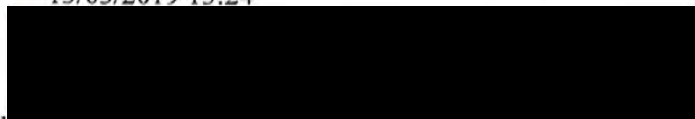
Yours faithfully

Melissa Benyon

PO2466



Re: Representation
Mel Benyon
to:
planningpolicy
13/03/2019 13:24



1 Attachment



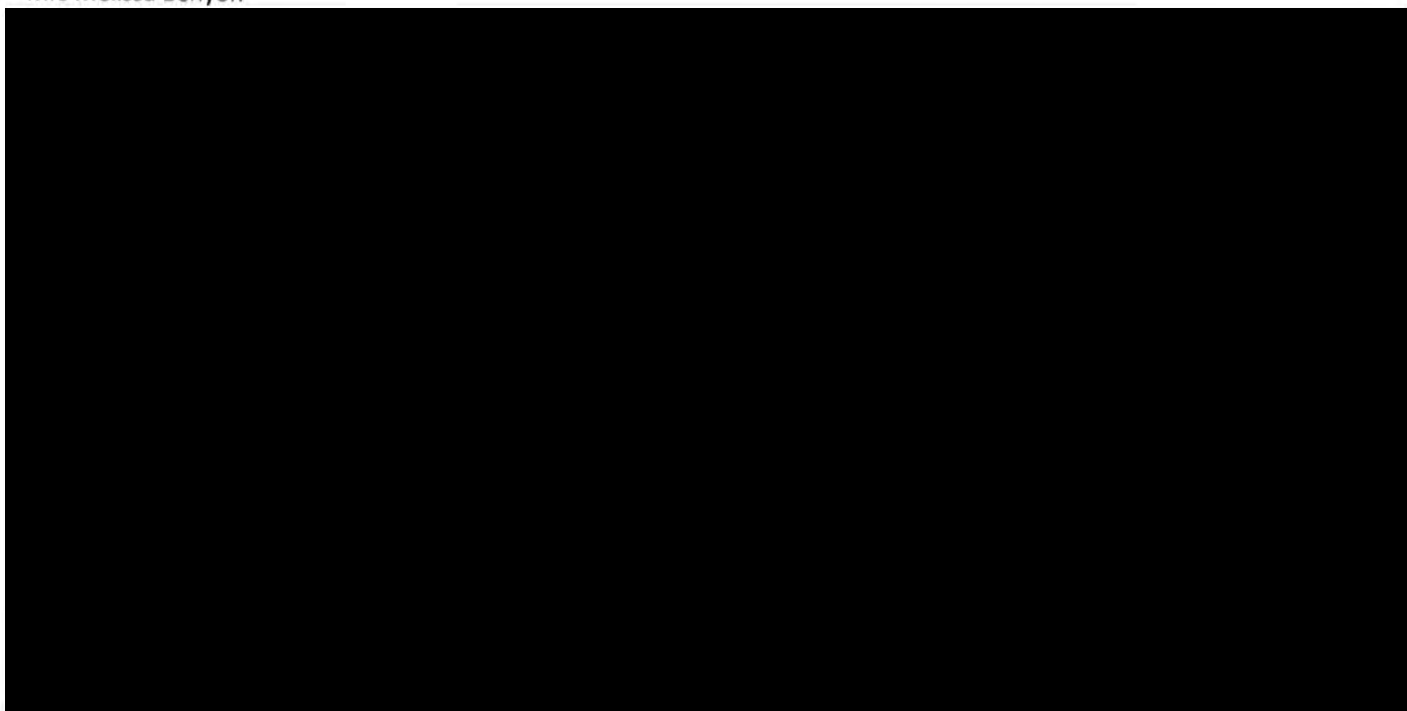
OBJECTION LETTER.docx

Dear Sirs

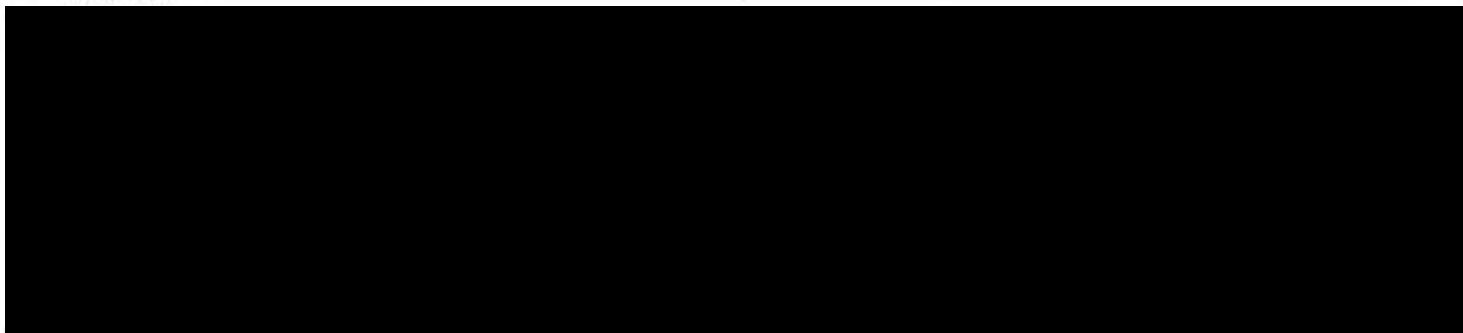
Please find attached my representation for the current Local Plan to development WA10 8HS 'Eccleston Vale'.

Kind regards

Mrs Melissa Benyon



Lancots Lane
Sutton Oak.
St Helens
UK
WA9 3EX



Melissa Benyon
9 Ecclesfield Road
Eccleston
St Helens
WA10 5LU

Reference: St Helens Local Plan

Dear Sirs,

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10

11

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Kind regards

Yours faithfully

Melissa Benyon

PO2467



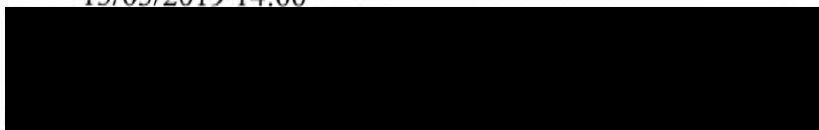
OBJECTION LETTER

Cathrine Benyon

to:

planningpolicy

13/03/2019 14:00



1 Attachment



OBJECTION LETTER.docx

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Regards,

Cath Benyon

Director

Aidapt Bathrooms Ltd

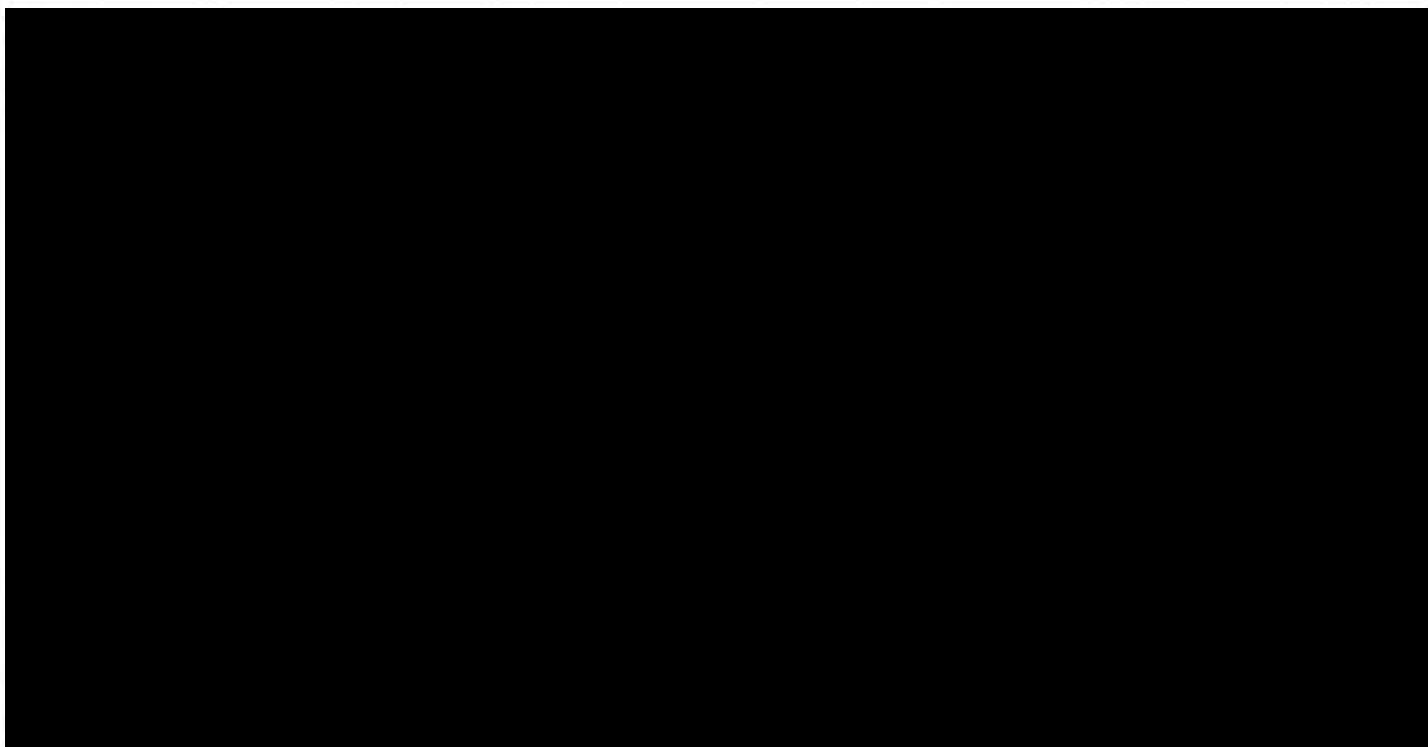
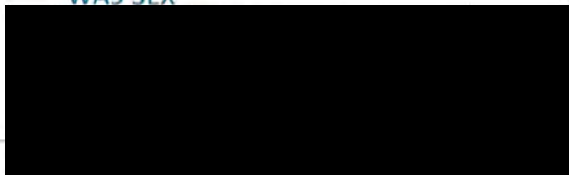
Lancots Lane

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Merseyside

WA9 3EX



Catherine Hanwright
56A, The Oaks,
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St Helens
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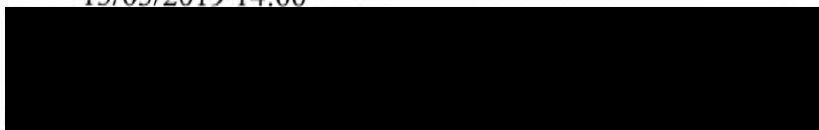
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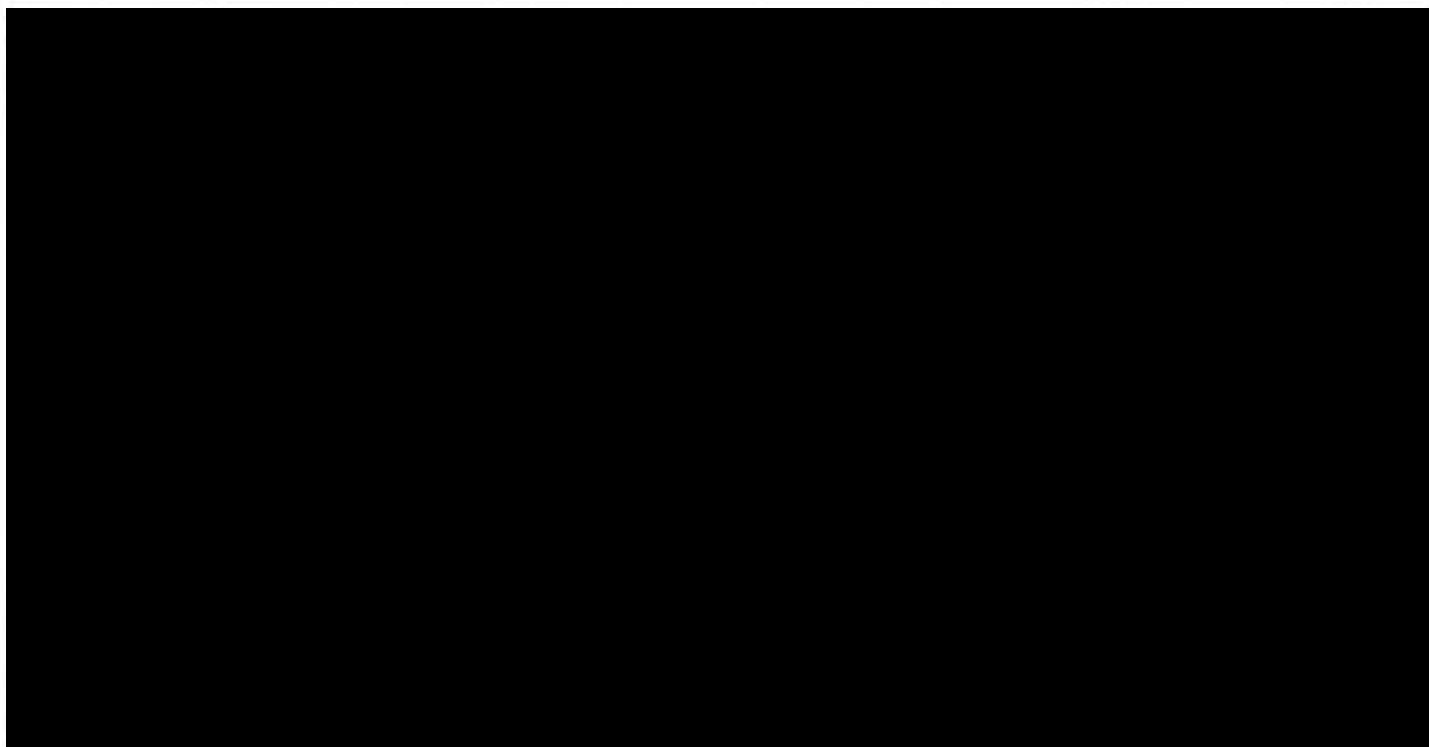
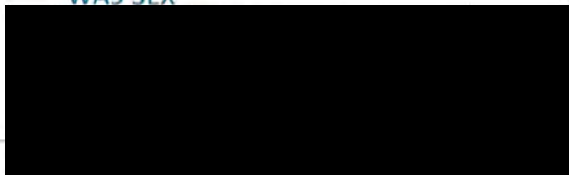
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Kind regards

Yours faithfully

Catherine Hanwright

PO2469



St Helens Local Plan 2020 - 2035, Submission Draft - Representations
Dan Ingram
to:
planningpolicy@sthelens.gov.uk
13/03/2019 14:20



2 Attachments



27020.A3.DLSG - St Helens Submission Draft Local Plan Representations on behalf of Miller Homes 13.03.2019 & Appendices.pdf



Representation Form.pdf

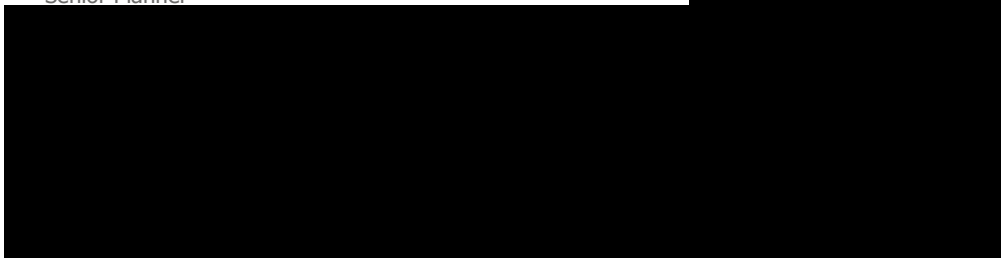
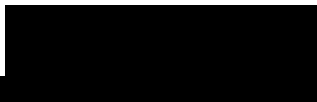
To whom it may concern,

Please find attached a copy of representations (including Development Framework Document), as well as the representation form, prepared by Barton Willmore, on behalf of our Client, Miller Homes, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan.
Dan Ingram
Senior Planner





St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|------------------------------------|--|
| Title: MR | Title: MR |
| First Name: DAVID | First name: DAN |
| Last Name: MORRIS | Last Name: INGRAM |
| Organisation/company: MILLER HOMES | Organisation/company: BARTON WILLMORIS |
| Address: C/O AGENT | Address: TOWER 12 BRIDGE STREET MANCHESTER |
| Postcode: | Postcode: M3 3BZ |

Signature

Date:

13 / 03 / 19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | |
|---|--|-----------------------------|--|------------------------|--|--|--------------------------------|
| Policy | | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats Regulation Assessment |
| Other documents (please name document and relevant part/section) | | | | WHOLE SUBMISSION DRAFT | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|------------------------------|-----------------------------|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|--------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input type="checkbox"/> |
| Effective? | <input type="checkbox"/> |
| Consistent with National Policy? | <input type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO REPRESENTATION DOCUMENT
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE REFER TO REPRESENTATION DOCUMENT
ACCOMPANYING THIS FORM.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☐ **No**, I do not wish to participate at the oral examination

☒ **Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO FURTHER DISCUSS MATTERS RELATING TO
ALLOCATIONS AS WELL AS THE SUITABILITY OF OTHER
SITES.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

St Helens Borough Local Plan 2020 - 2035

Submission Draft

Representations on behalf of Miller Homes

March 2019

5.0 SOURCES OF SUPPLY

- 5.1 In order to meet the housing needs of the Borough throughout the Plan period, the Council has sought to allocate sites for residential development. In the case of the New Local Plan, the Council now identifies just ten sites to be allocated for residential development, as detailed within Policy LPA05, one of which comprises part of our Client's land interests (Site 8HA). Nevertheless, this represents a reduction in the overall number of proposed allocations from the previous Local Plan Preferred Options document.
- 5.2 Cumulatively, these ten sites have an indicative capacity of 7,040 dwellings. However, only 4,085 of these dwellings are identified as being deliverable within the Plan period (i.e. before 2035), with 2,995 (approximately 43%) of these dwellings to be delivered beyond the Plan period (i.e. after 2035).
- 5.3 These ten site allocations underpin the New Local Plan. Accordingly, in order for the New Local Plan to be considered sound, these sites must be deliverable in line with the provisions of national planning policy. As such, our Client has undertaken their own assessment of a sample of sites to establish their deliverability. Five sites were assessed in all with the detailed analysis enclosed at **Appendix 3**.
- 5.4 In addition to the above, Appendix 3 also contains an analysis of a sample of urban capacity sites within the Borough, again to ascertain whether these sites are deliverable.
- 5.5 This analysis raises some serious concerns about the deliverability of a number of sites, and which in turn raises concerns over whether these sites will actually contribute to the Borough's housing needs during the Plan period.
- 5.6 A number of the sites allocated for development are brownfield in nature. Whilst it is encouraging that the re-use of brownfield sites is proposed, consistent with national planning policy, some of these sites will require extensive remediation; the cost of such works could ultimately render these sites unviable. This is particularly true given the need to demonstrate that other policy requirements can be met, and which should be considered at the plan-making stage (i.e. policy compliant affordable housing, open space provision, S106 contributions)
- 5.7 Furthermore, it is clear that a number of the sites are subject to extant planning permissions. This immediately raises the question of why these sites have yet to come forward for development/be delivered; this only serves to raise more questions as to

whether they will ever actually be developed in the future. If they have not come forward to date, why is it considered that they will come forward in the future? The Council needs to provide robust and compelling evidence to support their position.

5.8 Our Client is concerned that the Council is over-reliant on sites for which it may not have fully assessed their deliverability. Accordingly, it is our Client's consideration that additional greenfield site allocations are required in order to bolster the supply of housing land in St Helens during the Plan period. This will provide flexibility in the event that any urban capacity sites fail to deliver (as the Council projects), or are subject to lengthy delay. 09

5.9 In this regard, our Client notes that the Council has safeguarded a number of sites for future development beyond 2035. Details of these sites are provided in Policy LPA06.

5.10 Our Client is broadly supportive of the principle behind Policy LPA06, which is consistent with Paragraph 139(c) of the NPPF. However, they do have some concerns that the Policy does not provide a mechanism for the early release of safeguarded land in the event that the Council is unable to demonstrate a five-year housing land supply. Accordingly, our Client considers that provision should be made within Policy LPA06 in the event that housing delivery in St Helens needs to be bolstered during the Plan period owing to a lack of delivery from site allocations and urban capacity sites 10

5.11 By identifying safeguarded land for future development, the Council is acknowledging that further Green Belt land release is needed in order to meet the future needs of the Borough. If any of the proposed site allocations fail to deliver as projected before 2035, the Council should adopt an approach whereby safeguarded sites are favoured to come forward over non-allocated windfall sites (particularly given the concerns already expressed over windfall sites within the urban area). This could be triggered by way of a Local Plan review at a five-yearly interval, consistent with paragraphs 33 and 139(d) of the NPPF. Regardless, and to provide greater flexibility, it is our Client's view that the Council should identify additional safeguarded land for housing now as part of the plan-making process to ensure that current and future housing needs are met, and thus negating the need for a further Green Belt Review every five years and beyond the Plan period (as per paragraph 139(e) of the NPPF). 11

PO2470



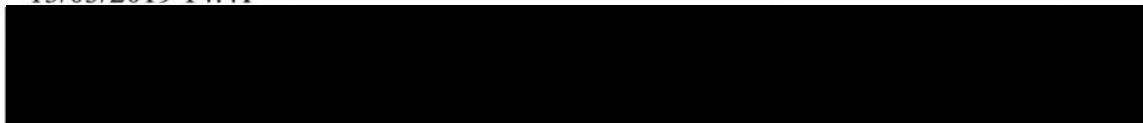
St Helens Borough Local Plan - Submission Draft - Representations on Behalf of Redrow Homes

Graham Trehwella

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:41



1 Attachment



1335 - Representation on Behalf of Redrow Homes Ltd Rev A 130319..pdf

REFERENCE EML-OUT/1335/20190313-143112-915

Dear Sirs

Please find attached a report which sets out our representations to the Submission Draft Local Plan. I would be grateful if you could confirm that it has been received.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) * Please note: e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

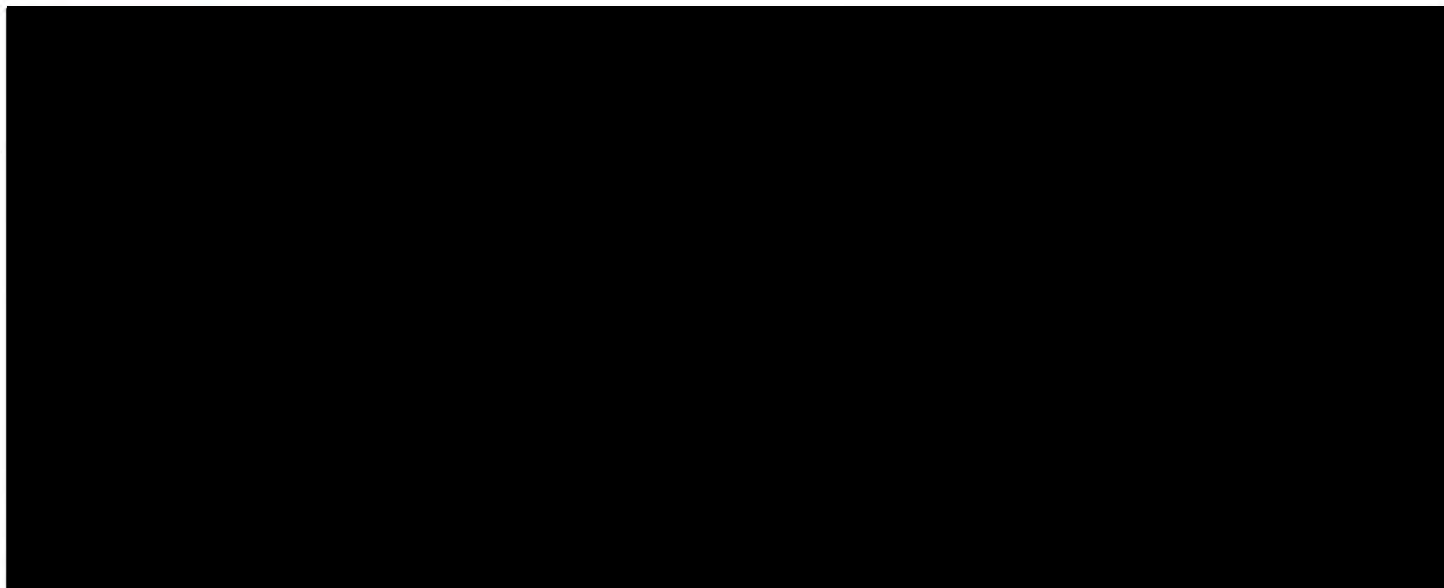
Yes (via e-mail)

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

Best regards,

Graham Trehwella
Director



Cass
associates

architecture
masterplanning
planning
landscape
conservation

ST HELENS BOROUGH LOCAL PLAN 2020-2035

SUBMISSION DRAFT

REPRESENTATIONS ON BEHALF OF REDROW HOMES LTD

on behalf of  **REDROW**

Cass Associates

Studio 204B
The Tea Factory
82 Wood Street
Liverpool
L1 4DQ

March 2019

2 Meeting Housing Needs

Redrow Homes does not consider that Policy LPA 05 is sound. It is not positively prepared, justified or consistent with national policy.

- 2.1 Policy LPA05 provides the Spatial Strategy. The spatial distribution of new development is guided by the principle that new land for new development should be in sustainable locations, generally within, on the edge of or close to Key Settlements. There is priority given to development on suitable and available sites in the urban area but a recognition that this is not in itself sufficient to meet needs. Some sites at the edge of Key Settlements are proposed for release from the Green Belt and allocated for development up to 2035. Other sites have been removed from the Green Belt and have been safeguarded to meet longer term development needs after 2035.
- 2.2 The approach to the Spatial Strategy raises questions about the distribution of development across the Borough of St Helens and the way in which the Green Belt Review has informed the identification of land to be released from the Green Belt but the starting point is to challenge the overall assessment of housing needs as set out in Policy LPA05 (meeting St Helens Borough's Housing Needs)

The Housing Requirement

- 2.3 The St Helens SHMA Update (January 2019) sets out the way in which the Housing OAN (objectively assessed need) has been calculated. It is founded on the standard method. Projections of household growth are the starting point. Government guidance requires the application of 2014 – based household projections. Annual average household growth over a 10 year period should give the demographic baseline. For St Helens the demographic baseline shown in the SHMA is:

St Helens – Household Change – 2018-28 – 2014 Based Household Projections

| Households 2016 | Households 2026 | % Growth | Average Annual Change |
|-----------------|-----------------|----------|-----------------------|
| 79,227 | 83,612 | 5.5% | 439 |

Source : St Helens SHMA Update

- 2.4 In accord with the standard method a Market Signals Adjustment is then applied to the demographic based projections. This increases the housing need where house prices are high relative to workplace incomes. The adjustment factor for St Helens is calculated as +9.94% (St Helens SHMA Update). If this is added to the demographic starting point (based on the period 2018-2028) then the OAN is calculated in the SHMA as 482 dwellings per annum (dpa). The Submission Draft Local Plan updates the outcome of the standard method by applying the average annual growth indicated in the 2014 based household projections for the 10 years from 2019 to 2029 and the latest affordability ratio data published in 2018. This generates a housing need of 468 dpa.
- 2.5 However, the standard method does not take account of economic growth. A growth in employment stimulated by identification of significantly more land for employment uses can increase the need for housing over the plan period. The 2019 SHMA Update considers a range of economic scenarios. The two scenarios which are considered by the Council to be the most realistic show a need which ranges between 479 and 514 dpa.

2.6 The Local Plan attempts to align the annual housing need figure with one of the economic growth scenarios to give rise to a new housing OAN over the plan period of 486 net new dwelling completions per annum. The 'adjustment' to account for employment growth is a modest 18dpa. If the ambitions in the Local Plan for economic growth are to be realised in full there is sound justification for a greater uplift in the housing figure. A point of reference in this context is the minimum housing requirement set out in the Preferred Options Local Plan. This was 570dpa. It was based on the Mid-Mersey Strategic Housing Market Assessment (MM SHMA). Uplifts were applied to account for economic growth, affordability and, significantly, a substantial uplift of 20% from the FOAHN to take account of:

- The Borough's ambitions to continue stabilising and increasing the population
- Allow for more housing choice and competition so more households can afford to form
- Allow for significant economic growth
- Reflect the high levels of housebuilding achieved in years before and after the 2008-2009 recession

Once demolitions are also accounted for, the housing required in the Preferred Options Local Plan was set at 570dpa. This is also the housing requirement in the St Helens Local Plan Core Strategy (2012).

2.7 The standard method has limitations. It is a demographic – based minimum starting point. In areas such as St Helens with an ambitious employment growth agenda actual housing need should be higher than the standard method figure. 01

2.8 It is recognised in national planning guidance (NPPF paragraph 81) that planning policies should:

'Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth....[and] seek to address potential barriers to investment such as inadequate.... housing'

Furthermore, Planning Policy Guidance (PPG paragraph 010 Reference ID: 2a-010-20190220) recognises that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. In areas with deliverable growth strategies increases in housing need are likely to exceed past trends (which, in any event, can be constrained or influenced by the historically suppressed supply of housing stock or housing land and, consequently, by low historic levels of housing growth).

2.9 St Helens has a significant role to play in realising the development aspirations outlined in the Liverpool City Region Growth Strategy (2016) the Strategic Economic Plan (2016) and the draft Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA). The Local Plan proposes to allocate land to meet the needs of employment sectors where the Borough can benefit from a particular competitive advantage. It identifies strategic employment sites, some released from the Green Belt, to assist in meeting targets for employment growth over the plan period.

2.10 There is a direct link between economic growth and housing. The housing requirement in St Helens needs to be set at a level which supports economic growth. This points to a greater uplift on the standard method figure than is proposed in the Local Plan. We believe that there is a lack of ambition when it comes to the calculation of the

housing requirement. This is evident if a comparison is made with the neighbouring authority of West Lancashire – The Preferred Options Local Plan Review Document for West Lancashire aims to take full advantage of economic growth associated with City Region initiatives that are likely to have wide impact such as Liverpool2. It proposes to progressively increase housing supply over a long period to 2050 and builds in a considerable allowance (120 dwellings per year) for Growth from Skelmersdale Rail and Large Scale Logistics Employment. St Helens should show a similarly bold approach and should increase its housing requirement.

2.11 Overall, there is a sound and justified case for a greater uplift in the housing requirement to account for:

- More choice and competition in the housing market to provide a positive impact on affordability (over and above the affordability adjustment ratio in the standard method)
- The ongoing trend of an increasing population creation and in migration
- The full implications of employment creation and economic growth

2.12 For these reasons it is reasonable, justified and sound to 'maintain' the long standing ambition to achieve 570dpa.

Housing Land Supply

2.13 The supply of land for housing and housing delivery are key considerations.

2.14 The majority of housing is expected to be built in the existing urban area. The St Helens Strategic Housing Land Availability Assessment (SHLAA) 2017 identifies urban sites with a total capacity of 7817 dwellings. There is a difference, however, between identified capacity and the likelihood of the delivery of housing. A combination of physical infrastructure, environmental and viability constraints and legal impediments could frustrate development on many of the sites identified in the SHLAA. Although there is an allowance for reduced delivery in the later years of the SHLAA period the SHLAA approach does not provide the degree of flexibility that is needed to be reasonably sure that projected delivery can be realised and it provides limited scope to adapt to changes in housing and employment land requirements brought about, for instance, by the outcome of the emerging Liverpool City Region Spatial Framework.

2.15 The uncertainty that surrounds delivery of the identified sites is particularly acute with previously developed sites where remediation, land reclamation and weak market demand can challenge delivery in a significant way. An example includes Moss Nook urban village which the SHLAA anticipates will deliver over 800 dwellings but there are other examples including the Bold Forest Garden Suburb and Land at Laffak Road and Carr Mill Road.

2.16 The housing land supply includes a number of sites to be released from the Green Belt. The selection of sites to be released from The Green Belt has been guided by the Green Belt Review.

The Green Belt Review 2018

2.17 The Green Belt Review is based on the assessment of parcels of land and sub-parcels of land (in the main at the edge of urban areas). Parcel boundaries have been defined using strong boundaries.

2.18 Each land parcel has been assessed against three of the purposes for including land in the Green Belt and beyond this, against any '*prohibitive*' constraints and accessibility. Parcels have been discounted or considered suitable

PO2471



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)
Emer Cunningham

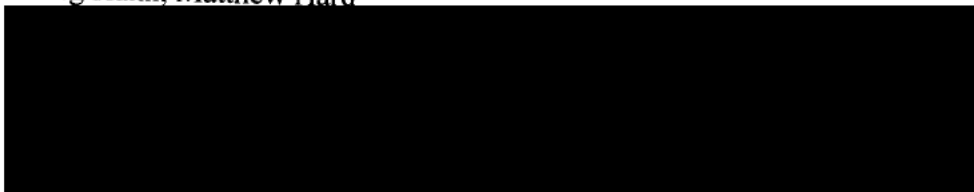
to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:02

Cc:

Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner

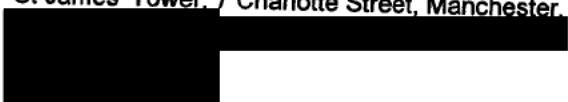


indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person.
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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|------------------------------------|--|
| Title: | Title: Miss |
| First Name: | First name: Emer |
| Last Name: | Last Name: Cunningham |
| Organisation/company: Murphy Group | Organisation/company: Indigo Planning |
| Address: c/o Agent | Address: St James' Tower 7 Charlotte Street Manchester |
| Postcode: | Postcode: M1 4DZ |
| Tel No: | |
| Mobile No: | |
| Email: | |
| Signature | Date: <input type="text" value="13/03/2019"/> |

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | |
|---|-------------------------------------|-----------------------------|-------------------------------------|---|-------------------------------------|--|--------------------------------|
| Policy | <input checked="" type="checkbox"/> | Paragraph / diagram / table | <input checked="" type="checkbox"/> | Policies Map | <input checked="" type="checkbox"/> | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats Regulation Assessment |
| Other documents (please name document and relevant part/section) | | | | 2017 Strategic Housing Land Availability Assessment | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|---|--|
| Legally Compliant? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|-------------------------------------|
| Positively Prepared? | <input checked="" type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input checked="" type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | | | |
|--|--|---|--|
| | No, I do not wish to participate at the oral examination | ✓ | Yes, I wish to participate at the oral examination |
|--|--|---|--|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

3. St Helens Borough Local Plan 2020-2035 Submission Draft

- 3.1. Chapter 3 contains specific representations to the proposed policies. However, we comment below on the strategic, overarching aspects of the current draft.

Employment land

- 3.2. The Employment Land Needs Study (ELNS) recognises that St Helens has experienced low rates of delivery of employment land, especially compared to some of its neighbours, because of an inadequate supply of market attractive sites. Nonetheless, the ELNS calculates the OAN predominantly from previous delivery rates.
- 3.3. By using this method, the future supply will continue to be hamstrung. By way of comparison, had previously there been a better supply of market attractive sites, the delivery of land would have increased and as such the OAN would rise. 01
- 3.4. Therefore, the Local Plan needs to revise the strategy to ensure the previous inadequate supply is rectified, in addition to meeting future needs.
- 3.5. Increasing the amount of employment land will have a consequential impact on the housing requirement, which has also been characterised by sluggish delivery.

Housing requirement

- 3.6. It will be necessary to review and update the housing targets as a consequence of reverting to an employment land target that is commensurate to the Council's own spatial vision and that strives to boost employment opportunities after years of dampened supply.
- 3.7. Furthermore, we have significant concerns that the new local plan will not resolve the shortfall in housing delivery against the Core Strategy.
- 3.8. Page 26 of the 2017 Strategic Housing Land Availability Assessment shows progress of housing delivery against the Core Strategy. Figure 5.1 confirms that 1,324 homes have failed to be delivered between 2003 and 2017. We acknowledge that the Council has only narrowly missed hitting 100% of its Housing Delivery Test, but this pertains to the previous three years and not to the historic Core Strategy period. 02
- 3.9. By starting afresh with calculating the housing requirement, the Council are failing to accommodate the historic shortfall against the Core Strategy. Given the Core Strategy has an end-date of 2027, it is necessary to add 1,324 to the requirement for 9,234 homes between 2016 and 2035 in order for the plan to be positively prepared and thus sound.

Housing supply

- 3.10. The housing supply compared with requirement of 9,234 homes is set out in Table 4.6 of the local plan.
- 3.11. There are several flaws with this table, partly stemming from using a 2017 base-date, and partly from errors in the counting. 03

Expected completions by April 2020

- 3.12. Adding the actual completions in 2016/17 to the expected number of completions in 2017 to 2020 gives a total of 1,962, not 1,989 as stated in Table 4.6. Although not accounted for in

the SHLAA, the Housing Delivery Test has confirmed there were 411 completions in 2017/18.

- 3.13. Row F of Table 4.6 accounts for 1,581 dwellings with planning permission but not yet started as at 1 April 2017.
- 3.14. The planning permission at SHLAA Site Reference HL456 (Sorrel Way) has now lapsed, removing 12 homes from the supply.
- 3.15. The planning permission at SHLAA Site Reference HL471 (Penlake) has now had reserved matters approval for 337 dwellings, a reduction from the outline permission by 21 dwellings.
- 3.16. Row I of Table 4.6 accounts for sites in the SHLAA that didn't have planning permission at 1 April 2017, but which the LPA has concluded to be developable. However, the following four sites are all in active use and should be removed, due to the uncertainty over them being made available for development.
 - 119-133 Crow Lane West is a builder's merchant;
 - Vicarage Road is a garage;
 - Juddfield Street is a scrapyard and garage;
 - Derbyshire Hill Family Centre is a community centre.

03

- 3.17. The glossary to NPPF says that:

"to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

- 3.18. There is no reasonable prospect of these sites being able to be developed in the plan period, particularly the three sites that are in quasi-industrial use that could have a high risk of contaminated land and other constraints.
- 3.19. The final and most significant error in the housing supply calculation is the inclusion of "expected completions by April 2020" (Row B) alongside sites with planning permission including those under construction (Row G). The SHLAA data inputted to Row G shows a remaining capacity of 654 dwellings to be built on sites under construction (ie Appendix 3 of the SHLAA), but the Development trajectory (Appendix 5 of the SHLAA) forecasts 277 homes to be delivered on these sites in 2017/18, 168 in 2018/19 and 79 in 2019/20,
- 3.20. These 524 homes have already been counted in the expected completions and need to be removed from the predicted supply to make the plan sound.
- 3.21. Appendix 2 of this report contains a recalculated version of Table 4.6, amending the supply to take account of the above errors. It should be noted that for ease of comparison, our amended table retains the overall housing requirement from the draft local plan, notwithstanding our objections to that figure noted above.
- 3.22. Our tables in Appendix 2 shows our recalculation of the supply against the requirement and shows a total supply of 6,975 as opposed to 7,606. This equates to 631 homes being wrongly accounted for in the supply. When carrying through the arithmetical assumptions of Table 4.6, this equates to a total of 754 additional dwellings that need to be allocated on Green Belt sites.

Reasons why plan is unsound

- 3.23. The St Helens Borough Local Plan 2020-2035 Submission Draft must be tested against paragraph 35 of the NPPF in terms of whether the plan has been prepared in accordance with legal and procedural requirements and whether it is 'sound'.

PO2472



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)
Emer Cunningham

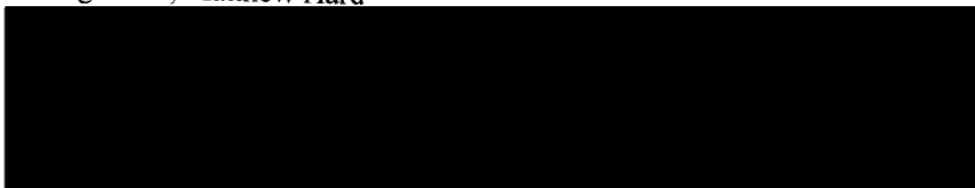
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Doug Hann, Matthew Hard



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Emer Cunningham | Planner



indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
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|------------------------------------|--|
| Title: | Title: Miss |
| First Name: | First name: Emer |
| Last Name: | Last Name: Cunningham |
| Organisation/company: Murphy Group | Organisation/company: Indigo Planning |
| Address: c/o Agent | Address: St James' Tower 7 Charlotte Street Manchester |
| Postcode: | Postcode: M1 4DZ |
| Tel No: | |
| Mobile No: | |
| Email: | |
| Signature | Date: 13/03/2019 |

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Merseyside
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|---|---|--|
| Legally Compliant? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

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| Justified? | <input checked="" type="checkbox"/> |
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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.

The Examination in Public will cover matters of strategic importance assessing the soundness of the plan and consideration and analysis of the housing figures.

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Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

Leyland Green Farm, Garswood

Representations on behalf of Murphy Group

indigo.

- 4.9. Nonetheless, the development of the Leyland Green Farm site will support the development principles identified within this policy. It could provide the indicative 291 homes highlighted; contributing not only towards the borough's housing target (providing market and affordable units), but also providing a sustainable mix and tenures of quality homes but and create direct and indirect investment in the local area. This in turn will contribute towards the borough's regeneration objectives. The upgrading of the draft safeguarded for development allocation to a housing allocation will mean the benefits outlined will be realised sooner and delivered within the plan period. 12

Policy LPA04: A Strong and Sustainable Economy

- 4.10. The employment target of a minimum of 215.4ha up to 2035 has been reduced from the minimum of 306ha up to 2033 outlined in the Preferred Options Local Plan. 13
- 4.11. Although this target appears sufficient to meet anticipated need, this figure does not reflect the borough's stated Spatial Vision and should reflect the opportunity to tap into the growth being driven by the Northern Powerhouse agenda and the significant investment in infrastructure projects within the Liverpool City Region and North West in general. Therefore, we object to this policy in its current form.
- 4.12. We support the allocation of employment sites within the Green Belt particularly those along the M6 and A580 corridor that will help ensure that St Helens can take advantage of its strategic location for logistic development. We also support the policy's aim to support the creation of and expansion of small businesses. 14

Policy LPA05: Meeting St Helens Borough's Housing Needs

- 4.13. We object to the housing requirement set out by Policy LPA05 suggests a minimum of 9,234 net additional dwellings to be provided in the plan period, equating to 486 dwellings per annum (dpa). The housing requirement is calculated and set out within the St Helens Borough Council Strategic Housing Market Assessment Update (January 2019). It is based on the 2014 based Household Projections and the latest affordability ratio the Objectively Assessed Need (OAN). Whilst this number has increased from the initial figure of 451dpa suggested in the Scoping Consultation, it has been significantly reduced from the figure suggested within the Preferred Options Plan (ie 570dpa). 15
- 4.14. We support St Helens Council's decision to not rely on the standard methodology to identify housing need for the Borough (383 dpa). We agree that it does not take into account the increased employment growth or the long-term trend of declining affordability which would continue to put pressure housing. 16
- 4.15. Despite this however, the housing requirement as suggested in the Proposed Submission Draft is too conservative and means that the Council is only just planning to meet its identified OAN for new housing in the Borough. The currently proposed housing requirement does not plan for boosting growth. 15
- 4.16. The Liverpool City Region places emphasis on a commitment to jobs-led growth but housing targets in St Helens have reduced which is inconsistent with the wider vision for the region. To reflect the ambitions for growth, the housing requirement should be increased to provide for a degree of flexibility in the event that allocated brownfield sites do not deliver as anticipated.
- 4.17. This policy reiterates that a key priority is to maximise housing delivery on previously developed land within existing urban areas. We do not support this policy as the requirement is only just meeting its identified housing needs with too much reliance placed on the questionable deliverability of brownfield sites. This is contrary to the provisions of the NPPF which requires plans to be 'positively prepared' (paragraph 26) and to support the Government's objective of 'significantly boosting the supply of homes' (paragraph 59). 17

- 4.18. St Helens has not consistently delivered sufficient housing to meet demand. The borough fell short of housing requirements in 2003/4 and 2006/7. More recent completion rates indicate that in 2013/14 and 2014/15 and 2015/16 there was an improvement but in the years 2016/17 and 2017/18 housing targets were not met.
- 4.19. The 2017 Strategic Housing Land Availability Assessment shows progress of housing delivery against the Core Strategy. This highlights that 1,324 homes have failed to be delivered between 2003 and 2017. 17
- 4.20. The housing requirement of 9,234 dwellings is therefore flawed as it will not resolve the shortfall in housing delivery against the Core Strategy. Notwithstanding increasing the requirement to reflect local and city-region growth objectives, as a minimum the requirement should increase to 10,558 in order to be based on sound evidence and to be positively prepared.
- 4.21. The expected housing supply is miscounted and there are several flaws in the Council's evidence, partly stemming from using a 2017 base-date and partly from errors in the counting. 18
- 4.22. We calculate that there is a need for a further 754 homes to be allocated for residential development within the plan period.
- 4.23. In Section 2 and Appendix 2 of this report, we set out a detailed analysis of the current housing supply which contains and supports our objection to this policy in its current form.
- 4.24. We do however support the description of the housing requirement as a 'minimum' figure in order to ensure that there is some flexibility in planned housing delivery and that housing needs, including for more affordable homes, are adequately addressed in the plan period. 19
- 4.25. We also support that the delivery of housing will be monitored annually over the Plan period as set out in Policy LPA05(4), and support that if delivery or current deliverable land supply falls substantially below the required level, the council will undertake a local plan review to bring forward additional sites such the Leyland Green Farm site (Site Ref. 1HS) under Policy LPA06. However, the plan needs a clearly defined timetable for a definitive local plan review. 20

Policy LPA05.1 Strategic Housing Sites

- 4.26. Policy LPA05.1 highlights the council's identification of other residential allocations in Policy LPA05 which are not large enough to warrant a "strategic" allocation. Although these sites will yield smaller numbers of homes compared to strategic sites, we support that their allocation will support the overall delivery of housing and will play a key part of the supply and balance out the phased delivery which will result from the large strategic housing sites. 21
- 4.27. Therefore, although it is not a strategic housing site, we support the removal of land south of Leyland Green Farm site (ie Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood) (Site Ref. 1HA) from the Green Belt and its proposed housing allocation for an indicative 216 dwellings. We support the council's strategy of delivering more housing in Garswood as the settlement can accommodate further growth. This proposed housing allocation forms a natural extension to the settlement of Garswood. 22
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PO2473



Representations to St Helens Local Plan 2020-2035 Submission Draft - on behalf of Murphy Group (Leyland Green Farm, Garswood)
Emer Cunningham

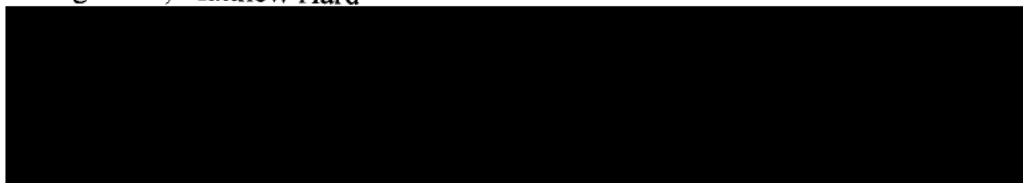
to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:02

Cc:

Doug Hann, Matthew Hard



3 Attachments



rpt.010.EC St Helens Representation - Leyland Green Farm.pdf Representation Form.pdf Delivery Statement.pdf

Dear Sir / Madam

On behalf of Murphy Group, we submit representations to the St Helens Local Plan 2020-2035 Submission Draft consultation. Please find attached our representation form and representation report.

Murphy Group own the land at Leyland Green Farm and are promoting their site for development within the plan period. Please find attached a Delivery Statement which supports the sites development.

If you require any further information please do not hesitate to contact us.

Kind regards

Emer

Emer Cunningham | Planner



indigo.



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|------------------------------------|--|
| Title: | Title: Miss |
| First Name: | First name: Emer |
| Last Name: | Last Name: Cunningham |
| Organisation/company: Murphy Group | Organisation/company: Indigo Planning |
| Address: c/o Agent | Address: St James' Tower 7 Charlotte Street Manchester |
| Postcode: | Postcode: M1 4DZ |
| Tel No: | |
| Mobile No: | |
| Email: | |

| | | | |
|-----------|--|-------|------------|
| Signature | | Date: | 13/03/2019 |
|-----------|--|-------|------------|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | |
|---|-------------------------------------|-----------------------------|-------------------------------------|---|-------------------------------------|--|--------------------------------|
| Policy | <input checked="" type="checkbox"/> | Paragraph / diagram / table | <input checked="" type="checkbox"/> | Policies Map | <input checked="" type="checkbox"/> | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats Regulation Assessment |
| Other documents (please name document and relevant part/section) | | | | 2017 Strategic Housing Land Availability Assessment | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|---|--|
| Legally Compliant? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|-------------------------------------|
| Positively Prepared? | <input checked="" type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input checked="" type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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St Helens Borough Local Plan 2020 – 2035 Submission Draft January 2019

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Representations on behalf of Murphy Group

indigo.

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PO2474



St Helens Borough Local Plan 2020-2035 Submission Draft - Representations on behalf of Bellway Homes Ltd

Claire Pegg/GBR

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:33

① - LPA 05
② - LPA 05 Table 4.6
③ - LPA 02
④ - GBR

3 Attachments



lpsd-representation-form_Bellway Homes Ltd_Rainhill Hall Farm.pdf Appendix 1 - Previous Representations.pdf



Bellway - Rainhill Hall Farm - St Helens Submission Draft - March 2019.pdf

Hello,

Please find attached representations made to the St Helens Borough Local Plan 2020-2035 Submission Draft on behalf of Bellway Homes Limited with regards to Land at Rainhill Hall Farm.

I will send Appendices 2 and 3 under separate cover due to their large file size.

I would be grateful if you could confirm receipt of this email and the attachments, and keep us updated on the progress of the Local Plan.

Please don't hesitate to let me know should you have any queries.

Kind regards,
Claire

Claire Pegg MRTPI MRICS
Senior Consultant
Development & Planning, UK Consulting

No 1 Marsden Street | Manchester | M2 1HW

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PERSPECTIVES

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WAKEFIELD**

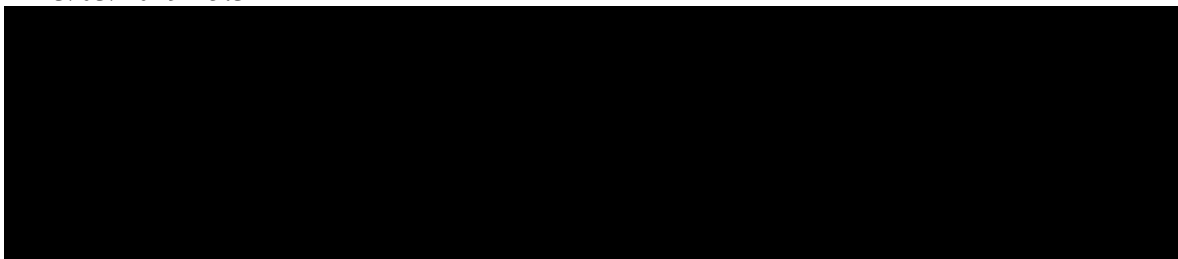
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St. Helens Borough Local Plan 2020-2035 Submission Draft
Claire Pegg/GBR
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:31



2 Attachments



lpsd-representation-form_Bellway Homes Ltd_Rainhill Hall Farm.pdf



Bellway - Rainhill Hall Farn - St Helens Submission Draft - March 2019_merge.pdf

Hello,

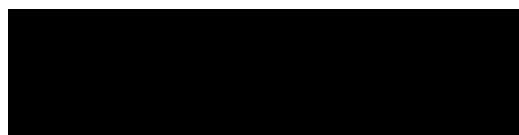
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Please don't hesitate to contact me should you have any queries.

Kind regards,
Claire

Claire Pegg MRTPI MRICS
Senior Consultant
Development & Planning, UK Consulting



No 1 Marsden Street | Manchester | M2 1HW

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St.Helens
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).

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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: Miss |
| First Name: Mike | First name: Claire |
| Last Name: Stone | Last Name: Pegg |
| Organisation/company: Bellway Homes Limited (Strategic Land Division) | Organisation/company: Cushman & Wakefield |
| Address: Bellway Homes Limited (Head Office), Seaton Burn House, Dudley Lane, Seaton Burn, Newcastle upon Tyne, Postcode: NE13 6BE | Address: 1 Marsden Street Manchester Postcode: M2 1HW |

Signature:

Date: 13.03.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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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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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

| | | | | | | | | | |
|--|-----------------|-----------------------------------|--|-------------------|---|--|--|--------------------------------------|--|
| Policy | LPA02; LPA05 | Paragraph / diagram / table | | Policies Map | X | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | Green Belt Review | | | | | |

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

| | | |
|-------------------------------------|------------------------------|--|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

| | |
|----------------------------------|-------------------------------------|
| Positively Prepared? | <input checked="" type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input checked="" type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see accompanying statement of representations.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally

compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying statement of representations.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | | | |
|--------------------------|--|-------------------------------------|--|
| <input type="checkbox"/> | No , I do not wish to participate at the oral examination | <input checked="" type="checkbox"/> | Yes , I wish to participate at the oral examination |
|--------------------------|--|-------------------------------------|--|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To assist the appointed Planning Inspector in his or her consideration and examination of the submitted development plan, Bellway Homes Limited (Strategic Land Division) would like to participate in discussions around whether the Local Plan is sufficient to meet the aspiration of national planning policy to boost significantly the supply of housing, whether the proposed distribution of allocations accords with the spatial vision and welcome the opportunity to discuss the merits of the site at Rainhill Hall Farm. Bellway Homes Limited (Strategic Land Division) do not consider that this can be achieved by relying on the submitted written representations alone.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

The St. Helens Borough Local Plan 2020-2035 Submission Draft

BELLWAY HOMES LIMITED

March 2019

only.

- 2.11 Within this context and with reference to the site profiles contained at Appendix 5, we have commented below against some of the proposed allocations to highlight site-specific issues and why for these sites the NDA should therefore be reduced below 75% (notwithstanding our above comments):

- **Site ref. 4HA** – The site profile states that the site requires “extensive green links through and around the site”, as well as new tree planting, and new tree cover. On-site education provision is required.
- **Site ref. 5HA** – We note that a higher minimum density is proposed of 35 dwellings per hectare (dph), however no justification for this is provided. This contradicts with the site profile which states “development should integrate well into the Bold Forest Park setting” which will naturally require a lower density or NDA.
- **Site ref. 6HA** – The site profile states that a green corridor should be provided, as well as measures to slow the flow and enhance biodiversity along the culvert. Measures, which could include a buffer, will be required to attenuate noise. Furthermore, the profile notes that 4ha of B1 employment use is required. It is not clear whether this is already excluded from the gross area.
- **Site ref. 7HA** – The site profile makes clear that mitigation measures will be required for a range of issues including flooding, noise and the consideration of existing protected trees.
- **Site ref. 8HA** – The site profile states that noise attenuation, flood attenuation and habitat creation and the retention of existing protected trees will be required.

- 2.12 These observations highlight a range of issues with some of the proposed allocation sites. Whilst we do not dispute whether these issues may be capable of being overcome, it is clear that they will reduce the NDA below the typical level currently being assumed. This will therefore reduce the minimum dwelling capacity of these sites, reducing the overall capability of the Council to meet its OAN making it imperative that the Council considers additional sites for allocation.

- 2.13 We note from Table 4.6 of the draft Local Plan that the Council have included for varying allowances for non-delivery of sites, including a 15% reduction in SHLAA capacity for non-delivery and a 20% allowance on Green Belt sites for non- or delays in delivery.

- 2.14 This inconsistency is not considered sound and a 20% allowance for non- or stalled delivery should be applied to both SHLAA and Green Belt sites. SHLAA sites, particularly those not within the 5-year supply, are not considered less likely to face issues with delivery. Applying a consistent allowance for non- or stalled delivery will further require additional sites to be allocated for housing delivery.

PO2475



Local Plan Representations on behalf of Story Homes - Email 1 of 7
Helen Hartley
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:34

ELO208
Site 8HS
① - LPA05
② - Table 4.6





5 Attachments

 13.03.2019_FINAL DRAFT_Representation on behalf of Story Homes - Eccleston Vale .pdf

 Story Homes Representations to Policy LPA05 - Housing Need.pdf

 Story Homes Representations to Policy LPA05 - Table 4.5.pdf

 Story Homes Representations to Policy LPA05 - Table 4.6.pdf  Story Homes Representations to Policy LPA06.pdf

③ - LPA06
④ - GBR
⑤ - HRA
⑥ - SA

Dear Sir/Madam

Thank you for the opportunity to comment on the Submission Local Plan.

I am pleased to attach representations on behalf of Story Homes in relation to the following parts of the Plan specifically:

- Policy LPA05
- Policy LPA05 – Table 4.5
- Policy LPA05 – Table 4.6
- Policy LPA06

I will attach the following information over **7 separate emails** due to file size:

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- Representations Forms (Email 1)
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- Appendix 2: Vision Brochure: Eccleston Vale – A Vision for Sustainable Family Living. Vision Brochure (August 2016) (Email 3,4,5)
- Appendix 3: Infrastructure and Delivery Statement: Eccleston Vale, St. Helens (January 2018) (Email 6,7)
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- Appendix 5: Recommended changes to SA Site Assessment Scoring (Email 2)
- Appendix 6: Story Homes SA Site Scoring (Email 2)

Given the large size of some of the files, I would be extremely grateful if you could confirm receipt of all 7 emails.

Kind regards
Helen

Helen Hartley
Principal Planner

[REDACTED]

Nexus Planning is pleased to have been shortlisted by the RTPI as a finalist for Planning Consultancy of the Year 2019

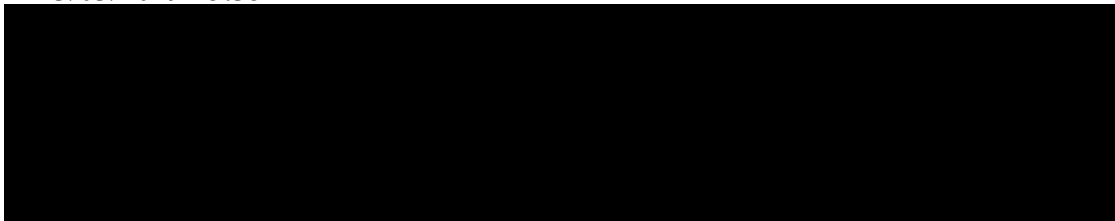


Nexus Planning - Manchester
Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ

[REDACTED]



RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7
 Helen Hartley
 to:
 planningpolicy@sthelens.gov.uk
 13/03/2019 15:35



2 Attachments



Appendix 1 - Eccleston Vale, Windle, St Helens - Indicative Masterplan August 2017.pdf



Appendix 4, 5 and 6.pdf

Email 2 of 7

From: Helen Hartley
Sent: 13 March 2019 15:34
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

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Helen Hartley
Principal Planner

[REDACTED]

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Nexus Planning - Manchester
Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ



RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7
 Helen Hartley
 to:
 planningpolicy@sthelens.gov.uk
 13/03/2019 15:37



1 Attachment



Appendix 2 - Eccleston Vale, Windle - FINAL August 2016 Document - Submission Version_Part1.pdf

Email 3 of 7

From: Helen Hartley
Sent: 13 March 2019 15:36
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [Redacted]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley
Sent: 13 March 2019 15:34
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [Redacted]
Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

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[REDACTED]

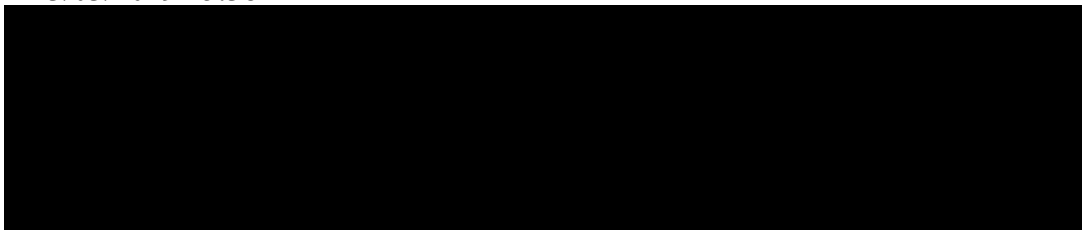
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Nexus Planning - Manchester
Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ



RE: Local Plan Representations on behalf of Story Homes - Email 4 of 7
 Helen Hartley
 to:
 planningpolicy@sthelens.gov.uk
 13/03/2019 15:38



1 Attachment



Appendix 2 - Ecclestone Vale, Windle - FINAL August 2016 Document - Submission Version_Part2.pdf

Email 4 of 7

From: Helen Hartley
Sent: 13 March 2019 15:37
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [Redacted]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7

Email 3 of 7

From: Helen Hartley
Sent: 13 March 2019 15:36
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [Redacted]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley
Sent: 13 March 2019 15:34
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [Redacted]
Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

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Principal Planner

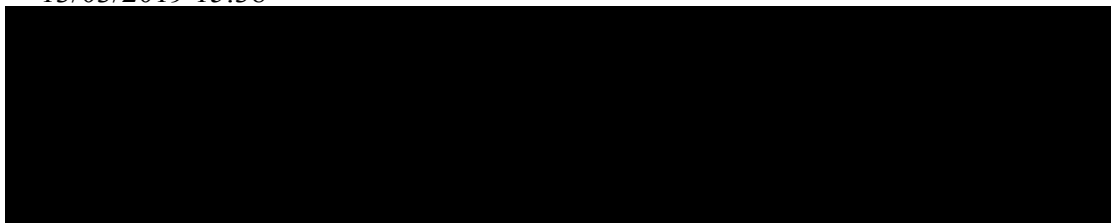
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Nexus Planning - Manchester
Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ



RE: Local Plan Representations on behalf of Story Homes - Email 5 of 7
 Helen Hartley
 to:
 planningpolicy@sthelens.gov.uk
 13/03/2019 15:38



1 Attachment



Appendix 2 - Eccleston Vale, Windle - FINAL August 2016 Document - Submission Version_Part3.pdf

Email 5 of 7

From: Helen Hartley
Sent: 13 March 2019 15:37
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [REDACTED]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 4 of 7

Email 4 of 7

From: Helen Hartley
Sent: 13 March 2019 15:37
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [REDACTED]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7

Email 3 of 7

From: Helen Hartley
Sent: 13 March 2019 15:36
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [REDACTED]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley
Sent: 13 March 2019 15:34
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [REDACTED]
Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

Dear Sir/Madam

Thank you for the opportunity to comment on the Submission Local Plan.

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- Policy LPA05 – Table 4.5
- Policy LPA05 – Table 4.6
- Policy LPA06

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Helen Hartley
Principal Planner

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Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ



RE: Local Plan Representations on behalf of Story Homes - Email 6 of 7
 Helen Hartley
 to:
 planningpolicy@sthelens.gov.uk
 13/03/2019 15:41



1 Attachment



Appendix 3 - Ecclestone Vale Infrastructure and Delivery Statement 22.01.2018_Part1.pdf

Email 6 of 7

From: Helen Hartley
Sent: 13 March 2019 15:38
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [Redacted]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 5 of 7

Email 5 of 7

From: Helen Hartley
Sent: 13 March 2019 15:37
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [Redacted]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 4 of 7

Email 4 of 7

From: Helen Hartley
Sent: 13 March 2019 15:37
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [Redacted]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7

Email 3 of 7

From: Helen Hartley
Sent: 13 March 2019 15:36
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [Redacted]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley
Sent: 13 March 2019 15:34
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [Redacted]

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

Dear Sir/Madam

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- Policy LPA05 – Table 4.5
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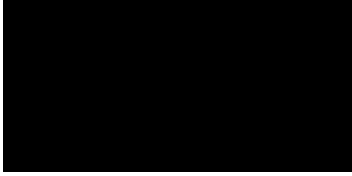
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Nexus Planning - Manchester
Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ





RE: Local Plan Representations on behalf of Story Homes - Email 7 of 7
 Helen Hartley
 to:
 planningpolicy@sthelens.gov.uk
 13/03/2019 15:40



1 Attachment



Appendix 3 - Ecclestone Vale Infrastructure and Delivery Statement 22.01.2018_Part2.pdf

Email 7 of 7

From: Helen Hartley
Sent: 13 March 2019 15:39
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [REDACTED]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 6 of 7

Email 6 of 7

From: Helen Hartley
Sent: 13 March 2019 15:38
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [REDACTED]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 5 of 7

Email 5 of 7

From: Helen Hartley
Sent: 13 March 2019 15:37
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [REDACTED]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 4 of 7

Email 4 of 7

From: Helen Hartley
Sent: 13 March 2019 15:37
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>
 [REDACTED]
Subject: RE: Local Plan Representations on behalf of Story Homes - Email 3 of 7

Email 3 of 7

From: Helen Hartley
Sent: 13 March 2019 15:36
To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: RE: Local Plan Representations on behalf of Story Homes - Email 2 of 7

Email 2 of 7

From: Helen Hartley

Sent: 13 March 2019 15:34

To: 'planningpolicy@sthelens.gov.uk' <planningpolicy@sthelens.gov.uk>

Subject: Local Plan Representations on behalf of Story Homes - Email 1 of 7

Dear Sir/Madam

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Principal Planner

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Nexus Planning - Manchester

Eastgate, 2 Castle Street

Castlefield

Manchester M3 4LZ





St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

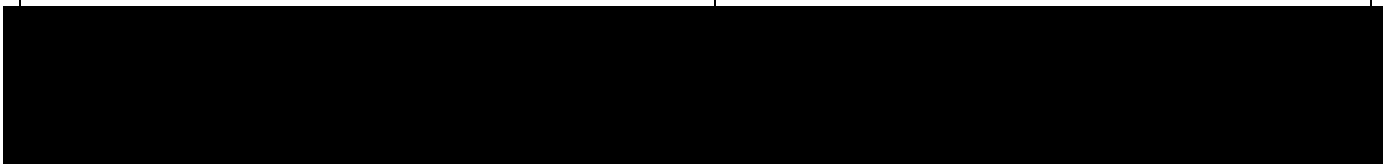
Part A – Personal Details

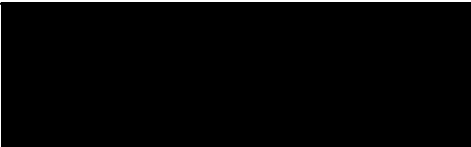
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--------------------------------------|--|
| Title: | Title: Ms |
| First Name: | First name: Helen |
| Last Name: | Last Name: Hartley |
| Organisation/company: Story Homes | Organisation/company: Nexus Planning |
| Address: c/o Agent | Address: Eastgate, Castle Street, Manchester, |
| Postcode: | Postcode: M4 3LZ |



| | | | |
|-------------------|---|--------------|-----------------------|
| Signature: |  | Date: | <div>13.03.2019</div> |
|-------------------|---|--------------|-----------------------|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|---|-------|-----------------------------|-----------|--------------|--|--|--|--------------------------------|--|
| Policy | LPA05 | Paragraph / diagram / table | Table 4.6 | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|------------------------------|--|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|---|
| Positively Prepared? | X |
| Justified? | X |
| Effective? | X |
| Consistent with National Policy? | X |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see Statement prepared by Nexus Planning on behalf of Story Homes and Statement prepared by Nexus Planning on behalf of a Consortium comprising Story Homes, Wainhomes and Eccleston Homes.

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 Section 2 of Statement prepared by Nexus Planning on behalf of Story Homes and Section 3 of Statement prepared by Nexus Planning on behalf of the Consortium.

For the reasons set out in detail in our Statement, we submit that the Local Plan should significantly reduce the level of housing supply anticipated to be delivered through site identified in the existing urban area. With regard to the detailed site analysis work undertaken, it is recommended that the Submission LP should be seeking to identify Green Belt land for at least an additional 3,560 dwellings over the Plan Period.

This would result in a strategy for meeting the identified housing needs that is more positively prepared to secure the future growth aspirations of St Helens, is justified in robust evidence about the deliverability of sites within the urban area, and achieves a more effective and deliverable strategy. In this way, the proposed modification will help ensure a sound 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 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:

Story Homes are promoting land identified in the Submission LP as Safeguarded Site '8HS: Land South of A580 between Houghtons Land and Crantock Grove, Windle'. The concerns expressed go to the heart of the soundness of the Local Plan. They are important and complex issues which need to be discussed through the Examination in Hearings process.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

St Helens Borough Local Plan 2020-2035

Representations to the Submission Draft Plan January 2019

on behalf of Story Homes

March 2019



2.0 Spatial Strategy and Meeting Housing Needs – Policy LPA05

2.1 The representations hereby submitted by Story Homes in relation to their site at Eccleston Vale should be read in conjunction with the representations prepared by Nexus Planning on behalf of the Consortium in relation to Policy LPA05. ✓

2.2 The Consortium representations set out in detail Story Homes' view that the Submission LP is failing to identify sufficient Green Belt land to meet housing needs over the Plan Period. This is in relation to the following areas of concern. ①

Housing Needs

2.3 Policy LPA05 states that 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 (dpa).

2.4 The Consortium consider that this figure does not represent the most appropriate housing figure to ensure the sustainable growth of the Borough. ①

2.5 In accordance with the requirements of the NPPF (2019) (namely paragraph 11 and 60) and the Planning Practice Guidance (PPG), the LP should contain as a minimum a housing requirement that delivers the standard methodology housing figure for St Helens.

2.6 However, the PPG is clear that:

"The standard methodology minimum figure does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates."

- 2.7 In proposing a housing requirement of 486 dpa, the Submission LP only proposes a very marginal uplift against the 482 dpa standard methodology figure to support economic growth. In light of the aspirations within the 2016 Preferred Options Draft LP to maximise the economic potential of St. Helens, such a marginal uplift points to a fundamental lack of ambition to deliver real change and enable the sustainable growth of the Borough.
- 2.8 In light of this, the Consortium have critical concerns over the soundness of the approach taken to determine the Policy LPA05 housing figure. These concerns principally focus on:
- a) Achieving sustainable and balanced population growth (a LP key issue, part of the overarching LP spatial vision and LP Key Strategic Aim 1);
 - b) The Policy LPA05 housing figure is significantly lower than previous levels of planned and delivered housing; and
 - c) The level of housing required to support planned economic growth.
- 2.9 With reference to the scenarios assessed within the Strategic Housing Market Assessment (SHMA) Update (2019), we therefore conclude that Policy LPA05 should be planning for a higher housing figure of 604 dpa. This would represent a figure more in line with the 570 dpa proposed in the Preferred Options LP and would therefore enable St Helens to deliver its original ambitions for growth in the Borough.
- 2.10 Overall, it is submitted that the **most appropriate housing requirement for St Helens over the period covered by the LP is 604 dpa**. A LP Policy LPA05 housing figure of 604 dpa would:
- Continue to stabilise and increase the boroughs population (a LP key issue, part of the overarching LP spatial vision and LP Key Strategic Aim 1);
 - Allow for more housing choice and competition;
 - Support planned economic growth; and
 - Reflect the higher levels of housebuilding achieved in years before and after the 2008-2009 recession.

Housing Land Supply

2.11 As well as the above comments about the identified housing requirement figure, the Consortium also share serious concerns with how Policy LPA05 proposes to meet the overall housing requirement identified. Table 4.6 of the LP states that the 2017 Strategic Housing Land Availability Assessment (SHLAA) identifies a total capacity of 6,287 dwellings from sites identified in the SHLAA between April 2017 and March 2035 (excluding windfalls).

2.12 The Consortium have reviewed the SHLAA sites that make up the identified supply and do not consider it to be justified nor effective plan-making to rely on these sites to meet this proportion of the housing need.

2.13 This representation discusses these concerns in the context of the following two areas of objection:

Effectiveness of Strategy

2.14 The reliance on the identified SHLAA sites will result in a LP Strategy which is not effective and will not achieve sustainable development in the Borough. It will result in a skewed distribution of housing sites, with over 60% of the overall supply focussed on the town centre and inner urban areas. This will fail to deliver the required balance of affordable and family dwellings required across the Borough. What is more, the majority of the SHLAA sites (77 out of 93 sites) will not deliver any affordable or family housing, in line with Policy LPC02 of the emerging LP, meaning overall the LP will fail to deliver the identified need for affordable homes across the Plan Period.

2.15 Past delivery rates in St. Helens appear to have largely comprised of strategic development opportunities explicitly identified in the previous adopted Local Plan rather than through any natural 'churn' in the availability of urban sites. For example strategic sites at Lea Green Colliery and Vulcan Works have made significant contributions towards these completion rates. This reinforces the point that in order to deliver the proposed annual requirement from sites identified in the SHLAA, the emerging LP must identify specific deliverable sites to achieve the required level of completions rather than rely on the market to deliver existing smaller scale urban brownfield sites.

Realism of Delivery

2.16 The Consortium have serious concerns as to whether the sites identified from the urban area can be considered to be deliverable and developable in accordance with national policy and accordingly, whether the Submission LP is justified in relying on them to meet housing needs as anticipated. An analysis of the SHLAA sites has revealed the following trends of uncertainty:

- **51 out of the 97 sites identified in the SHLAA do not have planning permission**, equating to 2,899 dwellings. This amounts to **46% of the supply** identified within the 15 year period (excluding windfall allowance). The principle and achievability of housing on these sites in terms of technical considerations has therefore not been demonstrated in any detail;
- Around **23% of the 'outstanding capacity' identified over the Plan Period in the SHLAA is currently in active alternative uses**. There is insufficient evidence to give confidence that these sites will become available despite these active uses and it is considered unrealistic to expect all of these sites to be made available for housing as anticipated. In many cases it is also considered undesirable to redevelop the sites for housing due to the resultant loss of more affordable employment space catering to small businesses in the Borough or the loss of valuable amenity greenspace in otherwise built up areas;
- Many of the SHLAA sites are identified as facing **significant technical constraints** likely to have impacts on net developable area. By way of example, the 'Former Red Quarry' has steep topography and is covered in mature trees and 'Land North and South of Corporation Street' occupies a narrow strip of land between a canal and a trainline. Whilst these constraints might not necessarily preclude the development of the sites for housing, it brings further doubt as to whether development of these sites is likely to be considered viable in the future, especially when the size and location of the sites means viability is already likely to be challenging. It also calls into question the Council's anticipated timescales since constrained urban sites can typically face protracted lead-in times;
- The SHLAA identifies **landownership constraints** facing several of the sites. Multiple or unclear landownerships can create major delays in bringing a site forward for development, with protracted legal processes and discussions;

- It is also concerning that the majority of the sites in the SHLAA are in areas of the Borough that have been identified through the Economic Viability Assessment (December 2018) prepared to inform the Local Plan as having **viability constraints**. Given the small size of many of the sites, this again raises concerns that it is wholly unrealistic to anticipate all, or even the most, of these sites will be delivered and those which are developed are unlikely to deliver new affordable homes, compounding the issue and lack of overall delivery of new homes over the plan period.

- 2.17 The above highlighted trends demonstrate how, for a significant proportion of the sites being relied on to deliver housing need over the plan period, the prospects that these sites will come forward as required is uncertain at best. Through a review of the SHLAA sites, **the Consortium consider that at least 1,173 dwellings should be removed from the supply identified from the SHLAA as coming forward over the Plan Period.**

Conclusions and Recommendations

- 2.18 In light of the above concerns, it is the Consortium's view that more Green Belt land must be identified for release over the Plan Period either through allocation or a mechanism for release of the Safeguarded land than is currently being proposed. This is essential in order to ensure a sound and deliverable Local Plan Strategy which will meet the housing needs for the Borough not ensure the long-term permanence of Green Belt boundaries, as required in the NPPF. **It is submitted that additional land for at least 3,560 dwellings should be released from the Green Belt to ensure a sound strategy.**

St Helens Borough Local Plan 2020-2035

Representations to the Submission Draft January 2019

**on behalf of Consortium comprising of Story Homes, Wainhomes
and Eccleston Homes**

March 2019



3.0 Housing Land Supply – Policy LPA05 and Table 4.6

- 3.1 As well as the above comments about the identified housing requirement figure, the Consortium also share fundamental concerns with how the Submission LP proposes to meet the overall housing requirement identified. In particular, the amount of housing expected to be delivered from the urban area.
- 3.2 Policy LPA05 and Table 4.6 of the Submission LP describes how the housing requirement will be met from the following sources:
- a) Completions;*
 - b) Sites with planning permission;*
 - c) Housing allocations shown on the Policies Map and listed in Table 4.5;*
 - d) Sites without planning permission identified in the Strategic Housing Land Availability Assessment (SHLAA); and*
 - e) 'Windfall' development, including development on small sites not individually identified in the SHLAA, sub-division of dwellings and conversions/changes of use.*
- 3.3 Paragraph 4.18.10 of the Submission LP sets out that a key priority for the Plan is to maximise housing delivery on previously developed ('brownfield') land within existing urban areas. It states that the SHLAA 2017 identifies a total capacity of 7,817 dwellings from sites within the urban area between 1st April 2017 and 31st March 2035.
- 3.4 It is on the basis of this 'urban supply' figure that the Council have calculated how much of the overall housing requirement must be delivered on sites outside of the existing urban areas, and specifically therefore how much land should be released from the Green Belt.
- 3.5 The preparation of the Local Plan presents a vital opportunity to review the Green Belt boundaries within St. Helens. The Consortium welcome and strongly support the Council's acknowledgement that not all of the Borough's future housing needs can be met within the existing urban areas and that exceptional circumstances exist, in line with paragraph 136 of the NPPF, to justify the release of Green Belt land within the next Plan Period. Paragraph 136 is clear that Green Belt boundaries should only be altered through the preparation or updating of plans.

3.6 It states:

"Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."

3.7 Paragraph 139, Part e) states that when defining Green Belt boundaries, plans should:

"be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period."

3.8 In this context, it is **essential** for the future of the Borough that the Submission LP takes the opportunity afforded to get decisions about future Green Belt boundaries in St. Helen's right.

3.9 The Consortium support the principle of directing development to previously developed land. However, Paragraph 23 of the NPPF sets out how:

"Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period."

3.10 The Consortium have significant concerns that the strategy being proposed in the Submission LP, considerably over-estimates the number of dwellings that are realistically likely to come forward on previously developed land over the plan period. In doing so, it is the Consortium's view that the Council are failing to identify sufficient land outside of the existing urban areas and within the Green Belt to meet future housing needs. In this way the strategy set out in Policy LPA05 fails to plan effectively for the future and is not consistent with national policy which requires plans to bring sufficient land forward to meet housing needs, and secure the long term permanence of Green Belt boundaries.

3.11 The following analysis confirms why this is the case.

Housing Land Supply identified in the SHLAA 2017

3.12 Despite the SHMA relating to the 2016 to 2035 period, the Plan Period proposed in the Submission LP is the 15 year period 2020-2035. In calculating housing requirement over the 'Plan Period', Table 4.6 of the Submission LP therefore seeks to discount expected completions up to 2020 (which is estimated to be 1,989 dwellings) to find a residual requirement of 7,245 dwellings (between 2020-

2035) left to plan for. The supply then identified to meet this requirement is based on the 2017 SHLAA, which covers the period 2017 to 2033. This overlap of different periods has led to an unnecessarily complex and confused calculation of requirements and supply set out in Table 4.6 of the Submission LP (replicated below), whereby it is not always entirely clear which period is being referred to. It is recommended that the calculations in the Submission LP should be clearly set out in relation to the period 2016 – 2035, and that is the approach we seek to take later in these representations.

Table 4.6: Housing land requirements and supply – 2016 until 2035

| Requirements | Dwellings |
|--|---------------------|
| a) St.Helens housing requirement (19 years from 1 Apr 2016 to 31 Mar 2035) at average of 486 per year | 9,234 |
| b) Expected completions by 1 Apr 2020 | 1,989 |
| c) Residual requirement over Local Plan period from 1 Apr 2020 to 31 Mar 2035 | 7,245 ²⁹ |
| d) Anticipated supply | |
| e) Total SHLAA supply– 1 Apr 2017 until 31 Mar 2035 | 7,817 ³⁰ |
| ... consisting of: | |
| f) Large sites (0.25ha or 5 units and above) - planning permission not started as of 1 Apr 2017 | 1,581 ³¹ |
| g) Large sites with planning permission under construction as of 1 Apr 2017 | 654 |
| h) Large sites with planning permission but stalled as of 1 Apr 2017 | 289 |
| i) Large sites - identified by 2017 SHLAA, no planning permission as of 1 Apr 2017 | 4,107 |
| j) Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowance) | 1,395 |
| k) Estimated SHLAA supply – 1 Apr 2020 until 31 Mar 2035 | 6,344 ³² |
| l) SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18) | 794 |
| m) Residual SHLAA capacity over 15 year Plan period (1 Apr 20 - 31 Mar 35) | 5,550 ³³ |
| n) Required capacity to be found on Green Belt land | 1,695 |
| o) Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (site allocations 5HA to 15HA inclusive) (to allow for contingencies e.g., infrastructure provision, delays, lead-in times to start of housing delivery etc.) | 2,034 |
| p) Total capacity of allocated sites removed from the Green Belt (sites 1, 2, 4, 5, 7 and 8 HA) (1 Apr 20 - 31 Mar 35) | 2,056 |
| q) Total supply over plan period³⁴ | 7,606 |

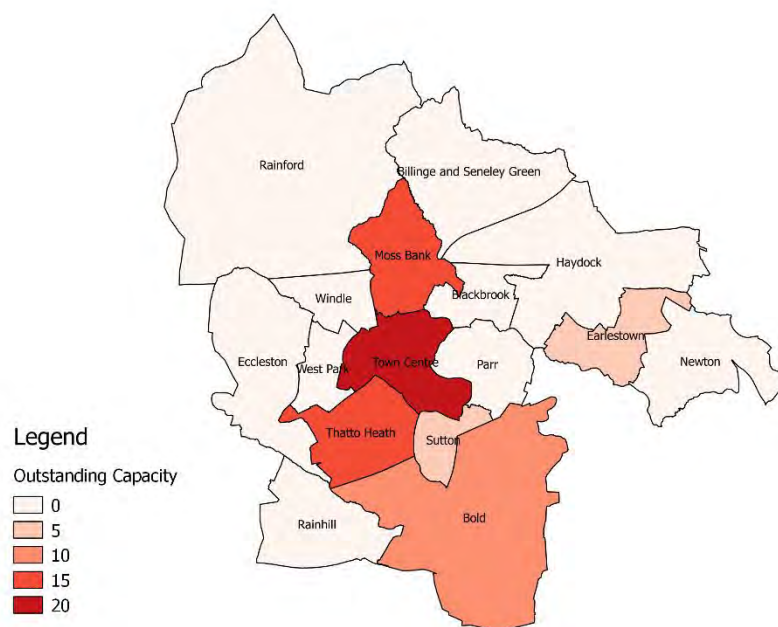
- 3.13 The Consortium have reviewed the SHLAA sites that make up the identified supply and have serious concerns that it is not justified nor effective plan-making to rely on all of these sites to meet housing needs to the level anticipated.
- 3.14 This section discusses these concerns in the context of the following two areas of objection:
- **Effectiveness of Strategy.** The reliance on the identified SHLAA sites will result in a LP Strategy which is not effective and will not achieve sustainable development.
 - **Realism of Delivery.** The Consortium have serious concerns as to whether these sites can be considered to be deliverable and developable in accordance with national policy and, accordingly, whether the Submission LP is justified in relying on them to meet housing needs as anticipated. Appendix A contains an overview of the 97 sites identified as deliverable and developable within the SHLAA, highlighting those particular sites that raise doubts.

Effectiveness of Strategy

Spatial Distribution of Sites

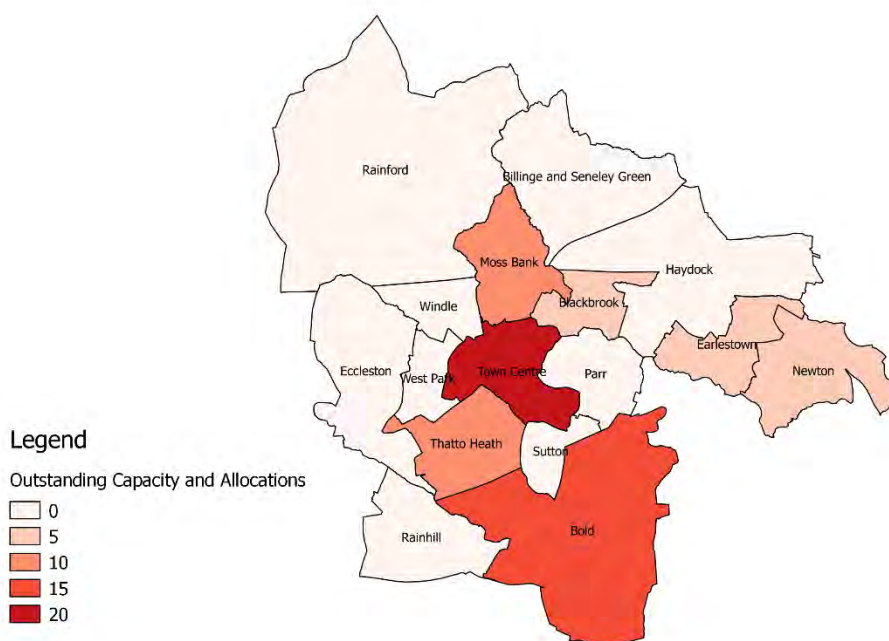
- 3.15 Appendix 5 of the SHLAA sets out the Development Trajectory of sites from the SHLAA over the next 15 years (2017/18 – 2032/33). The sites identified in Appendix 5 total 6,287 dwellings.² Graphic 3 below demonstrates how 68% of this 'outstanding capacity' is concentrated in 4 wards, 3 of which are within the central part of St. Helen's Core Area: Town Centre (26%), Moss Bank (15%), Thatto Heath (16%) and Bold (11%). It is evident that relying on the sites identified through the SHLAA will result in skewed distribution of new housing across the Borough – with growth focussed within these inner urban areas at the expense of the edge of the Core Area and the outlying settlements.

² This is a total of the 'outstanding capacity' figure for all the sites, adjusted to account for 405 dwellings from Site. 111 (in accordance with the trajectory set out in the SHLAA).



Graphic 3: Map showing percentage of SHLAA capacity in each Ward

- 3.16 Graphic 4 below shows the distribution of dwellings over the Plan Period, if the proposed Green Belt allocations are added to the overall capacity from the SHLAA. It continues to show a clear imbalance in housing distribution across the Borough which is still not rectified through the proposed Green Belt allocations. It is submitted that by over-relying on SHLAA sites which are concentrated within only a few parts of the Borough, **the Submission LP is prevented from delivering a more balanced spatial distribution of growth.**
- 3.17 As we go on to demonstrate, this approach is not justified or necessary. The proposed distribution of housing will not effectively meet the range of housing needs required in the Borough, explicitly for both market and affordable need in different parts of the Borough.



Graphic 4: Map showing percentage of Total Supply in each Ward (including Green Belt Allocations)

Affordable Housing Provision

- 3.18 The St. Helens SHMA Update 2018 identified that there is a need for 1,987 affordable housing units to be delivered in the Borough between 2016 and 2033, at an average of 117 units per year. Paragraph 6.3.3 of the Submission LP sets out how extending this until the end of the Plan Period means that out of the overall housing requirement of 9,234 dwellings, approximately 2,223 dwellings should be affordable.
- 3.19 The Economic Viability Assessment (December 2018) prepared by Keppie Massie to inform the LP identifies the quantum of affordable housing likely to be viable in different parts of the Borough and concludes that delivery of affordable housing is anticipated to be a significant issue in much of the Borough. It is on the basis of this evidence that the Submission LP Policy LPC02 sets a 0% affordable requirement for all brownfield sites, except those within the areas of Eccleston, Rainford and Rainhill as detailed in Table 4 below.

- 3.20 The affordable housing requirement established under Policy LPC02 is set out in Table 6.3 of the Submission LP, which is replicated below.

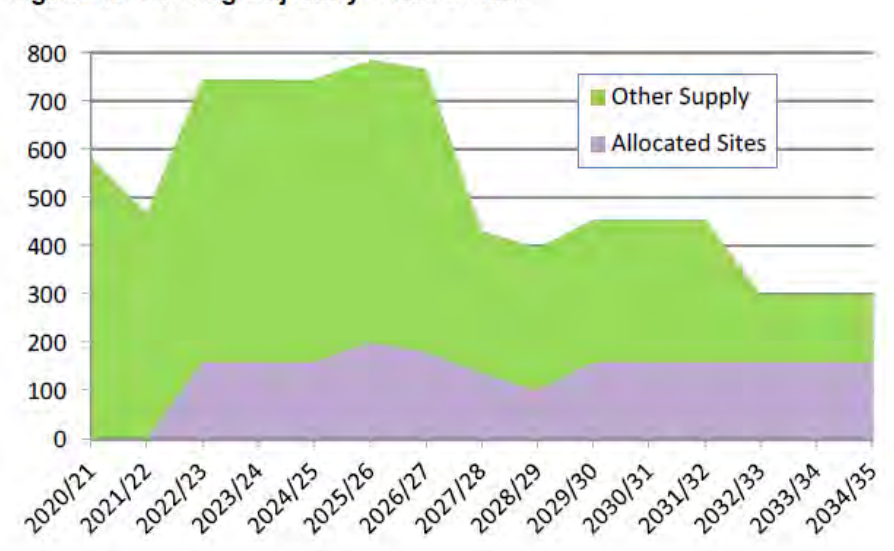
| Table 4: Submission LP Affordable Housing Requirement | | |
|---|--|--|
| Affordable Housing Zone | Areas include | Affordable Housing Requirement |
| 1 | Town Centre and Parr wards | No affordable housing requirement due to viability constraints |
| 2 | Blackbrook, Bold, Earlestown, Haydock, Sutton, Thatto Heath, West Park Billinge & Seneley Green, Moss Bank, Newton, Windle | 30% requirement on greenfield sites 0% requirement on brownfield sites |
| 3 | Eccleston, Rainford, Rainhill | 30% requirement on greenfield sites 10% requirement on brownfield sites |

- 3.21 Based on this, the table below sets out that **77 of the 97 sites identified in the SHLAA, will not be required to provide any affordable housing.**

| Table 5: Affordable Housing from SHLAA Sites | | |
|--|---------------------------------|---|
| | Number of Sites from 2017 SHLAA | Number of Affordable Dwellings to be Provided |
| 0% requirement | 77 | 0 |
| 10% requirement | 2 | 13 |
| 30% requirement | 18 | 341 |
| Total | 97 sites | 354 dwellings |

- 3.22 This shows that through **an over-reliance on sites within the urban area, a large proportion of the overall housing land supply identified through the Submission LP will barely contribute towards meeting affordable housing needs.** Figure 4.3 of the Submission LP does not anticipate any of the allocated sites coming forward until 2021/22, so a lack of affordable provision from the 'other supply' sites will particularly impact the early part of the Plan Period.

Figure 4.3: Housing Trajectory – Year to Year



Graphic 5: Housing Trajectory Year to Year - Submission LP (Figure 4.3)

- 3.23 Whilst the proposed Green Belt allocations will all be required to provide affordable housing, provision of 30% to this source (which amounts to 2,056 dwellings) will only result in the provision of 617 affordable dwelling from Green Belt allocations. Added to the 354 expected from the SHLAA sites this will still only amount to a total of 971 affordable dwellings over the Plan Period and this is assuming all the SHLAA sites deliver as anticipated. This represents a significant shortfall against the 2,223 affordable dwellings required.
- 3.24 **The above analysis further highlights the importance that a larger number of deliverable and viable greenfield sites are identified in order to maintain the continued delivery of affordable housing across the Borough and throughout the Plan Period, in line with the need identified.**

Realism of Delivery

- 3.25 The recently revised NPPF (2019) has confirmed the definition of what constitutes a deliverable and developable site. Annex 2 of the NPPF (2019) defines 'deliverable' as:

"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

- 3.26 It goes on to define 'developable' as:

"Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

- 3.27 The Planning Practice Guidance (PPG) requires that:

"strategic policy-making authorities will need to provide robust, up-to-date evidence to support plan preparation. Their judgements on deliverability of housing sites, including windfall sites, will need to be clearly and transparently set out."

- 3.28 Whilst we appreciate that conclusions in relation to each site are to some extent a matter of planning judgement, **the concerns we have with specific sites add up to create an overall picture that delivery from a significant number of the SHLAA sites is highly uncertain.** This is with regard to the following trends.

Planning Status

- 3.29 Of the 97 sites identified as deliverable and developable in the SHLAA, and identified as having an outstanding capacity of 6,287 dwellings over the Plan Period; 51 sites (equating to 2,899 dwellings)

do not have planning permission. The principle and achievability of housing on these sites in terms of technical considerations has therefore not been demonstrated in any detail as is considered later.

- 3.30 Particular doubts are raised as to the deliverability of these sites, when it is considered that many have long been identified in the Council's evidence base as suitable for housing yet have still not come forward in that time. By way of example, 853 dwellings now being relied on to come forward in the Plan Period, were similarly anticipated to come forward within 0-5 years when assessed in the 2012 SHLAA (therefore before 2017/18). The anticipated delivery of these sites has slipped considerably therefore, suggesting constraints or lack of market demand. **Little to no evidence has been provided to demonstrate why the delivery of these sites would not slip again, raising serious doubts as to whether these sites can now be relied upon to make up the required supply over the plan period.**

Active Uses

- 3.31 Around 23% of the 'outstanding capacity' identified in the SHLAA (equating to 1,439 dwellings) are currently in active alternative uses, including several where planning policy would seek to restrict redevelopment for housing. By way of example, these include 'Land west of Vista Road', Ref. 87 which is currently in use as a scrap yard and 'Derbyshire Hill Family Centre', Ref. 129 which is an active community centre. There is insufficient evidence to give confidence that these sites will become available despite these active uses and it is considered unrealistic to expect all of these sites to be made available for housing as anticipated. This is especially given that alternative locations/premises would need to be identified and secured, taking considerable time.
- 3.32 As well as technical deliverability, we would also question the *desirability* that all of the identified sites are developed for housing, given the need to also maintain land for employment and community uses, and to maintain an acceptable level of amenity for both future and existing residents of the Borough. There are several identified sites (for example 'Land at Newby Place, Ref. 135', 'Land adjacent Church of Christ, Heather Brae, Ref.84' and 'Land at Waterdale Crescent, Ref. 63') which are noted to be open green space within existing residential areas. Whilst these spaces are not always designated as formal open space, it is apparent they have an important role to play for local communities as amenity green space in otherwise built-up parts of St. Helens. Development of these spaces will in many cases constitute undesirable 'urban-cramming' and would not be consistent with national policy, which seeks to protect open spaces (Paragraph 97, NPPF).

Technical Constraints

- 3.33 Many of the SHLAA sites are identified as facing significant technical constraints likely to have impacts on net developable area. For example 'Site of former 56-120, Eccleston Street, Ref. 59' is likely to have a severely reduced net developable area given its narrow shape and presence of mature trees on a prominent road frontage. Land at 'Milton Street, Ref. 91' is partly within Flood Zone 3. 'Land off Monastery Lane, Ref. HL189' has been stalled due to 'substantially unanticipated remediation costs'. Whilst the technical constraints identified might not necessarily preclude the development of the sites for housing, it further brings doubt as to whether development of those sites is likely to be considered viable in the foreseeable future, especially when the size and location of the sites means viability is already likely to be challenging.
- 3.34 We also note 11 sites for which the SHLAA identifies landownership complications as a potential constraint. Multiple or unclear landownership can create major delays in bringing a site forward for development, with protracted legal processes and discussions. Whilst many of these sites have been identified as deliverable in years 1 to 5, there is no 'clear evidence' that this is the case as required by Annex 2 of the NPPF.

Viability

- 3.35 It is also concerning that the majority of the sites (77 of the 97 sites identified in the SHLAA) identified in the SHLAA are in areas of the Borough that have been identified through the Economic Viability Assessment (December 2018) as having viability constraints (Affordable Housing Zone 1). Given the small size of many of the sites, this again raises concerns that it is wholly unrealistic to anticipate all, or even the majority, of these sites will be delivered.

Summary on Realism of Delivery

- 3.36 The above highlighted trends demonstrate how, for a significant proportion (estimated to be at least a third) of the sites being relied on to deliver housing need over the plan period, their deliverability is uncertain at best. With regard to the above considerations, the individual assessment of sites within Appendix A provides our assessment as to whether the specific sites can be considered deliverable or developable in line with the Council's anticipated trajectory. It is clear from this Appendix and from the discussion above that **there are several sites which are not considered to be deliverable and**

developable such that it is not justified or sound to include them in the Council's supply calculations under Policy LPA05.

- 3.37 With regard to the site-specific considerations set out in Appendix A, **the Consortium consider that at least 1,173 dwellings should be removed from Council's total estimated supply figure from the SHLAA.**

Non-Delivery Rate

- 3.38 The Submission LP applies a non-delivery rate of 15% to the identified SHLAA capacity. The Consortium strongly support the application of a rate of non-delivery. DCLG analysis³ has indicated that between 10-20% of planning permissions are not implemented, whilst a further 15-20% are subject to a revised application process which delays delivery. Given this, the consortium agree it is essential that a non-delivery rate of at least 15% is applied to any supply that is identified at the stage of plan-making.
- 3.39 We are also mindful that the SHLAA applies assumptions about lead-in times and built out rates which may not be accurate for every site. In the Consortium's experience, the larger brownfield sites in particular often face protracted lead-in times due to the timescales associated with relocating existing uses, demolition and land remediation costs.

³ Presentations to the HBF Planning Conference (September 2015)

Revised Calculation of Housing Land Supply

3.40 As set out above, the approach taken in Table 4.6 of the Submission LP (replicated above) in respect of Plan Period leads to an unnecessarily confused calculation of requirement and supply, compounded by the fact the figures given in the LP rely on the SHLAA to identify the supply figures which cover a different period 2017-2032 to the Local Plan. Accordingly, we set out below what we would consider a more straightforward approach - that is of setting out the calculation and anticipated supply in relation to the full period 2017 – 2035.

| Table 6: Nexus Calculation of Requirement and Supply | | |
|--|---|------------------|
| | | 604 dpa scenario |
| a) | Housing requirement (19 years from 1st April 2016 to 31 March 2035) based on needs range identified in Section 2. | 11,476 |
| b) | Expected completions in 2016/17 ⁴ | 489 |
| c) | Residual requirement over Period from 1 April 2017 to 31 March 2035 (a-b) | 10,987 |
| d) | Estimated Capacity from SHLAA 2017-2035 | 5,114 |
| e) | Estimated Capacity from SHLAA with 15% reduction for non-delivery (applied to years 6-18 only) | 4,634 |
| f) | Windfalls (93 dpa x 18 years) | 1,674 |
| g) | Total non-Green Belt Supply 2017 – 2035 (e+f) | 6,308 |
| h) | Required capacity to be found on Green Belt Land ⁵ (c-g) | 4,679 |
| i) | Required capacity to be found on Green Belt Land with 20% increased allowance | 5,615 |

⁴ Table 3.12 of SHLAA

- 3.41 This calculation leads to the following conclusion regarding the amount of *additional* Green Belt land the Submission LP should be seeking to identify for release over this Plan Period.

| Table 7: Calculation of Additional Green Belt land required | |
|---|------------------------|
| | 604 dpa scenario |
| Current allocated Green Belt land ⁶ | 2,056 dwellings |
| Additional Green Belt land required | 3,559 dwellings |
| Total | 5,615 dwellings |

⁶ Table 4.5 of the Submission LP

4.0 Conclusions

- 4.1 This representation is prepared by Nexus Planning on behalf of a consortium of landowners and housebuilders with various land interests across the Borough of St. Helens (referred to as “the Consortium”).
- 4.2 It has set out significant concerns the Consortium share that the Submission LP, as currently drafted **is not sound**. Specifically, that **the housing requirement of 486 dpa over the Plan Period, as identified in the Submission LP does not represent the objectively assessed needs for housing in the Borough**, as required by Paragraph 11 of the NPPF. It is submitted that **Policy LPA05** should instead be identifying a housing requirement of **604dpa**.
- 4.3 What is more, the Consortium consider that the Submission LP is over-reliant on sites identified through the Strategic Housing Land Availability Assessment (SHLAA), which are predominantly within the existing urban area. A significant proportion of these do not have planning permission, have currently active uses, have been identified for housing since the 2012 SHLAA without coming forward and are in areas facing viability constraints as evidenced by the Council’s own viability assessment. **The Consortium consider there is a strong possibility that a high proportion of the SHLAA sites will not deliver as anticipated, meaning the LP will be ineffective in meeting housing needs over the period.**
- 4.4 These representations have also considered how **the proposed reliance on the sites within the SHLAA, will result in a LP strategy that does not deliver the type of housing needed, in the right locations**. In over-estimating the amount of land likely to be delivered from SHLAA sites, it is the Consortium’s view that the Council are failing to identify sufficient land outside of the existing urban areas and within the Green Belt to meet future housing needs.
- 4.5 In light of these concerns, it is submitted that the Submission LP as drafted is unsound with regard to the tests set out in Paragraph 35 of the NPPF.

4.6 The Submission LP is considered unsound because it is not:

- **Positively prepared** – contrary to the requirements of Paragraph 35, the Submission LP does not ‘provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs’;
- **Justified** – the strategy proposed in the Submission LP is not considered to be justified by the evidence regarding the likely deliver rates from the urban area;
- **Effective** – the Submission LP fails to provide an effective or deliverable strategy for ensuring sustainable growth across St. Helens within the Plan Period;
- **Consistent with national policy** – with regard to the above, the Submission LP is not consistent with national policy.

Recommendations

- To be considered sound, Policy LPA05 should identify a housing requirement of 604 dpa.
- The Submission LP should significantly reduce the level of housing supply anticipated to be delivered through those sites identified in the existing urban area.
- With regard to the detailed site analysis work undertaken, it is recommended that the Submission LP should be seeking to identify Green Belt land for at least an additional 3,560 dwellings over the Plan Period.

PO2476

4115

E10216



Representations on behalf of Jones Homes (North West) Limited - Submission Draft

Lorraine Robertson

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:49



1 Attachment



27131.A3.VR Representations and Encl. by Jones Homes NW FINAL 13.03.19.pdf

Local Plan Team,

On behalf of our Client, Jones Homes (North West) Limited, please find enclosed representations to the Submission Draft Local Plan.

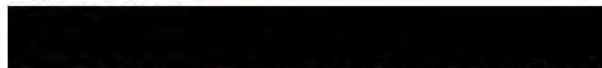
Please confirm receipt.

Many Thanks

Lorraine

Lorraine Robertson

Senior Planner



Tower 12, Bridge Street, Spinningfields, Manchester, M3 3BZ

**BARTON
WILLMORE**

Consider the Environment, Do you really need to print this email?

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① - LPA02

② - LPA05

③ - LPA05 - Table 4.6

④ - GBR

⑤ - HERITAGE IMPACT ASS

⑥ - LPA06

⑦ - APPENDIX 4
MONITORING
FRAMEWORK

⑧ - SHLAA

⑨ - LPA04



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;


Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: | Title: Mr |
| First Name: | First name: Vincent |
| Last Name: | Last Name: Ryan |
| Organisation/company: Jones Homes (North West) Ltd | Organisation/company: Barton Willmore |
| Address: c/o Agent | Address: Tower 12, 18/22 Bridge Street, Spinningfields, Manchester |
| Postcode: | Postcode: M3 3BZ |
| Tel No: | |
| Mobile No: | |
| Email: | |

| | |
|--|--|
| Signature:  | Date: <input type="text" value="13 March 2019"/> |
|--|--|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

| | |
|---|-----------------------------|
| Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) | |
| Yes <input checked="" type="checkbox"/> (Via Email) | No <input type="checkbox"/> |
| Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address. | |

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: **planningpolicy@sthelens.gov.uk**

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

| | | | | | | | | | |
|--|--------------|-----------------------------|--|--------------|--|--|--|--------------------------------|--|
| Policy | LPA05 | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

| | | |
|-------------------------------------|------------------------------|--|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

| | |
|----------------------------------|-------------------------------------|
| Positively Prepared? | <input checked="" type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input checked="" type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See separate document.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See separate document.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | |
|---|--|
| <input type="checkbox"/> No, I do not wish to participate at the oral examination | <input checked="" type="checkbox"/> Yes, I wish to participate at the oral examination |
|---|--|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

See separate document.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

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**BARTON
WILLMORE**

18/22 Bridge Street
Spinningfields
Manchester
M3 3BZ

Local Plan
St Helens Borough Council
Town Hall
Victoria Square
St Helens
WA10 1HP

By Email: planningpolicy@sthelens.gov.uk

27131/A3/VR
13 March 2019

Dear Sir/Madam,

**ST HELENS BOROUGH LOCAL PLAN 2020-2035 – SUBMISSION DRAFT CONSULTATION
REPRESENTATIONS BY JONES HOMES (NORTH WEST) LIMITED**

On behalf of our Client, Jones Homes (North West) Limited, we write to set out our representations to the above consultation.

These representations are intended to assist St Helens Council ("the Council") in finalising its Local Plan and evidence base in advance of submission to the Secretary of State, to ultimately ensure that the Local Plan is sound, in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF). We trust that these representations are of assistance to the Council.

Introduction

Jones Homes is one of the UK's leading housebuilders, creating high quality homes in desirable locations since 1959. Currently building more than 600 homes a year in the UK, Jones Homes offers an impressive portfolio of apartments, mews and townhouse residences, as well as spacious detached homes.

Jones Homes, which is part of The Emerson Group, boasts a strong record of delivering successful developments in St Helens. Recent housing schemes that have been delivered, or are in the process of being delivered, include:

- Newlands Grange – 153 units
- Eccleston Grange – 283 units
- Former Caremlite Monastery – 12 units

Orbit Developments, also part of the Emerson Group, has completed a local centre at Eccleston Grange and Linkway West, a 67,602 sq.ft leisure and retail development in the centre of St Helens. These developments represent a £12.5 million investment across the local area.

Policy LPA05 – Meeting St Helens Borough's Housing Needs

Housing Requirement

Policy LPA05 sets a housing requirement for the Borough, over the Plan period, of 486 dwellings per annum ("dpa") (9,234 in total). This is a notable reduction from the Preferred Options document, which proposed 570 dpa.

The figure of 486 dpa is arrived at following the application of the Government's Standard Methodology for calculating objectively assessed needs ("Standard OAN") for housing. Whilst the SDLP rightly acknowledges that this is a starting point, and that the stated housing requirement incorporates an uplift from the Standard OAN by 18 dpa, it is not clear how this requirement has been arrived at and how it relates to the Council's aspirations for economic growth. Our Client **objects** to the proposed housing requirement on the basis that it is **not adequately justified**.

As a starting point, our Client considers that a housing requirement of 860 dpa should be investigated by the Council. Such a housing requirement would be fully justified because it would align with the economic growth scenario set out in the SHELMA, to which, by the Council's own admission, the economy of St Helens is inextricably linked. Without a significant uplift, **it cannot be concluded that the SDLP is positively prepared or effective**. In the event that the Council does not consider such a housing requirement to be deliverable, it should at least aim to deliver the St Helens Strategic Housing Market Assessment (January 2019) Update's economic growth uplift requirement of 514 dpa.

Housing Distribution

With regard to the distribution of housing allocations under Policy LPA05, whilst we note there is broad alignment with Policy LPA02, in that housing allocations are principally located in and around the Key Settlements, there is no clear relationship between the distribution of housing and employment land. In the interests of sustainability, a *sound* development distribution strategy would see housing growth located in areas with good accessibility to the highest intensity of employment growth, and in the most sustainable settlements in terms of facilities and public transport connectivity (Paragraphs 102-104, NPPF).

In the case of Newton-le-Willows, the proposed Parkside East (7EA) and Parkside West (8EA) strategic employment land allocations (Policy LPA04.1) are directly to the east of the settlement and in combination will deliver in excess of 144 hectares of employment land (over 200 hectares when including the proposed Strategic Rail Freight Interchange). Clearly, the Council believes that Newton-le-Willows is a sustainable settlement that is capable of delivering such expansion, and rightly so given its public transport connections and range of existing facilities. However, despite this significant job growth in the area, the SDLP only proposes a single housing allocation for Newton-le-Willows (Ref: 7HA, for 181 dwellings). This is despite the fact that there are other available and deliverable sites on the edge of Newton-le-Willows, such as our Client's Site. Land East of Newlands Grange is within walking and cycling distance of both Parkside West and Parkside East. The failure of the SDLP to align the distribution of employment and housing land allocations means that it runs contrary to the need to actively manage patterns of growth that support the objectives of sustainable development, and in particular sustainable transport (Paragraphs 102-104, NPPF). On this basis, **the SDLP is not sound; it is not positively prepared, is not justified and is not consistent with national policy**.

Housing Supply

Table 4.6 of the SDLP summarises the housing requirement and supply from 2016-2035. We note this is at odds with the Plan period of 2020-2035. Our first observation is that Table 4.6 will most likely be confusing to many people, having to refer to a number of footnotes in order to understand the breakdown provided.

Table 4.6 places great reliance on the Council's Strategic Housing Land Availability Assessment ("SHLAA") to support its claimed level of supply. Whilst we have not forensically analysed the SHLAA

to ascertain whether the supply figure is robust, we do note that it has a base date of April 2017. In our Client's opinion this does not represent an up-to-date evidence base, particularly when bearing in mind that the Examination of the Local Plan is unlikely to take place until late 2019 at the earliest, at which point the SHLAA will be two and a half years old. Because of its age, it is unlikely that the SHLAA can be regarded as consistent with national planning policy because it does not appear to comply with the latest definition of 'deliverable' contained in Annex 2 of the 2019 NPPF. In light of the uncertainty that this has for the SDLP's claimed level of housing land supply, **it cannot be concluded that the SDLP is justified or consistent with national policy.**

Our Client wishes to emphasise the importance of ensuring a robust housing supply, in light of the fact the Housing Trajectory set out in Table 4.7 of the SDLP does not anticipate that allocated housing sites will contribute towards supply until 2022/2023.

Policy LPA06 – Safeguarded Land / Monitoring Framework

Our Client supports the SDLP's allocation of Safeguarded Land, to ensure a future supply of housing and employment land beyond the Plan period, notwithstanding that our Client considers that its land East of Newlands Grange, Newton-le-Willows should be allocated for housing now, for the reasons explained earlier in these representations.

Policy LPA06 states very clearly that proposals for housing or employment development on Safeguarded Land in the Plan period will be refused. Paragraph 2 of the Policy states that:

'Planning permission for the development of the safeguarded sites for the purposes identified in Tables 4.7 and 4.8 will only be granted following a future Local Plan review that proposes such development.' (emphasis added)

Appendix 4 of the SDLP sets out the Monitoring Framework for the Plan. For Policy LPA06, the Monitoring Framework proposes that an early Local Plan review will be considered in the event of:

'10% (or more) of land safeguarded granted planning consent for built development'

This monitoring and review scenario present a very confusing situation. 10% of Safeguarded housing land equates to at least 14.83 hectares, which is a minimum of 500-520 dwellings. It is difficult to foresee a situation where the Council would allow this to happen, when the development of Safeguarded Land within the Plan period (i.e. before any review) runs directly contrary to the policy concerned (LPA06). If the monitoring mechanism is to have any credibility, Policy LPA06 must be amended to clearly set out under what circumstances the Council will grant planning permission for development on Safeguarded Land. Without this clarity, Policy LPA06 **is not sound because it is not justified** and appropriately aligned to the monitoring and review mechanism of the Plan.

Summary of Representations

Our Client wishes to continue to pro-actively engage with the Council to assist in the Local Plan process. For the reasons set out within these representations, our Client does not consider that the Council's assessment of Land East of Newlands Grange, as set out within the Green Belt Review, is accurate and adequately justified. The evidence provided above and enclosed in the form of the highways Transport Representations Appraisal, Development Framework and updated Concept Masterplan, demonstrate that the Site as a whole (i.e. the full 15.56 hectares) is unconstrained and has good development potential and should therefore achieve the highest possible scoring in the Green Belt Review. In order for the SDLP to be considered sound, our Client considers it necessary for the Council to update the evidence base accordingly and adjust the extent of the Site's allocation. On the basis of the evidence that we put forward, we also consider that the Site should be allocated for housing in this Local Plan.

The need for further housing land allocations is highlighted further when it has become apparent that the SDLP does not seek to align with the economic growth aspirations of the LCR, which by the Council's own admission, is inextricably linked to St Helens. To align the SDLP with economic growth

PO2477

E10221



Local Plan Representations on behalf of Consortium - Story Homes, Wainhomes and
Eccleston Homes
Helen Hartley
to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:56

① - LPA05
② - LPA05 Table 4.6

3 Attachments



Nexus Planning Representation on behalf of Consortium.pdf



Representations Form - Consortium Representations to Policy LPA05.pdf



Representations Form Consortium Representations to Policy LPA05 - Table 4.6.pdf

Dear Sir/Madam

Thank you for the opportunity to comment on the Submission Local Plan.

I am pleased to attach representations on behalf of a Consortium of housebuilders. The Consortium comprises Story Homes, Wainhomes and Eccleston Homes.

I hereby attach a representations statement, and completed representations form.

I would be extremely grateful if you could confirm receipt.

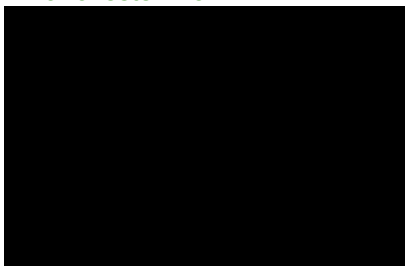
Kind regards
Helen

Helen Hartley
Principal Planner

Nexus Planning is pleased to have been shortlisted by the RTPI as a finalist for Planning Consultancy of the Year 2019



Nexus Planning - Manchester
Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ





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: | Title: Ms |
| First Name: | First name: Helen |
| Last Name: | Last Name: Hartley |
| Organisation/company: Consortium comprising Story Homes, Wainhomes and Eccleston Homes | Organisation/company: Nexus Planning |
| Address: c/o Agent | Address: Eastgate, Castle Street, Manchester, |
| Postcode: | Postcode: M4 3LZ |

| | | | |
|------------|--|-------|------------|
| Signature: | | Date: | 13.03.2019 |
|------------|--|-------|------------|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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St.Helens Council
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Victoria Square
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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

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|---|-------|-----------------------------|-----------|--------------|--|--|--|--------------------------------|--|
| Policy | LPA05 | Paragraph / diagram / table | Table 4.6 | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|------------------------------|--|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|---|
| Positively Prepared? | X |
| Justified? | X |
| Effective? | X |
| Consistent with National Policy? | X |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see Statement prepared by Nexus Planning on behalf of the Consortium. In particular Section 3 setting out reasons we consider Policy LPA05 to be unsound as regards the proposed housing land supply.

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 section 3 of Statement prepared by Nexus Planning on behalf of the Consortium.

For the reasons set out in detail in our Statement, we submit that the Local Plan should significantly reduce the level of housing supply anticipated to be delivered through site identified in the existing urban area. With regard to the detailed site analysis work undertaken, it is recommended that the Submission LP should be seeking to identify Green Belt land for an additional 3,560 dwellings over the Plan Period.

This would result in a strategy for meeting the identified housing needs that is more positively prepared to secure the future growth aspirations of St Helens, is justified in robust evidence about the deliverability of sites within the urban area, and achieves a more effective and deliverable strategy. In this way, the proposed modification will help ensure a sound 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 type="checkbox"/> | No , I do not wish to participate at the oral examination | <input checked="" type="checkbox"/> | Yes , I wish to participate at the oral examination |
|--------------------------|--|-------------------------------------|--|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Consortium is comprised of several housebuilders with key land interests in the Borough. The concerns expressed go to the heart of the soundness of the Local Plan. They are important and complex issues which need to be discussed through the Examination in Hearings process.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

St Helens Borough Local Plan 2020-2035

Representations to the Submission Draft January 2019

**on behalf of Consortium comprising of Story Homes, Wainhomes
and Eccleston Homes**

March 2019



3.0 Housing Land Supply – Policy LPA05 and Table 4.6

- 3.1 As well as the above comments about the identified housing requirement figure, the Consortium also share fundamental concerns with how the Submission LP proposes to meet the overall housing requirement identified. In particular, the amount of housing expected to be delivered from the urban area.
- 3.2 Policy LPA05 and Table 4.6 of the Submission LP describes how the housing requirement will be met from the following sources:
- a) Completions;*
 - b) Sites with planning permission;*
 - c) Housing allocations shown on the Policies Map and listed in Table 4.5;*
 - d) Sites without planning permission identified in the Strategic Housing Land Availability Assessment (SHLAA); and*
 - e) 'Windfall' development, including development on small sites not individually identified in the SHLAA, sub-division of dwellings and conversions/changes of use.*
- 3.3 Paragraph 4.18.10 of the Submission LP sets out that a key priority for the Plan is to maximise housing delivery on previously developed ('brownfield') land within existing urban areas. It states that the SHLAA 2017 identifies a total capacity of 7,817 dwellings from sites within the urban area between 1st April 2017 and 31st March 2035.
- 3.4 It is on the basis of this 'urban supply' figure that the Council have calculated how much of the overall housing requirement must be delivered on sites outside of the existing urban areas, and specifically therefore how much land should be released from the Green Belt.
- 3.5 The preparation of the Local Plan presents a vital opportunity to review the Green Belt boundaries within St. Helens. The Consortium welcome and strongly support the Council's acknowledgement that not all of the Borough's future housing needs can be met within the existing urban areas and that exceptional circumstances exist, in line with paragraph 136 of the NPPF, to justify the release of Green Belt land within the next Plan Period. Paragraph 136 is clear that Green Belt boundaries should only be altered through the preparation or updating of plans.

3.6 It states:

"Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."

3.7 Paragraph 139, Part e) states that when defining Green Belt boundaries, plans should:

"be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period."

3.8 In this context, it is **essential** for the future of the Borough that the Submission LP takes the opportunity afforded to get decisions about future Green Belt boundaries in St. Helen's right.

3.9 The Consortium support the principle of directing development to previously developed land. However, Paragraph 23 of the NPPF sets out how:

"Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period."

3.10 The Consortium have significant concerns that the strategy being proposed in the Submission LP, considerably over-estimates the number of dwellings that are realistically likely to come forward on previously developed land over the plan period. In doing so, it is the Consortium's view that the Council are failing to identify sufficient land outside of the existing urban areas and within the Green Belt to meet future housing needs. In this way the strategy set out in Policy LPA05 fails to plan effectively for the future and is not consistent with national policy which requires plans to bring sufficient land forward to meet housing needs, and secure the long term permanence of Green Belt boundaries.

3.11 The following analysis confirms why this is the case.

Housing Land Supply identified in the SHLAA 2017

3.12 Despite the SHMA relating to the 2016 to 2035 period, the Plan Period proposed in the Submission LP is the 15 year period 2020-2035. In calculating housing requirement over the 'Plan Period', Table 4.6 of the Submission LP therefore seeks to discount expected completions up to 2020 (which is estimated to be 1,989 dwellings) to find a residual requirement of 7,245 dwellings (between 2020-

2035) left to plan for. The supply then identified to meet this requirement is based on the 2017 SHLAA, which covers the period 2017 to 2033. This overlap of different periods has led to an unnecessarily complex and confused calculation of requirements and supply set out in Table 4.6 of the Submission LP (replicated below), whereby it is not always entirely clear which period is being referred to. It is recommended that the calculations in the Submission LP should be clearly set out in relation to the period 2016 – 2035, and that is the approach we seek to take later in these representations.

Table 4.6: Housing land requirements and supply – 2016 until 2035

| Requirements | Dwellings |
|--|---------------------|
| a) St.Helens housing requirement (19 years from 1 Apr 2016 to 31 Mar 2035) at average of 486 per year | 9,234 |
| b) Expected completions by 1 Apr 2020 | 1,989 |
| c) Residual requirement over Local Plan period from 1 Apr 2020 to 31 Mar 2035 | 7,245 ²⁹ |
| d) Anticipated supply | |
| e) Total SHLAA supply– 1 Apr 2017 until 31 Mar 2035 | 7,817 ³⁰ |
| ... consisting of: | |
| f) Large sites (0.25ha or 5 units and above) - planning permission not started as of 1 Apr 2017 | 1,581 ³¹ |
| g) Large sites with planning permission under construction as of 1 Apr 2017 | 654 |
| h) Large sites with planning permission but stalled as of 1 Apr 2017 | 289 |
| i) Large sites - identified by 2017 SHLAA, no planning permission as of 1 Apr 2017 | 4,107 |
| j) Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowance) | 1,395 |
| k) Estimated SHLAA supply – 1 Apr 2020 until 31 Mar 2035 | 6,344 ³² |
| l) SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18) | 794 |
| m) Residual SHLAA capacity over 15 year Plan period (1 Apr 20 - 31 Mar 35) | 5,550 ³³ |
| n) Required capacity to be found on Green Belt land | 1,695 |
| o) Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (site allocations 5HA to 15HA inclusive) (to allow for contingencies e.g., infrastructure provision, delays, lead-in times to start of housing delivery etc.) | 2,034 |
| p) Total capacity of allocated sites removed from the Green Belt (sites 1, 2, 4, 5, 7 and 8 HA) (1 Apr 20 - 31 Mar 35) | 2,056 |
| q) Total supply over plan period³⁴ | 7,606 |

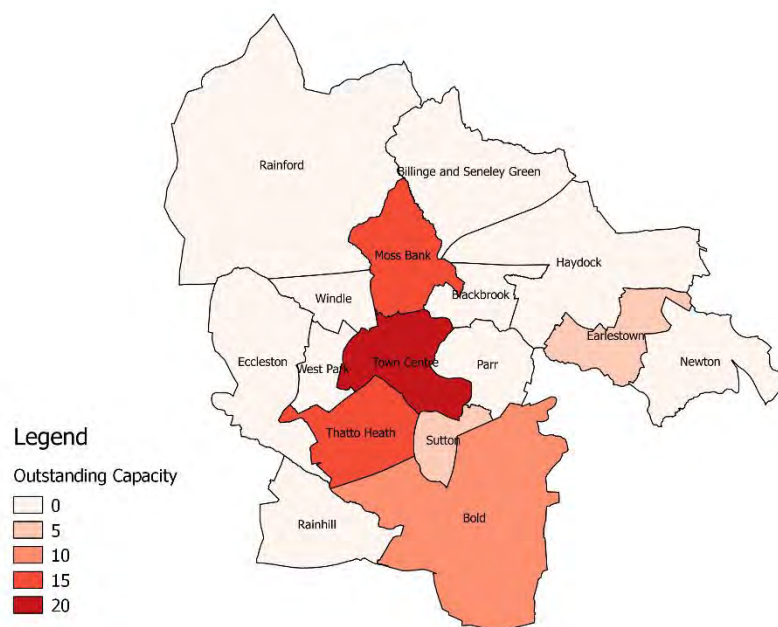
- 3.13 The Consortium have reviewed the SHLAA sites that make up the identified supply and have serious concerns that it is not justified nor effective plan-making to rely on all of these sites to meet housing needs to the level anticipated.
- 3.14 This section discusses these concerns in the context of the following two areas of objection:
- **Effectiveness of Strategy.** The reliance on the identified SHLAA sites will result in a LP Strategy which is not effective and will not achieve sustainable development.
 - **Realism of Delivery.** The Consortium have serious concerns as to whether these sites can be considered to be deliverable and developable in accordance with national policy and, accordingly, whether the Submission LP is justified in relying on them to meet housing needs as anticipated. Appendix A contains an overview of the 97 sites identified as deliverable and developable within the SHLAA, highlighting those particular sites that raise doubts.

Effectiveness of Strategy

Spatial Distribution of Sites

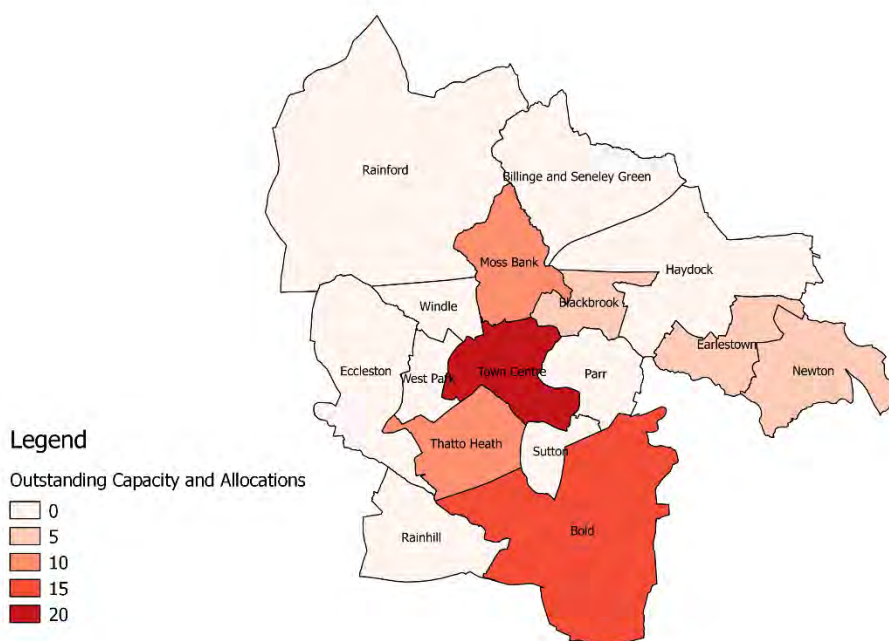
- 3.15 Appendix 5 of the SHLAA sets out the Development Trajectory of sites from the SHLAA over the next 15 years (2017/18 – 2032/33). The sites identified in Appendix 5 total 6,287 dwellings.² Graphic 3 below demonstrates how 68% of this 'outstanding capacity' is concentrated in 4 wards, 3 of which are within the central part of St. Helen's Core Area: Town Centre (26%), Moss Bank (15%), Thatto Heath (16%) and Bold (11%). It is evident that relying on the sites identified through the SHLAA will result in skewed distribution of new housing across the Borough – with growth focussed within these inner urban areas at the expense of the edge of the Core Area and the outlying settlements.

² This is a total of the 'outstanding capacity' figure for all the sites, adjusted to account for 405 dwellings from Site. 111 (in accordance with the trajectory set out in the SHLAA).



Graphic 3: Map showing percentage of SHLAA capacity in each Ward

- 3.16 Graphic 4 below shows the distribution of dwellings over the Plan Period, if the proposed Green Belt allocations are added to the overall capacity from the SHLAA. It continues to show a clear imbalance in housing distribution across the Borough which is still not rectified through the proposed Green Belt allocations. It is submitted that by over-relying on SHLAA sites which are concentrated within only a few parts of the Borough, **the Submission LP is prevented from delivering a more balanced spatial distribution of growth.**
- 3.17 As we go on to demonstrate, this approach is not justified or necessary. The proposed distribution of housing will not effectively meet the range of housing needs required in the Borough, explicitly for both market and affordable need in different parts of the Borough.



Graphic 4: Map showing percentage of Total Supply in each Ward (including Green Belt Allocations)

Affordable Housing Provision

- 3.18 The St. Helens SHMA Update 2018 identified that there is a need for 1,987 affordable housing units to be delivered in the Borough between 2016 and 2033, at an average of 117 units per year. Paragraph 6.3.3 of the Submission LP sets out how extending this until the end of the Plan Period means that out of the overall housing requirement of 9,234 dwellings, approximately 2,223 dwellings should be affordable.
- 3.19 The Economic Viability Assessment (December 2018) prepared by Keppie Massie to inform the LP identifies the quantum of affordable housing likely to be viable in different parts of the Borough and concludes that delivery of affordable housing is anticipated to be a significant issue in much of the Borough. It is on the basis of this evidence that the Submission LP Policy LPC02 sets a 0% affordable requirement for all brownfield sites, except those within the areas of Eccleston, Rainford and Rainhill as detailed in Table 4 below.

- 3.20 The affordable housing requirement established under Policy LPC02 is set out in Table 6.3 of the Submission LP, which is replicated below.

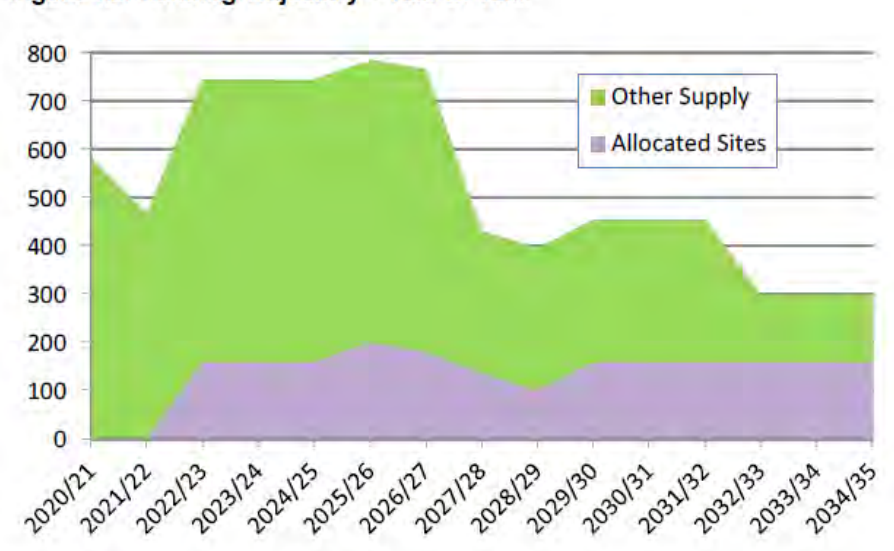
| Table 4: Submission LP Affordable Housing Requirement | | |
|---|--|--|
| Affordable Housing Zone | Areas include | Affordable Housing Requirement |
| 1 | Town Centre and Parr wards | No affordable housing requirement due to viability constraints |
| 2 | Blackbrook, Bold, Earlestown, Haydock, Sutton, Thatto Heath, West Park Billinge & Seneley Green, Moss Bank, Newton, Windle | 30% requirement on greenfield sites 0% requirement on brownfield sites |
| 3 | Eccleston, Rainford, Rainhill | 30% requirement on greenfield sites 10% requirement on brownfield sites |

- 3.21 Based on this, the table below sets out that **77 of the 97 sites identified in the SHLAA, will not be required to provide any affordable housing.**

| Table 5: Affordable Housing from SHLAA Sites | | |
|--|---------------------------------|---|
| | Number of Sites from 2017 SHLAA | Number of Affordable Dwellings to be Provided |
| 0% requirement | 77 | 0 |
| 10% requirement | 2 | 13 |
| 30% requirement | 18 | 341 |
| Total | 97 sites | 354 dwellings |

- 3.22 This shows that through **an over-reliance on sites within the urban area, a large proportion of the overall housing land supply identified through the Submission LP will barely contribute towards meeting affordable housing needs.** Figure 4.3 of the Submission LP does not anticipate any of the allocated sites coming forward until 2021/22, so a lack of affordable provision from the 'other supply' sites will particularly impact the early part of the Plan Period.

Figure 4.3: Housing Trajectory – Year to Year



Graphic 5: Housing Trajectory Year to Year - Submission LP (Figure 4.3)

- 3.23 Whilst the proposed Green Belt allocations will all be required to provide affordable housing, provision of 30% to this source (which amounts to 2,056 dwellings) will only result in the provision of 617 affordable dwelling from Green Belt allocations. Added to the 354 expected from the SHLAA sites this will still only amount to a total of 971 affordable dwellings over the Plan Period and this is assuming all the SHLAA sites deliver as anticipated. This represents a significant shortfall against the 2,223 affordable dwellings required.
- 3.24 **The above analysis further highlights the importance that a larger number of deliverable and viable greenfield sites are identified in order to maintain the continued delivery of affordable housing across the Borough and throughout the Plan Period, in line with the need identified.**

Realism of Delivery

- 3.25 The recently revised NPPF (2019) has confirmed the definition of what constitutes a deliverable and developable site. Annex 2 of the NPPF (2019) defines 'deliverable' as:

"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

- 3.26 It goes on to define 'developable' as:

"Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

- 3.27 The Planning Practice Guidance (PPG) requires that:

"strategic policy-making authorities will need to provide robust, up-to-date evidence to support plan preparation. Their judgements on deliverability of housing sites, including windfall sites, will need to be clearly and transparently set out."

- 3.28 Whilst we appreciate that conclusions in relation to each site are to some extent a matter of planning judgement, **the concerns we have with specific sites add up to create an overall picture that delivery from a significant number of the SHLAA sites is highly uncertain.** This is with regard to the following trends.

Planning Status

- 3.29 Of the 97 sites identified as deliverable and developable in the SHLAA, and identified as having an outstanding capacity of 6,287 dwellings over the Plan Period; 51 sites (equating to 2,899 dwellings)

do not have planning permission. The principle and achievability of housing on these sites in terms of technical considerations has therefore not been demonstrated in any detail as is considered later.

- 3.30 Particular doubts are raised as to the deliverability of these sites, when it is considered that many have long been identified in the Council's evidence base as suitable for housing yet have still not come forward in that time. By way of example, 853 dwellings now being relied on to come forward in the Plan Period, were similarly anticipated to come forward within 0-5 years when assessed in the 2012 SHLAA (therefore before 2017/18). The anticipated delivery of these sites has slipped considerably therefore, suggesting constraints or lack of market demand. **Little to no evidence has been provided to demonstrate why the delivery of these sites would not slip again, raising serious doubts as to whether these sites can now be relied upon to make up the required supply over the plan period.**

Active Uses

- 3.31 Around 23% of the 'outstanding capacity' identified in the SHLAA (equating to 1,439 dwellings) are currently in active alternative uses, including several where planning policy would seek to restrict redevelopment for housing. By way of example, these include 'Land west of Vista Road', Ref. 87 which is currently in use as a scrap yard and 'Derbyshire Hill Family Centre', Ref. 129 which is an active community centre. There is insufficient evidence to give confidence that these sites will become available despite these active uses and it is considered unrealistic to expect all of these sites to be made available for housing as anticipated. This is especially given that alternative locations/premises would need to be identified and secured, taking considerable time.
- 3.32 As well as technical deliverability, we would also question the *desirability* that all of the identified sites are developed for housing, given the need to also maintain land for employment and community uses, and to maintain an acceptable level of amenity for both future and existing residents of the Borough. There are several identified sites (for example 'Land at Newby Place, Ref. 135', 'Land adjacent Church of Christ, Heather Brae, Ref.84' and 'Land at Waterdale Crescent, Ref. 63') which are noted to be open green space within existing residential areas. Whilst these spaces are not always designated as formal open space, it is apparent they have an important role to play for local communities as amenity green space in otherwise built-up parts of St. Helens. Development of these spaces will in many cases constitute undesirable 'urban-cramming' and would not be consistent with national policy, which seeks to protect open spaces (Paragraph 97, NPPF).

Technical Constraints

- 3.33 Many of the SHLAA sites are identified as facing significant technical constraints likely to have impacts on net developable area. For example 'Site of former 56-120, Eccleston Street, Ref. 59' is likely to have a severely reduced net developable area given its narrow shape and presence of mature trees on a prominent road frontage. Land at 'Milton Street, Ref. 91' is partly within Flood Zone 3. 'Land off Monastery Lane, Ref. HL189' has been stalled due to 'substantially unanticipated remediation costs'. Whilst the technical constraints identified might not necessarily preclude the development of the sites for housing, it further brings doubt as to whether development of those sites is likely to be considered viable in the foreseeable future, especially when the size and location of the sites means viability is already likely to be challenging.
- 3.34 We also note 11 sites for which the SHLAA identifies landownership complications as a potential constraint. Multiple or unclear landownership can create major delays in bringing a site forward for development, with protracted legal processes and discussions. Whilst many of these sites have been identified as deliverable in years 1 to 5, there is no 'clear evidence' that this is the case as required by Annex 2 of the NPPF.

Viability

- 3.35 It is also concerning that the majority of the sites (77 of the 97 sites identified in the SHLAA) identified in the SHLAA are in areas of the Borough that have been identified through the Economic Viability Assessment (December 2018) as having viability constraints (Affordable Housing Zone 1). Given the small size of many of the sites, this again raises concerns that it is wholly unrealistic to anticipate all, or even the majority, of these sites will be delivered.

Summary on Realism of Delivery

- 3.36 The above highlighted trends demonstrate how, for a significant proportion (estimated to be at least a third) of the sites being relied on to deliver housing need over the plan period, their deliverability is uncertain at best. With regard to the above considerations, the individual assessment of sites within Appendix A provides our assessment as to whether the specific sites can be considered deliverable or developable in line with the Council's anticipated trajectory. It is clear from this Appendix and from the discussion above that **there are several sites which are not considered to be deliverable and**

developable such that it is not justified or sound to include them in the Council's supply calculations under Policy LPA05.

- 3.37 With regard to the site-specific considerations set out in Appendix A, **the Consortium consider that at least 1,173 dwellings should be removed from Council's total estimated supply figure from the SHLAA.**

Non-Delivery Rate

- 3.38 The Submission LP applies a non-delivery rate of 15% to the identified SHLAA capacity. The Consortium strongly support the application of a rate of non-delivery. DCLG analysis³ has indicated that between 10-20% of planning permissions are not implemented, whilst a further 15-20% are subject to a revised application process which delays delivery. Given this, the consortium agree it is essential that a non-delivery rate of at least 15% is applied to any supply that is identified at the stage of plan-making.
- 3.39 We are also mindful that the SHLAA applies assumptions about lead-in times and built out rates which may not be accurate for every site. In the Consortium's experience, the larger brownfield sites in particular often face protracted lead-in times due to the timescales associated with relocating existing uses, demolition and land remediation costs.

³ Presentations to the HBF Planning Conference (September 2015)

Revised Calculation of Housing Land Supply

3.40 As set out above, the approach taken in Table 4.6 of the Submission LP (replicated above) in respect of Plan Period leads to an unnecessarily confused calculation of requirement and supply, compounded by the fact the figures given in the LP rely on the SHLAA to identify the supply figures which cover a different period 2017-2032 to the Local Plan. Accordingly, we set out below what we would consider a more straightforward approach - that is of setting out the calculation and anticipated supply in relation to the full period 2017 – 2035.

| Table 6: Nexus Calculation of Requirement and Supply | | |
|--|---|------------------|
| | | 604 dpa scenario |
| a) | Housing requirement (19 years from 1st April 2016 to 31 March 2035) based on needs range identified in Section 2. | 11,476 |
| b) | Expected completions in 2016/17 ⁴ | 489 |
| c) | Residual requirement over Period from 1 April 2017 to 31 March 2035 (a-b) | 10,987 |
| d) | Estimated Capacity from SHLAA 2017-2035 | 5,114 |
| e) | Estimated Capacity from SHLAA with 15% reduction for non-delivery (applied to years 6-18 only) | 4,634 |
| f) | Windfalls (93 dpa x 18 years) | 1,674 |
| g) | Total non-Green Belt Supply 2017 – 2035 (e+f) | 6,308 |
| h) | Required capacity to be found on Green Belt Land ⁵ (c-g) | 4,679 |
| i) | Required capacity to be found on Green Belt Land with 20% increased allowance | 5,615 |

⁴ Table 3.12 of SHLAA

- 3.41 This calculation leads to the following conclusion regarding the amount of *additional* Green Belt land the Submission LP should be seeking to identify for release over this Plan Period.

| Table 7: Calculation of Additional Green Belt land required | |
|---|------------------------|
| | 604 dpa scenario |
| Current allocated Green Belt land ⁶ | 2,056 dwellings |
| Additional Green Belt land required | 3,559 dwellings |
| Total | 5,615 dwellings |

⁶ Table 4.5 of the Submission LP

4.0 Conclusions

- 4.1 This representation is prepared by Nexus Planning on behalf of a consortium of landowners and housebuilders with various land interests across the Borough of St. Helens (referred to as “the Consortium”).
- 4.2 It has set out significant concerns the Consortium share that the Submission LP, as currently drafted **is not sound**. Specifically, that **the housing requirement of 486 dpa over the Plan Period, as identified in the Submission LP does not represent the objectively assessed needs for housing in the Borough**, as required by Paragraph 11 of the NPPF. It is submitted that **Policy LPA05** should instead be identifying a housing requirement of **604dpa**.
- 4.3 What is more, the Consortium consider that the Submission LP is over-reliant on sites identified through the Strategic Housing Land Availability Assessment (SHLAA), which are predominantly within the existing urban area. A significant proportion of these do not have planning permission, have currently active uses, have been identified for housing since the 2012 SHLAA without coming forward and are in areas facing viability constraints as evidenced by the Council’s own viability assessment. **The Consortium consider there is a strong possibility that a high proportion of the SHLAA sites will not deliver as anticipated, meaning the LP will be ineffective in meeting housing needs over the period.**
- 4.4 These representations have also considered how **the proposed reliance on the sites within the SHLAA, will result in a LP strategy that does not deliver the type of housing needed, in the right locations**. In over-estimating the amount of land likely to be delivered from SHLAA sites, it is the Consortium’s view that the Council are failing to identify sufficient land outside of the existing urban areas and within the Green Belt to meet future housing needs.
- 4.5 In light of these concerns, it is submitted that the Submission LP as drafted is unsound with regard to the tests set out in Paragraph 35 of the NPPF.

4.6 The Submission LP is considered unsound because it is not:

- **Positively prepared** – contrary to the requirements of Paragraph 35, the Submission LP does not ‘provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs’;
- **Justified** – the strategy proposed in the Submission LP is not considered to be justified by the evidence regarding the likely deliver rates from the urban area;
- **Effective** – the Submission LP fails to provide an effective or deliverable strategy for ensuring sustainable growth across St. Helens within the Plan Period;
- **Consistent with national policy** – with regard to the above, the Submission LP is not consistent with national policy.

Recommendations

- To be considered sound, Policy LPA05 should identify a housing requirement of 604 dpa.
- The Submission LP should significantly reduce the level of housing supply anticipated to be delivered through those sites identified in the existing urban area.
- With regard to the detailed site analysis work undertaken, it is recommended that the Submission LP should be seeking to identify Green Belt land for at least an additional 3,560 dwellings over the Plan Period.

PO2478



St Helens Borough Local Plan 2020-2035 Submission Draft - Representations on behalf of the Knowsley Estate
Olivia Hewitt/GBR

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:05

① - LPA05

② - LPA06

③ - TABLE 4-6

2 Attachments



lpsd-representation-form_The Knowsley Estate_Bushey Lane.pdf



Land at Bushey Lane - St Helens - Reps - FINAL.pdf

④ - LPA02

⑤ - GREEN BELT REVIEW

Hello,

Please find attached representations made to the St Helens Borough Local Plan 2020-2035 Submission Draft on behalf of The Knowsley Estate with regards to land at Bushey Lane.

I would be grateful if you could confirm receipt of this email and the attachments, and keep us updated on the progress of the Local Plan.

Please don't hesitate to let me know should you have any queries.

Kind Regards,

Olivia

Olivia Hewitt MRTPI
Consultant - Manchester
Development and Planning



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St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: Mr | Title: Miss |
| First Name: Simon | First name: Claire |
| Last Name: Waller | Last Name: Pegg |
| Organisation/company: The Knowsley Estate | Organisation/company: Cushman & Wakefield |
| Address: The Estate Office, Knowsley Park Prescot Merseyside Postcode: L34 4AG | Address: 1 Marsden Street Manchester Postcode: M2 1HW |

Signature: [Redacted]

Date: 13.03.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

| | | | | | | | | | |
|--|----------------------------|-----------------------------------|--|-------------------|---|--|--|--------------------------------------|--|
| Policy | LPA02; LPA05; LPA06; | Paragraph / diagram / table | | Policies Map | X | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | Green Belt Review | | | | | |

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

| | | |
|-------------------------------------|------------------------------|--|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

| | |
|----------------------------------|-------------------------------------|
| Positively Prepared? | <input checked="" type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input checked="" type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see accompanying statement of representations.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally

compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see accompanying statement of representations.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | | | |
|--------------------------|--|-------------------------------------|--|
| <input type="checkbox"/> | No, I do not wish to participate at the oral examination | <input checked="" type="checkbox"/> | Yes, I wish to participate at the oral examination |
|--------------------------|--|-------------------------------------|--|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To assist the appointed Planning Inspector in his or her consideration and examination of the submitted development plan, The Knowsley Estate would like to participate in discussions around whether the Local Plan is sufficient to meet the aspiration of national planning policy to boost significantly the supply of housing, whether the proposed distribution of allocations accords with the spatial vision and welcome the opportunity to discuss the merits of the sites to the north and south of Bushey Lane, Rainford. The Knowsley Estate do not consider that this can be achieved by relying on the submitted written representations alone.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**



**CUSHMAN &
WAKEFIELD**

The St. Helens Borough Local Plan 2020-2035 Submission Draft

KNOWSLEY ESTATE

March 2019

2.0 Proposed Housing Requirement and Allocations

Housing Requirement

- 2.1 We note that Policy LPA05 of the Submission Draft proposes a housing requirement of at least 9,234 dwellings over the plan period, equivalent to 486 dwellings per annum (dpa). This is a decrease from 570 dpa set out in the previous draft of the Local Plan. No explanation is provided for this decrease.
- 2.2 It is recognised that the housing requirement has utilised the standard methodology for assessing housing need (including the 2014-based household projections) and that this gave a starting point of 482 dpa.
- 2.3 The PPG¹ is clear that the standard method provides a minimum figure and should be uplifted where for example, growth strategies are proposed, as this will result in an increase in housing need likely to exceed past trends.
- 2.4 The submission draft of the Local Plan is clear that the LPA aspires for significant economic growth, with Policy LPA04 proposing to allocate 215.4 ha of land for employment development. Policy LPA03 states that the Council seeks to retain and grow their population and thus there are clear growth strategies proposed.
- 2.5 An uplift of 4 dpa from the minimum figure calculated is not considered to align with this economic growth strategy and it is thus strongly considered that a more significant uplift should be included for within the Council's housing need.
- 2.6 The January 2019 SHMA Update explored two economic growth scenarios, which resulted in forecasts of 479 and 514 dpa (Economic Scenario 3 and 2 respectively). Given 479 dpa is below the figure calculated by the standard method and the Council's housing need should account for growth, we therefore consider Economic Scenario 2 to be more realistic and the housing requirement should be uplifted accordingly.

Safeguarded Land

- 2.7 The Submission Draft of the Local Plan identifies proposed allocations for housing within two categories – Strategic Housing Sites (Policy LPA05.1) and Safeguarded Land (Policy LPA06).
- 2.8 Land south of Bushey Lane was previously allocated within this latter category under allocation ref. HS19, however this has been removed in the Submission Draft of the Local Plan.
- 2.9 Safeguarded Land is identified in the draft Local Plan as required to meet *"longer term development needs well beyond the Plan period ... [and] planning permission ... will only be granted following a future Local Plan review that proposes such development"*.
- 2.10 The current wording of Policy LPA06 does not explicitly identify when a Local Plan review will be undertaken. Policy LPA06 should be revised to clearly identify a review mechanism of at least once every 5 years to accord with paragraph 33 of the NPPF and allow safeguarded sites to be brought forward earlier in the plan period should the review confirm that the Council are failing to meet their housing needs.

Proposed Housing Allocations

- 2.11 We note that in assuming the capacity of the proposed housing allocations, the Council has assumed a blanket net developable area (NDA) of 75% of the gross area across each allocation. This assumption lacks evidence with paragraph 3.45 of the 2017 SHLAA simply stating this reflects the

¹ Paragraph: 010 Reference ID: 2a-010-20190220

6.0 Conclusion

- 6.1 These representations have demonstrated that there is a clear case for considering supporting the release of the land identified in Figure 1 from the Green Belt and allocating, or safeguarding, for residential development.
- 6.2 The delivery of up to 843 new homes at the site would make a significant and necessary contribution towards the Council's housing need, which as set out in Section 2, should be significantly higher to account for the Council's significant economic growth aspirations.
- 6.3 Policy LPA06 should be revised to clearly identify a review mechanism of at least once every 5 years to accord with paragraph 33 of the NPPF and allow safeguarded sites to be brought forward earlier in the plan period should the review confirm that the Council are failing to meet their housing needs.] ②
- 6.4 The development of the site would also assist in supporting Rainford as a key settlement and Rainford Junction as a satellite settlement to Rainford, ensuring a fair and balanced distribution of new development in St Helens in accordance with the Spatial Vision and settlement hierarchy set out in Policy LPA02.] ③
- 6.5 The land presents appropriate and logical locations for development, adjacent to the settlement edge, without causing harm to the wider landscape or threatening the wider Green Belt.
- 6.6 We consider that the Council incorrectly scored the sites at Stage 2B of the GB Review and should not have discounted the sites at Stage 3. Our own assessment of the parcels demonstrates their capacity for development and as a minimum, that they should be identified as safeguarded housing land.] ⑤
- 6.7 We consider that the release of the site from the Green Belt is wholly justified as the scheme will deliver a high-quality residential environment, with significant associated socio-economic benefits. The development has a willing landowner, with experience and expertise of partnering with willing developers to bring forward the delivery of new homes.
- 6.8 In summary:
- The site is extremely well-located for access to a range of public transport options;
 - The site is not subject to any significant technical constraints;
 - The development will deliver high-quality market and affordable homes;
 - The development would contribute towards meeting the Council's housing land supply, at a time when there is an identified requirement to release land from the Green Belt;
 - The proposed development would deliver economic benefits through increased local spend from new residents; job creation during the construction phase; and monies to the Council through Council Tax;
 - The release of the sites from the Green Belt would not prejudice the preservation of the wider parcel as they are well-enclosed with strong defensible boundaries to all directions; and
 - The land owner is willing and available to deliver homes in the short, medium and long term.
- 6.9 The development of the land parcels is strongly considered to comprise sustainable development and accord with national and local planning policy. Development can be sensitively designed and mitigated to ensure there are no significant adverse impacts and the desktop review has not identified any insurmountable technical constraints to the delivery of housing. The sites are available, suitable and

PO2479

E-LO229



St Helens Local Plan Submission Draft - strategic representations on behalf of

Wainhomes NW

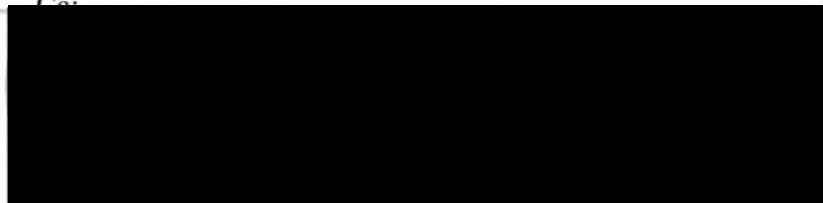
Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:16

Cc:



1 Attachment



Representations - St Helens LP Reg 19 - Wainhomes combined.pdf

Dear Sir / Madam,

Please find attached, strategic written representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan.

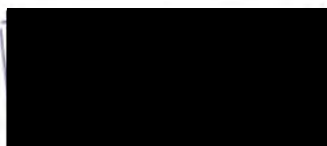
We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

Nick Scott

Assistant Consultant



① - GENERAL

② - LPA05

③ - LPC02

④ - LPA05.1

ns.gov.uk>

⑤ - LPA06

⑥ - LPC01 - CRITERIA 1

⑦ - LPC01 - CRITERIA 2

⑧ - LPC01 - CRITERIA 3

⑨ - LPC13

⑩ - LPA05 - TABLE 4.6

Emery Planning is proud to support the Keaton Emery Memorial Foundation. To find out more about the charity or to make a donation, please visit www.keatonemeryfoundation.com

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Representations to the Submission Draft

St Helens Local Plan – Regulation 19

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005



5. Policy LPA05: Housing land supply and trajectory

- 5.1 Policy LPA05: "Meeting St Helens Borough's Housing Needs" is not sound for the following reasons as set out in paragraph 35 of the NPPF:

a) It has not been positively prepared

- 5.2 The policy does not provide a sound strategy for meeting the area's objectively assessed needs. This is because it essentially relies on large, non-allocated sites which have been identified in the Strategic Housing Land Availability Assessment (SHLAA) on coming forward. Some of these SHLAA sites were allocated for residential development in the Unitary Development Plan (UDP), which was adopted over 20 years ago in July 1998 and others had planning permission for residential development, which has since expired. Despite this, the Council relies on these sites delivering housing in the plan period but does not propose to allocate these sites. Given their history, there is no certainty that these sites will come forward and as a result the plan does not provide a sound plan-led strategy for ensuring that the minimum housing needs will be met.

b) It is not justified

- 5.3 The policy does not provide an appropriate strategy compared to the reasonable alternative of allocating additional deliverable housing sites for development. The policy is not supported by up to date evidence. The latest SHLAA has a base date of 1st April 2017 and was produced under the previous NPPF and PPG. It is out of date.

d) It is not consistent with national policy

- 5.4 The policy fails to bring sufficient land forward at a sufficient rate to address objectively assessed needs over the plan period, which is contrary to paragraphs 20(a), 23 and 67 of the NPPF.
- 5.5 The policy also fails to identify a five year supply of deliverable housing land, which accords with the revised definition of deliverable as set out in the revised NPPF and updated PPG. This is contrary to paragraphs 67 and 73 of the NPPF.

Housing land supply over the plan period 2020 to 2035

Components of the supply

- 5.6 Table 4.6 of the Submission Draft (page 45) seeks to demonstrate how the housing requirement of 486 dwellings per annum to 31st March 2035 will be achieved. ✓
- 5.7 Whilst the plan period is 2020 to 2035, policy LPA05 sets out a housing requirement of 9,234 net dwellings over the period 1st April 2016 to 31st March 2035. This is set out in row a) of table 4.6 and is based on 486 dwellings per annum.

Completions 2016-20

- 5.8 Row b) of table 4.6 then states that the expected number of housing completions between 1st April 2016 and 31st March 2020 is 1,989 dwellings. The Housing Delivery Test (HDT) results confirm that 518 dwellings were completed in 2016/17. This means that 1,471 dwellings are expected to be delivered between 1st April 2017 and 31st March 2020, which is confirmed in the 2017 SHLAA as follows: ✓

| Year | 2017-18 | 2018-19 | 2019-20 | Total |
|----------------------|------------|------------|------------|--------------|
| Large sites | 286 | 316 | 592 | 1,194 |
| Small site allowance | 93 | 93 | 93 | 279 |
| Total | 379 | 409 | 685 | 1,473 |

Residual requirement

- 5.9 Row c) of table 4.6 then states that the residual requirement over the local plan period is 7,245 dwellings (i.e. 9,234 from row a) minus 1,989 from row b) = 7,245) ✓

Housing supply 2020-35

- 5.10 The remainder of table 4.6 then deals with the anticipated supply. It essentially concludes that sites identified in the 2017 SHLAA and small sites have a deliverable / developable capacity of 5,550 dwellings over the plan period 2020 to 2035 and therefore in order to meet the 7,245 dwelling requirement, sites with a capacity of 2,034 dwellings need to be released from the Green Belt. On this basis, if 5,550 dwellings do not come forward on the SHLAA sites and small ✓

sites then further land needs to be released from the Green Belt to meet housing needs, even if the Council's proposed housing requirement is found sound.

- 5.11 Our understanding is that the 5,550 dwelling figure set out in row m) of table 4.6 of the Submission Draft includes the following sources of supply set out in the table below:

| Row in table 4.6 | Source | Total | Expected completions 2017-20 | Total | Total following non-delivery reduction |
|------------------|---|--------------|------------------------------|--------------|--|
| f) | Large sites with planning permission but not under construction at 1 st April 2017 | 1,581 | 500 | 1,081 | 988 |
| g) | Large sites under construction at 1 st April 2017 | 654 | 524 | 130 | 124 |
| h) | Large stalled sites at 1 st April 2017 | 289 | 0 | 289 | 246 |
| i) | Large SHLAA sites without planning permission at 1 st April 2017 | 3,763 | 170 | 3,593 | 3,097 |
| j) | Small sites / windfall allowance | 1,395 | 279 | 1,116 | 977 |
| - | Additional allowance for 2032 to 2035 | 135 | 0 | 135 | 115 |
| | Total | 7,817 | 1,473 | 6,344 | 5,550 |

- 5.12 We discuss each component below.

Row f) Large sites with planning permission but were not under construction at 1st April 2017

- 5.13 Table 4.6 of the Submission Draft states that there are 1,581 dwellings on large sites that had planning permission at 1st April 2017 but were not under construction. Figure 4.3 of the SHLAA (page 23) then explains that 958 dwellings are considered deliverable between 1st April 2017 and 31st March 2022 and 623 dwellings are developable between 1st April 2022 and 31st March 2027. The trajectory set out in appendix 5 of the SHLAA reveals that there are 20 large sites which fall within this category.
- 5.14 Because the plan period starts at 1st April 2020, the number of dwellings, which are expected to be completed on these sites between the base date of the SHLAA at 1st April 2017 and 31st March 2020 have been removed. The trajectory set out in appendix 5 of the SHLAA shows that

500 dwellings will be completed over this 3 year period and therefore 1,081 dwellings could be delivered on these sites over the plan period (i.e. $1,581 - 500 = 1,081$).

5.15 The Council then applies a 15% discount to the 623 dwellings that are due to be completed on these sites in years 6-18, which results in a deduction of 93 dwellings. ✓

5.16 We make the following adjustments to the sites in this category for the following reasons:

HL443 – Land off Lowfield Lane (Capacity = 114 dwellings)

5.17 At the time of the 2017 SHLAA, the site had planning permission for 114 dwellings. It is being developed by Morris Homes. Following a number of applications and approvals to amend the plans by substituting various plots, 104 dwellings will now be developed at this site and therefore **10 dwellings** should be removed from the supply.

HL471/ 3HA – Penlake Industrial Estate (Capacity = 358 dwellings)

5.18 The site is to be allocated in the plan (ref: 3HA) and Countryside Homes will develop the site.

5.19 The site had outline planning permission for up to 358 dwellings (LPA ref: P/2015/0130). However, the details approved at the reserved matters are for 337 dwellings (LPA ref: P/2018/0251). Therefore, **21 dwellings** should be removed from the supply. ✓

HL526 – Former Broadoak Social Club, Boardmans Lane, St Helens (Capacity = 21 dwellings)

5.20 At the time of the 2017 SHLAA, the site had outline planning permission for 21 dwellings. It now has full planning permission for 24 dwellings (LPA ref: P/2018/0287). Therefore, **3 dwellings** should be added. ✓

HL531 – Land at Mere Grange, Lowfield Lane (Capacity = 98 dwellings)

5.21 At the time of the 2017 SHLAA, the site only had outline planning permission for up to 120 no. dwellings (LPA ref: P/2016/0567). The SHLAA considered that 98 dwellings would be delivered on the site. However, Anwyl Homes has submitted a full planning application for 82 no. dwellings, which is pending determination (LPA ref: P/2018/0849). Therefore, **16 dwellings** should be removed. ✓

5.22 As a result of these amendments, **44 dwellings** should be removed from the supply from this category. 704

5.23 The following two sites only have outline planning permission, which expires this year. Despite this, applications for reserved matters have not been made and therefore there is some doubt as to whether they should be included in the housing land supply. An update on the following sites will be required at the examination hearing sessions:

- HL496 – Land at Elton Head Road, Lea Green (Capacity = 180 dwellings), outline planning permission (ref: P/2015/0309) expires on 29/04/19; and
- HL525 – Fishwicks Industrial Estate (Capacity = 93 dwellings), outline planning permission (ref: P/2016/0299) expires on 15/11/19.

Row g) – Large sites with planning permission under construction as of 1st April 2017

5.24 Table 4.6 of the Submission Draft states that there were 654 dwellings on large sites that had planning permission at 1st April 2017 and were under construction. Figure 4.3 of the SHLAA (page 23) explains that of these 614 dwellings are considered deliverable between 1st April 2017 and 31st March 2022 and 40 dwellings are developable between 1st April 2022 and 31st March 2027. The trajectory set out in appendix 5 of the SHLAA reveals that there are 12 large sites which fall within this category.

5.25 Because the plan period starts at 1st April 2020, the number of dwellings, which are expected to be completed on these sites between the base date of the SHLAA at 1st April 2017 and 31st March 2020 have been removed. The trajectory set out in appendix 5 of the SHLAA shows that 524 dwellings will be completed over this 3 year period and therefore 130 dwellings could be delivered on these sites over the plan period from 2020 (i.e. $654 - 524 = 130$).

5.26 The Council then applies a 15% discount to the 40 dwellings that are due to be completed on these sites in years 6-18, which results in a deduction of 6 dwellings and therefore 124 dwellings in the plan period 2020-35.

5.27 We accept that these sites should be included in the supply.


Row h) – Large sites with planning permission but stalled as of 1st April 2017

5.28 Table 4.6 of the Submission Draft states that there are 289 dwellings on large sites that had planning permission at 1st April 2017 but had stalled. Figure 4.3 of the SHLAA (page 23) explains that all 289 dwellings are considered developable between 1st April 2027 and 31st March 2032. This is also reflected in the trajectory set out in appendix 5 of the SHLAA.

5.29 The Council then applies a 15% discount to the 289 dwellings that are due to be completed on these sites, which results in a deduction of 43 dwellings, meaning the Council relies on 246 dwellings to be delivered on these sites. ✓

5.30 None of these sites should be relied on. Even though these sites had planning permission, there is no reasonable prospect that they can viably be developed as evidenced by the fact they have stalled. They should not be included within the developable supply because they do not meet the definition set out in the Glossary of the NPPF as follows: ✓

"Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

5.31 Therefore **246 dwellings** should be removed from the supply. 

Row i) – Large sites identified in the 2017 SHLAA, without planning permission as of 1st April 2017

5.32 Table 4.6 of the Submission Draft states that there are 4,107 dwellings on large sites, which have been identified in the SHLAA but did not have planning permission as of 1st April 2017. It is unclear what the source is for the 4,107 dwellings. The 2017 SHLAA identifies 59 large sites, which it considered were capable of delivering 3,763 dwellings over a 15 year period. This is confirmed in figure 4.3 of the SHLAA, which considers that: ✓

- 484 dwellings are deliverable between 1st April 2017 and 31st March 2022;
- 2,305 dwellings are developable between 1st April 2022 and 31st March 2027; and
- 974 dwellings are developable between 1st April 2027 and 31st March 2032. ✓

5.33 It is also confirmed in the trajectory at appendix 5 of the SHLAA. Therefore, we assume the 4,107 figure is an error and the Council's figure should be 3,763 dwellings.

5.34 Because the plan period starts at 1st April 2020, the number of dwellings, which are expected to be completed on these sites between the base date of the SHLAA at 1st April 2017 and 31st March 2020 need to be removed. The trajectory set out in appendix 5 of the SHLAA shows that 170 dwellings will be completed over this 3 year period and therefore 3,593 dwellings could be delivered on these sites over the plan period (i.e. $3,763 - 170 = 3,593$).

5.35 The Council then applies a 15% discount to the 3,593 dwellings that are due to be completed on these sites, which results in a deduction of 496 dwellings.

- 5.36 As set out in appendix **EP2**, we have reviewed all 59 sites, which we have split into the following categories:

| | Number of sites | SHLAA Capacity |
|--|------------------------|-----------------------|
| SHLAA sites which now have planning permission or a planning application pending determination | 16 | 811 |
| SHLAA sites which are proposed allocations | 3 | 1,582 |
| SHLAA sites which were allocated in the UDP and have not come forward | 5 | 222 |
| SHLAA sites that had planning permission which has expired | 11 | 275 |
| Other SHLAA sites | 24 | 873 |
| | 59 | 3,763 |

- 5.37 We comment as follows.

- 5.38 Firstly, as above, the majority of SHLAA sites are not proposed to be allocated and do not have planning permission. It is therefore not known whether planning permission would even be granted for residential development on the sites that still do not have permission. Indeed, the SHLAA itself states:

"The inclusion of any site in this assessment does not indicate that it will be allocated or successfully obtain permission for housing".

- 5.39 Secondly, there is no guarantee that a planning application will even be made on a site identified in the SHLAA. As set out in the table above, 5 of the SHLAA sites were allocated for a combined total of 222 no. dwellings in the UDP over 20 years ago, yet these sites have not delivered any dwellings.

- 5.40 Thirdly, even if planning permission is granted on a SHLAA site, there is no guarantee that it will be implemented. As set out in the table above, 11 of the SHLAA sites have already had planning permission in the past and that permission was allowed to expire.

- 5.41 Fourthly, the detail provided in the SHLAA means that many of the sites have problems without any guarantee that they will be overcome, yet the Council relies on these sites to deliver dwellings in the plan period. For example:

Site ref 113: Land at Willow Tree Avenue (capacity = 50 dwellings)

- 5.42 The SHLAA explains that there are pylons and electric cables running across the site.

Site ref 129: Derbyshire Hill Family Centre (capacity = 12 dwellings)

- 5.43 The site has no relevant planning history. The SHLAA explains that it is used as a community centre. There is no evidence that this site will even be available. The SHLAA states:

"If this community centre becomes surplus to requirements, it could potentially provide dwellings over the longer term."

Site ref 133: Land rear of 2-24 Massey Street (capacity = 14 dwellings)

- 5.44 The site has no relevant planning history. The SHLAA explains that the site is located adjacent to industrial uses and there are viability issues in bringing the site forward.
- 5.45 For these reasons, we consider that unless the SHLAA site has planning permission or is proposed to be allocated in the Local Plan, it should not be included in the supply. This means that 40 of the SHLAA sites with a total capacity of 1,370 dwellings should be removed. Due to the Council already applying a 15% reduction, this means that **1,165 dwellings** should be removed from the supply.
- 5.46 In addition, three of the SHLAA sites without planning permission at the base date are proposed allocations, which we discuss below:

6HA: Land at Cowley Street, Cowley Hill, Town Centre

- 5.47 This site is around 31 ha in area and is located to the north of St Helens Town Centre. It is allocated for 816 dwellings of which 540 dwellings are expected to be delivered by 2035. The Council's evidence (SHLAA and the Economic Viability Assessment) assume 60 dwellings per annum will be delivered on the site from 2026.
- 5.48 Even if it is found to be sound, we question whether the site is deliverable in the plan period. We have identified above sites that have either been allocated in the UDP and not come forward or had planning permission which expired. We note the SHLAA allowed 7 years from 2017 for "significant site preparation", planning permission and demolition. The Economic Viability Assessment report confirms that this site is only viable without providing any affordable housing.

- 5.49 A planning application has still not been made and therefore there has been no progress towards meeting even the ambitious timescales as set out in the SHLAA. The Council has provided no evidence to demonstrate that 60 dwellings per annum would be achieved.
- 5.50 We consider that the site could deliver 315 dwellings in the plan period based on a build rate of 45 dwellings per annum, which the Council has applied to other large sites and the completion of dwellings from 2028, which allows for 7 years from the adoption of the plan. This results in a deduction of **145 dwellings** from the supply as the Council applies a 15% deduction to the 540 dwelling figure, meaning it relies on 460 dwellings being delivered at this site ($460 - 315 = 145$ dwellings).

9HA: Former Linkway Distribution Park, Elton Head Road, Thatto Heath

- 5.51 This site is 12.5 ha in area. It is a proposed allocation for 350 dwellings. It is included in the 2017 SHLAA for 375 dwellings.
- 5.52 The site has outline planning permission for up to 352 no. dwellings (LPA ref: P/2018/0060/FUL). Again, the Economic Viability Assessment report confirms that this site is only viable without providing any affordable housing.
- 5.53 We accept that this site could be delivered in full in the plan period.

10HA: Moss Nook Urban Village, Watery Lane, Moss Nook, Sutton (capacity = 802 dwellings)

- 5.54 The site is 26.74 ha in area. The proposed allocation is for 802 dwellings, which the Council assumes will all be delivered before the end of the plan period on 31st March 2035. The site is to be delivered at a density of 40 dwellings per hectare.
- 5.55 The Council's evidence is contradictory. The SHLAA assumes a build rate of 80 dwellings per annum and the Economic Viability Assessment assumes a build rate of 60 dwellings per annum.
- 5.56 In terms of suitability, the SHLAA states:

"This site is not close to a train station or high frequency bus route but is otherwise accessible and located in a sustainable location. A large area is identified as Greenway, the land is suspected to be contaminated and may have mineshafts present; there are no other policy or known physical constraints that would make the site unsuitable for housing."

- 5.57 The Economic Viability Assessment report confirms that this site is only viable without providing any affordable housing.
- 5.58 On 18th July 2007, outline planning permission was granted for up to 1,200 dwellings on this site (LPA ref: P/2003/1574), but this permission was not implemented and expired. There is therefore no certainty that this site will come forward even if planning permission is granted.
- 5.59 Nevertheless, a planning application has still not been made and therefore there has been no progress towards meeting even the ambitious timescales as set out in the SHLAA. The Council has provided no evidence to demonstrate that 60 dwellings per annum would be achieved.
- 5.60 Even it is found sound and developable, we consider that the site could deliver 400 dwellings in the plan period based on a build rate of 45 dwellings per annum, which the Council has applied to other large sites. We also consider that the completion of dwellings could be achieved from 2026 which allows for 7 years from now for planning permission to be secured, infrastructure put in place and the ground conditions / mineshafts to be addressed. This results in a deduction of **281 dwellings** from the supply as the Council applies a 15% deduction to the 802 dwelling figure, meaning it relies on 682 dwellings being delivered at this site ($682 - 400 = 281$ dwellings).
- 5.61 Therefore, from all of the SHLAA sites without planning permission, we remove 1,586 dwellings (i.e. $1,165 + 145 + 281 = 1,586$ dwellings).

Row j) – Small sites (below 0.25 ha / 5 units (small sites / "windfall allowance)

- 5.62 Table 4.6 of the Submission Draft explains that 1,395 dwellings will be delivered on small sites in the plan period. This is based on 93 dwellings per annum over 15 years.
- 5.63 Figure 3.12 of the SHLAA (page 18) confirms that there has been an average of 93 dwellings delivered on small sites over the period 2007 to 2018. However, the figures are gross. The net figures have not been provided. We have asked the Council to provide the net figure but have not yet received a response.
- 5.64 The 2017 SHLAA does not set out how many small sites had planning permission at 1st April 2017. Therefore, it is unclear as to how large any windfall allowance should be.

- 5.65 In summary, the submission draft and its associated evidence base fall significantly short of providing the compelling evidence required to justify a windfall allowance as set out in paragraph 70 of the NPPF, which states:

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."

- 5.66 Once the Council has provided the evidence, we request an opportunity to comment. Whilst we have included the Council's windfall allowance in our calculation of the supply, because this is a gross figure, it is optimistic.

Additional allowance for 2032 to 2035

- 5.67 As above, table 4.6 of the Local Plan includes an additional allowance of 115 dwellings because the SHLAA only runs to 2032 but the plan period runs to 2035. This again highlights the inadequacy of relying on a 2017 based SHLAA to support the plan. Nevertheless, this allowance does not meet the requirements of paragraph 67b) of the NPPF which requires "specific" developable sites or broad locations to be identified for years 11-15 and therefore **115 dwellings** should be removed.

Summary in relation to housing supply from sites identified in the SHLAA

- 5.68 In summary, the Council considers that 5,550 dwellings should be considered developable on sites identified in the SHLAA. It uses this figure to then calculate how much land needs to be released from the Green Belt to meet the remaining requirement. However, we consider that the 5,550 dwelling figure is unrealistic and in particular reliance cannot be made on SHLAA sites without planning permission. In some cases, these sites have either been allocated in the UDP and / or had planning permission, which has subsequently expired. For the reasons set out above, we consider that around 3,550 dwellings could be considered developable as is summarised in the following table.

| Row in table 4.6 | Source | Council's position | Emery Planning's position | Difference |
|------------------|---|--------------------|---------------------------|---------------|
| f) | Large sites with planning permission but not under construction at 1 st April 2017 | 988 | 944 | -44 |
| g) | Large sites under construction at 1 st April 2017 | 124 | 124 | 0 |
| h) | Large stalled sites at 1 st April 2017 | 246 | 0 | -246 |
| i) | Large SHLAA sites without planning permission at 1 st April 2017 | 3,097 | 1,511 | -1,586 |
| j) | Small sites / windfall allowance | 977 | 977 | 0 |
| - | Additional allowance for 2032 to 2035 | 115 | 0 | -115 |
| | Total | 5,550 | 3,556 | -1,991 |

5.69 This assumes that the delivery on small windfall sites will be as the Council claims, whilst as above, the Council has not provided the compelling evidence required.

5.70 In summary, this means that even if the Council's housing requirement is found sound an additional 2,000 dwellings on sites in the Green Belt need to be identified.

Housing Delivery Test

5.71 The definition of the Housing Delivery Test (HDT) is provided in the Glossary to the NPPF on page 67 as follows:

"Housing Delivery Test: Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November"

5.72 The HDT is measured as a percentage each year. The following implications apply where the HDT results delivery falls below specific thresholds.

5.73 Firstly, as explained in footnote 7 of the NPPF, the tilted balance to the presumption in favour of sustainable development set out in paragraph 11(d) of the NPPF applies where the HDT indicates that the delivery of housing was "substantially below" the housing requirement over the previous years. The transitional arrangements set out in Annex 1 of the NPPF explain that "substantially below" means for the 2018 HDT results below 25%, for the 2019 HDT results below 45% and for the 2020 HDT and beyond below 75%.

- 5.74 Secondly, paragraph 73 and footnote 39 of the NPPF explain that where the HDT result is below 85%, the 20% buffer will apply for purposes of calculating the five year housing land supply.
- 5.75 Thirdly, Paragraph 75 of the NPPF explains that where the HDT result is below 95%, the local planning authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years.
- 5.76 Consequently, given these implications, it is important that the Local Plan ensures that the HDT will be passed each year.
- 5.77 The HDT Measurement Rule Book (July 2018) explains that HDT is calculated as a percentage of net homes delivered against the "number of homes required". However, it then explains that even where the latest adopted housing requirement figure is less than five years old "the number of homes required" means the lower of either the latest adopted housing requirement figure or the minimum annual local housing need figure. The transitional arrangements set out in paragraph 21 of the HDT Measurement Rule Book then explain that for the financial years 2015/16, 2016/17 and 2017/18, the minimum annual local housing need figure is replaced by household projections.
- 5.78 The HDT results for 2018 were published on 19th February 2019. The result for St Helens is summarised in the table below:

| | 2015-16 | 2016-17 | 2017-18 | Total |
|---------------------------|---------|---------|---------|-------|
| Number of homes required | 532 | 518 | 454 | 1,504 |
| Number of homes delivered | 575 | 487 | 411 | 1,473 |
| HDT measurement | | | | 98% |

- 5.79 As can be seen from the above, St Helens delivered 1,473 new homes over the last three years against a "requirement" based on household projections over the same period of 1,504 dwellings. This results in a HDT measurement of 98% and means that whilst the HDT has not been passed, currently the tilted balance set out in paragraph 11(d) of the NPPF is not triggered because of the HDT result, the buffer is not increased to 20% and an action plan is not required. However, the HDT thresholds will need to be met each year going forward and one way of ensuring this will be the case will be for the Council to demonstrate a five year housing land supply, which we now discuss.

Five year housing land supply

5.80 Policy LPA05: "Meeting St Helens Borough's Housing Needs" states that the delivery of new housing development will be monitored annually to ensure that there is a deliverable supply of housing that is sufficient to provide at least 5 years' worth of new housing development against the housing requirement. However, neither the Submission Draft nor any of the supporting documents identify a supply of specific, deliverable sites plus a buffer for years one to five of the plan period i.e. 1st April 2020 to 31st March 2025. This is contrary to the requirements of the NPPF as set out within paragraphs 67a) and 73. ✓

5.81 Whilst we note that section 5 of the 2017 SHLAA (pages 24 to 28) provides calculations in relation to five year housing land supply, this is in relation to:

- Previous national planning policy and guidance;
- A housing requirement set out in the Core Strategy and an untested objectively assessed need (OAN) figure; and
- A five year period of 1st April 2017 to 31st March 2022.

5.82 The five year calculation set out in the SHLAA is therefore out of date and cannot be relied on.

5.83 Once it is submitted, the Local Plan will be examined against the revised NPPF (published February 2019) and updated PPG.

5.84 Paragraph 74 of the NPPF gives the Council the opportunity to demonstrate a confirmed five year supply of specific deliverable sites through the plan examination process. However, paragraph 3-049 of the PPG: "How can local authorities demonstrate that they have a confirmed 5 year land supply as part of the plan examination?" confirms that if the Council chose to do so it needed to indicate that it was seeking to do so at the regulation 19 stage i.e. during the current consultation. This was not the case and therefore the Council's five year supply will not be "confirmed" through the Local Plan examination process. ✓

5.85 Notwithstanding this, the Council will still need to be able to demonstrate a five year housing land supply for the plan to be found sound. Indeed, paragraph 3-038 of the PPG: "When should an authority demonstrate a 5 year housing land supply?" states:

"In principle an authority will need to be able to demonstrate a 5 year land supply at any point to deal with applications and appeals, unless it is choosing

to confirm its 5 year land supply, in which case it need demonstrate it only once per year."

- 5.86 This paragraph of the PPG should be read alongside paragraph 3-028 of the PPG: "What is a 5 year land supply?", which states:

"A 5 year land supply is a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against a housing requirement set out in adopted strategic policies, or against a local housing need figure where appropriate in accordance with paragraph 73 of the National Planning Policy Framework."

- 5.87 As above, the Council has not identified a five year supply, which is contrary to the NPPF and this section of the PPG.

- 5.88 We therefore assume that the Council will produce a five year housing land supply position statement before or during the Local Plan examination. This position statement will be expected to provide all of the information as set out in paragraphs 3-048 and 3-036 of the PPG.

- 5.89 Paragraph 3-048 of the PPG: "What information will annual reviews of 5 year land supply, including annual position statements, need to include?" (our emphasis) states:

"Assessments need to be realistic and made publicly available in an accessible format as soon as they have been completed. Assessments will be expected to include:

- for sites with detailed planning permission, details of numbers of homes under construction and completed each year; and where delivery has either exceeded or not progressed as expected, a commentary indicating the reasons for acceleration or delays to commencement on site or effects on build out rates;*
- for small sites, details of their current planning status and record of completions and homes under construction by site;*
- for sites with outline consent or allocated in adopted plans (or with permission in principle identified on Part 2 of brownfield land registers, and where included in the 5 year housing land supply), information and clear evidence that there will be housing completions on site within 5 years, including current planning status, timescales and progress towards detailed permission;*
- permissions granted for windfall development by year and how this compares with the windfall allowance;*
- details of demolitions and planned demolitions which will have an impact on net completions;*

- total net completions from the plan base date by year (broken down into types of development e.g. affordable housing); and
- the 5 year land supply calculation clearly indicating buffers and shortfalls and the number of years of supply." (our emphasis)

5.90 Paragraph 3-036 of the PPG: "What constitutes a 'deliverable site' in the context of housing policy?" provides further information. It states:

"For sites with outline planning permission, permission in principle, allocated in a development plan or identified on a brownfield register, where clear evidence is required to demonstrate that housing completions will begin on site within 5 years, this evidence may include:

- any progress being made towards the submission of an application;
- any progress with site assessment work; and
- any relevant information about site viability, ownership constraints or infrastructure provision.

For example:

- a statement of common ground between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates.
- a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions."

5.91 The Council has not provided any of the information required by paragraphs 3-036 and 3-048 in the Submission Draft or the evidence base. Once the Council provide the information required either before the plan is submitted or during the course of the examination, we respectfully request the opportunity to comment.

Five year housing requirement

5.92 The five year housing requirement will be five times the annual housing requirement plus buffer. Notwithstanding our objections to the proposed housing requirement elsewhere, the annual requirement proposed in the draft plan is 486 and the 2018 HDT results mean that the 5% buffer applies. Therefore, the five year requirement is currently 2,552 dwellings as summarised in the following table:

| | Requirement | |
|---|--|-------|
| A | Proposed annual housing requirement | 486 |
| B | Five year net Local Plan housing requirement (A X 5) | 2,430 |
| C | 5% Buffer (5% of B) | 122 |
| D | Total supply to be demonstrated (B + C) | 2,552 |
| E | Annual average (D / 5) | 510 |

Five year housing land supply

What constitutes a 'deliverable' site

- 5.93 The definition of what constitutes a 'deliverable' site has changed significantly since the 2017 SHLAA was published. The revised definition of "deliverable" is set out on page 66 of the NPPF as follows:

"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

- 5.94 The NPPF does not provide any further detail on the "clear evidence" referred to in paragraph b) above, but further information is set out in paragraphs 3-036 and 3-048 of the PPG as we have described above.
- 5.95 The 2017 SHLAA claimed a five year supply of 2,521 dwellings at 1st April 2017 from the following sources:

| | Source | Number of dwellings in the five year supply | Percentage of 5YHLS at 01/04/17 |
|---|--|---|---------------------------------|
| A | Large sites – planning permission under construction | 614 | 24% |
| B | Large sites – planning permission not started | 958 | 38% |
| C | Large sites – SHLAA sites | 484 | 19% |
| D | Small sites – allowance (93 X 5) | 465 | 19% |
| | Total | 2,521 | |

5.96 The revised definition of deliverable has significant implications for the five year supply in St Helens as we summarise below:

- Large sites – planning permission under construction – these sites meet the definition of deliverable and should be included in the supply unless there is clear evidence that homes will not be delivered in five years.
- Large sites – planning permission not started –
 - sites with full planning permission for major development should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans)
 - sites with outline planning permission for major development should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years
- Large SHLAA sites – these do not meet the definition set out in the NPPF and should not be included in the supply. Whilst the previous PPG stated that sites without planning permission which were not allocated in a local plan “may” be included in the five year supply, this is no longer the case.
- Small sites – the 2017 SHLAA does not identify small sites with planning permission. Paragraph 73 of the NPPF requires “specific deliverable sites” to be identified. Therefore the small sites with planning permission must be identified. In terms of the small sites windfall allowance, compelling evidence is required for the inclusion of an allowance under paragraph 70 of the NPPF.

5.97 In summary, contrary to the requirements of the NPPF as set out within paragraphs 67a) and 73, the Council has not demonstrated it has a “deliverable” five year housing land supply. Given the reliance on SHLAA sites as set out in its latest position at 1st April 2017, once the definition has been applied, it is unlikely that the Council will be able to demonstrate a five year housing land supply.

- 5.98 Notwithstanding this, once the Council provide the information required either before the plan is submitted or during the course of the examination, we respectfully request the opportunity to comment.

EP2

EP2 – Comments on SHLAA sites without planning permission

Site ref 1: Land rear of 1-27 Station Road, Haydock (Capacity = 12 dwellings)

- 1.1 The site is 0.4 ha in area. A number of planning applications for residential development have been made at the site since 2000 (LPA refs: P/2004/1549, P/2009/0398, P/2009/0926, P/2010/0611, P/2011/0161). Even when outline planning permission was granted, it was not implemented and expired. The 2017 SHLAA reports that a pre-application enquiry for 12 dwellings had been made. This appears to have been made in 2016 (ref: PRE/2016/0007/PRE), and has not led to a planning application.

Site refs 3, 4 and 5: Land rear of 14 to 20 Weymouth Avenue, land between 8 & 34 Portland Way and land between Weymouth Avenue and Berry's Lane, Parr (capacity = 14, 11 and 18 dwellings)

- 1.2 On 6th October 2017, full planning permission was granted at these sites for 52 dwellings (LPA ref: P/2016/0923/FUL). The applicant was Gleeson Homes. The houses are all open market housing. No affordable housing is to be provided because of viability.

Site ref 7: Land at Park Road, Town Centre (capacity = 28 dwellings)

- 1.3 On 4th December 2017, full planning permission was granted for 26 dwellings (LPA ref: P/2017/0672/FUL). The applicant is Torus / Kier Homes. All of the homes are affordable (affordable rent).

Site ref 9: Moss Nook Urban Village (capacity = 802 dwellings)

- 1.4 This site is a proposed allocation in the Local Plan.

Site ref 10: Land at junction of Sunbury Street and Fir Street, Thatto Heath (capacity = 32 dwellings)

- 1.5 A full planning application for 30 no. dwellings has been made and is pending determination (LPA ref: 3/2018/0882/FUL). All of the dwellings proposed are to be affordable (social rent).

Site ref 13: Land rear of Carnegie Crescent and Goodban Street (capacity = 7 dwellings)

- 1.6 The site had outline planning permission for residential development, which expired on 28th April 2011 (LPA ref: P/2006/0298). A further planning application has not been made.

Site 18: Land at Somerset Street and Sussex Grove, Parr (capacity = 66 dwellings)

- 1.7 The site had planning permission for 86 no. dwellings, which expired on 21st August 2010 (LPA ref: P/2007/0680). A further planning application has not been made.

Site ref 19: Leyland Green Road (capacity = 7 dwellings)

- 1.8 This site was allocated in the UDP (ref: 3H2). On 11th March 2002, outline planning permission for residential development was granted at the site (LPA ref: P/2001/1117), which has subsequently expired. A further planning application has not been made.

Site ref 21: Land at Holly Bank Street, Town Centre (capacity = 34 dwellings)

- 1.9 On 6th February 2018, full planning permission was granted at the site for 66 dwellings (LPA ref: P/2017/0674/FUL). All of the dwellings are to be affordable (62 affordable rent and 4 shared ownership).

Site ref 22: Land at corner of Fairclough Street and Wargrave Road (capacity = 14 dwellings)

- 1.10 The site had planning permission for 61 no. apartments, which expired on 28th February 2011 (LPA ref: P/2004/0996). A further planning application has not been made. The SHLAA refers to problems with land ownership.

Site ref 23: Liverpool Arms and Former Sacred Heart RC Church and School, Borough Road, Town Centre (capacity = 29 dwellings)

- 1.11 Part of the site had outline planning permission for residential development (LPA ref: P/2004/1101) and part of the site had planning permission for 130 apartments (LPA ref: P/2005/1033). Both permissions have expired. A further planning application has not been made.

Site ref 25: Alexandra Park – Former Pilkington HQ, West Park (capacity = 162 dwellings)

- 1.12 The site has no relevant planning history. Part of the site is a grade II listed building.

Site ref 27: Former Bethell Mission Bowling Green, Marsden Avenue, West Park (capacity = 10 dwellings)

- 1.13 The site has in the past had planning permission for 16 dwellings (LPA ref: P/2010/0638) and 12 dwellings (LPA ref: P/2007/0822). Both permissions were allowed to expire and a further planning application has not been made.

Site ref 31: Former Sutton Arms PH, Elephant Lane, Thatto Heath (capacity = 18 dwellings)

- 1.14 The site had planning permission for 18 dwellings, which expired in October 2014 (LPA ref: P/2011/0651). A further planning application has not been made.

Site ref 36: Land and Premises at Lords Fold, Rainford (capacity = 45 dwellings)

- 1.15 On 23rd May 2018, outline planning permission was granted (LPA ref: P/2017/0789/OUP). Only 5% of the homes to be provided will be affordable.

Site ref 38: Land north of Elton Head Road, Thatto Heath (capacity = 375 dwellings)

- 1.16 The site has outline planning permission for up to 352 no. dwellings (LPA ref: P/2018/0060/FUL). It is a proposed allocation in the Local Plan.

Site ref 58: Former Central Works, Church Road, Haydock (capacity = 48 dwellings)

- 1.17 The site historically had planning permission for residential development, which was not implemented (LPA ref: P/2001/0845). A further planning application has not been made.

Site ref 59: Site of former 56-120 Eccleston Street (capacity = 13 dwellings)

- 1.18 The site has no relevant planning history.

Site ref 60: Vacant land adjacent to the rail line, Elephant Lane (capacity = 112 dwelling)

- 1.19 This site was allocated in the UDP (5H10). Despite this a planning application has not been made on the site. The 2017 SHLAA explains that the site has a number of issues:

"This site is former allotments and quarry that has become self seeded and overgrown. There are a number of potential technical issues including access, a buried canal, covenants, noise and contamination which are all currently subject to further investigation."

Site ref 61: Land north and south of Corporation Street (capacity = 169 dwellings)

- 1.20 The site has no relevant planning history. The 2017 SHLAA explains that there is low viability and interest in town centre apartment schemes such as that assumed on this site:

"This cleared former industrial site is centrally located close to St Helens train station. There is a mixed use masterplan being prepared for this site and the wider area surrounding the train station as part of the One Public Estate programme. The viability and market interest in town centre apartment schemes is currently low but this site could come forward within years 0-5 years

if third party funding is successfully obtained or possibly as an affordable housing scheme."

Site ref 63: Land at Waterdale Crescent (capacity = 10 dwellings)

- 1.21 The site has no relevant planning history. The SHLAA explains that it is amenity use. It states that other better sites are likely to be chosen by developers than this site.

Site ref 64: BT Depot, Sutton Road (capacity = 36 dwellings)

- 1.22 The site formed part of the wider Moss Nook site that had planning permission, which has since expired. The SHLAA explains that the site is in use as a donation centre for Willowbrook Hospice.

Site ref 65: Former Pumping Station, Sutton Road (capacity = 10 dwellings)

- 1.23 The site formed part of the wider Moss Nook site that had planning permission, which has since expired. It also had planning permission for residential development, which expired (LPA ref: P/2004/0546).

Site ref 66: Land off Wargrave Road, Newton (capacity = 7 dwellings)

- 1.24 The site has no relevant planning history. Housing was cleared at the site.

Site ref 69: Site of former Parr Community High School, Fleet Lane (capacity = 54 dwellings)

- 1.25 The site has no relevant planning history.

Site ref 72: Site of former St Marks Primary School, Willow Tree Avenue (capacity = 18 dwellings)

- 1.26 The site has no relevant planning history.

Site ref 74: Site of former 119-133 Crow Lane West (capacity = 9 dwellings)

- 1.27 The site has no relevant planning history. The SHLAA explains that it is in active use as a builders merchants and in mixed ownership. It is not available.

Site ref 75: Christ Church Parish Hall, Chapel Lane, Eccleston (capacity = 10 dwellings)

- 1.28 The site now has outline planning permission for 7 no. dwellings (LPA ref: P/2018/0749/OUP), which was granted on 22nd January 2019.

Site ref 78: Former St Helens Glass, Corporation Street (capacity = 149 dwellings)

- 1.29 The site now has planning permission for 130 extra care apartments (LPA ref: P/2017/0634/FUL).

Site ref 82: Land adjacent Laffak Road and Carr Mill Road, Moss Bank (capacity = 99 dwellings)

- 1.30 A full planning application was made at the site for 150 no. dwellings on 16th January 2019 and is pending determination (LPA ref: P/2016/0036/FUL). All of the dwellings are to be affordable.

Site ref 84: Land adjacent Church of Christ, Heather Brae (capacity = 9 dwellings)

- 1.31 The site has no relevant planning history. The SHLAA states that it is used as informal open space.

Site ref 85: Site of former Our Lady's Primary School, Fleet Lane, Parr (capacity = 21 dwellings)

- 1.32 On 31st January 2019, full planning permission was granted at this site for 54 no. dwellings (LPA ref: P/2018/0502/FUL).

Site ref 87: Land west of Vista Road (capacity = 33 dwellings)

- 1.33 The site has no relevant planning history. The SHLAA states that it is adjacent to a scrap yard and a cement works and landfill site.

Site ref 89: Land rear of 64-94 Marshalls Cross Road (capacity = 12 dwellings)

- 1.34 The site was allocated in the UDP (ref: 5H2). Despite this, a planning application has not been made on the site. However, a pre-application request has been submitted for 12 dwellings (LPA ref: PRE/2019/0031/PREC). Part of the site is in flood zone 3.

Site ref 90: Land to the west of Common Road, Earlestown (capacity = 142 dwellings)

- 1.35 The site now has planning permission for 142 no. dwellings (LPA ref: P/2016/0742/FUL). The site is to be developed by Taylor Wimpey.

Site ref 91: Milton Street, Bold (capacity = 25 dwellings)

- 1.36 The site had planning permission for residential development, which expired (LPA ref: P/2012/0512). The SHLAA explains that it is allotments and some of the site is in flood zone 3.

Site ref 95: Site of former Carr Mill Infants School, Ullswater Avenue (capacity = 53 dwellings)

- 1.37 The site has no relevant planning history.

Site ref 96: Land rear of 350 Warrington Road (capacity = 11 dwellings)

- 1.38 The site has no relevant planning history. The SHLAA confirms that the site is in mixed ownership and access to it would be difficult to achieve.

Site ref 102: Auto Safety Centre, Vicarage Road, Blackbrook (capacity = 9 dwellings)

- 1.39 The site has no relevant planning history. The SHLAA recognises that the site is in active use as a car repair garage.

Site ref 103: Land rear of 39-67 Valentine Road (capacity = 10 dwellings)

- 1.40 The site has no relevant planning history. The SHLAA explains that it comprises of cleared former garages and some open space.

Site ref 106: Site of former 126-154 Birchley Street (capacity = 10 dwellings)

- 1.41 The site has no relevant planning history. The SHLAA explains that it is in active use as a car park.

Site ref 109: Land adjacent Piele Road, Haydock (capacity = 13 dwellings)

- 1.42 The site has no relevant planning history. The SHLAA explains that the site is currently used as informal open space next to a roundabout.

Site ref 111: Land east of City Road, Cowley Hill (capacity = 813 dwellings)

- 1.43 This site is a proposed allocation in the Local Plan.

Site ref 112: Land to the rear of Juddfield Road (capacity = 41 dwellings)

- 1.44 The site was allocated in the UDP (ref: 2H7). Despite this, the site has no relevant planning history. The SHLAA states that it is currently in use as a scrap yard and is in mixed ownership.

Site ref 113: Land at Willow Tree Avenue (capacity = 50 dwellings)

- 1.45 The site was allocated in the UDP (ref: 6H3). Despite this, the only relevant planning history relates to the proposed use of the site as sports fields, which was refused on 29th April 2014 (LPA ref: P/2013/0775). The SHLAA explains that there are pylons and electric cables running across the site.

Site ref 114: Land at 19 and 25 Sutton Moss Road, Parr (capacity = 14 dwellings)

- 1.46 This site has no relevant planning history. The SHLAA explains that it is in mixed ownership.

Site ref 126: Former Halton and St. Helens PCT HQ, Cowley Hill (capacity = 32 dwellings)

- 1.47 The site now has planning permission for a specialist C2 communal care home (LPA ref: P/2018/0535/FUL).

Site ref 129: Derbyshire Hill Family Centre (capacity = 12 dwellings)

- 1.48 The site has no relevant planning history. The SHLAA explains that it is used as a community centre. There is no evidence that this site will even be available. The SHLAA states:

"If this community centre becomes surplus to requirements, it could potentially provide dwellings over the longer term."

Site ref 133: Land rear of 2-24 Massey Street (capacity = 14 dwellings)

- 1.49 The site has no relevant planning history. The SHLAA explains that the site is located adjacent to industrial uses and there are viability issues in bringing the site forward.

Site ref 134: Land at Littler Road, Blackbrook (capacity = 11 dwellings)

- 1.50 The site has no relevant planning history. The SHLAA explains that the site is used as informal open space and has pipelines running along the southern boundary.

Site ref 135: Land at Newby Place, Moss Bank (capacity = 13 dwellings)

- 1.51 The site has no relevant planning history. The SHLAA explains that the site is used as informal open space.

Site ref 150: Former Red Quarry, Chester Lane (capacity = 57 dwellings)

- 1.52 The site has no relevant planning history. The SHLAA explains that the site is a former landfill site and this may affect viability.

Site ref 151: Land adjacent St.Helens Hospital, Marshalls Cross Road (capacity = 59 dwellings)

- 1.53 The site has no relevant planning history. The SHLAA explains there was interest in the site in 2013, but this has not led to a planning application. It states:

"This cleared former hospital site was of interest to an affordable housing developer 4 years ago but there has been no meaningful progress on bringing the site forwards."

Site ref 152: Sidac Sports Club (capacity = 137 dwellings)

- 1.54 The site now has planning permission for 117 dwellings and is under construction (LPA ref: P/2017/0890/FUL).

Site ref 154: College Street (capacity = 103 dwellings)

- 1.55 The site has no relevant planning history. The SHLAA explains that the site is publically owned land including car park, job centre and register office.

Site ref 155: Land south of Knowsley Road, West Park (capacity = 18 dwellings)

- 1.56 The site has planning permission for 50 no. dwellings (LPA ref: P/2017/0936/FUL).

Site ref 156: Land south of Crab Street, Town Centre (capacity = 21 dwellings)

- 1.57 The site has planning permission for an extra care facility with 61 no. bedrooms (LPA ref: P/2018/0021/FUL).

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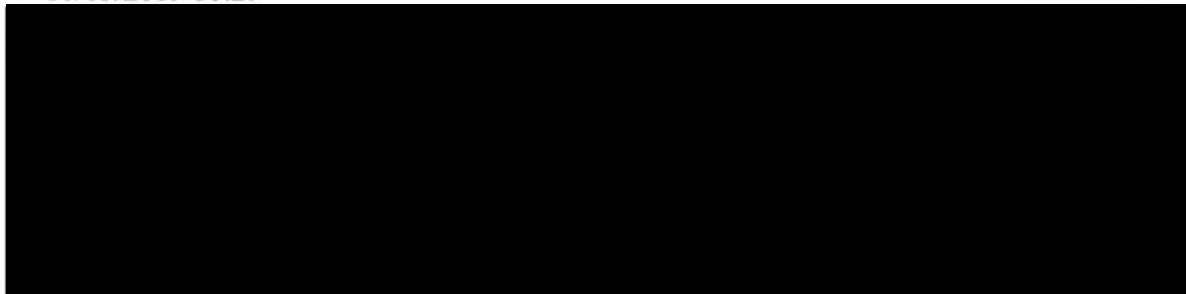
ECRA Response to SHLPSD(2018)

barton su

to:

planningpolicy

10/05/2019 10:29



1 Attachment



ECRA Final Submission_May19.docx

On behalf of Eccleston Community Residents Association, together with Windle (ECRA), I am attaching a copy of our Response to the SHLPSD (2018) for the attention of the Planning Inspectorate. ECRA have worked hard to ensure our report represents the facts as we know them.

The question was asked, during the Council Information Sessions, as to whether the SHLPSD (2018) can be changed and we were given a variety of responses. We would hope that some small changes could be made, such as reducing the aspirational number of housing units and building on more Brownfield and Contaminated land. The reasoning and support for this is detailed in our report, the consequence would be to eliminate much, if not all, of the Green Belt land required by the plan, which, I am sure you agree, would be beneficial for St. Helens Council, Councillors and Residents alike. ✓

ECRA would like to participate at the Oral Examination. We would also request an acknowledgement for the receipt of this comprehensive report. ✓

A hard copy of this response will be posted by hand later today ✓

regards

Su Barton

ECRA Communication Lead

c/o 19 Brooklands Road, WA10 5HE

① - LPA05

② - LPA07

③ - GENERAL

④ - LPA06

⑤ - PARA 1.7.2 DEC

⑥ - LPA04

⑦ - GBR

⑧ - 10P

⑨ - TABLE 4.6

⑩ - SA



**Response to
ST HELENS LOCAL PLAN
SUBMISSION DRAFT (SHLPD)
December 2018**

ECRA's comments on the Local Plan

Housing Need (Appendix 3)

Table 4.6 of the SHLPSD indicates that capacity is required to be found on Green Belt land for 2034 dwellings to meet housing needs, requiring 88ha of Green Belt to be released.

ECRA dispute the figures in this table:

1. The starting point is based on a figure of 486 that is not consistent with the Standard Method figure of 468 and is applied across 19 years from 2016 to 2035; the figure is over-stated by 342 dwellings.
2. The small sites/windfall sites allowance of 93pa in the table is applied across only 15 years rather than the 19 years as per the housing requirement; the figure is under-stated by 372.
3. The 15% non-delivery figure is excessive given that there are currently only 289 of 7682 units not delivered from SHLAA 2017 (3.8%).
4. It is not acceptable to allow for a "failure to deliver" factor of 15% on the land that has been identified, is deliverable and is available for development.
5. Additionally, the 15% non-delivery reduction is being applied to the 93pa from small/windfall sites despite 93 being calculated from robust data over a 10-year period; at 15% the reduction is over-stated by 160 dwellings.
6. There is a second allowance of 20% applied to the "Required capacity to be found on Green Belt land" to allow for contingencies, one of which is "infrastructure provision". Allowance for infrastructure is already accounted for by the Net Developable Area factors as used by Keppie Massie within the EVA; typically, 100%, 90% or 75% dependent on gross site size.

Contaminated, Previously Developed and 'Brownfield' Land

ECRA calls upon the council to rigorously adopt policies to bring forward contaminated, previously-developed or 'brownfield' land, in the plan period, to ensure that both Sections 8 c) and 11 of the NPPF (February 2019) are satisfied (Appendix 1). There is a concern that the Brownfield First policy commitment of the council is weakened significantly by the addition of the wording: "as far as practicable."

ECRA calls upon the council to be proactive in the implementation of its documented strategies and joint working arrangements, as detailed in the SHMBC Contaminated Land Inspection Strategy, revised January 2017 (CLIS). This strategy (CLIS) highlights the fact that "contamination in St Helens is widespread, due to the area's industrial heritage and the nature of its past industries" (p.35 Contaminated Land Inspection Strategy Revised January 2017 CLIS). Furthermore, it is noted that "Tackling the historic legacy of contaminated land through the regeneration process is a sub-regional priority. Its importance is being flagged up through joint working arrangements at the sub-regional level including:

- Liverpool City Region Combined Authority and its future delivery of a Spatial Framework covering the City Region;
 - The Local Enterprise Partnership (LEP);
 - City Region Growth Strategy (LEP);
 - EU Investment Plan 2014-2020 (LCR EU Structural and Investment Funds Strategy 2014-2020);
 - Local Nature Partnership".
- (p.11 & p. 12 CLIS)

Appendix 3 – Housing Need

Table 4.6 of the SHLPD indicates that capacity is required to be found on Green Belt land for 2034 dwellings to meet housing needs, requiring 88ha of Green Belt to be released.

There are a number of reasons that ECRA dispute the figures in this table:

- The table uses multiple date ranges which appear to confuse the figures, with various additions and allowances being applied.
 - Plan period is 2020-2035
 - Housing requirement in the table is 2016-2035
 - SHLAA referenced is 2017-2035
- The PPG makes it clear that in decision making:
“unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green Belt”
- Why is it that in the Local Plan drafted in December 2018, STHC are including 486 dwellings per annum for the years 2016, 17 and 18?
 - If any of that housing need has been unmet, Green Belt should not be targeted to recover those ‘losses’
- The starting point is based on a figure of 486 that is not consistent with the Standard Method figure of 468 and is applied across 19 years from 2016 to 2035; the figure is over-stated by 342 dwellings.
- The small sites/windfall sites allowance of 93pa in the table is applied across only 15 years rather than the 19 years as per the housing requirement; the figure is under-stated by 372.
- The 15% non-delivery figure seems to be excessive given that there are currently only 289 of 7682 units not delivered from SHLAA 2017 (3.8%).
- Given there is the suggestion that land availability is the problem and why Green Belt is required, it is not acceptable to allow for a “failure to deliver” factor of 15% on the land that has been identified, is deliverable and is available for development.
- Additionally, the 15% non-delivery reduction is being applied to the 93pa from small/windfall sites despite that figure of 93 being calculated from robust data over a 10-year period; at 15% the reduction is over-stated by 160 dwellings.
- There is a second allowance of 20% applied to the “Required capacity to be found on Green Belt land” to allow for contingencies, one of which is “infrastructure provision”.
- Allowance for infrastructure is already accounted for by the Net Developable Area factors as used by Keppie Massie within the EVA; typically, 100%, 90% or 75% dependent on gross site size.
- ECRA would suggest it more reasonable to use a figure of 10% for this allowance to avoid any double counting; over-stated by 170 dwellings.
- Based on Appendix 2 above, an allowance should be included for large windfall sites at either a smaller figure for the 15-year plan period or possibly a larger figure for the longer-term supply period (11-15 years).
- Acknowledging the mixture of dates used in Table 4.6, the Local Plan period is 2020-2035 meaning a housing need of 15 years at 486 dpa → Total = 7290

- The latest Brownfield Register (2018) due for release at the latest by December 2018 was finally released in April 2019 and identifies availability for 6028 units.
- Given the Brownfield Register is 1 year out of alignment with the LP, simply increasing the 7290 by an additional 486 aligns the inputs → Total = 7776 (2019-2035).
- If previously developed land availability is an issue, why allow non-delivery of such magnitude?
- At 10% non-delivery, the 6028 from Brownfield would equate to 5425 units.
- This results in a residual capacity to be found of 2351
 - (7776 minus 5425)
- There is then the Small/Windfall Sites allowance of 93 units per annum → Total = 1488
- It is a fact that planning has been submitted or already approved on several Large/Windfall Sites between the LPSD publication in December 2018 and now, April 2019 → Total = 222
- There should be an allowance included within the plan for further sites of this nature and it would not be unreasonable to say 30 dpa over the period given that over 200 have been found within 4 months of the plan being published → Total = 480.
- This results in a final residual capacity to be identified of 161. (2351 minus 1488 minus 222 minus 480)
- Clearly, using the Standard Method figure of 468 would result in that 161 becoming a negative (surplus) figure.
- The requirement to find capacity for only 161 dwellings would not constitute exceptional circumstances and therefore no Green Belt Review should have been performed and no Green Belt should be released.

ECRA contend that during the next 15 years, St Helens Council should bring about change in its policies and procedures, and work to regenerate at least some of the 3170 ha of the lowest contaminated land in the borough.

PO2481

E0258



Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P
Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston
Park, St Helens
Graham Lamb

to:
planningpolicy@sthelens.gov.uk
13/03/2019 17:01

Site GBP-092-A

4 Attachments

L004- Land at St Helens Road - Reps to Submission Local Plan.pdf Appendix 3- Agricultural Land Report.pdf

Appendix 4- Comprehensive Reps to Submission Local Plan.pdf

Appendix 4a- Interim Housing Needs Assessment.pdf

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group
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- | | |
|------------------|------------------|
| ① LPA05 | ⑥ S.O.5.1 |
| ② LPA02 | ⑦ LPA02 - PARA 3 |
| ③ GBR | ⑧ LPA02 - PARA 4 |
| ④ S.A. | ⑨ LPA03 |
| ⑤ S.O.4.1 | ⑩ LPA04 |
| ⑪ LPA05 - PARA 3 | ⑬ APPENDIX 4 |
| ⑫ LPA05 - PARA 4 | ⑭ TABLE 4.6 |
| ⑮ LPA05.1 | ⑯ LPA07, PARA 9 |
| ⑰ LPC02 | ⑲ LPC10 - PARA 6 |
| ⑱ LPC04 | ⑳ LPC13 - PARA 4 |
| ㉑ LPA06 | ㉒ LPD07 |
| ㉓ LPC01 | ㉔ LPD02 |
| | ㉕ LPD03 |

 <https://i.imgur.com/05aES4f.jpg>



RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o
P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston
Park, St Helens (EMAIL 2)
Graham Lamb
to:
planningpolicy@sthelens.gov.uk
13/03/2019 17:03



1 Attachment



Appendix 1- Delivery Statement.pdf

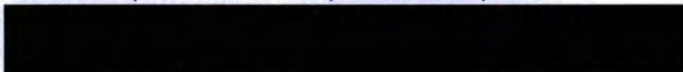
Email 2

Graham Lamb
Associate Planner

Pegasus Group

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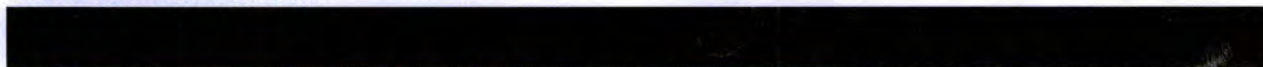
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From: Graham Lamb

Sent: 13 March 2019 17:01



Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.


Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group

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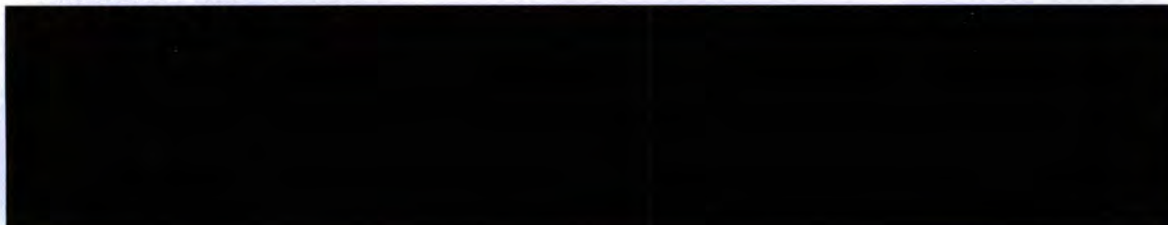
 <https://i.imgur.com/05aES4f.jpg>

 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>



RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)
Graham Lamb
to:
planningpolicy@sthelens.gov.uk
13/03/2019 17:04



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

Email 3

Graham Lamb
Associate Planner

Pegasus Group

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 Please consider the environment before printing this email message.

From: Graham Lamb

Sent: 13 March 2019 17:01

To: planningpolicy@sthelens.gov.uk

Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group

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 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHEt88g.jpg>

13 March 2019

Planning Policy Team
Development Plans Section
St Helens Council
Place Services
Town Hall Annexe
Victoria Square
St Helens
Merseyside
WA10 1HP

Sent via email to: planningpolicy@sthelens.gov.uk

Dear Sir/Madam,

**Land North of St Helens Road, Eccleston Park, St Helens
St Helens Local Plan Submission Draft (January-March 2019 Consultation)**

We are instructed on behalf of the client, I Birchall & D Birchall (c/o P Wilson & Company LLP Chartered Surveyors), to submit representations to the Local Plan Submission Consultation of the emerging St Helens Local Plan. The client are the landowners of a parcel of land referred to as land north of St Helens Road, Eccleston Park.

A Delivery Statement has been prepared for the site, which is contained at **Appendix 1**. As demonstrated in the document, the site has capacity to deliver up to 625 homes in a highly sustainable location. This document demonstrates how the site is entirely suitable, deliverable and viable for housing development, as well as being an entirely appropriate Green Belt release site.

Further technical studies have also been prepared to further demonstrate the suitability of St Helens Road site for housing development, as set out below and attached:

- Accessibility Statement (**Appendix 2**)
- Agricultural Land Report (**Appendix 3**)

The need to allocate additional sites

Pegasus Group has prepared comprehensive representations and an Interim Housing Report to the St Helens Local Plan on behalf of another client, Redrow, who have separate land interests within Eccleston (both reports are contained at **Appendix 4**).

So whilst not directly related to this site, these reports (particularly sections 4-9 of the main representation) outline a compelling case as to why the Council need to allocate more sites in order for the plan to be found sound and to meet emerging housing requirements, as summarised below:

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- There is strong evidence that the Council should be aiming for a higher housing requirement than the Submission Draft suggests, with the 570 dpa requirement set out in the adopted Core Strategy and previous Preferred Options Draft considered a more appropriate starting point, to ensure that the District's housing and economic aspirations are fully aligned.
- There are numerous issues with the Council's housing land supply figures, as well as the Council's methodology in assessing sites. The evidence base is insufficiently robust, meaning that the evidence base must be comprehensively updated as part of the next stage of the local plan process to identify the most suitable sites.
- The Council's spatial strategy currently fails to direct development towards a number of highly sustainable areas. The Council must re-address their proposed spatial strategy and adopt a more distributed approach to housing allocations. The St Helens Road site represents one such highly suitable site which should be allocated within the Local Plan.

To conclude, we politely suggest that the Council need to allocate more sites in order for the plan to be found sound. As demonstrated in the appended documents, the St Helens Road, Eccleston site is available and suitable for development and should therefore be considered for housing allocation.

I trust the enclosed is clear, however should you have any queries on these representations please do not hesitate to contact me on the details provided below.

Yours sincerely,

Graham Lamb
Associate Planner

Encs.



**ST HELENS BOROUGH LOCAL PLAN 2020-2035:
SUBMISSION DRAFT**

**REPRESENTATION BY
REDROW HOMES NORTH WEST**

Date: 13th March 2019

Pegasus Reference: GL/KW/P17-0098/R005v4

Pegasus Group

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6. HOUSING SUPPLY MATTERS (POLICY LPA05 PART2)

- 6.1 This section looks at the Council's housing supply and trajectory in more detail, assessing total supply across the plan period but also considering the five-year housing land supply position and the Housing Delivery Test. ✓
- 6.2 This analysis is based on the Table 4.6 'Housing land requirements and supply – 2016 until 2035' and Table 4.7 'Housing Trajectory' within the Submission Plan, and the 2017 SHLAA which forms the most of up to date housing evidence base. ✓
- 6.3 However, at the outset we would highlight the fact that these tables and the SHLAA include various discrepancies and do not allow for direct comparison or the consideration of delivery on individual sites.] (1)
- 6.4 The SHLAA starts with a 1st April 2017 base date but only provides individual site delivery within the first 5 years (up to 2021/2022), with delivery aggregated into 5 year periods beyond that; whilst the housing trajectory in the plan starts at the year 2020 and provides an annual aggregated figure for 'allocations' and 'other supply' (which includes SHLAA sites and windfall), and the total figures in each to do not tally.] (14)
- 6.5 As such we would ask that the Council provide further clarification on this, ideally by updating the SHLAA and making a full local plan trajectory available with projected delivery on each individual SHLAA site and allocation on a year by year basis to allow the full plan period supply to be considered.] (14)
- 6.6 Furthermore, as noted previously, the Council have not produced an AMR since 2011, nor do they have any form of report or schedule monitoring housing delivery. As such it is not possible to obtain detailed information on delivery rates within St Helens in recent years and brings into question whether the Council can justify their delivery rates going forward. —
- 6.7 To assist our analysis at this stage we have consolidated information into one table, and we attach the Council's own trajectory (or our understanding of it) at **Appendix 8**, with our own trajectory attached at **Appendix 9**.] (14)
- 6.8 Our delivery analysis at **Appendix 9** presents two scenarios a best case/ high delivery scenario (**Appendix 9a**) and a worst case/ low delivery scenario (**Appendix 9b**), from which we take a mid-point to calculate our overall supply figures. We also include summary trajectories for both scenarios to compare with the Council's (**Appendix 9c**). —
- 6.9 Accordingly, we reserve the right to make further comments on this at the EiP stage or whenever the Council are able to clarify the above points and provide a consolidated trajectory and supporting evidence to justify the proposed delivery rates. ✓

Overall Housing Supply

- 6.10 Table 4.6 sets out the Council's supply position in more detail across the full plan period to 2035. It suggests there will be 1,989 dwellings completed by April 2020, leaving a residual requirement of 7,245 over the plan period.
- 6.11 In line with the figures in the table, Paragraph 4.18.10 of the Submission Local Plan goes on to state the 2017 SHLAA identified capacity for 7,817 dwellings within the existing urban area including sites with planning permission, sites under construction and other sites identified as being suitable for housing. The same paragraph goes on to state that it also allowed for 93 dwellings per annum from small windfall sites (less than 0.25 ha) and that the largest brownfield sites identified by the SHLAA are strategic allocations including Sites 3HA, 9HA and 10HA.
- 6.12 Figure 4.3 in the SHLAA suggests the following over the next 15 years:
- 1,581 dwellings with planning permission and not started on large sites;
 - 654 dwellings under construction on large sites;
 - 289 on historically implemented but stalled sites;
 - 3,763 dwellings on suitable SHLAA Sites without planning permission;
 - 1,395 dwellings on small windfall sites (93x15);
 - **= TOTAL 7,682 dwellings.**
- 6.13 We assess the implications and discrepancies between these 2 tables below before setting out our own housing supply.

Table 4.6 (Row B) – Completions

- 6.14 Our analysis suggests that proposed completions of 1,989 by April 2020 is realistic based on completions in recent years (as set out below from MCHLG Live Table 122 – and including over-supply of 29 units in the year 2017/2018) and projected delivery in the SHLAA.
- 6.15 Accordingly, the basis for the residual requirement in line (c) is correct, albeit we suggest this is increased to align with our suggested housing requirement of 570 dpa, leaving a residual requirement of 8,391 dwellings.
- 6.16 The table at 6.1 does suggest there are issues with past delivery and we address these later in this section.

Table 4.6 (Row I) – Large SHLAA Sites

- 6.17 This suggests a total figure of 4,107 dwellings from this source; however, this is not consistent with the 2017 SHLAA which suggests a figure of 3,763 dwellings.] ④

6.18 The Council have seemingly allowed for some additional unknown capacity to make up the time period beyond the next 15 years, which is accounted for in the SHLAA. However, bearing in mind the SHLAA has undertaken a comprehensive review of all potential large sites for housing in the urban area, it seems unreasonable to add on additional supply unless some of the sites were expected to be delivered beyond the 15-year SHLAA period and this is articulated in the SHLAA tables. Upon first inspection, the SHLAA does not appear to allow for this.

6.19 That said, we have addressed this discrepancy by providing our own trajectory based on a composite of the Local Plan and SHLAA.

Table 4.6 (Row J) - Small Sites/ Windfall Allowance

6.20 The Council's supply figure includes a windfall allowance of 93 dpa over the 15-year plan period, based on historic completion rates from small sites (below 0.25 Ha) over the past 10 years, as set out in Figure 3.12 of the 2017 SHLAA.

6.21 Whilst the 2019 NPPF acknowledges that windfall development can be a realistic source of supply, paragraph 70 requires evidence not only of past delivery rates, but that such rates can continue going forward, taking account of expected future trends.

6.22 In this instance, it is considered that a flat rate across the full plan period is optimistic as sources of windfall are finite, and therefore the rate of windfall should fall over time as more sites are picked up through the call for sites and SHLAA processes going forward.

6.23 Furthermore, no formal housing allocations have been made within St Helens since the 1998 UDP, which only covered the period to 2001. This was substantially replaced by the Core Strategy in October 2012 (including Policy RES1 relating to residential allocations), however this document did not include allocations, as these were due to follow in a separate Allocations DPD, a process which has since been abandoned, in favour of the current Plan.

6.24 Given the limitations of these adopted plans, it is reasonable to assume that a large proportion of the Council's housing supply over the last 10 years has been through windfall development leading to an elevated delivery rate. It is also reasonable to assume that development opportunities of this scale and nature will have therefore been partly exhausted over this period, and as such are highly unlikely to continue at the same rate.

6.25 It follows that much of this windfall delivery will have been on previously developed land, on the basis that speculative applications on greenfield land have lower chances of success (and also given the lack of greenfield/ non-Green Belt sites in St Helens).

6.26 This is partly evidenced within the Council's Housing Land Position Statement 2013 (which is the most recent monitoring document available) which confirmed that net completions between 2003 and 2013 averaged 91.23% previously developed, with just 8.77% on greenfield land.

Fig 6.1 – Housing Completions and Site Type 2003-2013

Table 3.1 Housing Completions 2003/04-2012/13

| Year | Gross Completions | Net Completions | PDL | GF |
|----------------|-------------------|-----------------|---------------|--------------|
| 2003/04 | 871 | 631 | 90.82% | 9.18% |
| 2004/05 | 896 | 783 | 87.83% | 12.17% |
| 2005/06 | 549 | 530 | 85.61% | 14.39% |
| 2006/07 | 637 | 600 | 91.52% | 8.48% |
| 2007/08 | 496 | 436 | 98.19% | 1.81% |
| 2008/09 | 441 | 240 | 99.3% | 0.7% |
| 2009/10 | 401 | 399 | 96.68% | 3.32% |
| 2010/11 | 183 | 157 | 92.35% | 7.65% |
| 2011/12 | 431 | 419 | 90.72% | 9.28% |
| 2012/13 | 320 | 264 | 82.19% | 17.81% |
| Total | 5,225 | 4,459 | 4,767 | 458 |
| Average | 523 p.a. | 446 p.a. | 91.23% | 8.77% |

- 6.27 This is relevant, as the ongoing supply of small PDL sites is now recorded within the Council's Brownfield Register (19th December 2017 base date). Analysis of this confirmed a capacity of 437 dwellings on sites of less than 0.25Ha, all of which have extant planning permission.
- 6.28 Applying an 8.77% uplift to this to support some windfall delivery on greenfield sites in line with historic evidence rates generates a total small site windfall total of 475 units, and we have used this figure in our trajectory, rather than the 93 per year figure which the Council propose, which we consider extremely optimistic.
- 6.29 That said, we continue with the rate of 93 dpa within the first 5 years (to 2021-2022) given that all these windfall sites already have consent and in light of elevated delivery rates in recent years, even without any adopted allocations, with the remaining 10 units dropping into year 6.
- 6.30 In our worst case scenario at Appendix 9b we assume no further windfall delivery; however in the best case we apply a rate of 10 dpa from year 6 onwards to take account of the possibility that small amounts of additional land may become available later in the period beyond what has been identified in the brownfield register.

Table 4.6 (Row L) – Lapse Rate for Non-Delivery

- 6.31 This row applies a 15% discount for non-delivery of SHLAA sites in years 6-15 (which equates to 437 from a total of 4,368). Whilst we fully support the rationale for this discount, we suggest a discount is also added to the sites in years 1-5, as there will inevitably be some slippage amongst permitted sites as well as strategic sites, and this approach has been commonly accepted at EiPs and S78 appeals decisions, generally at 10% across all sites.
- 6.32 In this instance a blanket 10% lapse actually generates a lower discount than the 15% off years 6-16) and is therefore presents a more positive position than the Council's own figures; however

given our supply analysis has already discounted specific sites we are keen to avoid double counting.

- 6.33 We have taken the view that it would not be appropriate to add the 10% discount to our worst case scenario; however a 10% discount may be appropriate for the best case scenario as this broadly accepts the Council's anticipated delivery rates and timescales without compelling evidence and only removes clearly constrained sites that arguably should have not been included anyway.
- 6.34 Therefore for the mid-point figures we use to calculate total supply we have applied a 5% discount, which we consider to be a robust position.

Table 4.6 (Row O) – Reserve Sites Buffer / Green Belt Housing Requirement

- 6.35 This row applies a 20% buffer to the Green Belt supply requirement to account for c and long lead-in times. Again, we fully support this discount as it provides flexibility and choice within the Green Belt site typology, without leading to any double counting with the 10 or 15% discount applied for non-delivery of the SHLAA sites.

Overall Delivery Assumptions

- 6.36 Given the variety of different site types/ sizes and sources within the St Helens housing supply and the lack of a detailed trajectory or any supporting monitoring evidence we have taken a bespoke approach to our assessment, providing both best and worst case scenarios to give a balanced view, including the following assumptions:
- Using the Council's delivery rates on sites that are under construction or that have consent and are due to start on site within years 1-5, due to the Council's reasonable delivery record in recent years (with them delivering in excess of their trajectory target in 2017/2018). This includes 2 of the brownfield allocations (3Ha and 9HA).
 - On the remaining brownfield allocations (6HA and 10HA) we have applied the approach advocated by the Lichfields Report published in November 2016, entitled 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?'. For sites between 500-999 units (as the two brownfield allocations are) it suggests an average lead in time of 9.2 years from first being identified in a plan (3.9 years to submission of the first planning application then 5.3 years to start on site), with average delivery rates of 68 per year after that.
 - On remaining SHLAA sites due in years 6 onwards, we have used standard delivery rates of 30 dpa on sites over 50 units, and 15 dpa on sites less than 50.
 - We have generally allowed a 1-year lead-in for sites with full consent or with Reserved Matters/ Discharge of condition applications in, 2 years for outline schemes with evidence of ongoing activity, and 3 years for outlines with no further evidence.
 - In respect of the proposed Green Belt allocations, we have applied the Council's projected lead-in times and build out rates as these look to be well staggered across the plan period,

and with variable rates that we assume take account of site-specific factors (albeit this is not evidence or broken down individually). For balance we also applied the Lichfield approach set out above (suggesting an average lead in time of 8 years for sites between 100-499 units, with delivery rates of 60 dpa; and 9.2 years and 68 dpa for sites between 500-999 units). The Lichfield approach actually generates higher delivery so this has been used in the best case scenario (**at Appendix 9a**) with the Council's own rates for the worst case scenario (**Appendix 9b**).

- 6.37 In terms of pushing sites to later in the plan period, or discounting them entirely we have applied the definitions of deliverable and developable sites within the glossary of the 2019 NPPF, as set out below:

"Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

Developable: *To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".*

- 6.38 Accordingly, larger sites with outline or expired consents or other obvious constraints which do not meet the definition of deliverable, have been moved to later years of the plans.

- 6.39 We have also removed several sites entirely where some of all the following applied:

- Site in existing alternative use with no current prospect of that ceasing;
- Access required through third party land (with no evidence that this is available or achievable);
- Large scale clearance of buildings required to bring forward for residential.
- Viability concerns acknowledged within the SHLAA;
- Mixed ownership/ legal issues (with no evidence that these can be overcome);

- Site constraints such as flood risk, contamination, noise, adjacent uses flagged as an issue within the SHLAA.

- 6.40 In the best case scenario at **Appendix 9a** we have generally moved constrained sites to the later part of the plan period on the basis that these issues can be overcome in the medium to long term, and only removed those with obvious major issues – which applies to **10 sites, totalling 278 units** (highlighted orange).
- 6.41 In the worst case scenario at **Appendix 9b** we have removed all sites with multiple constraints – which applies to **25 sites, totalling 598 units** (also highlighted orange).
- 6.42 Having taken all the above into consideration we projected a total plan period supply of between 8,541 (worst-case scenario) and 9,824 (best case scenario). This generates a midpoint of 9,183 which in turn equated to a total SHLAA supply mid-point of **6,738** (from 1st April 2017- 31st March 2035), which can be entered Row E of Table 4.6.
- 6.43 Accordingly, our assessment of St Helens total housing supply and Green Belt allocation requirements is set out on the following page, with the full trajectories attached at **Appendix 9**.
- 6.44 Overall, this supply analysis suggests the Council will need to allocate additional Green Belt land for at least **2,243 dwellings**, based on a requirement of 570 dpa (and **868 dwellings** if the 486 dpa figure is pursued).] (14)
- 6.45 It is pertinent that this figure includes some headroom to allow for under-delivery, however this is only applied (at a rate of 20%) to the Green Belt element of the supply, which only represents 1/3 of the total supply. However, such a buffer is equally applicable across the total supply to allow for under delivery but also to provide a range and choice of sites for development, as advocated by the NPPF.] (14)
- 6.46 If a 20% buffer was sought across the total supply, then this would require additional land for 3,204 dwellings; whilst a 10% buffer would equate to 2,365 dwellings.
- 6.47 Even if the Council's own supply and requirement figures are used then there will be a surplus supply of just 361 dwellings, equating to just 4.98% of the total, which leaves minimal flexibility. In this case a 20% buffer would require land for an additional 1,088 units; whilst 10% would require 364 units.

Figure 6.2 – Total Housing Supply 2016-2035

| | Requirements | Council claimed position | Council's reqt with Peg supply and methodology | Pegasus position |
|---|---|--------------------------|--|------------------|
| a | St.Helens housing requirement (19 years from 1st April 2016 to 31st March 2035) at average of 486 dpa / 570 dpa | 9,234 | 9,234 | 10,380 |
| b | Expected completions by 1st April 2020 | 1,989 | 1,989 | 1,989 |
| c | Residual requirement over Local Plan period from 1st Apr 2020 to 31st March 2035 | 7,245 | 7,245 | 8,391 |
| d | Anticipated supply | | | |
| e | Total SHLAA supply– 1st April 2017 until 31st March 2035/ From Pegasus Trajectory | 7,817 | 6,378 | 6,378 |
| | ... consisting of: | | | |
| f | <i>Large sites (0.25ha or 5 units and above) - planning permission not started as of 1st April 2017</i> | 1,581 | n/a | n/a |
| g | <i>Large sites with planning permission under construction as of 1st April 2017</i> | 654 | n/a | n/a |
| h | <i>Large sites with planning permission but stalled as of 1st April 2017</i> | 289 | n/a | n/a |
| i | <i>Large sites - no planning permission as of 1st April 2017 in Local Plan/ in 2017 SHLAA</i> | 4,107 | 3,763 | 3,763 |
| j | <i>Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowance)</i> | 1,395 | 475 | 475 |
| k | Estimated SHLAA supply – 1st April 2020 until 31st March 2035/ calculated from From Pegasus Trajectory | 6,344 | 5,060 | 5,060 |
| l | SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18)/ 5% off overall plan | 794 | 253 | 253 |
| m | Residual SHLAA capacity over 15 year Plan period (1st Apr 2020 - 31st March 2035) | 5,550 | 4,807 | 4,807 |
| n | Required capacity to be found on Green Belt land | 1,695 | 2,438 | 3,584 |
| o | Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (site allocations 5HA to 15HA inclusive) (to allow for contingencies e.g., infrastructure provision, delays, lead-in times, to start of housing delivery etc.) | 2,034 | 2,926 | 4,301 |
| p | Total capacity of allocated sites removed from the Green Belt (sites 1, 2, 4, 5, 7 and 8 HA) (1st April 2020- 31st March 35) Counting up table 4.7 equates to 2,058 | 2,056 | 2,058 | 2,058 |
| q | Total supply over plan period | 7,606 | 6,865 | 6,865 |
| | Total headroom % on residual requirement | 4.98% | -5.24% | -18.19% |
| | Total headroom numbers on residual requirement | 361 | n/a | n/a |
| | Additional allocations required to meet requirement (with GB headroom) | n/a | 868 | 2,243 |
| | Additional requirement to give overall 10% headroom | 364 | 1,105 | 2,365 |
| | Additional requirement to give overall 20% headroom | 1,088 | 1,829 | 3,204 |

Housing Delivery Test

- 6.48 The first round of Housing Delivery Test (HDT) results were issued in February 2019, which applies a standardised approach to housing delivery over the preceding 3-year period for all the Local Authorities across the country (in line with the HDT Measurement Rulebook and paragraphs 73-75 of the NPPF).
- 6.49 The resultant percentage figure used to confirm which buffer should be applied in the five-year supply calculation (5% if delivery is above 85% and 20% if below). In addition, if delivery has dropped below 95% the Council are required to prepare an Action Plan to assess the causes of under-delivery and identify actions to increase delivery in future years. Finally, if delivery is below 25% (in the current 2018 results but increasing to 45% in 2019 and 75% in November 2020 under transitional arrangements), then the tilted balance in relation to the presumption in favour of sustainable development is engaged.
- 6.50 In the case of St Helens this suggests a figure of 98% meaning that the 5% buffer is applicable, and an action plan is not required.

Figure 6.3 – Housing Delivery Test

| | 2019 HDT completions | 2019 HDT requirement | Local Plan Requirement | Delivery against HDT requirement | Delivery against Local Plan Requirement |
|--------------------|----------------------|----------------------|------------------------|----------------------------------|---|
| 2015/2016 | 575 | 532 | 570 | 43 | 5 |
| 2016/2017 | 487 | 518 | 570 | -31 | -83 |
| 2017/2018 | 411 | 454 | 570 | -43 | -159 |
| | 1,473 | 1,504 | 1,710 | -31 | -237 |
| Average dpa/ HDT % | 491 | 501 | | 97.94% | 87.95% |

| | | | |
|---|-------|-------------------------------|--------|
| Shortfall (pre 2015) | 1,805 | | |
| 5 year requirement | 2,850 | | |
| 5 year requirement + shortfall | 4,655 | | |
| Shortfall required in 3 years (3/5ths of total) | 2,793 | against real reqt w/shortfall | 52.74% |

- 6.51 As can be seen from the table, St Helens delivered 1,473 new homes over the last three years against a 'requirement' of 1,504 dwellings; although it is pertinent that this requirement is based on the household projections (under transitional arrangements in the first 3 years of the HDT process) and is therefore artificially low, as the local plan requirement over the same period is 1,710 (206 higher). If delivery is considered against the adopted plan requirement the HDT figure drops to 88%.
- 6.52 Furthermore, it must be stressed that the household projections do not reflect the level of housing that should have actually been delivered over the last three years in St Helens and does not take

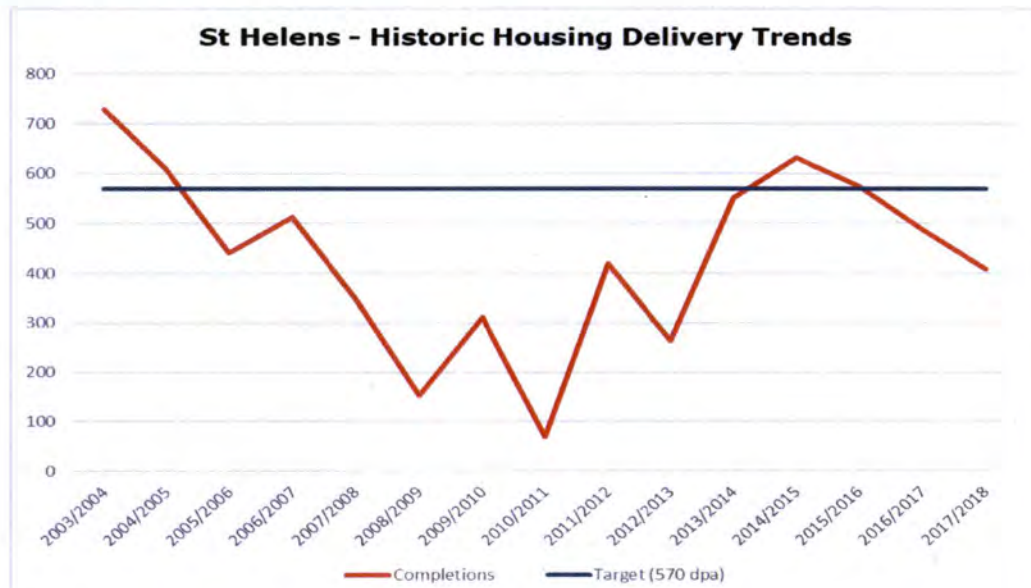
account of any historic under delivery, which is an issue in St Helens. Whilst the HDT and standard methodology effectively resets the clock and clears and past under delivery, the NPPG does confirm (at paragraph 2a-011-20190220) that where an alternative approach to the standard method is used, as it is in St Helens, past under delivery should be taken into account.

- 6.53 In the case of St Helens, a review of figures 6.3 and 6.4 below confirms there has been major under-delivery within St Helens dating back to 2003, when the RSS period began and the 570 dpa requirement figure was introduced, generating a total shortfall of 1,805 dwellings at 1st April 2015 (when the current HDT period begins).

Figure 6.4 – Historic Completions

| | Live Table 122 Net Completions | Local Plan Requirement | Mixed Local Plan Requirement | Delivery against Local Plan Requirement | Delivery against Mixed Local Plan Requirement |
|-------------|--------------------------------------|---------------------------|------------------------------------|--|---|
| 2003/2004 | 728 | 570 | 570 | 158 | 158 |
| 2004/2005 | 607 | 570 | 570 | 37 | 37 |
| 2005/2006 | 442 | 570 | 570 | -128 | -128 |
| 2006/2007 | 512 | 570 | 570 | -58 | -58 |
| 2007/2008 | 348 | 570 | 570 | -222 | -222 |
| 2008/2009 | 152 | 570 | 570 | -418 | -418 |
| 2009/2010 | 311 | 570 | 570 | -259 | -259 |
| 2010/2011 | 69 | 570 | 570 | -501 | -501 |
| 2011/2012 | 419 | 570 | 570 | -151 | -151 |
| 2012/2013 | 264 | 570 | 570 | -306 | -306 |
| 2013/2014 | 551 | 570 | 570 | -19 | -19 |
| 2014/2015 | 632 | 570 | 570 | 62 | 62 |
| 2015/2016 | 575 | 570 | 570 | 5 | 5 |
| 2016/2017 | 487 | 570 | 486 | -83 | 1 |
| 2017/2018 | 408 | 570 | 486 | -162 | -78 |
| TOTAL | 6,505 | 8,550 | | -2,045 | -1,877 |
| Average dpa | 434 | 570 | | -136 | -125 |

Figure 6.5 – Historic Housing Delivery Rates



Delivery figures from MCHLG Net Additions by Local Authority District Live Table 122

- 6.54 This meant that the actual annualised requirement the Council should have achieved from 1st April 2015 to 31st March 2020 was 931 dwellings per annum (i.e. $1,805 / 5 = 361 + 570 = 931$), which equates to **2,793 dwellings** over the 3-year period to 31st March 2018.
- 6.55 When considered against this elevated requirement, the 1,473 completions look less impressive and represents just **52%** of the requirement.
- 6.56 Notwithstanding this, the result of the HDT confirms that the 5% buffer is applicable when calculating 5YHLS in St Helens.

Five Year Housing Land Supply

- 6.57 The Council do not confirm their 5-year housing land supply position within the Submission Plan, yet their 2017 SHLAA concludes the following in Figures 45.4 and 5.5:
- Based on the 570 dpa Core Strategy requirement, the Council claim a **2.7 year supply**.
 - Based on an OAN figure of 451 dpa, they claim a figure of **5.3 year supply**.
- 6.58 Clearly the position has moved on since the 2017 SHLAA, indeed a 2018 base date can now be used to calculate supply, as can the Council's proposed requirement figure of 486 (albeit we are still advocating the use of the 570 dpa figure).
- 6.59 Accordingly, we set out our analysis of the Council's 5YHLS position below, using various different scenarios for both the requirement and supply side inputs to give a range of figures.

Figure 6.6 – Five Year Housing Land Supply

| 5 YEAR HOUSING LAND SUPPLY (1ST APRIL 2018 BASE DATE) | Council's Requirement | | Pegasus Requirement | |
|---|-----------------------|-------|---------------------|-------|
| Annual requirement | 486 | | 570 | |
| 5 year requirement | 2,430 | | 2,850 | |
| Shortfall (plan period/ 2016-2018) | 77 | | 245 | |
| Shortfall (historic/ 2003-2018) | 1,877 | | 2,045 | |
| Buffer | 5% | 20% | 5% | 20% |
| Total requirement (no shortfall) | 2,552 | 2,916 | | |
| Total requirement (with plan period shortfall) | 2,632 | 3,008 | 3,073 | 3,512 |
| Total requirement (with historic shortfall) | 4,522 | 5,168 | 4,963 | 5,672 |
| Council Claimed Supply | 2,726 | | | |
| Pegasus Supply (10% discount applied to Peg trajectory) | 2,816 | | | |
| Council 5YHLS (no shortfall) | 5.34 | 4.67 | | |
| Council 5YHLS (with plan period shortfall) | 5.18 | 4.53 | 4.43 | 3.88 |
| Council 5YHLS (with historic shortfall) | 3.01 | 2.64 | 2.75 | 2.40 |
| Pegasus 5YHLS (with plan period shortfall) | 5.35 | 4.68 | 4.58 | 4.01 |
| Pegasus 5YHLS (with historic shortfall) | 3.11 | 2.72 | 2.84 | 2.48 |

- 6.60 We conclude that the Council's supply is **2.84** or **4.58 years** depending whether shortfall is considered over the long-term (2003 onwards) or shorter term (2016 onwards), using the 570 dpa requirement and the 5% buffer as required by the HDT.
- 6.61 Within that it is pertinent to note that we have not applied a lapse rate for non-delivery as we have to the full supply figures. This is because we have been through on a site by site basis and therefore wanted to avoid double counting; however given the limited evidence on delivery rates presented by the Council it is highly likely that there will be additional slippage, particularly on sites that are already under construction or that have consent and are due to start on site within years 1-5, where we have accepted the Council's projections.
- 6.62 By way of comparison, using the Council's own supply figures and 486 requirement puts them between 3.01 and 5.18 years (with the same approach to shortfall), and with the 570 requirement between 2.75 and 4.43 years.
- 6.63 This combination of historic under-delivery and the 5-year supply shortfall (which it accentuates) provide further support for releasing additional sites now, on top of the Green Belt sites already proposed for allocation, to aid delivery in the first five years of the plan. This should also negate the need for an early review, or the risk of taking a plan to examination without a deliverable 5-year supply.
- 6.64 In short there are acute housing supply issues in the area that should be addressed at the earliest opportunity.

Conclusions on Housing Land Supply

- 6.65 Overall, this supply analysis suggests the Council will need to allocate additional Green Belt land for at least **2,243 dwellings** to meet shortfall within the first 5 years and across the full plan period.
- 6.66 Whilst housing delivery in recent years has been relatively strong, reflected in the 98% performance within the Housing Delivery Test, this masks acute under-delivery in the years before that, dating back to 2003.

PO2482



Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-

Email 1 of 4

Rebecca Dennis

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13/05/2019 16:05

① - LPA05

② - LPA02

③ - GBR

④ - S.A.

⑤ - S.O. 4.1

⑥ - S.O. 5.1

⑦ - LPA02 - PARA 3

⑧ - LPA02 - PARA 4

⑨ - LPA03

⑩ - LPA04

4 Attachments



Appendix 1-Site Location Plan-Redrow.pdf Appendix 2 Part 1-Delivery Statement-Redrow.pdf



Representation Form-Redrow-May 19.pdf R005v6 - Repts to Submission Local Plan-Redrow.pdf

Dear Sir/Madam,

We are instructed on behalf of our client, Redrow Homes North West, to submit the attached form and representation (R005) to the Local Plan Submission Draft Consultation. Redrow have land interests in relation to the Burrows Lane, Ecclestone site, which is discussed in detail in the attached representation.

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Site Location Plan (attached to this email)
- Appendix 2 - Delivery Statement (Part 1 attached to this email)
- Appendix 3 - Accessibility Statement
- Appendix 4 - Phase 1 Ecology Survey
- Appendix 5 - Agricultural Land Assessment
- Appendix 6 - Detailed Site Pro Forms
- Appendix 7 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 8 - Council's Housing Trajectory
- Appendix 9 - Pegasus Housing Trajectory
- Appendix 10 - Spatial Distribution of Sites

⑪ - LPA05 - PARA 3

⑫ - LPA05 - PARA 4

⑬ - APPENDIX 4

⑭ - TABLE 4.6

⑮ - LPA05.1

⑯ - LPA06

We will follow up this submission by sending a CD in the post which contains the entirety of Redrow's submission to the Local Plan consultation.

⑰ - LPC01

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

⑱ - LPC02

Many thanks and kind regards,

⑲ - LPC03 - PARA 4

⑳ - LPC07

㉑ - LPC02

㉒ - LPC03

㉓ - LPC04

㉔ - LPA07 - PARA 3d

㉕ - LPA07 - PARA 9

㉖ - LPC10

Rebecca Dennis

Principal Planner

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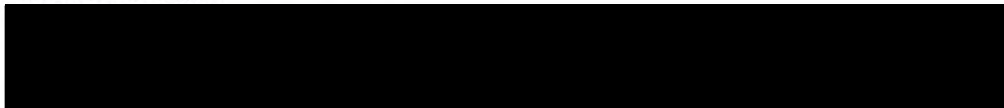
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3 Attachments



Appendix 2 Part 2-Delivery Statement-Redrow.pdf



Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

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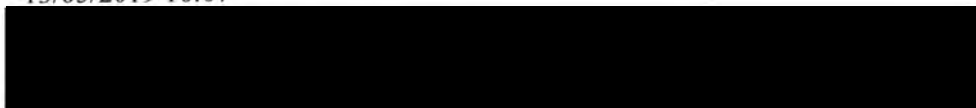
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7 Attachments



Appendix 5-Agricultural Land Classification-Redrow.pdf Appendix 6-Detailed Site Pro Forma-Redrow.pdf



Appendix 8-Council's Housing Trajectory-Redrow.pdf



Appendix 9a-Pegasus Trajectory Best Case Scenario-Redrow.pdf



Appendix 9b-Pegasus Trajectory Worst Case Scenario 9b-Redrow.pdf



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



Appendix 7-Review of Employment-Led Local Plan Housing Requirement-Redrow.pdf

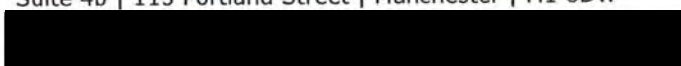
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planningpolicy@sthelens.gov.uk

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1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

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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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Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: | Title: Mr |
| First Name: | First name: Graham |
| Last Name: | Last Name: Lamb |
| Organisation/company: Redrow Homes North West | Organisation/company: Pegasus Group |
| Address: | Address: Suite 4b, 113 Portland Street, Manchester, |
| Postcode: | Postcode: M1 6DW |



| | |
|------------|-------|
| Signature: | Date: |
|------------|-------|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email:

planningpolicy@sthelens.gov.uk

Telephone:

01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

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 | Tables 4.6 and 4.7 | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|------------------------------|-----------------------------|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No X |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|--------------------------|
| Positively Prepared? | X |
| Justified? | X |
| Effective? | X |
| Consistent with National Policy? | <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

WE RAISE A NUMBER OF CONCERNS WITH THE COUNCIL'S CLAIMED HOUSING LAND SUPPLY (TABLE 4.6) AND THE LACK OF DETAIL PROVIDED IN THE HOUSING TRAJECTORY TABLE (4.7). THIS LEADS TO A NEED TO ALLOCATE MORE SITES TO MEET DEVELOPMENT NEEDS.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.
Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

COUNCIL NEED TO ALLOCATE MORE SITES TO ENSURE A HEALTHY HOUSING LAND SUPPLY WHICH MEETS DEVELOPMENT REQUIREMENTS.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | | | |
|--------------------------|--|-------------------------------------|--|
| <input type="checkbox"/> | No, I do not wish to participate at the oral examination | <input checked="" type="checkbox"/> | Yes, I wish to participate at the oral examination |
|--------------------------|--|-------------------------------------|--|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.



ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY REDROW HOMES NORTH WEST

Date: 13th May 2019

Pegasus Reference: GL/KW/P17-0098/R005v6

Pegasus Group

Suite 4b | 113 Portland Street | Manchester | M1 6DW



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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6. HOUSING SUPPLY MATTERS (POLICY LPA05 PART2)

- 6.1 This section looks at the Council's housing supply and trajectory in more detail, assessing total supply across the plan period but also considering the five-year housing land supply position and the Housing Delivery Test.
- 6.2 This analysis is based on the Table 4.6 'Housing land requirements and supply – 2016 until 2035' and Table 4.7 'Housing Trajectory' within the Submission Plan, and the 2017 SHLAA which forms the most of up to date housing evidence base.
- 6.3 However, at the outset we would highlight the fact that these tables and the SHLAA include various discrepancies and do not allow for direct comparison or the consideration of delivery on individual sites. (1)
- 6.4 The SHLAA starts with a 1st April 2017 base date but only provides individual site delivery within the first 5 years (up to 2021/2022), with delivery aggregated into 5 year periods beyond that; whilst the housing trajectory in the plan starts at the year 2020 and provides an annual aggregated figure for 'allocations' and 'other supply' (which includes SHLAA sites and windfall), and the total figures in each to do not tally. (14)
- 6.5 As such we would ask that the Council provide further clarification on this, ideally by updating the SHLAA and making a full local plan trajectory available with projected delivery on each individual SHLAA site and allocation on a year by year basis to allow the full plan period supply to be considered.
- 6.6 Furthermore, as noted previously, the Council have not produced an AMR since 2011, nor do they have any form of report or schedule monitoring housing delivery. As such it is not possible to obtain detailed information on delivery rates within St Helens in recent years and brings into question whether the Council can justify their delivery rates going forward.
- 6.7 To assist our analysis at this stage we have consolidated information into one table, and we attach the Council's own trajectory (or our understanding of it) at **Appendix 8**, with our own trajectory attached at **Appendix 9**. (14)
- 6.8 Our delivery analysis at **Appendix 9** presents two scenarios a best case/ high delivery scenario (**Appendix 9a**) and a worst case/ low delivery scenario (**Appendix 9b**), from which we take a mid-point to calculate our overall supply figures. We also include summary trajectories for both scenarios to compare with the Council's (**Appendix 9c**).
- 6.9 Accordingly, we reserve the right to make further comments on this at the EiP stage or whenever the Council are able to clarify the above points and provide a consolidated trajectory and supporting evidence to justify the proposed delivery rates.

Overall Housing Supply

- 6.10 Table 4.6 sets out the Council's supply position in more detail across the full plan period to 2035. It suggests there will be 1,989 dwellings completed by April 2020, leaving a residual requirement of 7,245 over the plan period.
- 6.11 In line with the figures in the table, Paragraph 4.18.10 of the Submission Local Plan goes on to state the 2017 SHLAA identified capacity for 7,817 dwellings within the existing urban area including sites with planning permission, sites under construction and other sites identified as being suitable for housing. The same paragraph goes on to state that it also allowed for 93 dwellings per annum from small windfall sites (less than 0.25 ha) and that the largest brownfield sites identified by the SHLAA are strategic allocations including Sites 3HA, 9HA and 10HA.
- 6.12 Figure 4.3 in the SHLAA suggests the following over the next 15 years:
- 1,581 dwellings with planning permission and not started on large sites;
 - 654 dwellings under construction on large sites;
 - 289 on historically implemented but stalled sites;
 - 3,763 dwellings on suitable SHLAA Sites without planning permission;
 - 1,395 dwellings on small windfall sites (93x15);
 - **= TOTAL 7,682 dwellings.**
- 6.13 We assess the implications and discrepancies between these 2 tables below before setting out our own housing supply.

Table 4.6 (Row B) – Completions

- 6.14 Our analysis suggests that proposed completions of 1,989 by April 2020 is realistic based on completions in recent years (as set out below from MCHLG Live Table 122 – and including over-supply of 29 units in the year 2017/2018) and projected delivery in the SHLAA.
- 6.15 Accordingly, the basis for the residual requirement in line (c) is correct, albeit we suggest this is increased to align with our suggested housing requirement of 570 dpa, leaving a residual requirement of 8,391 dwellings.
- 6.16 The table at 6.1 does suggest there are issues with past delivery and we address these later in this section.

Table 4.6 (Row I) – Large SHLAA Sites

- 6.17 This suggests a total figure of 4,107 dwellings from this source; however, this is not consistent with the 2017 SHLAA which suggests a figure of 3,763 dwellings.

10

6.18 The Council have seemingly allowed for some additional unknown capacity to make up the time period beyond the next 15 years, which is accounted for in the SHLAA. However, bearing in mind the SHLAA has undertaken a comprehensive review of all potential large sites for housing in the urban area, it seems unreasonable to add on additional supply unless some of the sites were expected to be delivered beyond the 15-year SHLAA period and this is articulated in the SHLAA tables. Upon first inspection, the SHLAA does not appear to allow for this.

6.19 That said, we have addressed this discrepancy by providing our own trajectory based on a composite of the Local Plan and SHLAA.

Table 4.6 (Row J) - Small Sites/ Windfall Allowance

6.20 The Council's supply figure includes a windfall allowance of 93 dpa over the 15-year plan period, based on historic completion rates from small sites (below 0.25 Ha) over the past 10 years, as set out in Figure 3.12 of the 2017 SHLAA.

6.21 Whilst the 2019 NPPF acknowledges that windfall development can be a realistic source of supply, paragraph 70 requires evidence not only of past delivery rates, but that such rates can continue going forward, taking account of expected future trends.

6.22 In this instance, it is considered that a flat rate across the full plan period is optimistic as sources of windfall are finite, and therefore the rate of windfall should fall over time as more sites are picked up through the call for sites and SHLAA processes going forward. 14

6.23 Furthermore, no formal housing allocations have been made within St Helens since the 1998 UDP, which only covered the period to 2001. This was substantially replaced by the Core Strategy in October 2012 (including Policy RES1 relating to residential allocations), however this document did not include allocations, as these were due to follow in a separate Allocations DPD, a process which has since been abandoned, in favour of the current Plan.

6.24 Given the limitations of these adopted plans, it is reasonable to assume that a large proportion of the Council's housing supply over the last 10 years has been through windfall development leading to an elevated delivery rate. It is also reasonable to assume that development opportunities of this scale and nature will have therefore been partly exhausted over this period, and as such are highly unlikely to continue at the same rate. 14

6.25 It follows that much of this windfall delivery will have been on previously developed land, on the basis that speculative applications on greenfield land have lower chances of success (and also given the lack of greenfield/ non-Green Belt sites in St Helens).

6.26 This is partly evidenced within the Council's Housing Land Position Statement 2013 (which is the most recent monitoring document available) which confirmed that net completions between 2003 and 2013 averaged 91.23% previously developed, with just 8.77% on greenfield land.

Fig 6.1 – Housing Completions and Site Type 2003-2013

Table 3.1 Housing Completions 2003/04-2012/13

| Year | Gross Completions | Net Completions | PDL | GF |
|----------------|-------------------|-----------------|---------------|--------------|
| 2003/04 | 871 | 631 | 90.82% | 9.18% |
| 2004/05 | 896 | 783 | 87.83% | 12.17% |
| 2005/06 | 549 | 530 | 85.61% | 14.39% |
| 2006/07 | 637 | 600 | 91.52% | 8.48% |
| 2007/08 | 496 | 436 | 98.19% | 1.81% |
| 2008/09 | 441 | 240 | 99.3% | 0.7% |
| 2009/10 | 401 | 399 | 96.68% | 3.32% |
| 2010/11 | 183 | 157 | 92.35% | 7.65% |
| 2011/12 | 431 | 419 | 90.72% | 9.28% |
| 2012/13 | 320 | 264 | 82.19% | 17.81% |
| Total | 5,225 | 4,459 | 4,767 | 458 |
| Average | 523 p.a. | 446 p.a. | 91.23% | 8.77% |

- 6.27 This is relevant, as the ongoing supply of small PDL sites is now recorded within the Council's Brownfield Register (19th December 2017 base date). Analysis of this confirmed a capacity of 437 dwellings on sites of less than 0.25Ha, all of which have extant planning permission.
- 6.28 Applying an 8.77% uplift to this to support some windfall delivery on greenfield sites in line with historic evidence rates generates a total small site windfall total of 475 units, and we have used this figure in our trajectory, rather than the 93 per year figure which the Council propose, which we consider extremely optimistic.
- 6.29 That said, we continue with the rate of 93 dpa within the first 5 years (to 2021-2022) given that all these windfall sites already have consent and in light of elevated delivery rates in recent years, even without any adopted allocations, with the remaining 10 units dropping into year 6.
- 6.30 In our worst case scenario at Appendix 9b we assume no further windfall delivery; however in the best case we apply a rate of 10 dpa from year 6 onwards to take account of the possibility that small amounts of additional land may become available later in the period beyond what has been identified in the brownfield register.

Table 4.6 (Row L) – Lapse Rate for Non-Delivery

- 6.31 This row applies a 15% discount for non-delivery of SHLAA sites in years 6-15 (which equates to 437 from a total of 4,368). Whilst we fully support the rationale for this discount, we suggest a discount is also added to the sites in years 1-5, as there will inevitably be some slippage amongst permitted sites as well as strategic sites, and this approach has been commonly accepted at EiPs and S78 appeals decisions, generally at 10% across all sites.
- 6.32 In this instance a blanket 10% lapse actually generates a lower discount than the 15% off years 6-16) and is therefore presents a more positive position than the Council's own figures; however

given our supply analysis has already discounted specific sites we are keen to avoid double counting.

- 6.33 We have taken the view that it would not be appropriate to add the 10% discount to our worst case scenario; however a 10% discount may be appropriate for the best case scenario as this broadly accepts the Council's anticipated delivery rates and timescales without compelling evidence and only removes clearly constrained sites that arguably should have not been included anyway.
- 6.34 Therefore for the mid-point figures we use to calculate total supply we have applied a 5% discount, which we consider to be a robust position in this instance.

Table 4.6 (Row O) – Reserve Sites Buffer / Green Belt Housing Requirement

- 6.35 This row applies a 20% buffer to the Green Belt supply requirement to allow for contingencies (listed as infrastructure provision, delays, lead-in times, to start of housing delivery etc). Again, we fully support this discount as it provides flexibility and choice within the Green Belt site typology, without leading to any double counting with the discount applied for non-delivery of the SHLAA sites.

Overall Delivery Assumptions

- 6.36 Given the variety of different site types/ sizes and sources within the St Helens housing supply and the lack of a detailed trajectory or any supporting monitoring evidence we have taken a bespoke approach to our assessment, providing both best and worst case scenarios to give a balanced view, including the following assumptions:
- Using the Council's delivery rates on sites that are under construction or that have consent and are due to start on site within years 1-5, due to the Council's reasonable delivery record in recent years (with them delivering in excess of their trajectory target in 2017/2018). This includes 2 of the brownfield allocations (3Ha and 9HA).
 - On the remaining brownfield allocations (6HA and 10HA) we have applied the approach advocated by the Lichfields Report published in November 2016, entitled 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?'. For sites between 500-999 units (as the two brownfield allocations are) it suggests an average lead in time of 9.2 years from first being identified in a plan (3.9 years to submission of the first planning application then 5.3 years to start on site), with average delivery rates of 68 per year after that.
 - On remaining SHLAA sites due in years 6 onwards, we have used standard delivery rates of 30 dpa on sites over 50 units, and 15 dpa on sites less than 50.
 - We have generally allowed a 1-year lead-in for sites with full consent or with Reserved Matters/ Discharge of condition applications in, 2 years for outline schemes with evidence of ongoing activity, and 3 years for outlines with no further evidence.

- In respect of the proposed Green Belt allocations, we have applied the Council's projected lead-in times and build out rates as these look to be well staggered across the plan period, and with variable rates that we assume take account of site-specific factors (albeit this is not evidence or broken down individually). For balance we also applied the Lichfield approach set out above (suggesting an average lead in time of 8 years for sites between 100-499 units, with delivery rates of 60 dpa; and 9.2 years and 68 dpa for sites between 500-999 units). The Lichfield approach actually generates higher delivery so this has been used in the best case scenario (**at Appendix 9a**) with the Council's own rates for the worst case scenario (**Appendix 9b**).

6.37 In terms of pushing sites to later in the plan period, or discounting them entirely we have applied the definitions of deliverable and developable sites within the glossary of the 2019 NPPF, as set out below:

"Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

Developable: *To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".*

6.38 Accordingly, larger sites with outline or expired consents or other obvious constraints which do not meet the definition of deliverable, have been moved to later years of the plans.

6.39 We have also removed several sites entirely where some of all the following applied:

- Site in existing alternative use with no current prospect of that ceasing;
- Access required through third party land (with no evidence that this is available or achievable);
- Large scale clearance of buildings required to bring forward for residential;
- Viability concerns acknowledged within the SHLAA;

- Mixed ownership/ legal issues (with no evidence that these can be overcome); and
- Site constraints such as flood risk, contamination, noise, adjacent uses flagged as an issue within the SHLAA.

- 6.40 In the best case scenario at **Appendix 9a** we have generally moved constrained sites to the later part of the plan period on the basis that these issues can be overcome in the medium to long term, and only removed those with obvious major issues – which applies to **10 sites, totalling 278 units** (highlighted orange).
- 6.41 In the worst case scenario at **Appendix 9b** we have removed all sites with multiple constraints – which applies to **25 sites, totalling 598 units** (also highlighted orange).
- 6.42 Having taken all the above into consideration we projected a total plan period supply of between 8,541 (worst-case scenario) and 9,824 (best case scenario). This generates a midpoint of 9,183 which in turn equated to a total SHLAA supply mid-point of **6,738** (from 1st April 2017- 31st March 2035), which can be entered Row E of Table 4.6.
- 6.43 Accordingly, our assessment of St Helens total housing supply and Green Belt allocation requirements is set out on the following page, with the full trajectories attached at **Appendix 9**.
- 6.44 Overall, this supply analysis suggests the Council will need to allocate additional Green Belt land for at least **2,243 dwellings**, based on a requirement of 570 dpa (and **868 dwellings** if the 486 dpa figure is pursued).
- 6.45 It is pertinent that this figure includes some headroom to allow for under-delivery, however this is only applied (at a rate of 20%) to the Green Belt element of the supply, which only represents 1/3 of the total supply. However, such a buffer is equally applicable across the total supply to allow for under delivery but also to provide a range and choice of sites for development, as advocated by the NPPF.
- 6.46 If a 20% buffer was sought across the total supply, then this would require additional land for 3,204 dwellings; whilst a 10% buffer would equate to 2,365 dwellings.
- 6.47 Even if the Council's own supply and requirement figures are used then there will be a surplus supply of just 361 dwellings, equating to just 4.98% of the total, which leaves minimal flexibility. In this case a 20% buffer would require land for an additional 1,088 units; whilst 10% would require 364 units.

Figure 6.2 – Total Housing Supply 2016-2035

| | Requirements | Council claimed position | Council's reqt with Peg supply and methodology | Pegasus position |
|---|--|--------------------------|--|------------------|
| a | St.Helens housing requirement (19 years from 1st April 2016 to 31st March 2035) at average of 486 dpa / 570 dpa | 9,234 | 9,234 | 10,380 |
| b | Expected completions by 1st April 2020 | 1,989 | 1,989 | 1,989 |
| c | Residual requirement over Local Plan period from 1st Apr 2020 to 31st March 2035 | 7,245 | 7,245 | 8,391 |
| d | Anticipated supply | | | |
| e | Total SHLAA supply– 1st April 2017 until 31st March 2035/ From Pegasus Trajectory | 7,817 | 6,378 | 6,378 |
| | ... consisting of: | | | |
| f | Large sites (0.25ha or 5 units and above) - planning permission not started as of 1st April 2017 | 1,581 | n/a | n/a |
| g | Large sites with planning permission under construction as of 1st April 2017 | 654 | n/a | n/a |
| h | Large sites with planning permission but stalled as of 1st April 2017 | 289 | n/a | n/a |
| i | Large sites - no planning permission as of 1st April 2017 in Local Plan/ in 2017 SHLAA | 4,107 | 3,763 | 3,763 |
| j | Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowance) | 1,395 | 475 | 475 |
| k | Estimated SHLAA supply – 1st April 2020 until 31st March 2035/ calculated from From Pegasus Trajectory | 6,344 | 5,060 | 5,060 |
| l | SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18)/ 5% off overall plan | 794 | 253 | 253 |
| m | Residual SHLAA capacity over 15 year Plan period (1st Apr 2020 - 31st March 2035) | 5,550 | 4,807 | 4,807 |
| n | Required capacity to be found on Green Belt land | 1,695 | 2,438 | 3,584 |
| o | Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (site allocations 5HA to 15HA inclusive) (to allow for contingencies e.g., infrastructure provision, delays, lead-in times, to start of housing delivery etc.) | 2,034 | 2,926 | 4,301 |
| p | Total capacity of allocated sites removed from the Green Belt (sites 1, 2, 4, 5, 7 and 8 HA) (1st April 2020- 31st March 35) Counting up table 4.7 equates to 2,058 | 2,056 | 2,058 | 2,058 |
| q | Total supply over plan period | 7,606 | 6,865 | 6,865 |
| | Total headroom % on residual requirement | 4.98% | -5.24% | -18.19% |
| | Total headroom numbers on residual requirement | 361 | n/a | n/a |
| | Additional allocations required to meet requirement (with GB headroom) | n/a | 868 | 2,243 |
| | Additional requirement to give overall 10% headroom | 364 | 1,105 | 2,365 |
| | Additional requirement to give overall 20% headroom | 1,088 | 1,829 | 3,204 |

Housing Delivery Test

- 6.48 The first round of Housing Delivery Test (HDT) results were issued in February 2019, which applies a standardised approach to housing delivery over the preceding 3-year period for all the Local Authorities across the country (in line with the HDT Measurement Rulebook and paragraphs 73-75 of the NPPF).
- 6.49 The resultant percentage figure is used to confirm which buffer should be applied in the five-year supply calculation (5% if delivery is above 85% and 20% if below). In addition, if delivery has dropped below 95% the Council are required to prepare an Action Plan to assess the causes of under-delivery and identify actions to increase delivery in future years. Finally, if delivery is below 25% (in the current 2018 results but increasing to 45% in 2019 and 75% in November 2020 under transitional arrangements), then the tilted balance in relation to the presumption in favour of sustainable development is engaged.
- 6.50 In the case of St Helens this suggests a figure of 98% meaning that the 5% buffer is applicable, and an action plan is not required.

Figure 6.3 – Housing Delivery Test

| | 2019 HDT completions | 2019 HDT requirement | Local Plan Requirement | Delivery against HDT requirement | Delivery against Local Plan Requirement |
|--------------------|----------------------|----------------------|------------------------|----------------------------------|---|
| 2015/2016 | 575 | 532 | 570 | 43 | 5 |
| 2016/2017 | 487 | 518 | 570 | -31 | -83 |
| 2017/2018 | 411 | 454 | 570 | -43 | -159 |
| TOTAL | 1,473 | 1,504 | 1,710 | -31 | -237 |
| Average dpa/ HDT % | 491 | 501 | | 97.94% | 87.95% |

| | | | |
|---|-------|-------------------------------|--------|
| Shortfall (pre 2015) | 1,805 | | |
| 5 year requirement | 2,850 | | |
| 5 year requirement + shortfall | 4,655 | | |
| Shortfall required in 3 years (3/5ths of total) | 2,793 | against real reqt w/shortfall | 52.74% |

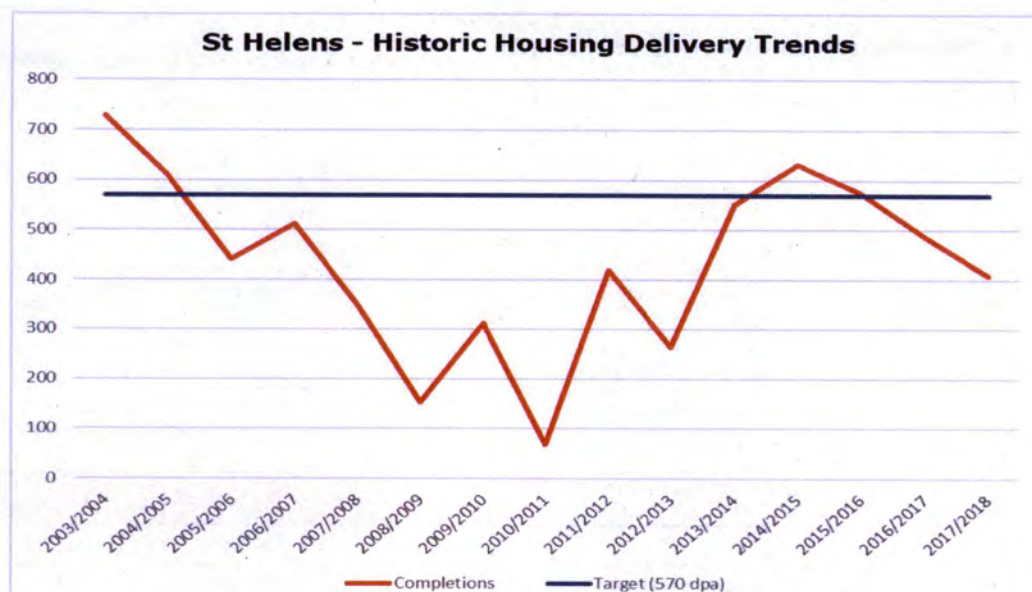
- 6.51 As can be seen from the table, St Helens delivered 1,473 new homes over the last three years against a 'requirement' of 1,504 dwellings; although it is pertinent that this requirement is based on the household projections (under transitional arrangements in the first 3 years of the HDT process) and is therefore artificially low, as the local plan requirement over the same period is 1,710 (206 higher). If delivery is considered against the adopted plan requirement the HDT figure drops to 88%.

- 6.52 Furthermore, it must be stressed that the household projections do not reflect the level of housing that should have actually been delivered over the last three years in St Helens and does not take account of any historic under delivery, which is an issue in St Helens. Whilst the HDT and standard methodology effectively resets the clock and clears past under delivery, the NPPG does confirm (at paragraph 2a-011-20190220) that where an alternative approach to the standard method is used, as it is in St Helens, past under delivery should be taken into account.
- 6.53 In the case of St Helens, a review of figures 6.3 and 6.4 below confirms there has been major under-delivery within St Helens dating back to 2003, when the RSS period began and the 570 dpa requirement figure was introduced, generating a total shortfall of 1,805 dwellings at 1st April 2015 (when the current HDT period begins).

Figure 6.4 – Historic Completions

| | Live Table 122 Net Completions | Local Plan Requirement | Mixed Local Plan Requirement | Delivery against Local Plan Requirement | Delivery against Mixed Local Plan Requirement |
|-------------|--------------------------------------|---------------------------|------------------------------------|--|---|
| 2003/2004 | 728 | 570 | 570 | 158 | 158 |
| 2004/2005 | 607 | 570 | 570 | 37 | 37 |
| 2005/2006 | 442 | 570 | 570 | -128 | -128 |
| 2006/2007 | 512 | 570 | 570 | -58 | -58 |
| 2007/2008 | 348 | 570 | 570 | -222 | -222 |
| 2008/2009 | 152 | 570 | 570 | -418 | -418 |
| 2009/2010 | 311 | 570 | 570 | -259 | -259 |
| 2010/2011 | 69 | 570 | 570 | -501 | -501 |
| 2011/2012 | 419 | 570 | 570 | -151 | -151 |
| 2012/2013 | 264 | 570 | 570 | -306 | -306 |
| 2013/2014 | 551 | 570 | 570 | -19 | -19 |
| 2014/2015 | 632 | 570 | 570 | 62 | 62 |
| 2015/2016 | 575 | 570 | 570 | 5 | 5 |
| 2016/2017 | 487 | 570 | 486 | -83 | 1 |
| 2017/2018 | 408 | 570 | 486 | -162 | -78 |
| TOTAL | 6,505 | 8,550 | | -2,045 | -1,877 |
| Average dpa | 434 | 570 | | -136 | -125 |

Figure 6.5 – Historic Housing Delivery Rates



Delivery figures from MCHLG Net Additions by Local Authority District Live Table 122

- 6.54 This meant that the actual annualised requirement the Council should have achieved from 1st April 2015 to 31st March 2020 was 931 dwellings per annum (i.e. $1,805 / 5 = 361 + 570 = 931$), which equates to **2,793 dwellings** over the 3-year period to 31st March 2018.
- 6.55 When considered against this elevated requirement, the 1,473 completions look less impressive and represents just **52%** of the requirement.
- 6.56 Notwithstanding this, the result of the HDT confirms that the 5% buffer is applicable when calculating 5YHLS in St Helens.

Five Year Housing Land Supply

- 6.57 The Council do not confirm their 5-year housing land supply position within the Submission Plan, yet their 2017 SHLAA concludes the following in Figures 45.4 and 5.5:
- Based on the 570 dpa Core Strategy requirement, the Council claim a **2.7 year supply**.
 - Based on an OAN figure of 451 dpa, they claim a figure of **5.3 year supply**.
- 6.58 Clearly the position has moved on since the 2017 SHLAA, indeed a 2018 base date can now be used to calculate supply, as can the Council's proposed requirement figure of 486 (albeit we are still advocating the use of the 570 dpa figure).
- 6.59 Accordingly, we set out our analysis of the Council's 5YHLS position below, using various different scenarios for both the requirement and supply side inputs to give a range of figures.

Figure 6.6 – Five Year Housing Land Supply

| 5 YEAR HOUSING LAND SUPPLY (1ST APRIL 2018 BASE DATE) | Council's Requirement | | Pegasus Requirement | |
|---|-----------------------|-------|---------------------|-------|
| Annual requirement | 486 | | 570 | |
| 5 year requirement | 2,430 | | 2,850 | |
| Shortfall (plan period/ 2016-2018) | 77 | | 245 | |
| Shortfall (historic/ 2003-2018) | 1,877 | | 2,045 | |
| Buffer | 5% | 20% | 5% | 20% |
| Total requirement (no shortfall) | 2,552 | 2,916 | | |
| Total requirement (with plan period shortfall) | 2,632 | 3,008 | 3,073 | 3,512 |
| Total requirement (with historic shortfall) | 4,522 | 5,168 | 4,963 | 5,672 |
| Council Claimed Supply | 2,726 | | | |
| Pegasus Supply (10% discount applied to Peg trajectory) | 2,816 | | | |
| Council 5YHLS (no shortfall) | 5.34 | 4.67 | | |
| Council 5YHLS (with plan period shortfall) | 5.18 | 4.53 | 4.43 | 3.88 |
| Council 5YHLS (with historic shortfall) | 3.01 | 2.64 | 2.75 | 2.40 |
| Pegasus 5YHLS (with plan period shortfall) | 5.35 | 4.68 | 4.58 | 4.01 |
| Pegasus 5YHLS (with historic shortfall) | 3.11 | 2.72 | 2.84 | 2.48 |

- 6.60 We conclude that the Council's supply is **2.84** or **4.58 years** depending whether shortfall is considered over the long-term (2003 onwards) or shorter term (2016 onwards), using the 570 dpa requirement and the 5% buffer as required by the HDT.
- 6.61 Within that it is pertinent to note that we have not applied a lapse rate for non-delivery as we have to the full supply figures. This is because we have been through on a site by site basis and therefore wanted to avoid double counting; however given the limited evidence on delivery rates presented by the Council it is highly likely that there will be additional slippage, particularly on sites that are already under construction or that have consent and are due to start on site within years 1-5, where we have accepted the Council's projections.
- 6.62 By way of comparison, using the Council's own supply figures and 486 requirement puts them between 3.01 and 5.18 years (with the same approach to shortfall), and with the 570 requirement between 2.75 and 4.43 years.
- 6.63 This combination of historic under-delivery and the 5-year supply shortfall (which it accentuates) provides further support for releasing additional sites now, on top of the Green Belt sites already proposed for allocation, to aid delivery in the first five years of the plan. This should also negate the need for an early review, or the risk of taking a plan to examination without a deliverable 5-year supply.
- 6.64 In short there are acute housing supply issues in the area that should be addressed at the earliest opportunity.

Conclusions on Housing Land Supply

- 6.65 Overall, this supply analysis suggests the Council will need to allocate additional Green Belt land for at least **2,243 dwellings** to meet shortfall within the first 5 years and across the full plan period.
- 6.66 Whilst housing delivery in recent years has been relatively strong, reflected in the 98% performance within the Housing Delivery Test, this masks acute under-delivery in the years before that, dating back to 2003.

APPENDIX 8- **COUNCIL'S HOUSING TRAJECTORY**

ST HELENS HOUSING SUPPLY - COUNCIL's TRAJECTORY (COMPOSITE OF SHLAA APPENDIX 5 AND LOCAL PLAN TABLE 4.7)

2017 SHLAA Appendix 5: Development Trajectory

| Ref | Site Name | Post code | Ward | Land Type | Size | Density | Type of site | Site Status | Site capacity | Units completed | Outstanding capacity | 2017/ 18 | 2018/ 19 | 2019/ 20 | 2020 /21 | 2021/ 22 | 2022/ 23 | 2023/ 24 | 2024/ 25 | 2025/ 26 | 2026/ 27 | 2027/ 28 | 2028/ 29 | 2029/ 30 | 2030/ 31 | 2031/ 32 | 2032/33 | 2033/34 | 2034/ 35 | 0-5 yrs | 6-10 yrs | 11-15 yrs | 15+ | Beyond Plan period |
|----------|---|-----------|--------------------------|------------|-------|---------|--------------|-------------|---------------|-----------------|----------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|---------|---------|----------|---------|----------|-----------|-----|--------------------|
| 1 | Land rear of 1-27 Station Road | WA11 0GU | Haydock | Greenfield | 0.4 | 30.00 | SHLAA_20 17 | | 12 | 0 | 12 | 0 | 0 | 10 | 2 | 0 | | | | | | | | | | | | | | 12 | 0 | 0 | 0 | |
| 3 | Land rear of 14 to 20 Weymouth Avenue | WA9 3QY | Parr | Brownfield | 0.36 | 38.89 | SHLAA_20 17 | | 14 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 14 | 0 | 0 | |
| 4 | Land Between 8 & 34 Portland Way and 161 & 123 Berry's Lane | WA9 3QZ | Parr | Brownfield | 0.28 | 39.29 | SHLAA_20 17 | | 11 | 0 | 11 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 11 | 0 | 0 | |
| 5 | Land Between Weymouth Avenue & Berry's Lane | WA9 3QT | Parr | Brownfield | 0.52 | 34.62 | SHLAA_20 17 | | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 18 | 0 | 0 | |
| 7 | Land at Park Road | WA9 1ER | Town Centre | Brownfield | 0.78 | 35.90 | SHLAA_20 17 | | 28 | 0 | 28 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 28 | 0 | 0 | |
| 9 (10HA) | Moss Nook Urban Village, Watery Lane | WA9 3EN | Town Centre | Brownfield | 26.74 | 29.99 | SHLAA_20 17 | | 802 | 0 | 802 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 401 | 401 | 0 | |
| 10 | Land at junction of Sunbury Street and Fir Street | WA10 3RA | Thatto Heath | Brownfield | 0.82 | 39.02 | SHLAA_20 17 | | 32 | 0 | 32 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 32 | 0 | 0 | |
| 13 | Land rear of Carnegie Crescent and Goodban Street | WA9 3LX | Parr | Brownfield | 0.26 | 26.92 | SHLAA_20 17 | | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 7 | 0 | 0 | |
| 18 | Land at Somerset Street and Sussex Grove | WA9 1QN | Parr | Brownfield | 2.21 | 29.86 | SHLAA_20 17 | | 66 | 0 | 66 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 66 | 0 | 0 | |
| 19 | Leyland Green Road | WN4 0OQ | Billinge & Seneley Green | Greenfield | 0.53 | 13.21 | SHLAA_20 17 | | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 7 | 0 | 0 | |
| 21 | Land at Holly Bank Street | WA9 1EH | Town Centre | PDL/GF | 1.28 | 26.56 | SHLAA_20 17 | | 34 | 0 | 34 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 34 | 0 | 0 | |
| 22 | Land at corner of Fairclough Street and Wargrave Road | WA12 9QU | Earlestown | Brownfield | 0.41 | 34.15 | SHLAA_20 17 | | 14 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 14 | 0 | 0 | |
| 23 | Liverpool Arms and former Sacred Heart RC Church and School, Borough Road | WA10 3SX | Town Centre | Brownfield | 0.83 | 34.94 | SHLAA_20 17 | | 29 | 0 | 29 | 0 | 0 | 29 | 0 | 0 | | | | | | | | | | | | | | 29 | 0 | 0 | 0 | |
| 25 | Alexandra Park- Former Pilkington HQ | WA10 3TP | West Park | Brownfield | 10.8 | 15.00 | SHLAA_20 17 | | 162 | 0 | 162 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 162 | 0 | 0 | |
| 27 | Former Bethel Mission Bowling Green, Marsden Avenue | WA10 4JL | West Park | Greenfield | 0.27 | 37.04 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 10 | 0 | 0 | |
| 31 | Former Sutton Arms PH, Elephant Lane | WA9 5HH | Thatto Heath | Brownfield | 0.35 | 51.43 | SHLAA_20 17 | | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 18 | 0 | 0 | |
| 36 | Land & Premises at Lords Fold | WA11 8HN | Rainford | Brownfield | 2.01 | 22.39 | SHLAA_20 17 | | 45 | 0 | 45 | 0 | 0 | 10 | 20 | 15 | | | | | | | | | | | | | | 45 | 0 | 0 | 0 | |
| 38 (9Ha) | Land north of Elton Head Road | WA9 5GN | Thatto Heath | Brownfield | 12.5 | 30.00 | SHLAA_20 17 | | 375 | 0 | 375 | 0 | 0 | 22 | 45 | 45 | | | | | | | | | | | | | | 112 | 225 | 38 | 0 | |
| 58 | Former Central Works, Church Road | WA11 0GT | Haydock | Brownfield | 1.35 | 35.56 | SHLAA_20 17 | | 48 | 0 | 48 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 48 | 0 | 0 | |
| 59 | Site of former 56-120 Eccleston Street | WA10 2PN | Town Centre | Brownfield | 0.33 | 39.39 | SHLAA_20 17 | | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 13 | 0 | 0 | |
| 60 | Vacant land adjacent to Rail Line, Elephant Lane | WA9 5RR | Thatto Heath | PDL/GF | 4.33 | 25.87 | SHLAA_20 17 | | 112 | 0 | 112 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 112 | 0 | 0 | |
| 61 | Land North and South of Corporation Street | WA9 1JU | Town Centre | Brownfield | 3.23 | 52.32 | SHLAA_20 17 | | 169 | 0 | 169 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 169 | 0 | 0 | |
| 63 | Land at Waterdale Crescent | WA9 3PG | Sutton | PDL/GF | 0.26 | 38.46 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 10 | 0 | 0 | |
| 64 | BT Depot, Sutton Road | WA9 3DZ | Town Centre | Brownfield | 1.02 | 35.29 | SHLAA_20 17 | | 36 | 0 | 36 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 0 | 36 | 0 | |
| 65 | Former Pumping Station, Sutton Road | WA9 3EW | Town Centre | Brownfield | 0.27 | 37.04 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 10 | 0 | 0 | |
| 66 | Land off Wargrave Road | WA12 8RW | Newton | PDL/GF | 0.3 | 23.33 | SHLAA_20 17 | | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 7 | 0 | 0 | |
| 69 | Site of former Parr Community High School, Fleet Lane | WA9 1ST | Parr | Brownfield | 1.52 | 35.53 | SHLAA_20 17 | | 54 | 0 | 54 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 54 | 0 | 0 | |
| 72 | Site of former St.Marks Primary School, Willow Tree Avenue | WA9 4LZ | Sutton | Brownfield | 0.51 | 35.29 | SHLAA_20 17 | | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 18 | 0 | 0 | |
| 74 | Site of former 119-133 Crow Lane West | WA12 9YN | Earlestown | Brownfield | 0.3 | 30.00 | SHLAA_20 17 | | 9 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 0 | 9 | 0 | |
| 75 | Christ Church Parish Hall, Chapel Lane | WA10 5DA | Eccleston | Brownfield | 0.36 | 27.78 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 0 | 10 | 0 | |
| 78 | Former St.Helens Glass, Corporation Street | WA10 1GF | Town Centre | Brownfield | 2.07 | 71.98 | SHLAA_20 17 | | 149 | 0 | 149 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 149 | 0 | 0 | |

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------|--|----------|--------------|------------|-------|-------|---|----|-----|----|-----|----|----|----|----|----|--|--|--|--|--|--|--|--|--|-----|-----|-----|-----|-----|
| 82 | Land adjacent Laffak Road and Carr Mill Road | WA11 9LG | Moss Bank | PDL/GF | 3.31 | 29.91 | SHLAA_20 17 | | 99 | 0 | 99 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 99 | 0 | 0 | |
| 84 | Land adjacent Church of Christ, Heather Brae | WA12 9DH | Earlestown | Greenfield | 0.3 | 30.00 | SHLAA_20 17 | | 9 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 9 | 0 | 0 | |
| 85 | Site of former Our Lady's Primary School, Fleet Lane | WA9 2RL | Parr | Brownfield | 0.61 | 34.43 | SHLAA_20 17 | | 21 | 0 | 21 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 21 | 0 | 0 | |
| 87 | Land west of Vista Road | WA11 0RW | Haydock | Greenfield | 1.24 | 26.61 | SHLAA_20 17 | | 33 | 0 | 33 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 33 | 0 | |
| 89 | Land rear of 64-94 Marshalls Cross Road | WA9 5AJ | Town Centre | Greenfield | 0.96 | 12.50 | SHLAA_20 17 | | 12 | 0 | 12 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 12 | 0 | 0 | |
| 90 | Land to the West of Common Road | WA12 9JA | Earlestown | Greenfield | 5.44 | 26.10 | SHLAA_20 17 | | 142 | 0 | 142 | 0 | 22 | 45 | 45 | 30 | | | | | | | | | | 142 | 0 | 0 | 0 | |
| 91 | Milton Street | WA9 4BQ | Bold | Greenfield | 1.27 | 19.69 | SHLAA_20 17 | | 25 | 0 | 25 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 25 | 0 | 0 | |
| 95 | Site of former Carr Mill Infants School, Ulswater Ave | WA11 7PT | Moss Bank | PDL/GF | 1.49 | 35.57 | SHLAA_20 17 | | 53 | 0 | 53 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 53 | 0 | 0 | |
| 96 | Land rear of 350 Warrington Road | L35 9JL | Rainhill | Greenfield | 0.39 | 28.21 | SHLAA_20 17 | | 11 | 0 | 11 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 11 | 0 | |
| 102 | Auto Safety Centre, Vicarage Road | WA11 0UJ | Blackbrook | Brownfield | 0.31 | 29.03 | SHLAA_20 17 | | 9 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 9 | 0 | 0 | |
| 103 | Land rear of 39-67 Valentine Road | WA12 9LF | Earlestown | PDL/GF | 0.46 | 21.74 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 10 | 0 | 0 | |
| 106 | Site of former 126-154 Birchley Street and 107- 125 Brynn Street | WA10 1HZ | Town Centre | Brownfield | 0.25 | 40.00 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 10 | 0 | 0 | |
| 109 | Land adjacent Piele Road | WA11 0PE | Haydock | PDL/GF | 0.61 | 21.31 | SHLAA_20 17 | | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 13 | 0 | 0 | |
| 111 (6HA) | Land east of City Road, Cowley Hill | WA10 1TY | Moss Bank | Brownfield | 47.09 | 17.26 | SHLAA_20 17 | | 813 | 0 | 813 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 180 | 225 | 132 | 276 |
| 112 | Land to the rear of Juddfield Street | WA11 0AZ | Blackbrook | Brownfield | 1.14 | 35.96 | SHLAA_20 17 | | 41 | 0 | 41 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 41 | 0 | |
| 113 | Land at Willow Tree Avenue | WA9 4NU | Sutton | Greenfield | 3.5 | 14.29 | SHLAA_20 17 | | 50 | 0 | 50 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 50 | 0 | |
| 114 | Land at 19 and 25 Sutton Moss Road | WA9 3HU | Parr | PDL/GF | 0.54 | 25.93 | SHLAA_20 17 | | 14 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 14 | 0 | |
| 126 | Former Halton and St Helens PCT HQ, Cowley Hill | WA10 2UE | Windle | Brownfield | 0.89 | 35.96 | SHLAA_20 17 | | 32 | 0 | 32 | 0 | 0 | 10 | 20 | 2 | | | | | | | | | | 32 | 0 | 0 | 0 | |
| 129 | Derbyshire Hill Family Centre, Derbyshire Hill Road | WA9 2LN | Parr | PDL/GF | 0.32 | 37.50 | SHLAA_20 17 | | 12 | 0 | 12 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 12 | 0 | |
| 133 | Land rear of 2-24 Massey Street | WA9 3NL | Town Centre | PDL/GF | 0.35 | 40.00 | SHLAA_20 17 | | 14 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 14 | 0 | |
| 134 | Land at Littler Road | WA11 0JP | Blackbrook | Greenfield | 0.52 | 21.15 | SHLAA_20 17 | | 11 | 0 | 11 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 11 | 0 | 0 | |
| 135 | Land at Newby Place | WA11 7BZ | Moss Bank | Greenfield | 0.34 | 38.24 | SHLAA_20 17 | | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 13 | 0 | 0 | |
| 150 | Former Red Quarry, Chester Lane | WA9 4DA | Bold | Brownfield | 1.93 | 29.53 | SHLAA_20 17 | | 57 | 0 | 57 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 57 | 0 | 0 | |
| 151 | Land adjacent St.Helens Hospital, Marshalls Cross Road | WA9 3BY | Town Centre | Brownfield | 1.65 | 35.76 | SHLAA_20 17 | | 59 | 0 | 59 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 59 | 0 | |
| 152 | Sidac Sports & Social Club, Applecorn Close | WA9 4NT | Sutton | PDL/GF | 3.65 | 37.53 | SHLAA_20 17 | | 137 | 0 | 137 | 0 | 0 | 22 | 45 | 45 | | | | | | | | | | 112 | 25 | 0 | 0 | |
| 154 | College Street Northern Gateway | WA10 1HT | Town Centre | Brownfield | 2.88 | 35.76 | SHLAA_20 17 | | 103 | 0 | 103 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 103 | 0 | 0 | |
| 155 | Land south of Knowsley Road | | West Park | Brownfield | 0.42 | 42.86 | SHLAA_20 17 | | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 18 | 0 | 0 | |
| 156 | Land south of Crab Street | WA10 2JN | Town Centre | Brownfield | 1.26 | 16.67 | SHLAA_20 17 | | 21 | 0 | 21 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 21 | 0 | |
| HL526 | Former Broad Oak Social Club and land rear of 1- 21 Seath Avenue | WA9 1SH | Parr | PDL/GF | 0.97 | 21.65 | Planning permission: not started | NS | 21 | 0 | 21 | 0 | 0 | 20 | 1 | 0 | | | | | | | | | | 21 | 0 | 0 | 0 | |
| HL496 | Land at Elton Head Road, Lea Green | WA9 5AU | Thatto Heath | Greenfield | 6.2 | 29.03 | Planning permission: not started | NS | 180 | 0 | 180 | 0 | 0 | 45 | 45 | 45 | | | | | | | | | | 135 | 45 | 0 | 0 | |
| NT03 | Land to side and rear of 41-49 Old Wargrave Road | WA12 8NG | Newton | Brownfield | 0.61 | 98.36 | Planning permission: not started | NS | 60 | 0 | 60 | 0 | 15 | 30 | 15 | 0 | | | | | | | | | | 60 | 0 | 0 | 0 | |
| HL417 | Sherdley Remec Ltd Gorsey Lane Clock Face | WA9 4SE | Bold | Brownfield | 0.93 | 20.43 | Planning permission: under construction | UC | 19 | 5 | 14 | 14 | 0 | 0 | 0 | 0 | | | | | | | | | | 14 | 0 | 0 | 0 | |
| HL557 | Land north of Edward Street | WA9 3DP | Town Centre | Brownfield | 1.21 | 42.98 | Planning permission: not started | NS | 52 | 0 | 52 | 0 | 15 | 30 | 7 | 0 | | | | | | | | | | 52 | 0 | 0 | 0 | |
| HL483 | lbstocks, Chester Lane | WA9 4EN | Bold | Brownfield | 9 | 28.89 | Planning permission: not started | NS | 260 | 0 | 260 | 0 | 0 | 10 | 20 | 20 | | | | | | | | | | 50 | 210 | 0 | 0 | |
| HL430 | Land at Delta Road | WA9 2EA | Parr | PDL/GF | 1.34 | 38.81 | Planning permission: under construction | UC | 52 | 14 | 38 | 30 | 8 | 0 | 0 | 0 | | | | | | | | | | 38 | 0 | 0 | 0 | |
| HL555 | Viridor Glass Recycling, Lancots Lane | WA9 3GL | Town Centre | Brownfield | 1.76 | 30.11 | Planning permission: not started | NS | 53 | 0 | 53 | 0 | 15 | 30 | 8 | 0 | | | | | | | | | | 53 | 0 | 0 | 0 | |
| HL532 | Land At Rear Of 46 Windle Hall Drive | WA10 6QQ | Windle | Greenfield | 0.43 | 20.93 | Planning permission: under construction | UC | 9 | 0 | 9 | 9 | 0 | 0 | 0 | 0 | | | | | | | | | | 9 | 0 | 0 | 0 | |
| HL488 | Saxon Court Keswick Road | WA10 2AT | Windle | PDL | 0.42 | 14.29 | Planning permission: under construction | UC | 6 | 0 | 6 | 6 | 0 | 0 | 0 | 0 | | | | | | | | | | 6 | 0 | 0 | 0 | |

APPENDIX 9 - PEGASUS HOUSING TRAJECTORY

ST HELENS HOUSING SUPPLY - PEGASUS BEST CASE SCENARIO

2017 SHLAA Appendix 5: Development Trajectory

| Ref | Site Name | Post code | Ward | Land Type | Size | Density | Type of site | Status/ Planning Reference | Permissions/ (expiry if applicable) | Site Status | Number of Conditions | Comments | Site capacity | Units completed | Outstanding capacity | 2017/ 18 | 2018/ 19 | 2019/ 20 | 2020/ 21 | 2021/ 22 | 2022/ 23 | 2023/ 24 | 2024/ 25 | 2025/ 26 | 2026/ 27 | 2027/ 28 | 2028/ 29 | 2029/ 30 | 2030/ 31 | 2031/ 32 | 2032/33 | 2033/34 | 2034/ 35 | 0-5 yrs | 6-10 yrs | 11-15 yrs | 15-18 | Beyond 2035 | total in plan period | | | | | | |
|----------|---|-----------|--------------------------|------------|-------|---------|--------------|----------------------------|-------------------------------------|-------------|----------------------|--|---------------|-----------------|----------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|---------|---------|----------|---------|----------|-----------|-------|-------------|----------------------|-----|-----|----|-----|---|----|
| 1 | Land rear of 1-27 Station Road | WA11 0GU | Haydock | Greenfield | 0.4 | 30.00 | SHLAA_20 17 | PRE/2018/0238/PREC | | NS | | looks like there has been pre-app on this so assume it will come forward | 12 | 0 | 12 | 0 | 0 | 10 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 12 | 0 | 0 | 0 | 0 | 12 | | | | | |
| 3 | Land rear of 14 to 20 Weymouth Avenue | WA9 3QY | Parr | Brownfield | 0.36 | 144.44 | SHLAA_20 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Land Between 8 & 34 Portland Way and 161 & 123 Berry's Lane | WA9 3QZ | Parr | Brownfield | 0.28 | 0.00 | SHLAA_20 17 | P/2016/0923/FUL | 06/10/2017 | UC | | Has full PP former cleared housing site - Gleeson Homes have consent for 52 dwellings and discharged several conditions early 2018. Site is called 'Berry Mead' and has website. Assume start on site 2019/20 30 per year, but 15 for 15/20 half year | 52 | 0 | 52 | 0 | 0 | 15 | 30 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 52 | 0 | 0 | 0 | 0 | 52 | | |
| 5 | Land Between Weymouth Avenue & Berry's Lane | WA9 3QT | Parr | Brownfield | 0.52 | 0.00 | SHLAA_20 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Land at Park Road | WA9 1ER | Town Centre | Brownfield | 0.78 | 33.33 | SHLAA_20 17 | P/2017/0672/FUL | 04/12/2017 | UC | | Torus Kier scheme - full permission for 20 house and 6 appts - approved December 2017 some conditions discharged July 2018 | 26 | 0 | 26 | 0 | 0 | 15 | 11 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 26 | 0 | 0 | 0 | 0 | 26 | | | | |
| 9 [20H4] | Moss Nook Urban Village, Watery Lane | WA9 3EN | Town Centre | Brownfield | 26.74 | 29.99 | SHLAA_20 17 | | | | | First identified in December 2016 Preferred Options as a SHLAA site. 9.2 year lead in (3.9 + 5.3) | 802 | 0 | 802 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 11 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 0 | 79 | 340 | 204 | 179 | 623 | 802 | | | | |
| 10 | Land at junction of Sunbury Street and Fir Street | WA10 3RA | Thurso Heath | Brownfield | 0.82 | 39.02 | SHLAA_20 17 | N/A | | NS | | November 2004 consent for 5 units. Potential viability concerns as no recent applications. Start at year 6 as per SHLAA, which is now 2023/24 | 32 | 0 | 32 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 17 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 32 | 0 | 0 | 0 | 0 | 32 | | | | |
| 13 | Land rear of Carnegie Crescent and Goodban Street | WA9 3LX | Parr | Brownfield | 0.26 | 26.92 | SHLAA_20 17 | N/A | | NS | | Cleared former Helena Homes ownership according to SHLAA and intention to still develop but no consent. Start in year 6 as per SHLAA (now 23/24) | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 7 | | | | | |
| 18 | Land at Somerset Street and Sussex Grove | WA9 1QN | Parr | Brownfield | 2.21 | 29.86 | SHLAA_20 17 | N/A | | NS | | Cleared former housing site, applications from 2004 and 2007 for up to 86 units/ Helena Homes ownership and intention to still develop. Potential viability issues. Start in year 6 as per SHLAA (now 23/24) | 66 | 0 | 66 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 66 | 0 | 0 | 0 | 0 | 66 | | | |
| 19 | Leyland Green Road | WN4 0QJ | Billings & Seneley Green | Greenfield | 0.53 | 13.21 | SHLAA_20 17 | P/2001/1117 | 04/03/2007 | NS | | Expired consent from 2002, looks to be flood risk, has land undeveloped for 17 years, steep slope. Otherwise start in year 6 as per SHLAA (now 23/24) | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 7 | | | | |
| 21 | Land at Holly Bank Street | WA9 1EH | Town Centre | POL/GF | 1.28 | 51.56 | SHLAA_20 17 | P/2017/0674/FUL | 06/02/2018 | NS | | Full planning permission for 66 units granted in Feb. 2018. Torus/ Kier scheme. No DOCS yet, but presume will start next year 2020/21 | 66 | 0 | 66 | 0 | 0 | 0 | 15 | 30 | 21 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 45 | 21 | 0 | 0 | 0 | 66 | | | | |
| 22 | Land at corner of Fairclough Street and Wargrave Road | WA12 9QU | Earlestown | Brownfield | 0.41 | 34.15 | SHLAA_20 17 | P/2005/0996 | 26/02/2011 | NS | | SHLAA notes. Ownership issues which freeholder is attempting to resolve. Historic consent from 2008 for 62 apartments. Start in year 6 (23/24) | 14 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 14 | 0 | 0 | 0 | 0 | 14 | | | |
| 23 | Liverpool Arms and former Sacred Heart RC Church and School, Borough Road | WA10 3SK | Town Centre | Brownfield | 0.83 | 34.94 | SHLAA_20 17 | P/2005/1033 | 15/01/2011 | NS | | old pub and nursery site, demolished in 2017. Full application in 2005 for 130 apartments but expired in 2011. No further apps. Some ownership issues but EVA suggests it is viable. Start in year 6 (23/24) | 29 | 0 | 29 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 14 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 29 | 0 | 0 | 0 | 0 | 29 | | |
| 25 | Alexandra Park- Former Pilkington HQ | WA10 3TP | West Park | Brownfield | 10.8 | 15.00 | SHLAA_20 17 | | | NS | | Former Pilkington HQ - being masterplanned but no consent yet. Start in year 6 (23/24) (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year) | 162 | 0 | 162 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 30 | 30 | 30 | 12 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 120 | 42 | 0 | 0 | 162 | | | | | |
| 27 | Former Bethel Mission Bowling Green, Manden Avenue | WA10 4UL | West Park | Greenfield | 0.27 | 37.04 | SHLAA_20 17 | P/2010/0638 | 04/10/2013 | NS | | Expired consent for 16 affordable in 2010 and earlier consent for 12 in 2007. Doesn't look to be any constraints. Start in year 6 (23/24) | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 10 | | | |
| 31 | Former Sutton Arms PH, Elephant Lane | WA9 1HH | Thurso Heath | Brownfield | 0.35 | 51.43 | SHLAA_20 17 | P/2011/0651 | 24/02/2014 | NS | | Fire damaged former pub with expired res consent. Potential viability issues. Start in year 6 | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 18 | 0 | 0 | 0 | 0 | 18 | | | | |
| 36 | Land & Premises at Lords Fold | WA11 8HN | Rainford | Brownfield | 2.01 | 22.39 | SHLAA_20 17 | P/2017/0789 | 23/05/2021 | NS | | Outline application permitted in 2018, further apps submitted, but no RM or DOCS as of yet. Expect a further year to resolve. So 15 dpa starting 2020/21 | 45 | 0 | 45 | 0 | 0 | 0 | 15 | 15 | 15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 15 | 0 | 0 | 0 | 45 | | | |
| 38 [9H4] | Land north of Elton Head Road | WA9 5GN | Thurso Heath | Brownfield | 12.5 | 28.16 | SHLAA_20 17 | P/2018/0060 | 20/06/2021 | NS | 9 | Permission granted June 2018. Project Properties. Hybrid planning application, full for demolition, outline for 352 dwellings. No DOCS or RMs submitted yet. According to Lichfield 4.1 year lead in. July 2022 start (Q2) - have used Council deliver rates considering it has consent | 352 | 0 | 352 | 0 | 0 | 0 | 0 | 0 | 0 | 34 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 352 | | |
| 58 | Former Central Works, Church Road | WA11 0GT | Haydock | Brownfield | 1.35 | 35.56 | SHLAA_20 17 | P/2005/0012 | Expired | NS | | Original consent from 2002, extended in 2005, the demolition of existing buildings and erection of petrol filling station, drive through restaurant, residential development and 1,393 square metre non-food retail unit, and relocation of Conservative Club. No indication on numbers. No ownership or viability issues. We understand it has been sold to Rowland Homes, but there are issues. May rely on adjacent site for access which was safeguarded but has now come out. Start in year 6 (23/24) | 48 | 0 | 48 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 15 | 15 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 48 | 0 | 0 | 0 | 0 | 48 |
| 59 | Site of former 56-120 Eccleston Street | WA10 2PN | Town Centre | Brownfield | 0.33 | 39.39 | SHLAA_20 17 | N/A | | NS | | No ownership or viability issues raised in SHLAA. No application. Start in year 6 | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13 | 0 | 0 | 0 | 0 | 13 | | | | |
| 60 | Vacant land adjacent to Rail Line, Elephant Lane | WA9 5RR | Thurso Heath | POL/GF | 4.33 | 25.87 | SHLAA_20 17 | N/A | | NS | | Council owned, former UDP allocation, noise, access and contamination issues flagged up though. Start in year 6, (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year) | 112 | 0 | 112 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 30 | 22 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 112 | 0 | 0 | 0 | 0 | 112 | | | | |
| 61 | Land North and South of Corporation Street | WA9 1JU | Town Centre | Brownfield | 3.23 | 52.32 | SHLAA_20 17 | N/A | | NS | | Potential Viability Issues with TC apartment schemes, is part of a masterplanned approach. Start in year 6, (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year) | 169 | 0 | 169 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 30 | 30 | 30 | 19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 120 | 49 | 0 | 0 | 169 | | | | | |
| 63 | Land at Watdale Crescent | WA9 3PG | Sutton | POL/GF | 0.26 | 38.46 | SHLAA_20 17 | N/A | | NS | | Potential viability/ market attractiveness issues raised. Start in year 6. | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 10 | | | | |
| 64 | BT Depot, Sutton Road | WA9 3DZ | Town Centre | Brownfield | 1.02 | 0.00 | SHLAA_20 17 | N/A | | NS | | is in use as a donation centre for a hospice. Council have put in as year 11-18 suggesting issues. Apparently has developer interest. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 65 | Former Pumping Station, Sutton Road | WA9 3EW | Town Centre | Brownfield | 0.27 | 37.04 | SHLAA_20 17 | N/A | | NS | | Potential viability issues, is included within Moss Nook Urban Village, as part of Phase 3, we would suggest this moves this to later in the period- year 11 (12 in SHLAA) | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 10 | | | |
| 66 | Land off Wargrave Road | WA12 8RW | Newton | POL/GF | 0.3 | 23.33 | SHLAA_20 17 | N/A | | NS | | Cleared housing site, no consent but know issues. Start in year 6. | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 7 | | | | |
| 69 | Site of former Parr Community High School, Fleet Lane | WA9 1ST | Parr | Brownfield | 1.52 | 35.53 | SHLAA_20 17 | N/A | | NS | | Surplus land from school redevelopment. Developer interest and no know ownership issues. Start in year 6. | 54 | 0 | 54 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 24 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 54 | 0 | 0 | 0 | 0 | 54 | | | |
| 72 | Site of former St.Marks Primary School, Willow Tree Avenue | WA9 4LZ | Sutton | Brownfield | 0.51 | 35.29 | SHLAA_20 17 | N/A | | NS | | SHLAA suggests developer interest and no known issues. Looks to be surplus land from school redevelopment | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 18 | 0 | 0 | 0 | 0 | 18 | | | |
| 74 | Site of former 119-133 Crow Lane West | WA12 9YN | Earlestown | Brownfield | 0.3 | 0.00 | SHLAA_20 17 | N/A | | NS | | Site is in active use as a builders merchant, no indication that it has closed. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| 75 | Christ Church Parish Hall, Chapel Lane | WA10 5DA | Eccleston | Brownfield | 0.36 | 0.00 | SHLAA_20 17 | N/A | | NS | | Site is in active use as a medical centre no indication that it has closed or relocation considered. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| 78 | Former St.Helens Glass, Corporation Street | WA10 1GF | Town Centre | Brownfield | 2.07 | 62.80 | SHLAA_20 17 | P/2017/0634/FUL | 06/11/2017 | NS | | Consent for 130 extra care apartments. They have started discharging conditions | 130 | 0 | 130 | 0 | 0 | 15 | 30 | 30 | 30 | 25 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 75 | 55 | 0 | 0 | 0 | 130 | | | | |
| 82 | Land adjacent Laffak Road and Carr Mill Road | WA11 9LG | Moss Bank | POL/GF | 3.31 | 43.32 | SHLAA_20 17 | P/2019/0036/FUL | | NS | | Live full application in for 150 dwellings (of 57 houses,1 bungalow, and 92 apartments) Assume 1.5 yrs to go through and sort conditions so 2021/2022 start. | 150 | 0 | 150 | 0 | 0 | 0 | 30 | 30 | 30 | 30 | 30 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 60 | 90 | 0 | 0 | 0 | 150 | | | | |
| 84 | Land adjacent Church of Christ, Heather Brae | WA12 9DH | Earlestown | Greenfield | 0.3 | 30.00 | SHLAA_20 17 | N/A | | NS | | Informal open space adjacent to builders yard (site 84). Mixed ownership but generally no issues raised. Start in year 6 | 9 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 9 | 0 | 0 | 0 | 0 | 9 | | | | |
| 85 | Site of former Our Lady's Primary School, Fleet Lane | WA9 2RL | Parr | Brownfield | 0.61 | 85.25 | SHLAA_20 17 | P/2018/0502/FUL | 31/01/2019 | UC | | Surplus land from school redevelopment, no known issues. Application for 52 dwellings approved January 2019 - DOC app has gone in/ MC developments. Start halfway 2019/2020 | 52 | 0 | 52 | 0 | 0 | 15 | 30 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 52 | 0 | 0 | 0 | 0 | 52 | | | |
| 87 | Land west of Vista Road | WA11 0RW | Haydock | Greenfield | 1.24 | 26.61 | SHLAA_20 17 | | | NS | | Council propose for years 11-15 as is in active grazing use, with scrap yard and cement works nearby. Start year 11. | 33 | 0 | 33 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 15 | 3 | | | | 0 | 0 | 33 | 0 | 0 | 33 | | | | | | | |
| 89 | Land rear of 64-94 Marshalls Cross Road | WA9 5AJ | Town Centre | Greenfield | 0.96 | 36.46 | SHLAA_20 17 | PRE/2019/0031/PREC | | NS | | Half site in Flood Zone 3, former overgrown allotments. Previous developer interest- looks like they've had a pre-app early 2019 for 35 units | 35 | 0 | 35 | 0 | 0 | 0 | 15 | 15 | 5 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | | | | | | | |

[illegible]

Small sites/ windfall

Proposed Allocations 2019 Plan (2020-2035 and beyond)

TOTALS (SHLAA + WINDFALLS + ALLOCATIONS)

[illegible]

ST HELENS HOUSING SUPPLY - PEGASUS WORST CASE SCENARIO

2017 SHLAA Appendix 5: Development Trajectory

| Ref | Site Name | Post code | Ward | Land Type | Size | Density | Type of site | Status/ Planning Reference | Permission/ (expiry if applicable) | Site Status | Number of Conditions | Comments | Site capacity | Units completed | Outstanding capacity | 2017/ 18 | 2018/ 19 | 2019/ 20 | 2020/ 21 | 2021/ 22 | 2022/ 23 | 2023/ 24 | 2024/ 25 | 2025/ 26 | 2026/ 27 | 2027/ 28 | 2028/ 29 | 2029/ 30 | 2030/ 31 | 2031/ 32 | 2032/ 33 | 2033/ 34 | 2034/ 35 | 0-5 yrs | 6-10 yrs | 11-15 yrs | 15-18 | Beyond 2035 | total in plan period | | | |
|----------|---|-----------|--------------------------|------------|-------|---------|--------------|----------------------------|------------------------------------|-------------|----------------------|--|---------------|-----------------|----------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|---------|----------|-----------|-------|-------------|----------------------|-----|----|-----|
| 1 | Land rear of 1-27 Station Road | WA11 0GU | Haydock | Greenfield | 0.4 | 30.00 | SHLAA_20 17 | PRE/2018/0238/PREC | | NS | | looks like there has been pre-app on this so assume it will come forward | 12 | 0 | 12 | 0 | 0 | 10 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 12 | 0 | 0 | 0 | 0 | 12 | | | |
| 3 | Land rear of 14 to 30 Weymouth Avenue | WA9 3QY | Parr | Brownfield | 0.36 | 144.44 | SHLAA_20 17 | P/2016/0923/FUL | 06/10/2017 | UC | | Has full PP former cleared housing site - Gleeson Homes have consent for 52 dwellings¹ and discharged several conditions early 2018. Site id called 'Berry Mead' and has website. Assume start on site 2019/20 30 per year, but 15 for 19/20 half year | 52 | 0 | 52 | 0 | 0 | 15 | 30 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 52 | 0 | 0 | 0 | 0 | 52 | | | |
| 4 | Land Between 8 & 34 Portland Way and 161 & 123 Berry's Lane | WA9 3QZ | Parr | Brownfield | 0.28 | 0.00 | SHLAA_20 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Land Between Weymouth Avenue & Berry's Lane | WA9 3QT | Parr | Brownfield | 0.52 | 0.00 | SHLAA_20 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Land at Park Road | WA9 1ER | Town Centre | Brownfield | 0.78 | 33.33 | SHLAA_20 17 | P/2017/0672/FUL | 04/12/2017 | UC | | Torus Kier scheme - Full permission for 20 house and 6 apgts -approved December 2017 some conditions discharged July 2018 | 26 | 0 | 26 | 0 | 0 | 15 | 11 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 26 | 0 | 0 | 0 | 0 | 26 | | | |
| 9 (10Ha) | Moss Nook Urban Village, Watery Lane | WA9 3EN | Town Centre | Brownfield | 26.74 | 29.99 | SHLAA_20 17 | | | | | First identified in December 2016 Preferred Options as a SHLAA site. 9.2 year lead in (3.9 + 5.3) | 802 | 0 | 802 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 11 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 0 | 79 | 340 | 204 | 179 | 623 | | |
| 10 | Land at junction of Sunbury Street and Fir Street | WA10 3RA | Thatto Heath | Brownfield | 0.82 | 0.00 | SHLAA_20 17 | N/A | | NS | | November 2004 consent for 5 units. Potential viability concerns as no recent applications. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 13 | Land rear of Carnegie Crescent and Goodban Street | WA9 3LX | Parr | Brownfield | 0.26 | 26.92 | SHLAA_20 17 | N/A | | NS | | Cleared former Helena Homes ownership according to SHLAA and intention to still develop but no consent. Start in year 6 as per SHLAA (now 23/24) | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 7 | | | |
| 18 | Land at Somerset Street and Sussex Grove | WA9 1QN | Parr | Brownfield | 2.21 | 29.86 | SHLAA_20 17 | N/A | | NS | | Cleared former housing site, applications from 2004 and 2007 for up to 86 units¹ Helena Homes ownership and intention to still develop. Potential viability issues. Start in year 6 as per SHLAA (now 23/24) | 66 | 0 | 66 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 66 | 0 | 0 | 0 | 0 | 66 | | |
| 19 | Leyland Green Road | WN4 0QJ | Billinge & Seneley Green | Greenfield | 0.53 | 0.00 | SHLAA_20 17 | P/2001/1117 | 04/03/2007 | NS | | Expired consent from 2002, looks to be flood risk, has laid undeveloped for 17 years, steep slope. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| 21 | Land at Holly Bank Street | WA9 1EH | Town Centre | PDL/GF | 1.28 | 51.56 | SHLAA_20 17 | P/2017/0674/FUL | 06/02/2018 | NS | | Full planning permission for 66 units granted in Feb 2018. Torus/ Kier scheme. No DOCs yet, but presume will start next year 2020/2021 | 66 | 0 | 66 | 0 | 0 | 0 | 15 | 30 | 21 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 45 | 21 | 0 | 0 | 0 | 66 | | | | |
| 22 | Land at corner of Fairclough Street and Wargrave Road | WA12 9QU | Earlestown | Brownfield | 0.41 | 0.00 | SHLAA_20 17 | P/2005/0996 | 28/02/2011 | NS | | SHLAA notes. Ownership issues which freeholder is attempting to resolve. Historic consent from 2008 for 61 apartments. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| 23 | Liverpool Arms and former Sacred Heart RC Church and School, Borough Road | WA10 3SX | Town Centre | Brownfield | 0.83 | 34.94 | SHLAA_20 17 | P/2005/1033 | 15/01/2011 | NS | | old pub and nursery site, demolished in 2017. Full application in 2005 for 130 apartments but expired in 2011. No further apps. Some ownership issues but EVA suggests it is viable. Start in year 6 (23/24) | 29 | 0 | 29 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 14 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 29 | 0 | 0 | 0 | 0 | 29 | | |
| 25 | Alexandra Park- Former Pilkington HQ | WA10 3TP | West Park | Brownfield | 10.8 | 15.00 | SHLAA_20 17 | | | NS | | Former Pilkington HQ - being masterplanned but no consent yet. Start in year 6 (23/24) (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year) | 162 | 0 | 162 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 30 | 30 | 30 | 12 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 120 | 42 | 0 | 0 | 162 | | | | |
| 27 | Former Bethel Mission Bowling Green, Marsden Avenue | WA10 4JL | West Park | Greenfield | 0.27 | 37.04 | SHLAA_20 17 | P/2010/0638 | 04/10/2013 | NS | | Expired consent for 16 affordable in 2010 and earlier consent for 12 in 2007. Doesn't look to be any constraints. Start in year 6 (23/24) | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 10 | 10 | | | |
| 31 | Former Sutton Arms PH, Elephant Lane | WA9 5HH | Thatto Heath | Brownfield | 0.35 | 0.00 | SHLAA_20 17 | P/2011/0651 | 26/01/2014 | NS | | Fire damaged former pub with expired rent consent. Potential viability issues. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 36 | Land & Premises at Lords Fold | WA11 8HN | Rainford | Brownfield | 2.01 | 22.39 | SHLAA_20 17 | P/2017/0789 | 23/05/2021 | NS | | Outline application permitted in 2018, further apps submitted, but no RM or DOCS as of yet. Expect a further year to resolve. So 15 dpa starting 2020/21 | 45 | 0 | 45 | 0 | 0 | 0 | 15 | 15 | 15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 15 | 0 | 0 | 0 | 45 | | | | |
| 38 (9Ha) | Land north of Elton Head Road | WA9 5GN | Thatto Heath | Brownfield | 12.5 | 28.16 | SHLAA_20 17 | P/2018/0060 | 20/06/2021 | NS | 9 | Permission granted June 2018. Project Properties. Hybrid planning application, full for demolition, outline for 352 dwellings. No DOCS or RMd submitted yet. According to Lichfield 4.1 year lead in. July 2022 start (Q2) - have used Council deliver rates considering it has consent | 352 | 0 | 352 | 0 | 0 | 0 | 0 | 0 | 34 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 3 | 0 | 0 | 0 | 0 | 0 | 214 | 138 | 0 | 0 | 352 |
| 58 | Former Central Works, Church Road | WA11 0GT | Haydock | Brownfield | 1.35 | 35.56 | SHLAA_20 17 | P/2005/0012 | Expired | NS | | Original consent from 2002, extended in 2005, the demolition of existing buildings and erection of petrol filling station, drive through restaurant, residential development and 1,393 square metre non-food retail unit, and relocation of Conservative Club. No indication on numbers. No ownership or viability issues. We understand it has been sold to Rowland Homes, but there are issues. May rely on adjacent site for access which was safeguarded but has now come out. Start in year 6 (23/24) | 48 | 0 | 48 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 15 | 15 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 48 | 0 | 0 | 0 | 48 | |
| 59 | Site of former 56-120 Eccleston Street | WA10 2PN | Town Centre | Brownfield | 0.33 | 39.39 | SHLAA_20 17 | N/A | | NS | | No ownership or viability issues raised in SHLAA. No application. Start in year 6 | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13 | 0 | 0 | 0 | 13 | | | | |
| 60 | Vacant land adjacent to Rail Line, Elephant Lane | WA9 5RR | Thatto Heath | PDL/GF | 4.33 | 0.00 | SHLAA_20 17 | N/A | | NS | | Council owned, former UDP allocation, noise, access and contamination issues flagged up though. Start in year 6, (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year). REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | | |
| 61 | Land North and South of Corporation Street | WA9 1JU | Town Centre | Brownfield | 3.23 | 52.32 | SHLAA_20 17 | N/A | | NS | | Potential Viability issues with TC apartment schemes. Is part of a masterplanned approach. Start in year 6, (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year) | 169 | 0 | 169 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 30 | 30 | 30 | 19 | 0 | 0 | 0 | 0 | 0 | 0 | 120 | 49 | 0 | 0 | 169 | | | | |
| 63 | Land at Waterdale Crescent | WA9 3PG | Sutton | PDL/GF | 0.26 | 0.00 | SHLAA_20 17 | N/A | | NS | | Potential viability/ market attractiveness issues raised. Could definitely come out. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| 64 | BT Depot, Sutton Road | WA9 3DZ | Town Centre | Brownfield | 1.02 | 0.00 | SHLAA_20 17 | N/A | | NS | | Is in use as a donation centre for a hospice. Council have put in so year 11-15 suggesting issues. Apparently has developer interest. REMOVED AS IN ACTIVE USE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 65 | Former Pumping Station, Sutton Road | WA9 3EW | Town Centre | Brownfield | 0.27 | 37.04 | SHLAA_20 17 | N/A | | NS | | Potential viability issues, is included within Moss Nook Urban Village, as part of Phase 3, we would suggest this moves this to later in the period- year 11 (12 in SHLAA) | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 10 | | | | |
| 66 | Land off Wargrave Road | WA12 8RW | Newton | PDL/GF | 0.3 | 23.33 | SHLAA_20 17 | N/A | | NS | | Cleared housing site, no consent but know issues. Start in year 6. | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 7 | | | | |
| 69 | Site of former Parr Community High School, Fleet Lane | WA9 1ST | Parr | Brownfield | 1.52 | 35.53 | SHLAA_20 17 | N/A | | NS | | Surplus land from school redevelopment. Developer interest and no know ownership issues. Start in year 6. | 54 | 0 | 54 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | |

[illegible]

[illegible]

| | |
|-------|-------|
| 2,755 | 2,816 |
|-------|-------|

Proposed Allocations 2019 Plan (2020-2035 and beyond)

| Ref | Site Name | | | Size | Density | Type of site | Status/ Planning Reference | Permission expiry? | Site Status | | | Site capacity | | | 2017/ 18 | 2018/ 19 | 2019/ 20 | 2020/ 21 | 2021/ 22 | 2022/ 23 | 2023/ 24 | 2024/ 25 | 2025/ 26 | 2026/ 27 | 2027/ 28 | 2028/ 29 | 2029/ 30 | 2030/ 31 | 2031/ 32 | 2032/33 | 2033/34 | 2034/ 35 | 0-5 yrs | 6-10 yrs | 11-15 yrs | 15 - 18 | Post Plan | COUNCIL Post Plan | | | total delivered | |
|------|---|--|--|--------|---------|--------------|------------------------------|--------------------|-------------|--|--|---|-------|-------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|---------|---------|----------|---------|----------|-----------|---------|-----------|-------------------|------|-----|-----------------|-----|
| 1 HA | Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood | | | 75% | 9.58 | 30 | | | | | | Persimmon have option. First identified Dec 2016 (was formerly HA2) According to Lichfields 8 year led-in (3.9 + 4.1 years) Dec 2024 start, then 60 per year (so 20 in first) | 216 | | 216 | | | | 0 | 0 | 40 | 40 | 40 | 40 | 31 | 25 | | | | | | 0 | 191 | 25 | 0 | 0 | 0 | 216 | 216 | | | |
| 2 HA | Land at Florida Farm (South of AS80), Slag Lane, Blackbrook | | | 75% | 23.19 | 30 | | | | | | Barrat have option on both landholdings. First identified Dec 2016 (was formerly HA3) According to Lichfields 9.2 year led-in (3.9 + 5.3 years) Feb 2026 start, then 68 per year (so 11 in first) | 522 | 122 | 400 | | | | 0 | 0 | 40 | 40 | 40 | 40 | 30 | 30 | 30 | 25 | 25 | 25 | 25 | 25 | 0 | 190 | 135 | 75 | 122 | 122 | 522 | 0 | 400 | |
| 4 HA | Land bounded by Reginald Road/Bold Road/Travers Entry/Gorsey Lane/Crawford Street, Bold (Bold Forest Garden Suburb) | | | 75% | 132.86 | 30 | former safeguard - bumped up | | | | | Delivery issues with this one as multiple landowners. Council and TW are main landowners, but remainder have no developer affiliation. First identified Jan 2019 (was formerly HS3 safeguarded) According to Lichfields 10.8 year led-in (3.9 + 6.9 years) Nov 2029 start, then 161 per year (so 67 in first) | 2,988 | 2,508 | 480 | | | | 0 | 0 | | | | | | | 80 | 80 | 80 | 80 | 80 | 80 | 0 | 0 | 240 | 240 | 2,508 | 2,508 | 2988 | 0 | 480 | |
| 5 HA | Land South of Gartons Lane and former St.Theresa's Social Club, Gartons Lane, Bold | | | 75% | 21.67 | 35 | | | | | | TW have option again. Council owned as well so should come forward. First identified Dec 2016 (was formerly HA6) According to Lichfields 9.2 year led-in (3.9 + 5.3 years) Feb 2026 start, then 68 per year (so 11 in first) | 569 | 49 | 520 | | | | 0 | 0 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 0 | 200 | 200 | 120 | 49 | 49 | 569 | 0 | 520 | |
| 7 HA | Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line, Newton-le-Willows | | | 75% | 8.03 | 30 | new allocation. | | | | | No developer attached to this one. Historic consent for children's home now closed. First identified Jan 2019. According to Lichfields 8 year led-in (3.9 + 4.1 years). Jan 2027 start, then 60 per year (so 15 in first) | 181 | | 181 | | | | 0 | 0 | | | | 40 | 40 | 15 | 15 | 10 | 10 | 10 | 13 | 15 | 15 | 0 | 80 | 60 | 43 | -2 | 0 | 181 | 2 | 183 |
| 8 HA | Land South of Higher Lane and East of Rookery Lane, Rainford | | | 75% | 11.49 | 30 | | | | | | Earl Derby/ Miller Homes have option. First identified Dec 2016. According to Lichfields 8 year led-in (3.9 + 4.1 years) Dec 2024 start, then 60 per year (so 20 in first) | 259 | | 259 | | | | | | 40 | 40 | 40 | 40 | 40 | 26 | 16 | 5 | 5 | 5 | 2 | | 0 | 200 | 57 | 2 | 0 | 0 | 259 | 0 | 259 | |
| | Pegasus Allocations Total (using Council's approach, with estimated rates for sites) | | | | | | | | | | | 4,735 | | 4735 | 0 | 0 | 0 | 0 | 0 | 160 | 160 | 160 | 200 | 181 | 136 | 101 | 160 | 160 | 160 | 160 | 160 | 160 | 0 | 861 | 717 | 480 | 2,677 | | | | | |
| | Council Total as per Table 4.7 | | | 693.99 | | | | | | | | 7,040 | | | | | | | | 160 | 160 | 160 | 200 | 181 | 136 | 101 | 160 | 160 | 160 | 160 | 160 | 160 | 0 | 861 | 717 | 480 | 2,679 | 2,679 | | | | |
| | Up or down compared to Council | | | | | | | | | | | | | | | | | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | | | | |

TOTALS (SHLAA + WINDFALLS + ALLOCATIONS)

| TOTALS (SHLAA + WINDFALLS + ALLOCATIONS) | | | | | | | | | | | | | | | | | | | | | | | | | | | | 2016 delivery | | | | | | | | | | | | total post plan | total in plan (inc 2016/2017) | total inc beyond 2035 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|--|----------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|---------------|--|--|--|--|--|--|--|--|--|--|--|-----------------|-------------------------------|-----------------------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| Pegasus Total | | | | 1,504.66 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

SUMMARY SUPPLY TRAJECTORIES

| Council Overall Trajectory | | | | | Pegasus Best Case (A) | | | Pegasus Worst Case (B) | | | | Pegasus Mid Points | | |
|----------------------------|-----------------|--------------|-------|----------------|-----------------------|--------------|-------|------------------------|--------------|-------|--------------------------------|--------------------|--------------|-------|
| Year | Allocated Sites | Other supply | Total | SOURCE | Allocated Sites | Other supply | Total | Allocated Sites | Other supply | Total | SOURCE | Allocated Sites | Other supply | Total |
| 2016/17 | 0 | 487 | 487 | live table 122 | 0 | 487 | 487 | 0 | 487 | 487 | Peg tables based on 2017 SHLAA | | | |
| 2017/18 | 0 | 379 | 379 | SHLAA 2017 | 0 | 389 | 389 | 0 | 389 | 389 | | | | |
| 2018/19 | 0 | 409 | 409 | SHLAA 2017 | 0 | 341 | 341 | 0 | 341 | 341 | | | | |
| 2019/20 | 0 | 685 | 685 | SHLAA 2017 | 0 | 588 | 588 | 0 | 588 | 588 | | | | |
| 2020/21 | 0 | 581 | 581 | LP Table 4.7 | 0 | 772 | 772 | 0 | 772 | 772 | Peg detailed trajectory | | | |
| 2021/22 | 0 | 467 | 467 | | 0 | 665 | 665 | 0 | 665 | 665 | | | | |
| 2022/23 | 160 | 584 | 744 | | 0 | 450 | 450 | 160 | 450 | 610 | | | | |
| 2023/24 | 160 | 584 | 744 | | 0 | 648 | 648 | 160 | 562 | 697 | | | | |
| 2024/25 | 160 | 584 | 744 | | 40 | 464 | 504 | 160 | 421 | 564 | | | | |
| 2025/26 | 200 | 584 | 784 | | 142 | 297 | 439 | 200 | 257 | 457 | | | | |
| 2026/27 | 181 | 584 | 765 | | 271 | 257 | 528 | 181 | 225 | 406 | | | | |
| 2027/28 | 136 | 294 | 430 | | 316 | 189 | 505 | 136 | 179 | 315 | | | | |
| 2028/29 | 101 | 294 | 395 | | 271 | 502 | 773 | 101 | 296 | 397 | | | | |
| 2029/30 | 160 | 294 | 454 | | 249 | 372 | 621 | 160 | 210 | 370 | | | | |
| 2030/31 | 160 | 294 | 454 | | 297 | 200 | 497 | 160 | 139 | 299 | | | | |
| 2031/32 | 160 | 294 | 454 | | 297 | 146 | 443 | 160 | 136 | 296 | | | | |
| 2032/33 | 160 | 138 | 298 | | 297 | 146 | 443 | 160 | 136 | 296 | | | | |
| 2033/34 | 160 | 138 | 298 | | 264 | 146 | 410 | 160 | 136 | 296 | | | | |
| 2034/35 | 160 | 138 | 298 | | 175 | 146 | 321 | 160 | 136 | 296 | | | | |
| tal 2020 - 2034 | 2,058 | 5,852 | 7,910 | | 2,619 | 5,400 | 8,019 | 2,058 | 4,720 | 6,736 | | 2,339 | 5,060 | 7,378 |
| tal 2016 - 2034 | 2,058 | 7,812 | 9,870 | | 2,619 | 7,205 | 9,824 | 2,058 | 6,525 | 8,541 | | 2,339 | 6,865 | 9,183 |
| tal 2017- 2034 | 2,058 | 7,325 | 9,383 | | 2,619 | 6,718 | 9,337 | 2,058 | 6,038 | 8,054 | | 2,339 | 6,378 | 8,696 |

PO2483

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ELO290B.1.pdf



Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8
Rebecca Dennis

to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:13

① LPA05

② LPA02

③ GBR

④ SA

⑤ S.O.4.1

⑥ S.O.5.1

⑦ LPA02-PARA 3

3 Attachments



Representation Form-Wallace-May 19.pdf R001v7- Reps to Submission Local Plan-Wallace.pdf



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑧ LPA02-PARA 4

⑨ LPA03

⑩ LPA04

⑪ LPA05-PARA 3

Dear Sir/Madam,

We are instructed on behalf of our client, Wallace Land Investments, to submit the attached form and representation (R001) to the Local Plan Submission Draft Consultation. Wallace have land interests in relation to the Mill Lane, Rainhill site, which is discussed in detail in the attached representation.

⑫ LPA05-PARA 4

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Illustrative Masterplan (attached to this email)
- Appendix 2 - Previously Submitted Documents and Technical Information
- Appendix 3 - Additional Technical Documents (May 2019)
- Appendix 4 - Detailed Site Pro Formas
- Appendix 5 - Council's Stage 3 Green Belt Assessment of Mill Lane Site
- Appendix 6 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 7 - Council's Housing Trajectory
- Appendix 8 - Pegasus Housing Trajectory
- Appendix 9 - Spatial Distribution of Sites

⑬ APPENDIX 4

⑭ LPA05-TABLE 4.6

⑮ LPA05.1

⑯ LPA06

⑰ LPC01

We will follow up this submission by sending a CD in the post which contains the entirety of Wallace's submission to the Local Plan consultation.

⑱ LPC02

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

⑲ LPC04

⑳ LPC03-PARA 4

㉑ LPA07-PARA 3c

㉒ LPA07

㉓ LPA07-PARA 9

㉔ LPA02

㉕ LPC10

㉖ LPA03

Many thanks and kind regards,

Rebecca Dennis
Principal Planner

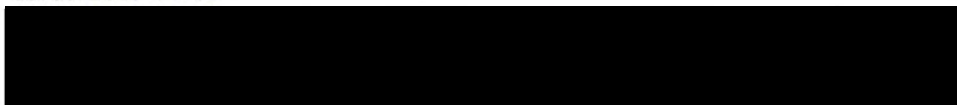
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Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8
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4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

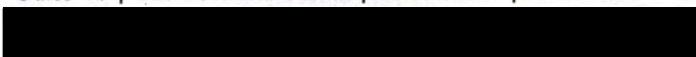
Rebecca Dennis

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1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

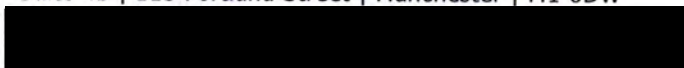
Rebecca Dennis

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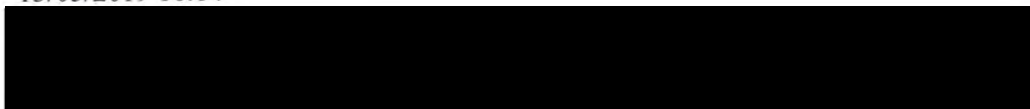
<https://i.imgur.com/ZuAcceY.jpg>



<https://i.imgur.com/iHET88g.jpg>



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2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

Email 4 of 8 of Wallace representations.

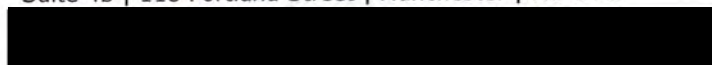
Rebecca Dennis

Principal Planner

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<https://i.imgur.com/05aES4f.jpg>



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Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

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1 Attachment



Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

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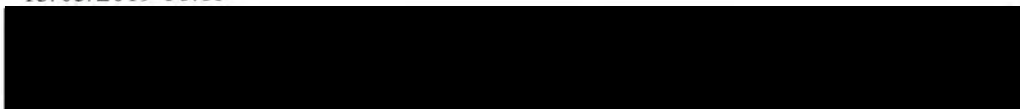
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 <https://i.imgur.com/ZuAcceY.jpg>

 <https://i.imgur.com/iHET88g.jpg>



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1 Attachment



Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

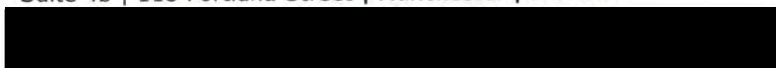
Email 6 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

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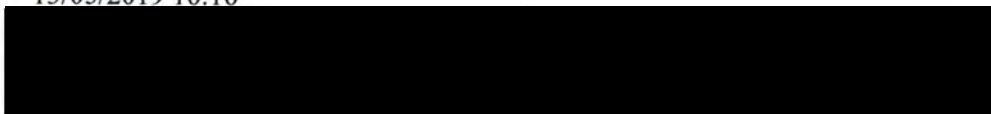
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7 Attachments



Appendix 4-Detailed Site Pro Formas-Wallace.pdf Appendix 5-Council's Stage 3 Green Belt Assessment-Wallace.pdf



Appendix 7-Council's Housing Trajectory-Wallace.pdf



Appendix 8b-Pegasus Trajectory Worst Case Scenario-Wallace.pdf



Appendix 8c-Summary Supply Trajectory-Wallace.pdf



Appendix 8a-Pegasus trajectory Best Case Scenario-Wallace.pdf



Appendix 6-Review of Employment-Led Local Plan Housing Requirement-Wallace.pdf

Email 7 of 8 of Wallace representations.

Rebecca Dennis

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1 Attachment



Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

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St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

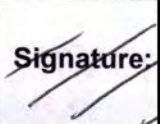
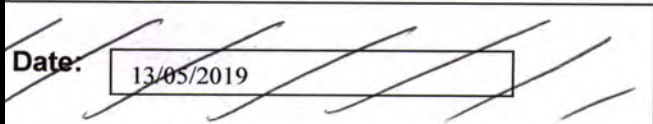
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: | Title: Mr |
| First Name: | First name: Sebastian |
| Last Name: | Last Name: Tibenham |
| Organisation/company: Wallace Land Investments (c/o Agent) | Organisation/company: Pegasus Group |
| Address: | Address: Suite 4b, 113 Portland Street, Manchester |
| Postcode: | Postcode: M1 6DW |



| | |
|--|--|
| Signature:  | Date:  13/05/2019 |
|--|--|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

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Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|---|--|-----------------------------|--------------------|--------------|--|--|--|--------------------------------|--|
| Policy | | Paragraph / diagram / table | Tables 4.6 and 4.7 | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|------------------------------|--|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|-------------------------------------|
| Positively Prepared? | <input checked="" type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input type="checkbox"/> |

6. Please give details of why you consider the Local Plan is 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

WE RAISE A NUMBER OF CONCERNS WITH THE COUNCIL'S CLAIMED HOUSING LAND SUPPLY (TABLE 4.6) AND THE LACK OF DETAIL PROVIDED IN THE HOUSING TRAJECTORY TABLE (4.7). THIS LEADS TO A NEED TO ALLOCATE MORE SITES TO MEET DEVELOPMENT NEEDS.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

COUNCIL NEED TO ALLOCATE MORE SITES TO ENSURE A HEALTHY HOUSING LAND SUPPLY WHICH MEETS DEVELOPMENT REQUIREMENTS.

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | | | |
|--------------------------|--|-------------------------------------|--|
| <input type="checkbox"/> | No , I do not wish to participate at the oral examination | <input checked="" type="checkbox"/> | Yes , I wish to participate at the oral examination |
|--------------------------|--|-------------------------------------|--|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

PLEASE REFER TO ACCOMPANYING REPRESENTATIONS REPORT FOR FULL DETAILS.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



ST HELENS BOROUGH LOCAL PLAN 2020-2035: SUBMISSION DRAFT

REPRESENTATION BY WALLACE LAND INVESTMENTS

Date: 13th May 2019

Pegasus Reference: ST/KW/P18-0592/R001v7

Pegasus Group

Suite 4b | 113 Portland Street | Manchester | M1 6DW

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Live: 45457800 v 3

- 5.30 We would also note that Annual Monitoring Reports (AMR's) are a key component for monitoring delivery, yet St Helens have not produced one since 2011, so we would suggest that annual reporting is made a policy requirement.
- 5.31 In respect of housing, an AMR, or equivalent document, should include the following as a minimum:
- Details of annual housing completions (both gross and net) with a list of contributing sites - to allow accurate monitoring of the Council's trajectory in Policy LPA05.
 - Details of windfall/ small site delivery – for compliance with NPPF 10% small site requirement and to ensure projected windfall rate remains realistic (see section 7 for further analysis of this).
 - Details of affordable completions – to monitor effectiveness of Policy LPC02.
 - Proportion of delivery on brownfield/ greenfield sites – to monitor effectiveness of spatial strategy/ Policy LPA02 Part 2.
- 5.32 The Monitoring Framework at Appendix 4 does refer to several of these indicators and refers to the Annual SHBC house completion survey as a data source, however as far as we are aware this is not publicly available, as such we would request that this is incorporated into the AMR.
- 5.33 Finally, in respect of Appendix 4 we would ask the Council to clarify the rationale for trigger in respect of safeguarded land (Policy LPA06), which states that if '10% or more of land safeguarded is granted planning consent, then they will consider an early review of the plan?'. 13

6. HOUSING SUPPLY MATTERS (POLICY LPA05 PART2)

- 6.1 This section looks at the Council's housing supply and trajectory in more detail, assessing total supply across the plan period, taking into account the five-year housing land supply position and the Housing Delivery Test.
- 6.2 This analysis is based on the Table 4.6 'Housing land requirements and supply – 2016 until 2035' and Table 4.7 'Housing Trajectory' within the Submission Plan, and the 2017 SHLAA which forms the most of up to date housing evidence base.
- 6.3 However, at the outset we would highlight the fact that these tables and the SHLAA include various discrepancies and do not allow for direct comparison or the consideration of delivery on individual sites. 11
- 6.4 The SHLAA starts with a 1st April 2017 base date but only provides individual site delivery within the first 5 years (up to 2021/2022), with delivery aggregated into 5 year periods beyond that; whilst the housing trajectory in the plan starts at the year 2020 and provides an annual aggregated 14

figure for 'allocations' and 'other supply' (which includes SHLAA sites and windfall). The total figures in each do not tally. (14)

- 6.5 As such we would ask that the Council provide further clarification on this, ideally by updating the SHLAA and making a full local plan trajectory available with projected delivery on each individual SHLAA site and allocation on a year by year basis to allow the full plan period supply to be considered.
- 6.6 Furthermore, as noted previously, the Council have not produced an AMR since 2011, nor do they have any form of report or schedule monitoring housing delivery. As such, it is not possible to obtain detailed information on delivery rates within St Helens in recent years, and it is not clear how the Council's anticipated delivery rates are supported.
- 6.7 To assist our analysis at this stage we have consolidated the trajectory information from the Local Plan and SHLAA into one table, and we attach the Council's own trajectory (or our understanding of it) at **Appendix 7**, with our own trajectory attached at **Appendix 8**. (14)
- 6.8 Our delivery analysis at **Appendix 8** presents two scenarios, a best case / high delivery scenario (**Appendix 8a**) and a worst case / low delivery scenario (**Appendix 8b**), from which we take a mid-point to calculate overall supply figures. We also include summary trajectories for both scenarios to compare with the Council's (**Appendix 8c**).
- 6.9 Accordingly we reserve the right to make further comments as required following clarification from the Council in relation to above points, and provision of a consolidated trajectory and supporting evidence to justify the proposed delivery rates.

Overall Housing Supply

- 6.10 Table 4.6 sets out the Council's supply position across the full plan period to 2035. It suggests there will be 1,989 dwellings completed by April 2020, leaving a residual requirement of 7,245 over the plan period.
- 6.11 In line with the figures in the table, Paragraph 4.18.10 of the Submission Local Plan goes on to state the 2017 SHLAA identified capacity for 7,817 dwellings within the existing urban area including sites with planning permission, sites under construction and other sites identified as being suitable for housing. The same paragraph goes on to state that it also allowed for 93 dwellings per annum from small windfall sites (less than 0.25 ha) and that the largest brownfield sites identified by the SHLAA are strategic allocations including Sites 3HA, 9HA and 10HA.
- 6.12 Figure 4.3 in the SHLAA suggests the following over the next 15 years:
- 1,581 dwellings with planning permission and not started on large sites;

- 654 dwellings under construction on large sites;
- 289 on historically implemented but stalled sites;
- 3,763 dwellings on suitable SHLAA Sites without planning permission;
- 1,395 dwellings on small windfall sites (93x15);
- **= TOTAL 7,682 dwellings.**

6.13 We assess the implications and discrepancies between these 2 tables below before setting out our own housing supply analysis.

Table 4.6 (Row B) – Completions

- 6.14 Our analysis suggests that proposed completions of 1,989 by April 2020 is realistic based on completions in recent years (confirmed within MCHLG live table 122 and including an over-supply of 29 units in the year 2017/2018) and projected delivery in the SHLAA.
- 6.15 Accordingly, the basis for the residual requirement in line (c) is correct, albeit we suggest this is increased to align with our suggested housing requirement of 570 dpa, leaving a residual requirement of 8,391 dwellings.
- 6.16 The table at 6.1 does suggest there are issues with past delivery and we address these later in this section.

Table 4.6 (Row I) – Large SHLAA Sites

- 6.17 This suggests a total figure of 4,107 dwellings from this source; however, this is not consistent with the 2017 SHLAA which suggests a figure of 3,763 dwellings.
- 6.18 The Council have seemingly allowed for some additional unknown capacity to make up the time period beyond the next 15 years, which is accounted for in the SHLAA. However, bearing in mind the SHLAA has undertaken a comprehensive review of all potential large sites for housing in the urban area, it seems unreasonable to add on additional supply unless some of the sites were expected to be delivered beyond the 15-year SHLAA period and this is articulated in the SHLAA tables. Upon first inspection, the SHLAA does not appear to allow for this.
- 6.19 That said, we have addressed this discrepancy by providing our own trajectory based on a composite of the Local Plan and SHLAA.

Table 4.6 (Row J) – Small Sites/ Windfall Allowance

- 6.20 The Council's supply figure includes a windfall allowance of 93 dpa over the 15-year plan period, based on historic completion rates from small sites (below 0.25 Ha) over the past 10 years, as set out in Figure 3.12 of the 2017 SHLAA.

- 6.21 Whilst the 2019 NPPF acknowledges that windfall development can be a realistic source of supply, paragraph 70 requires evidence not only of past delivery rates, but that such rates can continue going forward, taking account of expected future trends.
- 6.22 In this instance, it is considered that a flat rate across the full plan period is optimistic as sources of windfall are finite, and therefore the rate of windfall will fall over time as more sites are picked up through the call for sites and SHLAA processes going forward. 14
- 6.23 Furthermore, no formal housing allocations have been made within St Helens since the 1998 UDP, which only covered the period to 2001. This was substantially replaced by the Core Strategy in October 2012 (including Policy RES1 relating to residential allocations); however this document did not include site allocations, as these were to follow in a separate Allocations DPD, a process which was abandoned in favour of the current Plan.
- 6.24 Given the limitations of these adopted plans, it is reasonable to assume that a large proportion of the Council's housing supply over the last 10 years has been through windfall development leading to an elevated delivery rate from this source. It is also reasonable to assume that windfall development opportunities of this scale will have been partly exhausted over this period, and as such are highly unlikely to continue at the same rate. 14
- 6.25 It follows that much of this historic windfall delivery will have been on previously developed land, given that speculative applications on greenfield land have lower chances of success (and also given the lack of greenfield/ non-Green Belt sites in St Helens).
- 6.26 This is partly evidenced within the Council's Housing Land Position Statement 2013 (which is the most recent monitoring document available) which confirmed that net completions between 2003 and 2013 averaged 91.23% previously developed, with just 8.77% on greenfield land.

Figure 6.1 – Housing Completions and Site Type 2003-2013

Table 3.1 Housing Completions 2003/04-2012/13

| Year | Gross Completions | Net Completions | PDL | GF |
|----------------|-------------------|-----------------|---------------|--------------|
| 2003/04 | 871 | 631 | 90.82% | 9.18% |
| 2004/05 | 896 | 783 | 87.83% | 12.17% |
| 2005/06 | 549 | 530 | 85.61% | 14.39% |
| 2006/07 | 637 | 600 | 91.52% | 8.48% |
| 2007/08 | 496 | 436 | 98.19% | 1.81% |
| 2008/09 | 441 | 240 | 99.3% | 0.7% |
| 2009/10 | 401 | 399 | 96.68% | 3.32% |
| 2010/11 | 183 | 157 | 92.35% | 7.65% |
| 2011/12 | 431 | 419 | 90.72% | 9.28% |
| 2012/13 | 320 | 264 | 82.19% | 17.81% |
| Total | 5,225 | 4,459 | 4,767 | 458 |
| Average | 523 p.a. | 446 p.a. | 91.23% | 8.77% |

- 6.27 This is relevant, as the ongoing supply of small PDL sites is now recorded within the Council's Brownfield Register (19th December 2017 base date). Analysis of this confirmed a capacity of 437 dwellings on sites of less than 0.25Ha, all of which have extant planning permission.
- 6.28 Applying an 8.77% uplift to this to support some windfall delivery on greenfield sites in line with historic evidence rates generates a total small site windfall total of 475 units. We have used this figure in our trajectory, rather than the 93 per year figure which the Council propose, which we consider extremely optimistic.
- 6.29 That said, we continue with the rate of 93 dpa within the first 5 years (to 2021-2022) given that all these windfall sites already have consent and in light of elevated delivery rates in recent years, even without any adopted allocations, with the remaining 10 units dropping into year 6.
- 6.30 In our worst case scenario at **Appendix 8b** we assume no further windfall delivery; however in the best case we apply a rate of 10 dpa from year 6 onwards to take account of the possibility that small amounts of additional land beyond what has been identified in the brownfield register may become available later in the plan period.

Table 4.6 (Row L) - Lapse Rate for Non-Delivery

- 6.31 This row applies a 15% discount for non-delivery of SHLAA sites in years 6-15 (which equates to 437 from a total of 4,368). Whilst we fully support the rationale for this discount, we suggest a discount is also added to the sites in years 1-5, as there will inevitably be some slippage amongst permitted sites as well as strategic sites, and this approach has been commonly accepted at EiPs and S78 appeals decisions, generally at 10% across all sites.
- 6.32 In this instance a blanket 10% lapse actually generates a lower discount than the 15% off years 6-16, and therefore presents a more positive position than the Council's own figures; however, given our supply analysis has already discounted specific sites we are keen to avoid double counting.
- 6.33 We have taken the view that it would not be appropriate to add the 10% discount to our worst case scenario; however a 10% discount may be appropriate for the best case scenario as this broadly accepts the Council's anticipated delivery rates and timescales without compelling evidence and only removes clearly constrained sites that arguably should have not been included anyway.
- 6.34 Therefore for the mid-point figures we use to calculate total supply we have applied a 5% discount, which we consider to be a robust position in this instance.

Table 4.6 (Row O) - Reserve Sites Buffer / Green Belt Housing Requirement

- 6.35 This row applies a 20% buffer to the Green Belt supply requirement to allow for contingencies (listed as infrastructure provision, delays, lead-in times, to start of housing delivery etc). Again, we fully support this discount as it provides flexibility and choice within the Green Belt site typology,

without leading to any double counting with the discount applied for non-delivery of the SHLAA sites.

Overall Delivery Assumptions

6.36 Given the variety of different site types/ sizes and sources within the St Helens housing supply and the lack of a detailed trajectory or any supporting monitoring evidence we have taken a bespoke approach to our assessment, providing both best and worst case scenarios to give a balanced view, including the following assumptions:

- Using the Council's delivery rates on sites that are under construction or that have consent and are due to start on site within years 1-5, due to the Council's reasonable delivery record in recent years (with them delivering in excess of their trajectory target in 2017/2018). This includes 2 of the brownfield allocations (3Ha and 9Ha).
- On the remaining brownfield allocations (6Ha and 10Ha) we have applied the approach advocated by the Lichfields Report published in November 2016, entitled '*Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?*'. For sites between 500-999 units (as the two brownfield allocations are) it suggests an average lead in time of 9.2 years from first being identified in a plan (3.9 years to submission of the first planning application then 5.3 years to start on site), with average delivery rates of 68 per year after that.
- On remaining SHLAA sites due in years 6 onwards, we have used standard delivery rates of 30 dpa on sites over 50 units, and 15 dpa on sites less than 50.
- We have generally allowed a 1-year lead-in for sites with full consent or with Reserved Matters/ Discharge of condition applications in, 2 years for outline schemes with evidence of ongoing activity, and 3 years for outlines with no further evidence.
- In respect of the proposed Green Belt allocations, we have applied the Council's projected lead-in times and build out rates as these look to be well staggered across the plan period, and with variable rates that we assume take account of site-specific factors (albeit this is not evidence or broken down individually). For balance we also applied the Lichfield approach set out above (suggesting an average lead in time of 8 years for sites between 100-499 units, with delivery rates of 60 dpa; and 9.2 years and 68 dpa for sites between 500-999 units). The Lichfield approach actually generates higher delivery so this has been used in the best case scenario (at **Appendix 8a**) with the Council's own rates for the worst case scenario (**Appendix 8b**).

6.37 In terms of moving sites to later in the plan period, or discounting them entirely we have applied the definitions of deliverable and developable sites within the glossary of the 2019 NPPF, as set out below:

"Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

Developable: *To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.*

6.38 Accordingly, larger sites with outline or expired consents or other obvious constraints which do not meet the definition of deliverable, have been moved to the later years of the plans.

6.39 We have also removed several sites entirely, based on our own judgment of the available evidence, where some or all the following applied (and these are highlighted within our trajectory):

- Site in existing alternative use with no current prospect of that ceasing;
- Access required through third party land (with no evidence that this is available or achievable);
- Large scale clearance of buildings required to bring forward for residential development;
- Viability concerns acknowledged within the SHLAA;
- Mixed ownership/ legal issues (with no evidence that these can be overcome); and
- Site constraints such as flood risk, contamination, noise, adjacent uses flagged as an issue within the SHLAA.

6.40 In the best case scenario at **Appendix 8a** we have generally moved constrained sites to the later part of the plan period on the basis that these issues can be overcome in the medium to long term, and only removed those with obvious major issues – which applies to **10 sites, totalling 278 units** (highlighted orange).

6.41 In the worst case scenario at **Appendix 8b** we have removed all sites with multiple constraints – which applies to **25 sites, totalling 598 units** (also highlighted orange).

6.42 Having taken all the above into consideration we projected a total plan period supply of between 8,541 (worst-case scenario) and 9,824 (best case scenario). This generates a midpoint of 9,183 which in turn equated to a total SHLAA supply mid-point of **6,738** (from 1st April 2017- 31st March 2035), which is set out in Row E of Table 4.6.

- 6.43 Accordingly, our assessment of St Helens total housing supply and Green Belt allocation requirements is set out on the following page, with the full trajectories attached at **Appendix 8**.
- 6.44 Overall, this supply analysis suggests the Council will need to allocate additional Green Belt land for at least **2,243 dwellings**, based on a requirement of 570 dpa (and **868 dwellings** if the 486 dpa figure is pursued).
- 6.45 It is pertinent that this figure includes some headroom to allow for under-delivery, however this is only applied (at a rate of 20%) to the Green Belt element of the supply, which only represents 1/3 of the total supply. However, such a buffer could equally be applied across the total supply to account for both under delivery and also to ensure a range and choice of sites for development, as advocated by the NPPF.
- 6.46 If a 20% buffer was sought across the total supply, then this would require additional land for 3,204 dwellings; whilst a 10% buffer would equate to 2,365 dwellings.
- 6.47 Even if the Council's own supply and requirement figures are used then there will be a surplus supply of just 361 dwellings, equating to just 4.98% of the total, which leaves minimal flexibility. In this case a 20% buffer would require land for an additional 1,088 units; whilst 10% would require 364 units.

Figure 6.2 – Total Housing Supply 2016-2035

| | Requirements | Council claimed position | Council's reqt with Peg supply and methodology | Pegasus position |
|---|--|--------------------------|--|------------------|
| a | St.Helens housing requirement (19 years from 1st April 2016 to 31st March 2035) at average of 486 dpa / 570 dpa | 9,234 | 9,234 | 10,380 |
| b | Expected completions by 1st April 2020 | 1,989 | 1,989 | 1,989 |
| c | Residual requirement over Local Plan period from 1st Apr 2020 to 31st March 2035 | 7,245 | 7,245 | 8,391 |
| d | Anticipated supply | | | |
| e | Total SHLAA supply– 1st April 2017 until 31st March 2035/ From Pegasus Trajectory | 7,817 | 6,378 | 6,378 |
| | ... consisting of: | | | |
| f | Large sites (0.25ha or 5 units and above) - planning permission not started as of 1st April 2017 | 1,581 | n/a | n/a |

| | | | | |
|---|---|--------------|---------------|----------------|
| g | Large sites with planning permission under construction as of 1st April 2017 | 654 | n/a | n/a |
| h | Large sites with planning permission but stalled as of 1st April 2017 | 289 | n/a | n/a |
| i | Large sites - no planning permission as of 1st April 2017 in Local Plan/ in 2017 SHLAA | 4,107 | 3,763 | 3,763 |
| j | Small sites (below 0.25ha / 5 units) (small sites / "windfall" allowance) | 1,395 | 475 | 475 |
| k | Estimated SHLAA supply – 1st April 2020 until 31st March 2035/ calculated from Pegasus Trajectory | 6,344 | 5,060 | 5,060 |
| l | SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-18)/ 5% off overall plan | 794 | 253 | 253 |
| m | Residual SHLAA capacity over 15 year Plan period (1st Apr 2020 - 31st March 2035) | 5,550 | 4,807 | 4,807 |
| n | Required capacity to be found on Green Belt land | 1,695 | 2,438 | 3,584 |
| o | Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (site allocations 5HA to 15HA inclusive) (to allow for contingencies e.g., infrastructure provision, delays, lead-in times, to start of housing delivery etc.) | 2,034 | 2,926 | 4,301 |
| p | Total capacity of allocated sites removed from the Green Belt (sites 1, 2, 4, 5, 7 and 8 HA) (1st April 2020- 31st March 35) Counting up table 4.7 equates to 2,058 | 2,056 | 2,058 | 2,058 |
| q | Total supply over plan period | 7,606 | 6,865 | 6,865 |
| | Total headroom % on residual requirement | 4.98% | -5.24% | -18.19% |
| | Total headroom numbers on residual requirement | 361 | n/a | n/a |
| | Additional allocations required to meet requirement (with GB headroom) | n/a | 868 | 2,243 |
| | Additional requirement to give overall 10% headroom | 364 | 1,105 | 2,365 |
| | Additional requirement to give overall 20% headroom | 1,088 | 1,829 | 3,204 |

Housing Delivery Test

- 6.48 The first round of Housing Delivery Test (HDT) results were issued in February 2019. This applies a standardised approach to housing delivery over the preceding 3-year period for all the Local Authorities across the country (in line with the HDT Measurement Rulebook and paragraphs 73-75 of the NPPF).
- 6.49 The resultant percentage figure is used to confirm which buffer should be applied in the five-year supply calculation (5% if delivery is above 85% and 20% if below). In addition, if delivery has dropped below 95%, the Council are required to prepare an Action Plan to assess the causes of under-delivery and identify actions to increase delivery in future years. Finally, if delivery is below 25% (in the current 2018 results but increasing to 45% in 2019 and 75% in November 2020 under transitional arrangements), then the tilted balance in relation to the presumption in favour of sustainable development is engaged.

- 6.50 In the case of St Helens this suggests a figure of 98% meaning that the 5% buffer is applicable, and an action plan is not required.

Figure 6.3 – Housing Delivery Test

| | 2019 HDT completions | 2019 HDT requirement | Local Plan Requirement | Delivery against HDT requirement | Delivery against Local Plan Requirement |
|--------------------|----------------------|----------------------|------------------------|----------------------------------|---|
| 2015/2016 | 575 | 532 | 570 | 43 | 5 |
| 2016/2017 | 487 | 518 | 570 | -31 | -83 |
| 2017/2018 | 411 | 454 | 570 | -43 | -159 |
| TOTAL | 1,473 | 1,504 | 1,710 | -31 | -237 |
| Average dpa/ HDT % | 491 | 501 | | 97.94% | 87.95% |

| | | | |
|---|-------|--------------------------------------|--------|
| Shortfall (pre 2015) | 1,805 | | |
| 5 year requirement | 2,850 | | |
| 5 year requirement + shortfall | 4,655 | | |
| Shortfall required in 3 years (3/5ths of total) | 2,793 | against real requirement w/shortfall | 52.74% |

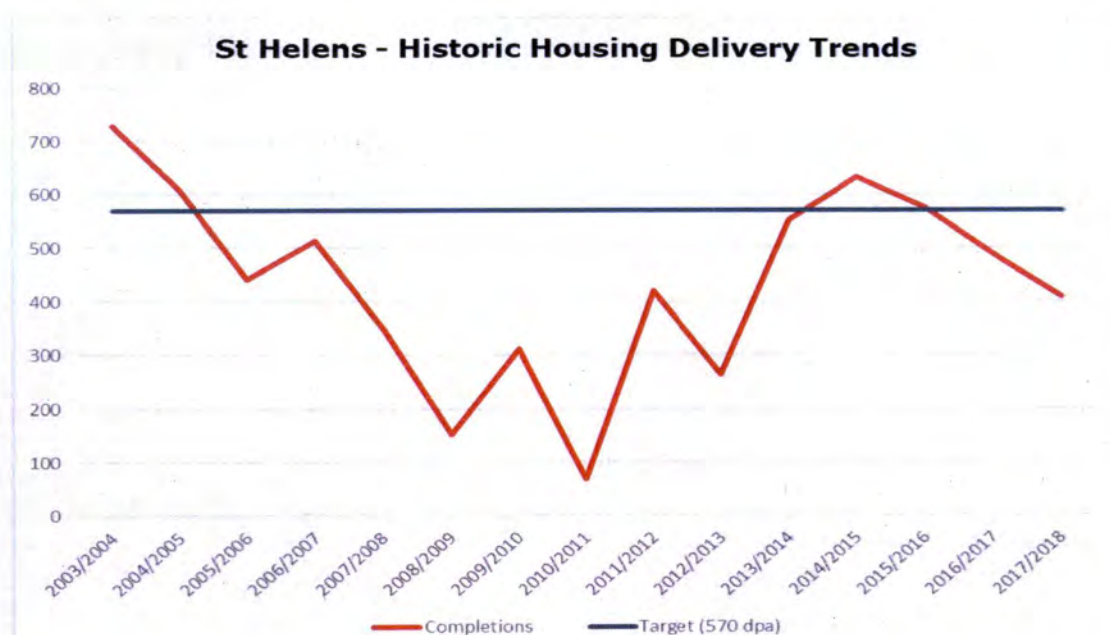
- 6.51 As can be seen from the table, St Helens delivered 1,473 new homes over the last three years against a 'requirement' of 1,504 dwellings; although it is pertinent that this requirement is based on the household projections (under transitional arrangements in the first 3 years of the HDT process) and is therefore artificially low, as the local plan requirement over the same period is 1,710 (206 higher). If delivery is considered against the adopted plan requirement, the HDT figure drops to 88%.
- 6.52 Furthermore, it must be stressed that the household projections do not reflect the level of housing that should have actually been delivered over the last three years in St Helens and does not take account of any historic under delivery, which is an issue in St Helens. Whilst the HDT and standard methodology effectively resets the clock and clears past under delivery, the NPPG confirms (at paragraph 2a-011-20190220) that where an alternative approach to the standard method is used, as it is in St Helens, past under delivery should be taken into account.
- 6.53 In the case of St Helens, a review of figures 6.3 and 6.4 below confirms there has been major under-delivery within St Helens dating back to 2003, when the RSS period began and the 570 dpa requirement figure was introduced, generating a total shortfall of 1,805 dwellings at 1st April 2015 (when the current HDT period begins).

Figure 6.4 – Historic Completions

| | Live Table 122 Net Completions | Local Plan Requirement | Mixed Local Plan Requirement | Delivery against Local Plan Requirement | Delivery against Mixed Local Plan Requirement |
|--|--------------------------------|------------------------|------------------------------|---|---|
|--|--------------------------------|------------------------|------------------------------|---|---|

| | | | | | |
|-------------|-------|-------|-----|--------|--------|
| 2003/2004 | 728 | 570 | 570 | 158 | 158 |
| 2004/2005 | 607 | 570 | 570 | 37 | 37 |
| 2005/2006 | 442 | 570 | 570 | -128 | -128 |
| 2006/2007 | 512 | 570 | 570 | -58 | -58 |
| 2007/2008 | 348 | 570 | 570 | -222 | -222 |
| 2008/2009 | 152 | 570 | 570 | -418 | -418 |
| 2009/2010 | 311 | 570 | 570 | -259 | -259 |
| 2010/2011 | 69 | 570 | 570 | -501 | -501 |
| 2011/2012 | 419 | 570 | 570 | -151 | -151 |
| 2012/2013 | 264 | 570 | 570 | -306 | -306 |
| 2013/2014 | 551 | 570 | 570 | -19 | -19 |
| 2014/2015 | 632 | 570 | 570 | 62 | 62 |
| 2015/2016 | 575 | 570 | 570 | 5 | 5 |
| 2016/2017 | 487 | 570 | 486 | -83 | 1 |
| 2017/2018 | 408 | 570 | 486 | -162 | -78 |
| TOTAL | 6,505 | 8,550 | | -2,045 | -1,877 |
| Average dpa | 434 | 570 | | -136 | -125 |

Figure 6.5 – Historic Housing Delivery Rates



Delivery figures from MCHLG Net Additions by Local Authority District Live Table 122

- 6.54 This meant that the actual annualised requirement the Council should have achieved from 1st April 2015 to 31st March 2020 was 931 dwellings per annum (i.e. $1,805 / 5 = 361 + 570 = 931$), which equates to **2,793 dwellings** over the 3-year period to 31st March 2018.
- 6.55 When considered against this elevated requirement, the 1,473 completions represent just **52%** of the requirement.
- 6.56 Notwithstanding this, the result of the HDT confirms that the 5% buffer is applicable when calculating 5YHLS in St Helens.

Five Year Housing Land Supply


- 6.57 The Council do not confirm their 5-year housing land supply position within the Submission Plan, yet their 2017 SHLAA concludes the following in Figures 45.4 and 5.5:
- Based on the 570 dpa Core Strategy requirement, the Council claim a **2.7 year supply**.
 - Based on an OAN figure of 451 dpa, they claim a figure of **5.3 year supply**.
- 6.58 Clearly the position has moved on since the 2017 SHLAA, indeed a 2018 base date can now be used to calculate supply, as can the Council's proposed requirement figure of 486 (albeit we are still advocating the use of the 570 dpa figure).
- 6.59 Accordingly, we set out our analysis of the Council's 5YHLS position below, using various different scenarios for both the requirement and supply side inputs to give a range of figures.

Figure 6.6 – Five Year Housing Land Supply

| 5 YEAR HOUSING LAND SUPPLY (1ST APRIL 2018 BASE DATE) | Council's Requirement | | Pegasus Requirement | |
|---|-----------------------|-------|---------------------|-------|
| Annual requirement | 486 | | 570 | |
| 5 year requirement | 2,430 | | 2,850 | |
| Shortfall (plan period/ 2016-2018) | 77 | | 245 | |
| Shortfall (historic/ 2003-2018) | 1,877 | | 2,045 | |
| Buffer | 5% | 20% | 5% | 20% |
| Total requirement (no shortfall) | 2,552 | 2,916 | | |
| Total requirement (with plan period shortfall) | 2,632 | 3,008 | 3,073 | 3,512 |
| Total requirement (with historic shortfall) | 4,522 | 5,168 | 4,963 | 5,672 |
| Council Claimed Supply | 2,726 | | | |
| Pegasus Supply | 2,816 | | | |
| Council 5YHLS (no shortfall) | 5.34 | 4.67 | | |
| Council 5YHLS (with plan period shortfall) | 5.18 | 4.53 | 4.43 | 3.88 |
| Council 5YHLS (with historic shortfall) | 3.01 | 2.64 | 2.75 | 2.40 |
| Pegasus 5YHLS (with plan period shortfall) | 5.35 | 4.68 | 4.58 | 4.01 |
| Pegasus 5YHLS (with historic shortfall) | 3.11 | 2.72 | 2.84 | 2.48 |

- 6.60 We conclude that the Council's supply is **2.84** or **4.58 years** depending whether shortfall is considered over the long-term (2003 onwards) or shorter term (2016 onwards), using the 570 dpa requirement and the 5% buffer as required by the HDT.
- 6.61 As explained above, a lapse rate for non-delivery has not been applied, as we have to the full supply figures. This is because we have undertaken a site by site assessment and therefore wanted to avoid double counting; however given the limited evidence on delivery rates presented by the Council it is highly likely that there will be additional slippage, particularly on sites that are already under construction or that have consent and are due to start on site within years 1-5, where we have accepted the Council's projections. These figures therefore represent a more generous position than is likely to be the case.
- 6.62 By way of comparison, using the Council's own supply figures and 486 requirement puts them between 3.01 and 5.18 years (with the same approach to shortfall), and with the 570 requirement between 2.75 and 4.43 years.
- 6.63 This combination of historic under-delivery and the 5-year supply shortfall (which it accentuates) provides further support for releasing additional sites now, on top of the Green Belt sites already proposed for allocation, to aid delivery in the first five years of the plan. This should also negate the need for an early review, or the risk of taking a plan to examination without a deliverable 5-year supply.
- 6.64 In short, there are acute housing supply issues in the area that should be addressed at the earliest opportunity.

Conclusions on Housing Land Supply

- 6.65 Overall, this supply analysis suggests the Council will need to allocate additional Green Belt land for at least **2,243 dwellings** to meet shortfall within the first 5 years and across the full plan period.
- 6.66 Whilst housing delivery in recent years has been relatively strong, reflected in the 98% performance within the Housing Delivery Test, this masks acute under-delivery in the years before that, dating back to 2003.
- 

APPENDIX 7- **COUNCIL'S HOUSING TRAJECTORY**

ST HELENS HOUSING SUPPLY - COUNCIL's TRAJECTORY (COMPOSITE OF SHLAA APPENDIX 5 AND LOCAL PLAN TABLE 4.7)

2017 SHLAA Appendix 5: Development Trajectory

| Ref | Site Name | Post code | Ward | Land Type | Size | Density | Type of site | Site Status | Site capacity | Units completed | Outstanding capacity | 2017/ 18 | 2018/ 19 | 2019/ 20 | 2020 /21 | 2021/ 22 | 2022/ 23 | 2023/ 24 | 2024/ 25 | 2025/ 26 | 2026/ 27 | 2027/ 28 | 2028/ 29 | 2029/ 30 | 2030/ 31 | 2031/ 32 | 2032/33 | 2033/34 | 2034/ 35 | 0-5 yrs | 6-10 yrs | 11-15 yrs | 15+ | Beyond Plan period |
|----------|---|-----------|--------------------------|------------|-------|---------|--------------|-------------|---------------|-----------------|----------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|---------|---------|----------|---------|----------|-----------|-----|--------------------|
| 1 | Land rear of 1-27 Station Road | WA11 0GU | Haydock | Greenfield | 0.4 | 30.00 | SHLAA_20 17 | | 12 | 0 | 12 | 0 | 0 | 10 | 2 | 0 | | | | | | | | | | | | | | 12 | 0 | 0 | 0 | |
| 3 | Land rear of 14 to 20 Weymouth Avenue | WA9 3QY | Parr | Brownfield | 0.36 | 38.89 | SHLAA_20 17 | | 14 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 14 | 0 | 0 | |
| 4 | Land Between 8 & 34 Portland Way and 161 & 123 Berry's Lane | WA9 3QZ | Parr | Brownfield | 0.28 | 39.29 | SHLAA_20 17 | | 11 | 0 | 11 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 11 | 0 | 0 | |
| 5 | Land Between Weymouth Avenue & Berry's Lane | WA9 3QT | Parr | Brownfield | 0.52 | 34.62 | SHLAA_20 17 | | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 18 | 0 | 0 | |
| 7 | Land at Park Road | WA9 1ER | Town Centre | Brownfield | 0.78 | 35.90 | SHLAA_20 17 | | 28 | 0 | 28 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 28 | 0 | 0 | |
| 9 (10HA) | Moss Nook Urban Village, Watery Lane | WA9 3EN | Town Centre | Brownfield | 26.74 | 29.99 | SHLAA_20 17 | | 802 | 0 | 802 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 401 | 401 | 0 | |
| 10 | Land at junction of Sunbury Street and Fir Street | WA10 3RA | Thatto Heath | Brownfield | 0.82 | 39.02 | SHLAA_20 17 | | 32 | 0 | 32 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 32 | 0 | 0 | |
| 13 | Land rear of Carnegie Crescent and Goodban Street | WA9 3LX | Parr | Brownfield | 0.26 | 26.92 | SHLAA_20 17 | | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 7 | 0 | 0 | |
| 18 | Land at Somerset Street and Sussex Grove | WA9 1QN | Parr | Brownfield | 2.21 | 29.86 | SHLAA_20 17 | | 66 | 0 | 66 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 66 | 0 | 0 | |
| 19 | Leyland Green Road | WN4 0OQ | Billinge & Seneley Green | Greenfield | 0.53 | 13.21 | SHLAA_20 17 | | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 7 | 0 | 0 | |
| 21 | Land at Holly Bank Street | WA9 1EH | Town Centre | PDL/GF | 1.28 | 26.56 | SHLAA_20 17 | | 34 | 0 | 34 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 34 | 0 | 0 | |
| 22 | Land at corner of Fairclough Street and Wargrave Road | WA12 9QU | Earlestown | Brownfield | 0.41 | 34.15 | SHLAA_20 17 | | 14 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 14 | 0 | 0 | |
| 23 | Liverpool Arms and former Sacred Heart RC Church and School, Borough Road | WA10 3SX | Town Centre | Brownfield | 0.83 | 34.94 | SHLAA_20 17 | | 29 | 0 | 29 | 0 | 0 | 29 | 0 | 0 | | | | | | | | | | | | | | 29 | 0 | 0 | 0 | |
| 25 | Alexandra Park- Former Pilkington HQ | WA10 3TP | West Park | Brownfield | 10.8 | 15.00 | SHLAA_20 17 | | 162 | 0 | 162 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 162 | 0 | 0 | |
| 27 | Former Bethel Mission Bowling Green, Marsden Avenue | WA10 4JL | West Park | Greenfield | 0.27 | 37.04 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 10 | 0 | 0 | |
| 31 | Former Sutton Arms PH, Elephant Lane | WA9 5HH | Thatto Heath | Brownfield | 0.35 | 51.43 | SHLAA_20 17 | | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 18 | 0 | 0 | |
| 36 | Land & Premises at Lords Fold | WA11 8HN | Rainford | Brownfield | 2.01 | 22.39 | SHLAA_20 17 | | 45 | 0 | 45 | 0 | 0 | 10 | 20 | 15 | | | | | | | | | | | | | | 45 | 0 | 0 | 0 | |
| 38 (9Ha) | Land north of Elton Head Road | WA9 5GN | Thatto Heath | Brownfield | 12.5 | 30.00 | SHLAA_20 17 | | 375 | 0 | 375 | 0 | 0 | 22 | 45 | 45 | | | | | | | | | | | | | | 112 | 225 | 38 | 0 | |
| 58 | Former Central Works, Church Road | WA11 0GT | Haydock | Brownfield | 1.35 | 35.56 | SHLAA_20 17 | | 48 | 0 | 48 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 48 | 0 | 0 | |
| 59 | Site of former 56-120 Eccleston Street | WA10 2PN | Town Centre | Brownfield | 0.33 | 39.39 | SHLAA_20 17 | | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 13 | 0 | 0 | |
| 60 | Vacant land adjacent to Rail Line, Elephant Lane | WA9 5RR | Thatto Heath | PDL/GF | 4.33 | 25.87 | SHLAA_20 17 | | 112 | 0 | 112 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 112 | 0 | 0 | |
| 61 | Land North and South of Corporation Street | WA9 1JU | Town Centre | Brownfield | 3.23 | 52.32 | SHLAA_20 17 | | 169 | 0 | 169 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 169 | 0 | 0 | |
| 63 | Land at Waterdale Crescent | WA9 3PG | Sutton | PDL/GF | 0.26 | 38.46 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 10 | 0 | 0 | |
| 64 | BT Depot, Sutton Road | WA9 3DZ | Town Centre | Brownfield | 1.02 | 35.29 | SHLAA_20 17 | | 36 | 0 | 36 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 0 | 36 | 0 | |
| 65 | Former Pumping Station, Sutton Road | WA9 3EW | Town Centre | Brownfield | 0.27 | 37.04 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 10 | 0 | 0 | |
| 66 | Land off Wargrave Road | WA12 8RW | Newton | PDL/GF | 0.3 | 23.33 | SHLAA_20 17 | | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 7 | 0 | 0 | |
| 69 | Site of former Parr Community High School, Fleet Lane | WA9 1ST | Parr | Brownfield | 1.52 | 35.53 | SHLAA_20 17 | | 54 | 0 | 54 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 54 | 0 | 0 | |
| 72 | Site of former St.Marks Primary School, Willow Tree Avenue | WA9 4LZ | Sutton | Brownfield | 0.51 | 35.29 | SHLAA_20 17 | | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 18 | 0 | 0 | |
| 74 | Site of former 119-133 Crow Lane West | WA12 9YN | Earlestown | Brownfield | 0.3 | 30.00 | SHLAA_20 17 | | 9 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 0 | 9 | 0 | |
| 75 | Christ Church Parish Hall, Chapel Lane | WA10 5DA | Eccleston | Brownfield | 0.36 | 27.78 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 0 | 10 | 0 | |
| 78 | Former St.Helens Glass, Corporation Street | WA10 1GF | Town Centre | Brownfield | 2.07 | 71.98 | SHLAA_20 17 | | 149 | 0 | 149 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | 149 | 0 | 0 | |

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------|--|----------|--------------|------------|-------|-------|---|----|-----|----|-----|----|----|----|----|----|--|--|--|--|--|--|--|--|--|-----|-----|-----|-----|-----|
| 82 | Land adjacent Laffak Road and Carr Mill Road | WA11 9LG | Moss Bank | PDL/GF | 3.31 | 29.91 | SHLAA_20 17 | | 99 | 0 | 99 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 99 | 0 | 0 | |
| 84 | Land adjacent Church of Christ, Heather Brae | WA12 9DH | Earlestown | Greenfield | 0.3 | 30.00 | SHLAA_20 17 | | 9 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 9 | 0 | 0 | |
| 85 | Site of former Our Lady's Primary School, Fleet Lane | WA9 2RL | Parr | Brownfield | 0.61 | 34.43 | SHLAA_20 17 | | 21 | 0 | 21 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 21 | 0 | 0 | |
| 87 | Land west of Vista Road | WA11 0RW | Haydock | Greenfield | 1.24 | 26.61 | SHLAA_20 17 | | 33 | 0 | 33 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 33 | 0 | |
| 89 | Land rear of 64-94 Marshalls Cross Road | WA9 5AJ | Town Centre | Greenfield | 0.96 | 12.50 | SHLAA_20 17 | | 12 | 0 | 12 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 12 | 0 | 0 | |
| 90 | Land to the West of Common Road | WA12 9JA | Earlestown | Greenfield | 5.44 | 26.10 | SHLAA_20 17 | | 142 | 0 | 142 | 0 | 22 | 45 | 45 | 30 | | | | | | | | | | 142 | 0 | 0 | 0 | |
| 91 | Milton Street | WA9 4BQ | Bold | Greenfield | 1.27 | 19.69 | SHLAA_20 17 | | 25 | 0 | 25 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 25 | 0 | 0 | |
| 95 | Site of former Carr Mill Infants School, Ulswater Ave | WA11 7PT | Moss Bank | PDL/GF | 1.49 | 35.57 | SHLAA_20 17 | | 53 | 0 | 53 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 53 | 0 | 0 | |
| 96 | Land rear of 350 Warrington Road | L35 9JL | Rainhill | Greenfield | 0.39 | 28.21 | SHLAA_20 17 | | 11 | 0 | 11 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 11 | 0 | |
| 102 | Auto Safety Centre, Vicarage Road | WA11 0UJ | Blackbrook | Brownfield | 0.31 | 29.03 | SHLAA_20 17 | | 9 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 9 | 0 | 0 | |
| 103 | Land rear of 39-67 Valentine Road | WA12 9LF | Earlestown | PDL/GF | 0.46 | 21.74 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 10 | 0 | 0 | |
| 106 | Site of former 126-154 Birchley Street and 107- 125 Brynn Street | WA10 1HZ | Town Centre | Brownfield | 0.25 | 40.00 | SHLAA_20 17 | | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 10 | 0 | 0 | |
| 109 | Land adjacent Piele Road | WA11 0PE | Haydock | PDL/GF | 0.61 | 21.31 | SHLAA_20 17 | | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 13 | 0 | 0 | |
| 111 (6HA) | Land east of City Road, Cowley Hill | WA10 1TY | Moss Bank | Brownfield | 47.09 | 17.26 | SHLAA_20 17 | | 813 | 0 | 813 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 180 | 225 | 132 | 276 |
| 112 | Land to the rear of Juddfield Street | WA11 0AZ | Blackbrook | Brownfield | 1.14 | 35.96 | SHLAA_20 17 | | 41 | 0 | 41 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 41 | 0 | |
| 113 | Land at Willow Tree Avenue | WA9 4NU | Sutton | Greenfield | 3.5 | 14.29 | SHLAA_20 17 | | 50 | 0 | 50 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 50 | 0 | |
| 114 | Land at 19 and 25 Sutton Moss Road | WA9 3HU | Parr | PDL/GF | 0.54 | 25.93 | SHLAA_20 17 | | 14 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 14 | 0 | |
| 126 | Former Halton and St Helens PCT HQ, Cowley Hill | WA10 2UE | Windle | Brownfield | 0.89 | 35.96 | SHLAA_20 17 | | 32 | 0 | 32 | 0 | 0 | 10 | 20 | 2 | | | | | | | | | | 32 | 0 | 0 | 0 | |
| 129 | Derbyshire Hill Family Centre, Derbyshire Hill Road | WA9 2LN | Parr | PDL/GF | 0.32 | 37.50 | SHLAA_20 17 | | 12 | 0 | 12 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 12 | 0 | |
| 133 | Land rear of 2-24 Massey Street | WA9 3NL | Town Centre | PDL/GF | 0.35 | 40.00 | SHLAA_20 17 | | 14 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 14 | 0 | |
| 134 | Land at Littler Road | WA11 0JP | Blackbrook | Greenfield | 0.52 | 21.15 | SHLAA_20 17 | | 11 | 0 | 11 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 11 | 0 | 0 | |
| 135 | Land at Newby Place | WA11 7BZ | Moss Bank | Greenfield | 0.34 | 38.24 | SHLAA_20 17 | | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 13 | 0 | 0 | |
| 150 | Former Red Quarry, Chester Lane | WA9 4DA | Bold | Brownfield | 1.93 | 29.53 | SHLAA_20 17 | | 57 | 0 | 57 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 57 | 0 | 0 | |
| 151 | Land adjacent St.Helens Hospital, Marshalls Cross Road | WA9 3BY | Town Centre | Brownfield | 1.65 | 35.76 | SHLAA_20 17 | | 59 | 0 | 59 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 59 | 0 | |
| 152 | Sidac Sports & Social Club, Applecorn Close | WA9 4NT | Sutton | PDL/GF | 3.65 | 37.53 | SHLAA_20 17 | | 137 | 0 | 137 | 0 | 0 | 22 | 45 | 45 | | | | | | | | | | 112 | 25 | 0 | 0 | |
| 154 | College Street Northern Gateway | WA10 1HT | Town Centre | Brownfield | 2.88 | 35.76 | SHLAA_20 17 | | 103 | 0 | 103 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 103 | 0 | 0 | |
| 155 | Land south of Knowsley Road | | West Park | Brownfield | 0.42 | 42.86 | SHLAA_20 17 | | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 18 | 0 | 0 | |
| 156 | Land south of Crab Street | WA10 2JN | Town Centre | Brownfield | 1.26 | 16.67 | SHLAA_20 17 | | 21 | 0 | 21 | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | 0 | 0 | 21 | 0 | |
| HL526 | Former Broad Oak Social Club and land rear of 1- 21 Seath Avenue | WA9 1SH | Parr | PDL/GF | 0.97 | 21.65 | Planning permission: not started | NS | 21 | 0 | 21 | 0 | 0 | 20 | 1 | 0 | | | | | | | | | | 21 | 0 | 0 | 0 | |
| HL496 | Land at Elton Head Road, Lea Green | WA9 5AU | Thatto Heath | Greenfield | 6.2 | 29.03 | Planning permission: not started | NS | 180 | 0 | 180 | 0 | 0 | 45 | 45 | 45 | | | | | | | | | | 135 | 45 | 0 | 0 | |
| NT03 | Land to side and rear of 41-49 Old Wargrave Road | WA12 8NG | Newton | Brownfield | 0.61 | 98.36 | Planning permission: not started | NS | 60 | 0 | 60 | 0 | 15 | 30 | 15 | 0 | | | | | | | | | | 60 | 0 | 0 | 0 | |
| HL417 | Sherdley Remec Ltd Gorsey Lane Clock Face | WA9 4SE | Bold | Brownfield | 0.93 | 20.43 | Planning permission: under construction | UC | 19 | 5 | 14 | 14 | 0 | 0 | 0 | 0 | | | | | | | | | | 14 | 0 | 0 | 0 | |
| HL557 | Land north of Edward Street | WA9 3DP | Town Centre | Brownfield | 1.21 | 42.98 | Planning permission: not started | NS | 52 | 0 | 52 | 0 | 15 | 30 | 7 | 0 | | | | | | | | | | 52 | 0 | 0 | 0 | |
| HL483 | lbstocks, Chester Lane | WA9 4EN | Bold | Brownfield | 9 | 28.89 | Planning permission: not started | NS | 260 | 0 | 260 | 0 | 0 | 10 | 20 | 20 | | | | | | | | | | 50 | 210 | 0 | 0 | |
| HL430 | Land at Delta Road | WA9 2EA | Parr | PDL/GF | 1.34 | 38.81 | Planning permission: under construction | UC | 52 | 14 | 38 | 30 | 8 | 0 | 0 | 0 | | | | | | | | | | 38 | 0 | 0 | 0 | |
| HL555 | Viridor Glass Recycling, Lancots Lane | WA9 3GL | Town Centre | Brownfield | 1.76 | 30.11 | Planning permission: not started | NS | 53 | 0 | 53 | 0 | 15 | 30 | 8 | 0 | | | | | | | | | | 53 | 0 | 0 | 0 | |
| HL532 | Land At Rear Of 46 Windle Hall Drive | WA10 6QQ | Windle | Greenfield | 0.43 | 20.93 | Planning permission: under construction | UC | 9 | 0 | 9 | 9 | 0 | 0 | 0 | 0 | | | | | | | | | | 9 | 0 | 0 | 0 | |
| HL488 | Saxon Court Keswick Road | WA10 2AT | Windle | PDL | 0.42 | 14.29 | Planning permission: under construction | UC | 6 | 0 | 6 | 6 | 0 | 0 | 0 | 0 | | | | | | | | | | 6 | 0 | 0 | 0 | |

APPENDIX 8- PEGASUS HOUSING TRAJECTORY

ST HELENS HOUSING SUPPLY - PEGASUS BEST CASE SCENARIO

2017 SHLAA Appendix 5: Development Trajectory

| Ref | Site Name | Post code | Ward | Land Type | Size | Density | Type of site | Status/ Planning Reference | Permissions/ (expiry if applicable) | Site Status | Number of Conditions | Comments | Site capacity | Units completed | Outstanding capacity | 2017/ 18 | 2018/ 19 | 2019/ 20 | 2020/ 21 | 2021/ 22 | 2022/ 23 | 2023/ 24 | 2024/ 25 | 2025/ 26 | 2026/ 27 | 2027/ 28 | 2028/ 29 | 2029/ 30 | 2030/ 31 | 2031/ 32 | 2032/33 | 2033/34 | 2034/ 35 | 0-5 yrs | 6-10 yrs | 11-15 yrs | 15-18 | Beyond 2035 | total in plan period | | | | | | |
|----------|---|-----------|--------------------------|------------|-------|---------|--------------|----------------------------|-------------------------------------|-------------|----------------------|--|---------------|-----------------|----------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|---------|---------|----------|---------|----------|-----------|-------|-------------|----------------------|-----|-----|-----|-----|---|----|
| 1 | Land rear of 1-27 Station Road | WA11 0GU | Haydock | Greenfield | 0.4 | 30.00 | SHLAA_20 17 | PRE/2018/0238/PREC | | NS | | looks like there has been pre-app on this so assume it will come forward | 12 | 0 | 12 | 0 | 0 | 10 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 12 | 0 | 0 | 0 | 0 | 12 | | | | | |
| 3 | Land rear of 14 to 20 Weymouth Avenue | WA9 3QY | Parr | Brownfield | 0.36 | 144.44 | SHLAA_20 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Land Between 8 & 34 Portland Way and 161 & 123 Berry's Lane | WA9 3QZ | Parr | Brownfield | 0.28 | 0.00 | SHLAA_20 17 | P/2016/0923/FUL | 06/10/2017 | UC | | Has full PP former cleared housing site - Gleeson Homes have consent for 52 dwellings and discharged several conditions early 2018. Site is called 'Berry Mead' and has website. Assume start on site 2019/20 30 per year, but 15 for 15/20 half year | 52 | 0 | 52 | 0 | 0 | 15 | 30 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 52 | 0 | 0 | 0 | 0 | 52 | | |
| 5 | Land Between Weymouth Avenue & Berry's Lane | WA9 3QT | Parr | Brownfield | 0.52 | 0.00 | SHLAA_20 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Land at Park Road | WA9 1ER | Town Centre | Brownfield | 0.78 | 33.33 | SHLAA_20 17 | P/2017/0672/FUL | 04/12/2017 | UC | | Torus Kier scheme - full permission for 20 house and 6 appts - approved December 2017 some conditions discharged July 2018 | 26 | 0 | 26 | 0 | 0 | 15 | 11 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 26 | 0 | 0 | 0 | 0 | 26 | | | |
| 9 [20H4] | Moss Nook Urban Village, Watery Lane | WA9 3EN | Town Centre | Brownfield | 26.74 | 29.99 | SHLAA_20 17 | | | | | First identified in December 2016 Preferred Options as a SHLAA site. 9.2 year lead in (3.9 + 5.3) | 802 | 0 | 802 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 11 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 0 | 79 | 340 | 204 | 179 | 623 | 802 | | | | |
| 10 | Land at junction of Sunbury Street and Fir Street | WA10 3RA | Thutto Heath | Brownfield | 0.82 | 39.02 | SHLAA_20 17 | N/A | | NS | | November 2004 consent for 5 units. Potential viability concerns as no recent applications. Start at year 6 as per SHLAA, which is now 2023/24 | 32 | 0 | 32 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 17 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 32 | 0 | 0 | 0 | 0 | 32 | | | | |
| 13 | Land rear of Carnegie Crescent and Goodban Street | WA9 3LX | Parr | Brownfield | 0.26 | 26.92 | SHLAA_20 17 | N/A | | NS | | Cleared former Helena Homes ownership according to SHLAA and intention to still develop but no consent. Start in year 6 as per SHLAA (now 23/24) | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 7 | | | | | |
| 18 | Land at Somerset Street and Sussex Grove | WA9 1QN | Parr | Brownfield | 2.21 | 29.86 | SHLAA_20 17 | N/A | | NS | | Cleared former housing site, applications from 2004 and 2007 for up to 86 units/ Helena Homes ownership and intention to still develop. Potential viability issues. Start in year 6 as per SHLAA (now 23/24) | 66 | 0 | 66 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 66 | 0 | 0 | 0 | 0 | 66 | | | |
| 19 | Leyland Green Road | WN4 0QJ | Billings & Seneley Green | Greenfield | 0.53 | 13.21 | SHLAA_20 17 | P/2001/1117 | 04/03/2007 | NS | | Expired consent from 2002, looks to be flood risk, has land undeveloped for 17 years, steep slope. Otherwise start in year 6 as per SHLAA (now 23/24) | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 7 | | | | |
| 21 | Land at Holly Bank Street | WA9 1EH | Town Centre | POL/GF | 1.28 | 51.56 | SHLAA_20 17 | P/2017/0674/FUL | 06/02/2018 | NS | | Full planning permission for 66 units granted in Feb 2018. Torus/ Kier scheme. No DOCS yet, but presume will start next year 2020/21 | 66 | 0 | 66 | 0 | 0 | 0 | 15 | 30 | 21 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 45 | 21 | 0 | 0 | 0 | 66 | | | | |
| 22 | Land at corner of Fairclough Street and Wargrave Road | WA12 9QU | Earlestown | Brownfield | 0.41 | 34.15 | SHLAA_20 17 | P/2005/0996 | 26/02/2011 | NS | | SHLAA notes. Ownership issues which freeholder is attempting to resolve. Historic consent from 2008 for 62 apartments. Start in year 6 (23/24) | 14 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | 0 | 14 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 14 | 0 | 0 | 0 | 0 | 14 | | | |
| 23 | Liverpool Arms and former Sacred Heart RC Church and School, Borough Road | WA10 3SK | Town Centre | Brownfield | 0.83 | 34.94 | SHLAA_20 17 | P/2005/1033 | 15/01/2011 | NS | | old pub and nursery site, demolished in 2017. Full application in 2005 for 130 apartments but expired in 2011. No further apps. Some ownership issues but EVA suggests it is viable. Start in year 6 (23/24) | 29 | 0 | 29 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 14 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 29 | 0 | 0 | 0 | 0 | 29 | | |
| 25 | Alexandra Park- Former Pilkington HQ | WA10 3TP | West Park | Brownfield | 10.8 | 15.00 | SHLAA_20 17 | | | NS | | Former Pilkington HQ - being masterplanned but no consent yet. Start in year 6 (23/24) (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year) | 162 | 0 | 162 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 30 | 30 | 30 | 12 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 120 | 42 | 0 | 0 | 162 | | | | | |
| 27 | Former Bethel Mission Bowling Green, Manden Avenue | WA10 4UL | West Park | Greenfield | 0.27 | 37.04 | SHLAA_20 17 | P/2010/0638 | 04/10/2013 | NS | | Expired consent for 16 affordable in 2010 and earlier consent for 12 in 2007. Doesn't look to be any constraints. Start in year 6 (23/24) | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 10 | | | |
| 31 | Former Sutton Arms PH, Elephant Lane | WA9 1HH | Thutto Heath | Brownfield | 0.35 | 51.43 | SHLAA_20 17 | P/2011/0651 | 24/02/2014 | NS | | Fire damaged former pub with expired res consent. Potential viability issues. Start in year 6 | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 18 | 0 | 0 | 0 | 0 | 18 | | | | |
| 36 | Land & Premises at Lords Fold | WA11 8HN | Rainford | Brownfield | 2.01 | 22.39 | SHLAA_20 17 | P/2017/0789 | 23/05/2021 | NS | | Outline application permitted in 2018, further apps submitted, but no RM or DOCS as of yet. Expect a further year to resolve. So 15 dpa starting 2020/21 | 45 | 0 | 45 | 0 | 0 | 0 | 15 | 15 | 15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 15 | 0 | 0 | 0 | 45 | | | |
| 38 [9H4] | Land north of Elton Head Road | WA9 5GN | Thutto Heath | Brownfield | 12.5 | 28.16 | SHLAA_20 17 | P/2018/0060 | 20/06/2021 | NS | 9 | Permission granted June 2018. Project Properties. Hybrid planning application, full for demolition, outline for 352 dwellings. No DOCS or RMs submitted yet. According to Lichfield 4.1 year lead in. July 2022 start (Q2) - have used Council deliver rates considering it has consent | 352 | 0 | 352 | 0 | 0 | 0 | 0 | 0 | 0 | 34 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 352 | | |
| 58 | Former Central Works, Church Road | WA11 0GT | Haydock | Brownfield | 1.35 | 35.56 | SHLAA_20 17 | P/2005/0012 | Expired | NS | | Original consent from 2002, extended in 2005, the demolition of existing buildings and erection of petrol filling station, drive through restaurant, residential development and 1,393 square metre non-food retail unit, and relocation of Conservative Club. No indication on numbers. No ownership or viability issues. We understand it has been sold to Rowland Homes, but there are issues. May rely on adjacent site for access which was safeguarded but has now come out. Start in year 6 (23/24) | 48 | 0 | 48 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 15 | 15 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 48 | 0 | 0 | 0 | 0 | 48 |
| 59 | Site of former 56-120 Eccleston Street | WA10 2PN | Town Centre | Brownfield | 0.33 | 39.39 | SHLAA_20 17 | N/A | | NS | | No ownership or viability issues raised in SHLAA. No application. Start in year 6 | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13 | 0 | 0 | 0 | 0 | 13 | | | | |
| 60 | Vacant land adjacent to Rail Line, Elephant Lane | WA9 5RR | Thutto Heath | POL/GF | 4.33 | 25.87 | SHLAA_20 17 | N/A | | NS | | Council owned, former UDP allocation, noise, access and contamination issues flagged up though. Start in year 6, (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year) | 112 | 0 | 112 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 30 | 22 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 112 | 0 | 0 | 0 | 0 | 112 | | | |
| 61 | Land North and South of Corporation Street | WA9 1JU | Town Centre | Brownfield | 3.23 | 52.32 | SHLAA_20 17 | N/A | | NS | | Potential Viability issues with TC apartment schemes, is part of a masterplanned approach. Start in year 6, (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year) | 169 | 0 | 169 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 30 | 30 | 30 | 19 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 120 | 49 | 0 | 0 | 169 | | | | | |
| 63 | Land at Watdale Crescent | WA9 3PG | Sutton | POL/GF | 0.26 | 38.46 | SHLAA_20 17 | N/A | | NS | | Potential viability/ market attractiveness issues raised. Start in year 6. | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 10 | | | | |
| 64 | BT Depot, Sutton Road | WA9 3DZ | Town Centre | Brownfield | 1.02 | 0.00 | SHLAA_20 17 | N/A | | NS | | is in use as a donation centre for a hospice. Council have put in as year 11-18 suggesting issues. Apparently has developer interest. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 65 | Former Pumping Station, Sutton Road | WA9 3EW | Town Centre | Brownfield | 0.27 | 37.04 | SHLAA_20 17 | N/A | | NS | | Potential viability issues, is included within Moss Nook Urban Village, as part of Phase 3, we would suggest this moves this to later in the period- year 11 (12 in SHLAA) | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 10 | | | |
| 66 | Land off Wargrave Road | WA12 8RW | Newton | POL/GF | 0.3 | 23.33 | SHLAA_20 17 | N/A | | NS | | Cleared housing site, no consent but know issues. Start in year 6. | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 7 | | | | |
| 69 | Site of former Parr Community High School, Fleet Lane | WA9 1ST | Parr | Brownfield | 1.52 | 35.53 | SHLAA_20 17 | N/A | | NS | | Surplus land from school redevelopment. Developer interest and no know ownership issues. Start in year 6. | 54 | 0 | 54 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 24 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 54 | 0 | 0 | 0 | 0 | 54 | | | |
| 72 | Site of former St.Marks Primary School, Willow Tree Avenue | WA9 4LZ | Sutton | Brownfield | 0.51 | 35.29 | SHLAA_20 17 | N/A | | NS | | SHLAA suggests developer interest and no known issues. Looks to be surplus land from school redevelopment | 18 | 0 | 18 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 18 | 0 | 0 | 0 | 0 | 18 | | | |
| 74 | Site of former 119-133 Crow Lane West | WA12 9YN | Earlestown | Brownfield | 0.3 | 0.00 | SHLAA_20 17 | N/A | | NS | | Site is in active use as a builders merchant, no indication that it has closed. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| 75 | Christ Church Parish Hall, Chapel Lane | WA10 5DA | Eccleston | Brownfield | 0.36 | 0.00 | SHLAA_20 17 | N/A | | NS | | Site is in active use as a medical centre no indication that it has closed or relocation considered. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| 78 | Former St.Helens Glass, Corporation Street | WA10 1GF | Town Centre | Brownfield | 2.07 | 62.80 | SHLAA_20 17 | P/2017/0634/FUL | 06/11/2017 | NS | | Consent for 130 extra care apartments. They have started discharging conditions | 130 | 0 | 130 | 0 | 0 | 15 | 30 | 30 | 30 | 25 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 75 | 55 | 0 | 0 | 0 | 130 | | | | |
| 82 | Land adjacent Laffak Road and Carr Mill Road | WA11 9LG | Moss Bank | POL/GF | 3.31 | 43.32 | SHLAA_20 17 | P/2019/0036/FUL | | NS | | Live full application in for 150 dwellings (of 57 houses,1 bungalow, and 92 apartments) Assume 1.5 yrs to go through and sort conditions so 2021/2022 start. | 150 | 0 | 150 | 0 | 0 | 0 | 30 | 30 | 30 | 30 | 30 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 60 | 90 | 0 | 0 | 0 | 150 | | | | |
| 84 | Land adjacent Church of Christ, Heather Brae | WA12 9DH | Earlestown | Greenfield | 0.3 | 30.00 | SHLAA_20 17 | N/A | | NS | | Informal open space adjacent to builders yard (site 84). Mixed ownership but generally no issues raised. Start in year 6 | 9 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 9 | 0 | 0 | 0 | 0 | 9 | | | | |
| 85 | Site of former Our Lady's Primary School, Fleet Lane | WA9 2RL | Parr | Brownfield | 0.61 | 85.25 | SHLAA_20 17 | P/2018/0502/FUL | 31/01/2019 | UC | | Surplus land from school redevelopment, no known issues. Application for 52 dwellings approved January 2019 - DOC app has gone in/ MC developments. Start halfway 2019/2020 | 52 | 0 | 52 | 0 | 0 | 15 | 30 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 52 | 0 | 0 | 0 | 0 | 52 | | | |
| 87 | Land west of Vista Road | WA11 0RW | Haydock | Greenfield | 1.24 | 26.61 | SHLAA_20 17 | | | NS | | Council propose for years 11-15 as is in active grazing use, with scrap yard and cement works nearby. Start year 11. | 33 | 0 | 33 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 15 | 3 | | | 0 | 0 | 33 | 0 | 0 | 33 | | | | | | | |
| 89 | Land rear of 64-94 Marshall's Cross Road | WA9 5AJ | Town Centre | Greenfield | 0.96 | 36.46 | SHLAA_20 17 | PRE/2019/0031/PREC | | NS | | Half site in Flood Zone 3, former overgrown allotments. Previous developer interest- looks like they've had a pre-app early 2019 for 35 units | 35 | 0 | 35 | 0 | 0 | 0 | 15 | 15 | 5 | 0 | 0</ | | | | | | | | | | | | | | | | | | | | | | |

[illegible]

Small sites/ windfall

Proposed Allocations 2019 Plan (2020-2035 and beyond)

TOTALS (SHLAA + WINDFALLS + ALLOCATIONS)

[illegible]

ST HELENS HOUSING SUPPLY - PEGASUS WORST CASE SCENARIO

2017 SHLAA Appendix 5: Development Trajectory

| Ref | Site Name | Post code | Ward | Land Type | Size | Density | Type of site | Status/ Planning Reference | Permission/ (expiry if applicable) | Site Status | Number of Conditions | Comments | Site capacity | Units completed | Outstanding capacity | 2017/ 18 | 2018/ 19 | 2019/ 20 | 2020/ 21 | 2021/ 22 | 2022/ 23 | 2023/ 24 | 2024/ 25 | 2025/ 26 | 2026/ 27 | 2027/ 28 | 2028/ 29 | 2029/ 30 | 2030/ 31 | 2031/ 32 | 2032/ 33 | 2033/ 34 | 2034/ 35 | 0-5 yrs | 6-10 yrs | 11-15 yrs | 15-18 | Beyond 2035 | total in plan period | | | |
|----------|---|-----------|--------------------------|------------|-------|---------|--------------|----------------------------|------------------------------------|-------------|----------------------|--|---------------|-----------------|----------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|---------|----------|-----------|-------|-------------|----------------------|----|-----|----|
| 1 | Land rear of 1-27 Station Road | WA11 0GU | Haydock | Greenfield | 0.4 | 30.00 | SHLAA_20 17 | PRE/2018/0238/PREC | | NS | | looks like there has been pre-app on this so assume it will come forward | 12 | 0 | 12 | 0 | 0 | 10 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 12 | 0 | 0 | 0 | 0 | 12 | | | |
| 3 | Land rear of 14 to 30 Weymouth Avenue | WA9 3QY | Parr | Brownfield | 0.36 | 144.44 | SHLAA_20 17 | P/2016/0923/FUL | 06/10/2017 | UC | | Has full PP former cleared housing site - Gleeson Homes have consent for 52 dwellings¹ and discharged several conditions early 2018. Site id called 'Berry Mead' and has website. Assume start on site 2019/20 30 per year, but 15 for 19/20 half year | 52 | 0 | 52 | 0 | 0 | 15 | 30 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 4 | Land Between 8 & 34 Portland Way and 161 & 123 Berry's Lane | WA9 3QZ | Parr | Brownfield | 0.28 | 0.00 | SHLAA_20 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Land Between Weymouth Avenue & Berry's Lane | WA9 3QT | Parr | Brownfield | 0.52 | 0.00 | SHLAA_20 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Land at Park Road | WA9 1ER | Town Centre | Brownfield | 0.78 | 33.33 | SHLAA_20 17 | P/2017/0672/FUL | 04/12/2017 | UC | | Torus Kier scheme - Full permission for 20 house and 6 appts approved December 2017. Some conditions discharged July 2018 | 26 | 0 | 26 | 0 | 0 | 15 | 11 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 26 | 0 | 0 | 0 | 0 | 26 | | | |
| 9 (10Ha) | Moss Nook Urban Village, Watery Lane | WA9 3EN | Town Centre | Brownfield | 26.74 | 29.99 | SHLAA_20 17 | | | | | First identified in December 2016 Preferred Options as a SHLAA site. 9.2 year lead in (3.9 + 5.3) | 802 | 0 | 802 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 11 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 68 | 0 | 79 | 340 | 204 | 179 | 623 | | | |
| 10 | Land at junction of Sunbury Street and Fir Street | WA10 3RA | Thatto Heath | Brownfield | 0.82 | 0.00 | SHLAA_20 17 | N/A | | NS | | November 2004 consent for 5 units. Potential viability concerns as no recent applications. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 13 | Land rear of Carnegie Crescent and Goodban Street | WA9 3LX | Parr | Brownfield | 0.26 | 26.92 | SHLAA_20 17 | N/A | | NS | | Cleared former Helena Homes ownership according to SHLAA and intention to still develop but no consent. Start in year 6 as per SHLAA (now 23/24) | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 7 | | |
| 18 | Land at Somerset Street and Sussex Grove | WA9 1QN | Parr | Brownfield | 2.21 | 29.86 | SHLAA_20 17 | N/A | | NS | | Cleared former housing site, applications from 2004 and 2007 for up to 86 units¹ Helena Homes ownership and intention to still develop. Potential viability issues. Start in year 6 as per SHLAA (now 23/24) | 66 | 0 | 66 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 66 | 0 | 0 | 0 | 0 | 66 | | |
| 19 | Leyland Green Road | WN4 0QJ | Billinge & Seneley Green | Greenfield | 0.53 | 0.00 | SHLAA_20 17 | P/2001/1117 | 04/03/2007 | NS | | Expired consent from 2002, looks to be flood risk, has laid undeveloped for 17 years, steep slope. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 21 | Land at Holly Bank Street | WA9 1EH | Town Centre | PDL/GF | 1.28 | 51.56 | SHLAA_20 17 | P/2017/0674/FUL | 06/02/2018 | NS | | Full planning permission for 66 units granted in Feb 2018. Torus/ Kier scheme. No DOCS yet, but presume will start next year 2020/2021 | 66 | 0 | 66 | 0 | 0 | 0 | 15 | 30 | 21 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 45 | 21 | 0 | 0 | 0 | 66 | | | |
| 22 | Land at corner of Fairclough Street and Wargrave Road | WA12 9QU | Earlestown | Brownfield | 0.41 | 0.00 | SHLAA_20 17 | P/2005/0996 | 28/02/2011 | NS | | SHLAA notes. Ownership issues which freeholder is attempting to resolve. Historic consent from 2008 for 61 apartments. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 23 | Liverpool Arms and former Sacred Heart RC Church and School, Borough Road | WA10 3SX | Town Centre | Brownfield | 0.83 | 34.94 | SHLAA_20 17 | P/2005/1033 | 15/01/2011 | NS | | old pub and nursery site, demolished in 2017. Full application in 2005 for 130 apartments but expired in 2011. No further apps. Some ownership issues but EVA suggests it is viable. Start in year 6 (23/24) | 29 | 0 | 29 | 0 | 0 | 0 | 0 | 0 | 15 | 14 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 29 | 0 | 0 | 0 | 0 | 29 | | |
| 25 | Alexandra Park- Former Pilkington HQ | WA10 3TP | West Park | Brownfield | 10.8 | 15.00 | SHLAA_20 17 | | | NS | | Former Pilkington HQ - being masterplanned but no consent yet. Start in year 6 (23/24) (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year) | 162 | 0 | 162 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 30 | 30 | 30 | 12 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 120 | 42 | 0 | 0 | 162 | | | | |
| 27 | Former Bethel Mission Bowling Green, Marsden Avenue | WA10 4JL | West Park | Greenfield | 0.27 | 37.04 | SHLAA_20 17 | P/2010/0638 | 04/10/2013 | NS | | Expired consent for 16 affordable in 2010 and earlier consent for 12 in 2007. Doesn't look to be any constraints. Start in year 6 (23/24) | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 10 | | | |
| 31 | Former Sutton Arms PH, Elephant Lane | WA9 5HH | Thatto Heath | Brownfield | 0.35 | 0.00 | SHLAA_20 17 | P/2011/0651 | 26/01/2014 | NS | | Fire damaged former pub with expired retail consent. Potential viability issues. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 36 | Land & Premises at Lords Fold | WA11 8HN | Rainford | Brownfield | 2.01 | 22.39 | SHLAA_20 17 | P/2017/0789 | 23/05/2021 | NS | | Outline application permitted in 2018, further apps submitted, but no RM or DOCS as of yet. Expect a further year to resolve. So 15 dpa starting 2020/21 | 45 | 0 | 45 | 0 | 0 | 0 | 15 | 15 | 15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 15 | 0 | 0 | 0 | 45 | | | |
| 38 (9Ha) | Land north of Elton Head Road | WA9 5GN | Thatto Heath | Brownfield | 12.5 | 28.16 | SHLAA_20 17 | P/2018/0060 | 20/06/2021 | NS | 9 | Permission granted June 2018. Project Properties. Hybrid planning application, full for demolition, outline for 352 dwellings. No DOCS or RMs submitted yet. According to Lichfield 4.1 year lead in, July 2022 start (Q2) - have used Council deliver rates considering it has consent | 352 | 0 | 352 | 0 | 0 | 0 | 0 | 0 | 34 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 3 | 0 | 0 | 0 | 0 | 0 | 214 | 138 | 0 | 0 | 352 | |
| 58 | Former Central Works, Church Road | WA11 0GT | Haydock | Brownfield | 1.35 | 35.56 | SHLAA_20 17 | P/2005/0012 | Expired | NS | | Original consent from 2002, extended in 2005, the demolition of existing buildings and erection of petrol filling station, drive through restaurant, residential development and 1,393 square metre non-food retail unit, and relocation of Conservative Club. No indication on numbers. No ownership or viability issues. We understand it has been sold to Rowland Homes, but there are issues. May rely on adjacent site for access which was safeguarded but has now come out. Start in year 6 (23/24) | 48 | 0 | 48 | 0 | 0 | 0 | 0 | 0 | 0 | 15 | 15 | 15 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 48 | 0 | 0 | 0 | 48 |
| 59 | Site of former 56-120 Eccleston Street | WA10 2PN | Town Centre | Brownfield | 0.33 | 39.39 | SHLAA_20 17 | N/A | | NS | | No ownership or viability issues raised in SHLAA. No application. Start in year 6 | 13 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | 0 | 13 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13 | 0 | 0 | 0 | 13 | | | |
| 60 | Vacant land adjacent to Rail Line, Elephant Lane | WA9 5RR | Thatto Heath | PDL/GF | 4.33 | 0.00 | SHLAA_20 17 | N/A | | NS | | Council owned, former UDP allocation, noise, access and contamination issues flagged up though. Start in year 6, (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year). REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | | |
| 61 | Land North and South of Corporation Street | WA9 1JU | Town Centre | Brownfield | 3.23 | 52.32 | SHLAA_20 17 | N/A | | NS | | Potential Viability Issues with TC apartment schemes. Is part of a masterplanned approach. Start in year 6, (would start a year later but deliver higher numbers if follow Lichfield 3.9 + 4.1 years then 60 a year) | 169 | 0 | 169 | 0 | 0 | 0 | 0 | 0 | 0 | 30 | 30 | 30 | 30 | 30 | 19 | 0 | 0 | 0 | 0 | 0 | 0 | 120 | 49 | 0 | 0 | 169 | | | | |
| 63 | Land at Waterdale Crescent | WA9 3PG | Sutton | PDL/GF | 0.26 | 0.00 | SHLAA_20 17 | N/A | | NS | | Potential viability/ market attractiveness issues raised. Could definitely come out. REMOVED | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| 64 | BT Depot, Sutton Road | WA9 3DZ | Town Centre | Brownfield | 1.02 | 0.00 | SHLAA_20 17 | N/A | | NS | | It is in use as a donation centre for a hospital. Council have put in so year 11-15 suggesting issues. Apparently has developer interest. REMOVED AS IN ACTIVE USE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| 65 | Former Pumping Station, Sutton Road | WA9 3EW | Town Centre | Brownfield | 0.27 | 37.04 | SHLAA_20 17 | N/A | | NS | | Potential viability issues, is included within Moss Nook Urban Village, as part of Phase 3, we would suggest this moves this to later in the period- year 11 (12 in SHLAA) | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 0 | 10 | | | | |
| 66 | Land off Wargrave Road | WA12 8RW | Newton | PDL/GF | 0.3 | 23.33 | SHLAA_20 17 | N/A | | NS | | Cleared housing site, no consent but know issues. Start in year 6. | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 7 | | | |
| 69 | Site of former Parr Community High School, Fleet Lane | WA9 1ST | Parr | Brownfield | 1.52 | 35.53 | SHLAA_20 17 | N/A | | NS | | Surplus land from school redevelopment. Developer interest and no know ownership issues. Start in year 6. | 54 | 0 | 54 | | | | | | | | | | | | | | | | | | | | | | | | | | | |

[illegible]

[illegible]

SUMMARY SUPPLY TRAJECTORIES

| Council Overall Trajectory | | | | | Pegasus Best Case (A) | | | Pegasus Worst Case (B) | | | | Pegasus Mid Points | | |
|----------------------------|-----------------|--------------|-------|----------------|-----------------------|--------------|-------|------------------------|--------------|-------|--------------------------------|--------------------|--------------|-------|
| Year | Allocated Sites | Other supply | Total | SOURCE | Allocated Sites | Other supply | Total | Allocated Sites | Other supply | Total | SOURCE | Allocated Sites | Other supply | Total |
| 2016/17 | 0 | 487 | 487 | live table 122 | 0 | 487 | 487 | 0 | 487 | 487 | Peg tables based on 2017 SHLAA | | | |
| 2017/18 | 0 | 379 | 379 | SHLAA 2017 | 0 | 389 | 389 | 0 | 389 | 389 | | | | |
| 2018/19 | 0 | 409 | 409 | SHLAA 2017 | 0 | 341 | 341 | 0 | 341 | 341 | | | | |
| 2019/20 | 0 | 685 | 685 | SHLAA 2017 | 0 | 588 | 588 | 0 | 588 | 588 | | | | |
| 2020/21 | 0 | 581 | 581 | LP Table 4.7 | 0 | 772 | 772 | 0 | 772 | 772 | Peg detailed trajectory | | | |
| 2021/22 | 0 | 467 | 467 | | 0 | 665 | 665 | 0 | 665 | 665 | | | | |
| 2022/23 | 160 | 584 | 744 | | 0 | 450 | 450 | 160 | 450 | 610 | | | | |
| 2023/24 | 160 | 584 | 744 | | 0 | 648 | 648 | 160 | 562 | 697 | | | | |
| 2024/25 | 160 | 584 | 744 | | 40 | 464 | 504 | 160 | 421 | 564 | | | | |
| 2025/26 | 200 | 584 | 784 | | 142 | 297 | 439 | 200 | 257 | 457 | | | | |
| 2026/27 | 181 | 584 | 765 | | 271 | 257 | 528 | 181 | 225 | 406 | | | | |
| 2027/28 | 136 | 294 | 430 | | 316 | 189 | 505 | 136 | 179 | 315 | | | | |
| 2028/29 | 101 | 294 | 395 | | 271 | 502 | 773 | 101 | 296 | 397 | | | | |
| 2029/30 | 160 | 294 | 454 | | 249 | 372 | 621 | 160 | 210 | 370 | | | | |
| 2030/31 | 160 | 294 | 454 | | 297 | 200 | 497 | 160 | 139 | 299 | | | | |
| 2031/32 | 160 | 294 | 454 | | 297 | 146 | 443 | 160 | 136 | 296 | | | | |
| 2032/33 | 160 | 138 | 298 | | 297 | 146 | 443 | 160 | 136 | 296 | | | | |
| 2033/34 | 160 | 138 | 298 | | 264 | 146 | 410 | 160 | 136 | 296 | | | | |
| 2034/35 | 160 | 138 | 298 | | 175 | 146 | 321 | 160 | 136 | 296 | | | | |
| tal 2020 - 2034 | 2,058 | 5,852 | 7,910 | | 2,619 | 5,400 | 8,019 | 2,058 | 4,720 | 6,736 | | 2,339 | 5,060 | 7,378 |
| tal 2016 - 2034 | 2,058 | 7,812 | 9,870 | | 2,619 | 7,205 | 9,824 | 2,058 | 6,525 | 8,541 | | 2,339 | 6,865 | 9,183 |
| tal 2017- 2034 | 2,058 | 7,325 | 9,383 | | 2,619 | 6,718 | 9,337 | 2,058 | 6,038 | 8,054 | | 2,339 | 6,378 | 8,696 |

APPENDIX 9- SPATIAL DISTRIBUTION OF SITES

| SHLAA Ref | Address |
|-----------|---|
| 1 | Land rear of 1-27 Station Road |
| 3 | Land rear of 14 to 20 Weymouth Avenue |
| 4 | Land Between 8 & 34 Portland Way and 161 & 123 Berry's Lane |
| 5 | Land Between Weymouth Avenue & Berry's Lane |
| 7 | Land at Park Road |
| 9 | Moss Nook Urban Village, Watery Lane |
| 10 | Land at junction of Sunbury Street and Fir Street |
| 13 | Land rear of Carnegie Crescent and Goodban Street |
| 16 | Land opposite 2 to 28 Egerton Street |
| 18 | Land at Somerset Street and Sussex Grove |
| 19 | Leyland Green Road |
| 21 | Land at Holly Bank Street |
| 22 | Land at corner of Fairclough Street and Wargrave Road |
| 23 | Liverpool Arms and Former Sacred Heart RC Church and School, Borough Road |
| 25 | Alexandra Park - Former Pilkington HQ |
| 27 | Former Bethell Mission Bowling Green, Marsden Avenue |
| 31 | Former Sutton Arms PH, Elephant Lane |
| 36 | Land & Premises at Lords Fold |
| 38 | Land north of Elton Head Road |
| 57 | Former Poultry Farm, South Lane |
| 58 | Former Central Works, Church Road |
| 59 | Site of former 56-120 Eccleston Street |
| 60 | Vacant land adjacent to Rail Line, Elephant Lane |
| 61 | Land North and South of Corporation Street |
| 62 | Former British Lead Mill Works, Salisbury Street |
| 63 | Land at Waterdale Crescent |
| 64 | BT Depot, Sutton Road |
| 65 | Former Pumping Station, Sutton Road |
| 66 | Land off Wargrave Road |
| 67 | Land to the rear of Carr Mill Community Centre, Kentmere Avenue |
| 69 | Site of former Parr Community High School, Fleet Lane |
| 72 | Site of former St.Marks Primary School, Willow Tree Avenue |
| 74 | Site of former 119-133 Crow Lane West |
| 75 | Christ Church Parish Hall, Chapel Lane |
| 78 | Atlas Street |
| 79 | Former United Glass (Phase 2), Peasley Cross Lane |
| 82 | Land adjacent Laffak Road and Carr Mill Road |
| 84 | Land adjacent Church of Christ, Heather Brae |
| 85 | Site of former Our Lady's Primary School, Fleet Lane |
| 86 | Land north of Vicarage Road |
| 87 | Land west of Vista Road |
| 89 | Land rear of 64-94 Marshalls Cross Road |
| 90 | Land to the West of Common Road |
| 91 | Milton Street |
| 92 | Land adjacent Allotments, Walkers Lane |
| 95 | Site of former Carr Mill Infants School, Ullswater Ave |
| 96 | Land rear of 350 Warrington Road |
| 98 | Industrial Estate, Station Road and Peckers Hill Road |
| 99 | 18 Rainford Road |
| 100 | Farmfoods, Boundary Road |
| 101 | Land rear of 13-33 Adelaide Avenue |
| 102 | Auto Safety Centre, Vicarage Road |
| 103 | Land rear of 39-67 Valentine Road |
| 106 | Site of former 126-154 Birchley Street and 107-125 Brynn Street |
| 109 | Land adjacent Piele Road |
| 111 | Land east of City Road, Cowley Hill |
| 112 | Land to the rear of Juddfield Street |
| 113 | Land at Willow Tree Avenue |

| SHLAA Ref | Address |
|-----------|--|
| 114 | Land at 19 and 25 Sutton Moss Road |
| 115 | Land at Former Hay's Chemicals, Baxters Lane |
| 116 | Land at Former Hay's Chemicals, Lancots Lane |
| 122 | Land at Ravenhead Retail Park, Burtonhead Road |
| 123 | Land at 235-237 Leach Lane |
| 125 | Newton Clinic, Crow Lane East |
| 126 | Former Halton and St Helens PCT HQ, Cowley Hill |
| 128 | Land adjacent St.David's Church, Eskdale Avenue |
| 129 | Derbyshire Hill Family Centre, Derbyshire Hill Road |
| 130 | Land rear of 17-41 McMinnis Avenue |
| 132 | Land at Kingsway |
| 133 | Land rear of 2-24 Massey Street |
| 134 | Land at Littler Road |
| 135 | Land at Newby Place |
| 137 | Land rear of 62-78 Esthwaite Avenue |
| 140 | Crown Works, Eccleston Street |
| 142 | Former Revere Graphics, Borough Road |
| 143 | Alexandra House, Borough Road |
| 146 | Land at Elton Head Road, Lea Green |
| 147 | Abbey House Hostel, Abbey Road |
| 150 | Former Red Quarry, Chester Lane |
| 151 | Land adjacent St.Helens Hospital, Marshalls Cross Road |
| 152 | Sidac Sports & Social Club, Applecorn Close |
| 153 | FDL Packaging, Abbeyway South |
| 154 | College Street Northern Gateway |
| 155 | Land south of Knowsley Road |
| 156 | Land south of Crab Street |

| Allocations and Safeguarding Draft Plan | |
|---|---|
| 1HA | - Land South of Billinge Road |
| 2HA | - Land at Florida Farm |
| 3HA | - Former Penlake Industrial Estate |
| 4HA | - Land bounded by Reginald Road (Bold Forest Garden Suburb) |
| 5HA | - Land South of Gartons Lane |
| 6HA | - Land at Cowley Street |
| 7HA | - Land West of the A49 Mill Lane |
| 8HA | - Land South of Higher Lane |
| 9HA | - Land at former Linkway Distribution Park |
| 10HA | - Moss Nook Urban Village |
| 1HS | - Land South of Leyland Green Road |
| 2HS | - Land between Vista Road |
| 3HS | - Former Eccleston Park Golf Club |
| 4HS | - Land East of Newlands Grange |
| 5HS | - Land West of Winwick Road |
| 6HS | - Land East of Chapel Lane |
| 7HS | - Land South of Elton Head Road |
| 8HS | - Land South of A580 |

| Legend | |
|--------|------------------------------------|
| | Deliverable 0-5 years |
| | Developable 6-10 years |
| | Developable 11-15 years |
| | Custom timescale within 0-15 years |
| | Not developable |
| | Borough boundary |

| Additions to Map Key | |
|----------------------|---|
| | Allocated Green Belt Housing Sites in Draft |
| | Safeguarded Green Belt Housing Sites in Draft |



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2017 SHLAA Update - Developability Plan

Date: 9th October 2017
Scale: NTS
Grid Ref: 354300, 396100
Drawn: N.Clark

PO2484



St Helens Local Plan Submission Draft Representations - Torus 62 Limited
Ian Gilbert
to:
planningpolicy@sthelens.gov.uk
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

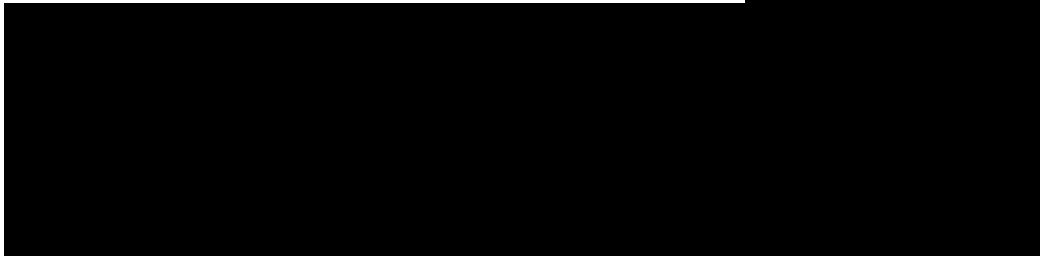
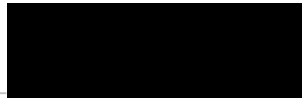
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

Ian Gilbert
Planning Associate



Representor Details

| | |
|----------------------|--|
| Web Reference Number | WF0114 |
| Type of Submission | Web submission |
| Full Name | Mr Adam Smith |
| Organisation | Torus 62 Limited |
| Address | co agent co agent |
| Agent Details | Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| | |
|---|---|
| Policy | Please see accompanying representations |
| Paragraph / diagram / table | Please see accompanying representations |
| Policies Map | Please see accompanying representations |
| Sustainability Appraisal / Strategic Environmental Assessment | Please see accompanying representations |
| Habitats Regulation Assessment | No |
| Other documents | Please see accompanying representations |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| | |
|--------------------------------------|-----|
| Is legally compliant? | Yes |
| Is sound? | No |
| Complies with the duty to cooperate? | Yes |

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

7. Please set out modification(s) you consider are necessary

Please see accompanying representations

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.32 With regard to the above, and in light of increasing difficulties facing the borough with regard to the affordability, it is considered that an additional uplift should be applied to the Council's housing requirement to boost the supply of housing to help meet affordable housing needs across the borough.

Supply

- 3.33 Our Client has a number of concerns in relation to the housing land supply identified within the Local Plan.

- 3.34 In the first instance, the Council has set out its supply within table 4.6 of the Local Plan in an unnecessarily confusing manner in which many of the identified sources of supply appear to relate to one and other with it being necessary to cross reference a number of footnotes to determine how elements of supply relate to one and other. We consider that it would be helpful for the Council to set out within the Local Plan the housing supply identified by completions, commitments and housing allocations.

- 3.35 Table 4.6 line o) refers to Site Allocation 15HA as forming part of the Green Belt Allocations for the Local Plan. It is not clear what allocation 15HA refers to.

- 3.36 Given the somewhat confusing nature of how the housing supply has been set out, it would be useful to be able to scrutinise the supply of housing sites that Council has identified. On analysis of the Appendices of the SHLAA 2017 it would be useful for the Council to set out when Sites with planning permission (Appendix 3) commenced development (or are proposed to commence), how quickly those Sites will be brought forward and how many units have been delivered prior to the commencement of the plan period.

- 3.37 The Council's Development Trajectory (Appendix 5 of SHLAA 2017) also lacks detail to be useful in scrutinising the deliverability of the housing land supply. The SHLAA relies heavily on brownfield sites coming forward between years 6-10 and 11-15 of the plan period albeit it is not clear what assumptions have been made to determine those Sites cannot start now but are likely to come forward after 6 or 10 years.

- 3.38 Equally, given the extent to which the Council's housing supply is predicated on larger housing allocations coming forward, we would expect the Local Plan to provide an updated schedule of sites proposed to be allocated including evidence of when those

Sites are expected to commence delivery and what assumptions have been made with regard to the phasing and delivery rates on those sites.

38

3.39 The above is particularly pertinent in relation to paragraph 4.18.18 of the Local Plan that notes the delivery of some sites allocated for development is predicated by the need to deliver specific infrastructure to serve the needs of development. Along with site compilation, infrastructure can be a particularly unpredictable barrier to development and it is essential that the Council makes clear the assumptions that it has based its housing trajectory on. This is particularly important on larger sites which the Council are likely to be more reliant on towards the middle and latter end of the plan period. We note the assumptions referenced at paragraph 4.18.19 of the Local Plan, however, we consider that those assumptions should be set out expressly for individual sites which the Council are relying on to deliver its housing trajectory.

39

40

3.40 With regard to the above uncertainty, and notwithstanding the allowance for non-delivery of SHLAA Sites and Green Belt sites, it is considered that the Council have not identified sufficient housing land supply to ensure a flexible and robust supply to meet the overall housing requirement identified. The current buffer of 361 units is inadequate and, to put it in context, is comparable to the 289 units that the Council are relying on coming forward on stalled sites.

41

3.41 Notwithstanding the overall level of supply identified, we also have concerns in relation to the Council's lack of site selection methodology and lack of meaningful distribution of housing amongst the Key Settlements. Paragraph 4.18.12 concludes that the site selection process has constrained the ability of the Local Plan to identify suitable sites in some key settlements. We consider that it is vital for the transparency of the plan that the Local Plan sets out a schedule of development which it seeks to allocate or see delivered within each of those key settlements. As set out earlier within these representations, where shortfalls are identified in key locations, it may be required to re-assess Green Belt Sites in relation to their contribution to the Green Belt relative to the severity of the shortfall of housing in those areas.

42

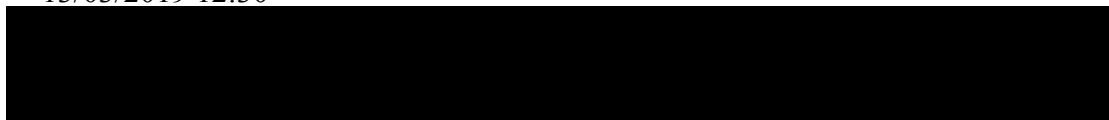
3.42 As set out later within these representations, we consider that our Client's Site is suitable for development as a previously developed Site within the Green Belt in a parcel of land that makes a negligible contribution to the Green Belt. The Council should add out Client's Site to its supply of housing land for the Plan Period as per previous iterations of the Local Plan.

43

PO2485



St Helens Local Plan Submission Draft
 McBride, Sean
 to:
 'planningpolicy@sthelens.gov.uk'
 13/03/2019 12:30



5 Attachments



St Helens Local Plan Submission Draft Rep - March 2019.pdf



Vision Document - Land at Weathercock Hill Farm Rev A 13 03 19_compressed (2).pdf



Weathercock Hill Farm_Ecological Statement(1.1).pdf



Landscape Feasibility Statement - Land at Weathercock Hill Farm.pdf 2503.TN.pdf

Dear Sir/Madam

Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards
 Sean

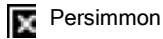
Sean McBride
 Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH



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Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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**St. Helens Borough Local Plan
2020-2035 Submission Draft**

Representations submitted on behalf of Persimmon Homes North West

March 2019



5.3 Para. 120 of the Framework sets out that planning policies and decisions need to reflect changes in the demand for land; where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in the plan, they should:-

- reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
- Support applications for alternative uses, where the proposed use would contribute to meeting an unmet need for development.

12

5.4 Paragraph 121 further states that Local Planning Authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help meet identified development needs, including the use of retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors.

5.5 Reuse of historic employment sites has been a constant source of housing land supply in St Helens in recent years, as evidenced by the Company's current sites at the former Vulcan Works and Deacon Trading Estate; it should be considered that such sites will continue to form part of the housing land supply in the Plan period.

Policy LPA05: Meeting St Helens Borough's Housing Needs

Housing Requirement

6.1 The Company acknowledges the Council seeking to adopt a housing requirement figure in accordance with the standard method figure, whilst having regard to economic growth projections in the Liverpool City Region Strategic Housing and Employment Land Market Assessment [SHELMA] and the St Helens Employment Land Needs Assessment [ELNA].

6.2 Of concern to the Company however is that the proposed annual requirement of 486 dpa represents a significant drop in housing requirement from the requirement identified within the Preferred Options Plan (2016) and also the currently adopted Core Strategy (2012) of 570 dpa – amounting to 1,680 homes across the plan period.

13

- 6.3 The Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) identifies an OAN range of 397 to 855 dpa for St Helens; the upper range being based on an economic growth scenario, which factors in planned/potential development and regeneration projects whilst the lower figure represents projected growth if economic growth remains stagnant.
- 6.4 It is considered that reducing the Council's currently adopted housing requirement fails to support Government's objective of 'significantly boosting the supply of homes' (para 59 of the Framework) and increasing housing delivery across the Country to 300,000 homes per annum.
- 6.5 The Framework is clear that the standard method figure is a minimum (para 60); PPG also confirming that an uplift to a housing requirement above standard method may be appropriate, where additional growth is likely to occur over the plan period (Ref: 2a-010-20180913).
- 6.6 PPG further sets out that 'where a strategic policy-making authority can demonstrate an alternative approach identifies a need higher than that identified using the standard method for assessing local housing need, the approach should be considered sound as it will have exceeded the minimum starting point (2a-015-20180913).
- 6.7 Notwithstanding, the Council's Strategic Housing Market Assessment Update 2019 [SHMA] sets out a range of economic growth scenarios, the emerging housing requirement being derived from scenario 2 (Development prioritisation) in the ELNA, which would require a housing OAN in the range of 504 - 514 dpa to support.
- 6.8 This OAN figure has been subject to further sensitivity tests (or options) based on different emerging employment allocations not coming forward in the Plan period, Option 3 reducing the OAN to 486 dpa.
- 6.9 The Company is not aware of any evidence to support the Council's assumptions that emerging employment allocations will not come forward in the Plan period, which would justify a housing requirement figure below the objectively assessed need set out in the

SHMA; nor would it seem sensible to allocate sites for development (employment or otherwise) which do not have realistic prospects of coming forward in the Plan period, unless acknowledging that they are safeguarded for development beyond the Plan period.

6.10 It is considered that setting a housing requirement on this basis is contrary to the Framework, which is clear that plans should be 'prepared positively, in a way that is aspirational but deliverable' (para 16).

13

6.11 We would encourage the Council to review its housing requirement and plan for a scale of housing which supports its economic growth aspirations, including delivery of those emerging employment allocations.

Density

6.12 The Company is generally supportive of paragraph 3 of Policy LPA05, which seeks to make efficient use of land, including those sites within or adjacent to key centres or well served by public transport connections.

6.13 We would however discourage adoption of a policy which seeks to place minimum density requirements on housing sites; as such policies fail to reflect individual sites' technical constraints or surrounding settlement context; and further fails to reflect market area or Companies' distinct product range and target market.

14

6.14 It is considered appropriate that density is determined throughout the pre-application and planning application process, informed by appropriate technical and design context.

Maintaining a sufficient housing land supply

6.15 The Company supports paragraph 4 of the policy, which seeks to ensure an adequate supply of housing throughout the Plan period, including a rolling 5 years supply of deliverable housing sites to meet identified needs; and makes provision for a partial or full plan review in the event that deliverable supply falls significantly below required levels.

15

6.16 PPG is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period (Ref: 61-045-201809013); and Local Plans should be reviewed to assess whether they need updating at least once

every 5 years to ensure that they remain relevant and address the needs of the local community (Ref: 61-043-20180913).

-
- 6.17 The Company supports the Council's approach to meeting its housing requirement and how its housing land supply is sourced, including the release of land from the Green Belt. 16

-
- 6.18 The Company supports the provision of a 15% reduction for non delivery of SHLAA sites and a 20% increase allowance for sites removed from the Green Belt; this being in accordance with the recommendations of the Local Plans Expert Group's (LPEG) Report to the Communities Secretary and to the Minister of Housing and Planning (March 2016).

- 6.19 It is considered that the Council should apply a further allowance for non delivery to those sites which currently have a planning permission but which have not been started, as receipt of a planning consent is not necessarily an assurance of delivery. This is particularly the case for sites which benefit from an outline consent; the Framework now requiring 'clear evidence' if such sites are to be considered deliverable.

Sites allocated for new housing development

- 6.20 The Company strongly supports the allocation of Site 1HA '*Land South of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood*' [the Site] as identified at Table 4.5 and are committed to working with the Council and other key stakeholders throughout the Local Plan process to bring the site forward for housing.

- 6.21 As evidenced by the information appended to this representation and the Council's evidence base; the Site is considered to be a logical site to release from the Green Belt, having regard to Green Belt policies set out within the Framework. 17

- 6.22 The site is not encumbered by any technical, legal or viability constraints which would preclude its development for housing, and is considered to be suitable, available and achievable.

-
- 6.23 The Company supports the increase in indicative capacity of the site from the Preferred Options Local Plan and considers this to represent an efficient use of land, appropriate for 18

the Site's location. There are no technical encumbrances which would prevent the site delivering this scale of homes.

6.24 The Parameters Masterplan appended to this representation demonstrates that the site can accommodate circa 265 new homes, having regard to the site's known physical and technical constraints; and the Council's open space requirements.

18

6.25 It is requested that the indicative site capacity is revised accordingly within table 4.5 to reflect this and to ensure that the Council is making the most efficient use of land.

6.26 Subject to the release of the land from the Green Belt upon adoption of the Local Plan, it is considered that the site can deliver homes early in the Plan period; the Company would welcome the opportunity to work with the Council to provide the necessary assurances to the Local Plan inspector.

Phasing

6.27 As set out at para 4.18.18; the Company supports the council not seeking to phase the release of allocated sites; acknowledging that lead-in times for larger sites will result in delivery occurring later in the Plan period.

19

Policy LPA05.1: Strategic Housing Sites

7.1 The Company supports the Council's approach to housing allocations, including a separate policy for those allocations considered to be strategic in scale (300 homes upwards).

7.2 It is considered appropriate that a range of sites are allocated in order to ensure a continuous and constant supply of homes throughout the Plan period. Sites' such as the Company's at Garswood (1HA) which are not identified as strategic in scale, present the opportunity to make a significant contribution to the Borough's housing supply early in the Plan period and are less likely to be encumbered by the requirement for significant additional supporting infrastructure, complicated land ownership patterns or disputes over land value equalisation.

20

7.3 Site 1HA is within a single private ownership and is controlled and being promoted by a FTSE-100 housebuilder with significant experience of delivering new homes in St Helens; its

PO2486

ELO206

HS20



St Helens Borough Local Plan 2020 - 2035 Submission Draft Representations

Daniel Strobe

to:

planningpolicy@sthelens.gov.uk

13/03/2019 15:26

① - LPA05

② - GJR

③ - TABLE 4.7



1 Attachment



PWA Representations to Submission Draft Local Plan_Rainford.pdf

Dear Sir/Madam

Please consider the attached document as a formal submission to the St Helens Local Plan Submission Draft representations. The online representations form has been completed and submitted to accompany the attached document.

I would be grateful if you could confirm safe receipt of the attached and we are kept updated of future stages of the Local Plan.

Kind regards,

Daniel Strobe | Graduate Planner

2 Lockside Office Park, Lockside Road, Preston, PR2 2YS

www.pwaplanning.co.uk

Paul Walton Associates and PWA Planning are trading names of
Paul Walton Associates Limited, a company registered in England with number 8605706.

Representor Details

| | |
|----------------------|---|
| Web Reference Number | WF0055 |
| Type of Submission | Web submission |
| Full Name | Mr & Mrs J & M Berry (landowners) |
| Organisation | and Seddon Homes (prospective developer) |
| Address | C/O agent C/O agent |
| Agent Details | Mr Paul Walton PWA Planning 2 Lockside Office Park Lockside Road Preston, PR2 2YS |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| | |
|---|---|
| Policy | Policy LPA05, Policy LPA05.1 & Policy LPA06 |
| Paragraph / diagram / table | |
| Policies Map | |
| Sustainability Appraisal / Strategic Environmental Assessment | |
| Habitats Regulation Assessment | |
| Other documents | |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| | |
|--------------------------------------|-----|
| Is legally compliant? | Yes |
| Is sound? | No |
| Complies with the duty to cooperate? | Yes |

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see supporting representations statement produced by PWA Planning which will be provided by email.

7. Please set out modification(s) you consider are necessary

Please see supporting representations statement produced by PWA Planning which will be provided by email.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

To explain in further detail the case put forwards within the supporting representations statement.

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 3:17:17 PM |
|---------------|----------------------|

ST. HELENS LOCAL PLAN 2020-2035: SUBMISSION DRAFT

LAND SOUTH OF HIGHER LANE AND WEST OF MILL LANE,
RAINFORD

Representations on Behalf of Mr & Mrs Berry
(landowners) and Seddon Homes (prospective
developer)

March 2019

standard method risks the Local Plan underdelivering on its housing requirements and would also not ensure the economic growth agenda of the Council can be achieved.

- 4.6. It is therefore considered that the plan is not sound as it fails to demonstrate adequate housing provision and delivery in order to meet the housing needs of the borough over the plan period.

- NOT SOUND

Size of allocations

- 4.7. The significant reduction in the range and geographical spread of strategic housing sites in favour of a small number of much larger green belt releases within the Submission Draft Plan is not considered to be good practice.

- 4.8. The reliance on releasing fewer yet larger sites from the Green Belt may result in significant issues if some of these larger sites experience any delays and a slower build out rate than anticipated. The requirement for extensive surveys, remediation, comprehensive master-planning, or infrastructure improvements could lead to delays in their delivery and may have significant implications on the Local Authority meeting their housing requirements.

- 4.9. Paragraph 73 of the Framework states that local planning authorities should include a trajectory illustrating the expected rate of housing delivery over the plan period. Looking at the Housing Trajectory within the Submission Local Plan, there is an assumption that most of the allocated Strategic Housing sites will be developed within the plan period. As there is a requirement for the local planning authorities to monitor the progress of housing delivery to ensure that in the previous three years the delivery has not fallen below 95%, there is therefore a concern that if there are delays and a slower build out rate than expected, this would result in failing of the Housing Delivery Test.

- 4.10. As stated with paragraph 67 of the NPPF "*planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*". This includes both deliverable sites for years one to five of the plan

period as well as *"developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan"*. The NPPF supports the allocation of an appropriate mix of sites and highlights within Paragraph 68 that *"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"*. ✓

- 4.11. It is therefore considered that the Local Plan should include a greater mix (scale / location) of sites to meet the meet the Local Plan's housing requirement and the housing needs of the Local Authority and the communities they serve. As NPPF Paragraph 11 states, plans should *"seek opportunities to meet the development needs of the area and sufficiently flexible to adapt to rapid change"*. The reliance on a smaller number of larger Housing Allocations would not ensure that any future changes would be accounted for and would not see the Borough's housing needs met. ①

- 4.12. As there has also been a reduction in the amount of Safeguarded Land identified within the Submission Draft Local Plan for larger and a fewer number of sites, this may require further green belt reviews sooner than anticipated and this would also make the Local Plan unsound. ①

Suitability of the site

- 4.13. The Green Belt Review conducted of the site concluded that there are constraints to the delivery of homes on the site. As discussed in depth within the representations submitted in response to the Preferred Options (Appendix 2), there would be no technical constraints preventing the delivery of the site. Although mentioned within the Green Belt Review, it has been demonstrated that there would not be any negative effects on the biodiversity or landscape sensitivity of the site, and it lies within a sustainable location for development with schools and health care facilities within walking distance of the site. ②

- 4.14. When testing the site against the purposes of including the site within the Green Belt, as stated within Paragraph 134 of the NPPF, the benefits of removing the site from the Green Belt would outweigh its continued inclusion as Green Belt land. The site would ②

PO2487

ELO251



St Helens Borough Local Plan 2020-2035 (Submission Draft) - Representations
Nellist, Paul (Avison Young - UK)
13/03/2019 16:47
To:
planningpolicy@sthelens.gov.uk

Sine BHS

2 Attachments



Response Form 13.03.19.pdf Final Chapel Lane Representations 13.03.19.pdf

Dear Sir or Madam

I attach a response form and representations made on behalf of Seddon Construction Limited to the St Helens Borough Local Plan 2020-2035 (Submission Draft) consultation.

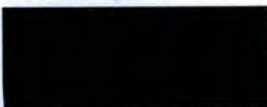
Please let me know if you have any issues downloading or opening the attached files.

Hard copies will follow in the post.

Kind regards

Paul Nellist
Principal Planner

Avison Young
Norfolk House
7 Norfolk Street
Manchester
M2 1DW
United Kingdom



[Blog](#) | [Twitter](#) | [Property Listings](#) | [LinkedIn](#) | [YouTube](#) | [Instagram](#)

Avison Young is the trading name of GVA Grimley Limited.

[Legal Disclaimer](#)

① - LPA06

② - LPA05

③ - GBR

④ - LPA05 - TABLE 4-7.



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

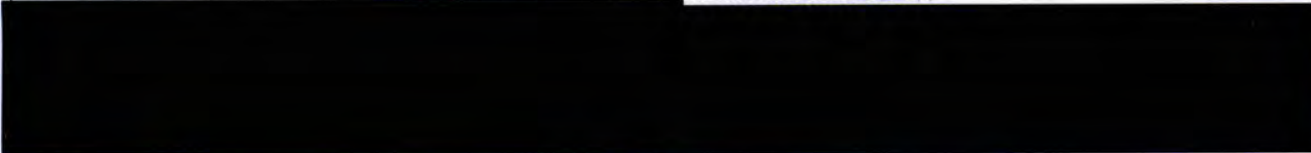
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: | Title: Mr |
| First Name: | First name: Paul |
| Last Name: | Last Name: Nellist |
| Organisation/company: Seddon Construction Ltd | Organisation/company: Avison Young |
| Address: c/o Agent | Address: Norfolk House 7 Norfolk Street Manchester United Kingdom |
| Postcode: | Postcode: M2 1DW |



| | | | |
|------------|--|-------|-----------|
| Signature: | | Date: | 13/3/2019 |
|------------|--|-------|-----------|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

| | | | | | | | | | |
|--|---|-----------------------------------|---|-------------------------------------|--|--|--|--------------------------------------|--|
| Policy | ✓ SEE ATTACHED REPRESENTATIONS | Paragraph / diagram / table | ✓ SEE ATTACHED REPRESENTATIONS | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | Please see attached representations | | | | | |

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

| | | |
|-------------------------------------|------------------------------|-----------------------------|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

| | |
|----------------------------------|--------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input type="checkbox"/> |
| Effective? | <input type="checkbox"/> |
| Consistent with National Policy? | <input type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see attached representations

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached representations

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | | | |
|--------------------------|--|-------------------------------------|--|
| <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 set out the merits of the Chapel Lane site and provide additional comments on any Matters, Issues and Questions raised by the Inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

**Representations to the St. Helens Submission Draft
Local Plan**

Land at Chapel Lane

March 2019

the M62 to the Junction 8 access to Omega and 1EA and 1ES). Unlike any of the other proposed allocations in this part of the Borough, the development of the Chapel Lane site would not require residents to make car journeys to the nearest employment sites through built up residential areas. 2

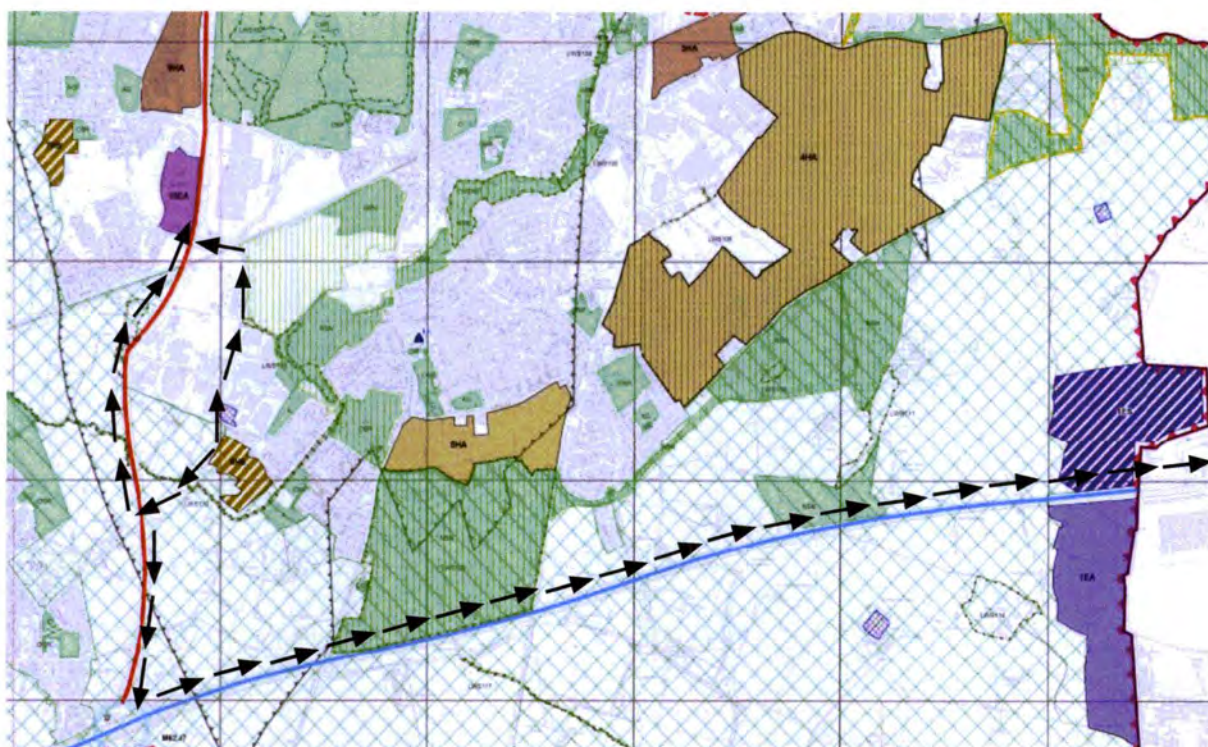


Figure 2 – Location of employment and housing proposed allocations and safeguarded sites (including indicative vehicle route from Chapel Lane site to employment sites)

- 5.20 Whilst the Local Plan and the Green Belt Review appear to demonstrate that the Council has taken into account access to shopping, leisure, education and other activities when deciding on proposed allocations, it would appear that the important consideration of access to employment opportunities has not been fully considered. 3
- 5.21 The relationship of the Chapel Lane site with the nearest proposed employment sites is another reason that the Council should consider allocating the site for residential development in the Local Plan.

Housing Trajectory

- 5.22 Table 4.7 of the Submission Draft identifies at what stages delivery of new housing required over the plan period can be anticipated. It is not clear from our review of both the Submission Draft and associated evidence base where the numbers forming the 'other supply' at Table 4.7 are derived from. In order for the Local Plan to be found sound and adoptable, this trajectory needs to be based upon clear and robust evidence. Seddon therefore respectfully request clarification on how the 'other supply' in Table 4.7 has been calculated. 4

PO2488



St Helens Local Plan Submission Draft Representations - Torus 62 Limited
Ian Gilbert
to:
planningpolicy@sthelens.gov.uk
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

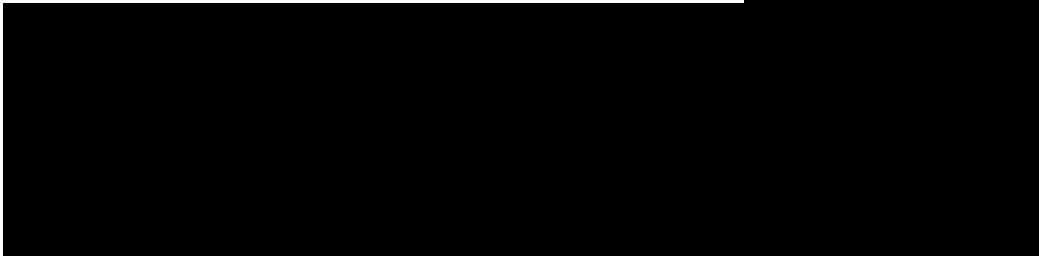
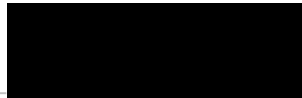
Dear Sir / Madam,

Further to the submission of your online form, please find attached accompanying representations on behalf of our clients, Torus 62 Ltd.

Please do not hesitate to contact me should you require any further information.

Kind regards

Ian Gilbert
Planning Associate



Representor Details

| | |
|----------------------|--|
| Web Reference Number | WF0114 |
| Type of Submission | Web submission |
| Full Name | Mr Adam Smith |
| Organisation | Torus 62 Limited |
| Address | co agent co agent |
| Agent Details | Mr Ian Gilbert Barton Willmore Tower 12 18-22 Bridge Street Spinningfields Manchester, M3 3BZ |

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

| | |
|---|---|
| Policy | Please see accompanying representations |
| Paragraph / diagram / table | Please see accompanying representations |
| Policies Map | Please see accompanying representations |
| Sustainability Appraisal / Strategic Environmental Assessment | Please see accompanying representations |
| Habitats Regulation Assessment | No |
| Other documents | Please see accompanying representations |

4. Do you consider the St Helens Borough Local Plan 2020-2035:

| | |
|--------------------------------------|-----|
| Is legally compliant? | Yes |
| Is sound? | No |
| Complies with the duty to cooperate? | Yes |

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please see accompanying representations

7. Please set out modification(s) you consider are necessary

Please see accompanying representations

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Please see accompanying representations

| | |
|---------------|----------------------|
| Response Date | 3/13/2019 8:50:55 AM |
|---------------|----------------------|

St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

February 2019

- 3.32 With regard to the above, and in light of increasing difficulties facing the borough with regard to the affordability, it is considered that an additional uplift should be applied to the Council's housing requirement to boost the supply of housing to help meet affordable housing needs across the borough.

Supply

- 3.33 Our Client has a number of concerns in relation to the housing land supply identified within the Local Plan.

- 3.34 In the first instance, the Council has set out its supply within table 4.6 of the Local Plan in an unnecessarily confusing manner in which many of the identified sources of supply appear to relate to one and other with it being necessary to cross reference a number of footnotes to determine how elements of supply relate to one and other. We consider that it would be helpful for the Council to set out within the Local Plan the housing supply identified by completions, commitments and housing allocations.

- 3.35 Table 4.6 line o) refers to Site Allocation 15HA as forming part of the Green Belt Allocations for the Local Plan. It is not clear what allocation 15HA refers to.

- 3.36 Given the somewhat confusing nature of how the housing supply has been set out, it would be useful to be able to scrutinise the supply of housing sites that Council has identified. On analysis of the Appendices of the SHLAA 2017 it would be useful for the Council to set out when Sites with planning permission (Appendix 3) commenced development (or are proposed to commence), how quickly those Sites will be brought forward and how many units have been delivered prior to the commencement of the plan period.

- 3.37 The Council's Development Trajectory (Appendix 5 of SHLAA 2017) also lacks detail to be useful in scrutinising the deliverability of the housing land supply. The SHLAA relies heavily on brownfield sites coming forward between years 6-10 and 11-15 of the plan period albeit it is not clear what assumptions have been made to determine those Sites cannot start now but are likely to come forward after 6 or 10 years.

- 3.38 Equally, given the extent to which the Council's housing supply is predicated on larger housing allocations coming forward, we would expect the Local Plan to provide an updated schedule of sites proposed to be allocated including evidence of when those

Sites are expected to commence delivery and what assumptions have been made with regard to the phasing and delivery rates on those sites.

38

3.39 The above is particularly pertinent in relation to paragraph 4.18.18 of the Local Plan that notes the delivery of some sites allocated for development is predicated by the need to deliver specific infrastructure to serve the needs of development. Along with site compilation, infrastructure can be a particularly unpredictable barrier to development and it is essential that the Council makes clear the assumptions that it has based its housing trajectory on. This is particularly important on larger sites which the Council are likely to be more reliant on towards the middle and latter end of the plan period. We note the assumptions referenced at paragraph 4.18.19 of the Local Plan, however, we consider that those assumptions should be set out expressly for individual sites which the Council are relying on to deliver its housing trajectory.

39

40

3.40 With regard to the above uncertainty, and notwithstanding the allowance for non-delivery of SHLAA Sites and Green Belt sites, it is considered that the Council have not identified sufficient housing land supply to ensure a flexible and robust supply to meet the overall housing requirement identified. The current buffer of 361 units is inadequate and, to put it in context, is comparable to the 289 units that the Council are relying on coming forward on stalled sites.

41

3.41 Notwithstanding the overall level of supply identified, we also have concerns in relation to the Council's lack of site selection methodology and lack of meaningful distribution of housing amongst the Key Settlements. Paragraph 4.18.12 concludes that the site selection process has constrained the ability of the Local Plan to identify suitable sites in some key settlements. We consider that it is vital for the transparency of the plan that the Local Plan sets out a schedule of development which it seeks to allocate or see delivered within each of those key settlements. As set out earlier within these representations, where shortfalls are identified in key locations, it may be required to re-assess Green Belt Sites in relation to their contribution to the Green Belt relative to the severity of the shortfall of housing in those areas.

42

3.42 As set out later within these representations, we consider that our Client's Site is suitable for development as a previously developed Site within the Green Belt in a parcel of land that makes a negligible contribution to the Green Belt. The Council should add out Client's Site to its supply of housing land for the Plan Period as per previous iterations of the Local Plan.

43

PO2489



St Helens Local Plan Submission Draft Representations - Torus 62 Limited
Ian Gilbert
to:
planningpolicy@sthelens.gov.uk
13/03/2019 08:54



1 Attachment



28037.A3.IG Torus - Newton Community Hospital 28.02.19 FINAL - COMBINED.pdf

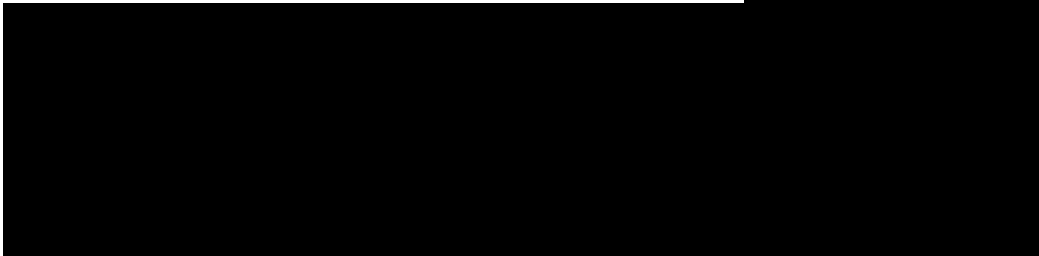
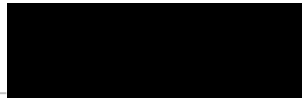
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Kind regards

Ian Gilbert
Planning Associate



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| Web Reference Number | WF0114 |
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| Paragraph / diagram / table | Please see accompanying representations |
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| Habitats Regulation Assessment | No |
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|--------------------------------------|-----|
| Is legally compliant? | Yes |
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St Helens Local Plan: Submission Draft

Representations on Behalf of Torus 62 Limited

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43

PO2490

EF0043



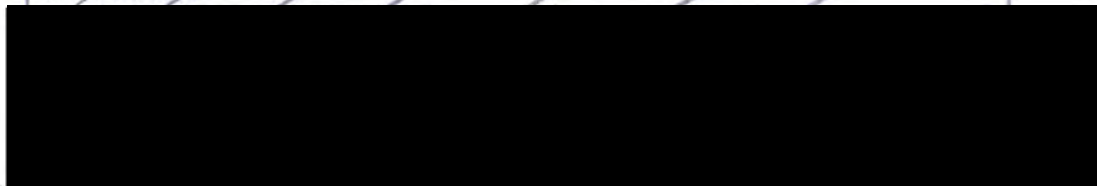
St.Helens Borough Local Plan 2020-2035: Submission Draft
Victoria Vernon

to:

planningpolicy@sthelens.gov.uk

12/03/2019 15:37

Hide Details



1 Attachment



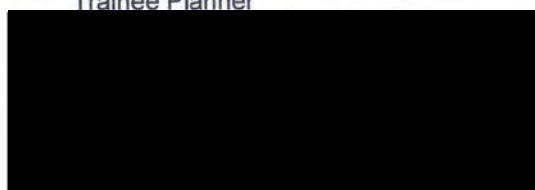
SP_19_00000483_St Helens LP_lpsd-representation-form..doc

Dear [REDACTED]

Please find attached Sport England's comments to the above consultation,

Kind regards,

Victoria Vernon BSc (Hons) MA
Trainee Planner



- ① - LPA05.1
- ② - LPA09
- ③ - LPC05
- ④ - LPD03
- ⑤ - LPA03



☒ This girl can

Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

☒ ☒ ☒ ☒ ☒

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Erin Stephens](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Erin Stephens, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: Mrs | Title: |
| First Name: Victoria | First name: |
| Last Name: Vernon | Last Name: |
| Organisation/company: Sport England | Organisation/company: |
| Address: Sport Park, 3 Oakwood Drive, Loughborough, Leicester, | Address: |
| Postcode: LE11 3QF | Postcode: |
| | Tel No: |
| | Mobile No: |
| | Email: |

Signature:

Date:

11/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

| | | | | | | | | | |
|--|--|-----------------------------|--|--------------|--|--|--|--------------------------------|--|
| Policy | | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

| | | |
|-------------------------------------|------------------------------|--|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

| | |
|----------------------------------|-------------------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input 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

LAP05.1 – Sport England supports the removal of 7HA & 13HA from the Local Plan. However, it has also come to light that further sites allocated are not policy compliant. Both 2HA and 10HA include land that is defined as playing field.

An objection is made to these allocations as they would involve the permanent loss of community playing fields and outdoor sports facilities that are in active use. While the Council may have plans to relocate the facilities on both

①

sites as part of the developments this has not been clarified in the policy and no replacement sites have been identified. The loss of the facilities without replacement has not been justified by the Council's evidence base which demonstrates the sites are not surplus to requirements. As these sites contain important sports facilities which serve the community in the area, the loss of these facilities would be contrary to Government planning policy on playing fields/sports facilities set out in paragraph 97 of the NPPF.

Consequently, at this stage, Sport England would object to the potential allocation of this sites for residential unless (in accordance with Government policy) off-site replacement playing field provision was made to mitigate the impact through confirmation in the policy that the facilities will be replaced with equivalent or better replacement facilities in terms of quantity and quality prior to commencement of development and the proposed replacement sites are identified in the plan to provide certainty.

The Council will be aware of Sport England's role as a statutory consultee on planning applications affecting playing fields. To avoid potential objections and delays at a later date should these sites remain allocated for development which may affect the delivery of the allocation, it is advised that discussions take place with Sport England before this site allocation is confirmed in the submission version of the Local Plan. Further advice can be provided on how our concerns could be potentially addressed as well as advice on how to avoid some of the problems experienced by other local authorities who have allocated playing fields for development in their local plans.

LPA09 – This policy refers to the councils Green Infrastructure provision.

Para 4.33.3 states that sports grounds and playing fields are included by this policy. The policy is not consistent with the council's evidence base. The council's Playing Pitch Strategy 2016 highlights deficiencies of almost 26 match equivalent sessions. However, paragraph 4.33.5 of this policy states that the councils open space study 2016 concluded that there is sufficient quantity of open space.

This part of the policy also provides a link to the open space standards in policy LPC05. However, policy LPC05 quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As Green Infrastructure includes playing fields it is important that policy LPA09 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.

Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if you consider a tennis court, and up to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

LPC05 - Table 7.1 referred to in policy LPC05 (part 2) quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As outdoor sport is a typology of open space it is important policy LPC05 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.

As stated above, local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if you consider a tennis court, and up to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space

LPD03 - Outdoor sport is a typology of open space but Sport England would be extremely concerned if this policy included a requirement for onsite sports provision. A quantitative standard is not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if a tennis court to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

LPA03: Part 5 – Sport England suggest strengthening of the policy to include physical activity opportunities within the design of new developments. Sport England has produced guidance in partnership with Public Health England that sets out ten principles to incorporate into design to promote physical activity. The Active Design Guidance can be found on Sport England's website.
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

The recent change in Government thinking has led to the emergence of DCMS Strategy "Sporting Future: A New Strategy for an Active Nation". In response to this strategy Sport England has published 'Towards an Active Nation' which sets out how Sport England will work in partnership with a range of organisations, including Local Planning Authorities, to implement the Strategy.
<https://www.sportengland.org/news-and-features/news/2016/may/19/sport-england-triples-investment-in-tackling-inactivity/>

LAP05.1 – Whilst the protection of these sites and the removal of the proposed allocations from the Plan would be an acceptable solution, as an alternative potential may exist for this objection to be addressed in accordance with paragraph 97 of the NPPF and Sport England's playing fields policy if the playing fields were acceptably replaced as a requirement of the site allocation policy.

LPA09 - Sport England suggest removing the reference to sufficient quantity of provision from this policy and amending para 4.33.5 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

LPC05 - Sport England suggest providing a new point within policy LPC05 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

Sport England also suggests strengthening para 7.10 to say "Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. In addition, the catchment area for sports range from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want

to participate in sport. The Playing Pitch Strategy and Action Plan, informed by a comprehensive Playing Pitch Assessment, has established the supply and demand for playing pitch facilities across the Borough in terms of usage and provision. The accompanying Playing Pitch Strategy and Action Plan identifies a series of sport by sport recommendations which provide a strategic framework for the protection, enhancement and provision of outdoor sports facilities."

LDP03 - It is suggested it is made clear within this policy that the onsite open space requirement does not include outdoor sport but that offsite contributions will be sought where the Playing Pitch Strategy identifies shortfalls in provision that would be exacerbated by the additional demand for sport generated by housing growth.

Please continue on a separate sheet if necessary

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="checked" type="checkbox"/> X | 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.**

EF 0043



RE: St.Helens Borough Local Plan - Submission draft
Victoria Vernon to: Sara Jones

02/07/2019 09:31

History: This message has been replied to and forwarded.

Good Morning,

Thank you for your email. For clarification, The PPS Assessment shows that all currently used playing field sites require protection and therefore cannot be deemed surplus to requirements because of shortfalls now and in the future. Lapsed, disused, underused and poor quality sites should also be protected from development or replaced as there is a requirement for playing field land to accommodate more pitches to meet the identified shortfalls.

Therefore Sport England object to any allocation which contains playing field land being taken forward if the evidence is not put forward to justify either it's loss or replacement.

Sport England accepted the councils evidence presented last month that allocation 2HA that there is no evidence or reference of a cricket ground/pitch ever being on that site and the farmer has confirmed that he has ploughed that field in excess of 30 years and the feature which appears to be a cricket wicket is a concrete slab.

With regards to allocation 10A please refer to my previous comments dated 18th April 2018.

Kind regards,

Victoria Vernon BSc (Hons) MA Assistant Planner



Afternoon Victoria,

I am now just summarising your email for the Responses Report the Council are preparing, and I still need to clarify a couple of issues with you in regards to the proposed site allocations.

In the first line of your response you state that you support the removal of 7HA & 13HA, do you mean site 7HA formerly site HA13 in the Preferred Options (Red Bank School, Newton-le Willows), do you mean you support its removal from the Green Belt or do you think we have removed it as an allocation? We haven't removed it as an allocation and are still proposing it come forward as a housing allocation.

Further to my previous emails, we still haven't come to any conclusion in regards to sites 2HA and 10HA, for which I believe the Council have produced additional information for you to remove your objection to these two sites.

If you think it may be easier to clarify any points over the phone I am in the office all week (apart from Thursday), and will be happy to discuss the points you have raised etc..

Kind regards



Senior Planning Officer (Policy)
Development Plans
Development & Growth
Place Services
St. Helens Council



Afternoon Victoria,

Just to let you know that I carried out a site visit this morning and I can confirm that there is a concrete slab in that area. However, we can still find no evidence or reference of a cricket

ground/pitch ever being on that site and the farmer has confirmed that he has ploughed that field in excess of 30 years. There is an active Cricket Club in the area but it is further to the east near what was called Princess Pit by Peile Road off Wexford Close so I don't think there would have been a need for two cricket pitches so close together.

Interestingly though I have found information that suggests there are coal mining shafts in this field and one mapped very close to this specific location, so it is more likely that this is just a mine shaft cover.

If you have any further information relating to the site other than an image from google maps, then we would appreciate you providing it.

Kind regards

[REDACTED]

Senior Planning Officer (Policy)
Development Plans
Development & Growth
Place Services
St. Helens Council

[REDACTED]

Good Morning [REDACTED]

Thank you for contacting Sport England

In response to your queries, I provide the following comments.

Site 2HA (Land at Florida Farm (south of A580), Slag Lane, Blackbrook) – The below aerial image shows what appears to be the remnants of a cricket wicket circled in red.

[IMAGE][IMAGE]

Just because an area of playing field is not currently marked out with a pitch does not mean that it is materially no longer a playing field. It is capable of accommodating a pitch and aerial images provided below clearly indicates that it has been marked out with a pitch in the past. There is no positive obligation (under planning law) for any part playing field to be actively used as such. The Town and Country Planning (Development Management Procedure) (England) Order 2015 defines a playing field as ‘the whole of a site which encompasses at least one playing pitch’ the definition refers to the whole of a site and therefore does not just cover land which is currently laid out as pitches. This is because those other parts of a playing field are a resource which may be needed, now or in the future, and it is important that they are afforded the same protection.

I hope this clarifies Sport England’s position on the allocation.

Kind Regards,

Victoria Vernon BSc (Hons) MA Trainee Planner



Afternoon Victoria,

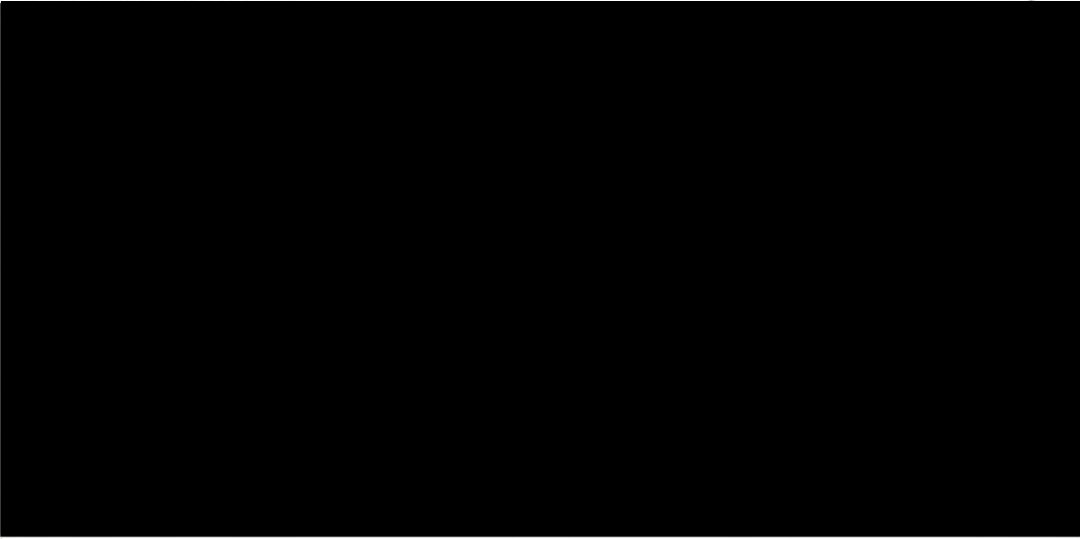
Further to my email of the 9th April, I'm just emailing again regarding the objections you raised to two of the sites put forward for allocation in the St. Helens Borough Local Plan.

Specifically the objection to site 2HA. I have looked at old aerial photographs and historic GIS layers and still cannot find any evidence of any sports facility on this site. I have spoken with our Grounds Maintenance Manager and they are not aware of any outdoor sports facilities on that site (allocated or not). It would be very helpful if you could give us any further information regarding this site and where you believe the pitch or facility is, so we can address this issue.

Kind regards



Senior Planning Officer (Policy)
Development Plans
Development & Growth
Place Services
St. Helens Council



Afternoon Victoria,

I'm just emailing you to clarify Sport England's position in regards to the objections received to the St. Helens Borough Local Plan Submission draft, and specifically the objections to allocated sites 2HA and 10HA, as you believe they both include land defined as a playing field.

We are not aware that site 2HA (Land at Florida Farm (south of A580), Slag Lane, Blackbrook) has any type of playing field within it. It is our understanding that the whole site currently comprises of agricultural fields. If you could give us more details on this it would be appreciated.

In regards to site 10HA (Moss Nook Urban Village, Watery Lane, Moss Nook), there is an extant planning application on this site (Ref: P/2003/1574) with agreed and suitable replacement pitches, and associated changing rooms and car-parking, to the north of the site. I

have attached the materplan for your convenience, but more information can be found on the Council website via

<https://publicaccess.sthelens.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZYBFPETA712>

Furthermore, the site proforma for site 10HA (page 247 Appendix 5 of the Local Plan) clearly states that appropriate provision of open space must be included in accordance with Policies LPC05 and LPD03, and that any loss of existing playing fields must include replacement provision of an equal (or improved) quantity and quality.

(See attached file: P_2003_1574-Illustrative_Masterplan_A2-726176.pdf)

With the above in mind, do you still wish to pursue your objection to these 2 sites? I have tried to ring you however, the telephone number we have for you does not appear to be working. We have telephone number [REDACTED]

If you would like to discuss these matters in more detail with me then please do not hesitate to give me a ring. Unfortunately I am out of the office this afternoon but I will be in all day tomorrow and Thursday.

Kind regards

[REDACTED]
Senior Planning Officer (Policy)
Development Plans
Development & Growth
Place Services
St. Helens Council

[REDACTED]

PO2491



CPRE Lancashire response
jackie.copley
to:
planningpolicy
13/03/2019 09:20



1 Attachment



image001.jpg image002.jpg image003.jpg image004.jpg



2019 03 13 CPRE response to St Helens submission local plan.doc

Dear Local Plan Team

Please find the CPRE Lancashire response to the St Helens Submission Local Plan attached.

Please confirm receipt.

We wish you well with the progression of the local plan.

If you have any queries please be in touch.

Yours sincerely

Jackie Copley MRTPI MA BA(Hons) PgCert
Planning Manager



Campaign to Protect Rural England

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU

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Registered Charity Number: 1107376

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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

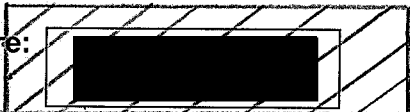
Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: Ms | Title: |
| First Name: Jackie | First name: |
| Last Name: Copley MRTPI MA BA(Hons) PgCert | Last Name: |
| Organisation/company: CPRE Lancashire | Organisation/company: |
| Address: PO Box 1386, PRESTON, | Address: |
| Postcode: PR2 0WU | Postcode: |
| Tel No: [REDACTED] | Tel No: |
| Mobile No: [REDACTED] | Mobile No: |
| Email: [REDACTED] | Email: |

| | |
|--|--|
| Signature:  | Date: <input type="text" value="13 March 2019"/> |
|--|--|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | |
|---|--|-----------------------------|--|--------------|--|--|--|
| Policy | | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|------------------------------|--|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> ✓ |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> ✓ |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|-------------------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input checked="" type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

CPRE Lancashire recognises the efforts of the local planning team, especially in the context of changing National Planning Policy Framework.

We hope that the Local Plan will progress towards adoption. In our experience, greenfield land in the countryside, particularly Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan steering development to the most sustainable locations.

That said, the Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

a) Positively prepared – on the whole the local plan is positively prepared, in fact too positive, leading to over-planning for jobs and housing;

land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However we think that there may be more brownfield sites to be recorded as "suitable" on the Brownfield Register, than is currently the case.

CPRE Lancashire believes there are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is in reality available for development. We hope to engage community members to help identify more brownfield sites in the next few months, and we have developed a Toolkit to support people to engage better with the Council's planners. www.cprelancashire.org.uk/resources/housing-and-planning/planning/item/2483-cpre-lancashire-brownfield-land-register-toolkit?highlight=WyJ0b29sa2l0l10=

We therefore think Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing being allocated in existing Green Belt. We also recommend the Council introduces a brownfield target, to focus activity in regard to a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could achieve such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The gratuitous ambitious targets bear no resemblance to the facts.

We also query whether the minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF by not making effective use of land.

CPRE agrees that adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future would mean that jobs and housing figures can be revised upwards or downwards on the basis of robust analysis at the relevant time.

Policy LPA05.1: Strategic Housing Sites

CPRE Lancashire is opposed to needless release of Green Belt land for housing, we reserve the right to comment on all the housing sites included in LPA05.1 at the examination.

Policy LPA06: Safeguarded Land

St Helens Council is really going for a "slash and burn" approach to the Green Belt. CPRE Lancashire is strongly opposed to the notion that changes in Green Belt should endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, based on flawed assumptions. As stated the Council needs to adopt a more precautionary approach to countryside loss. This approach is all the more relevant in view of the historically large amounts of land within the Borough which have been despoiled by mining and heavy industry, and the need to place emphasis on saving what remains of the unspoiled land for the benefit of young people and future generations.

CPRE accepts that safeguarded land can be a useful tool, however proposing 85.88 hectares for employment (equal to 39.9% of employment land), and 114.19 hectares for housing (equal to 28.6% of housing land), is hugely excessive.

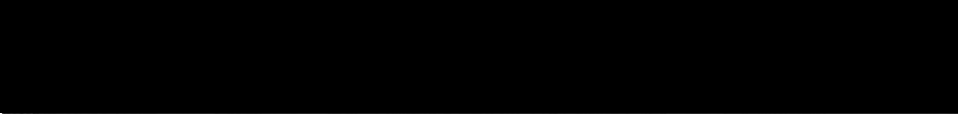
CPRE Lancashire is concerned that if too much land is allocated all at once, then developers will target that which is most profitable, which tends to be rural fringe sites with high values. This leaves other areas bereft of investment, often poorer areas whose community is most in need of it, in the case of St Helens large tracts of land to the south east need rejuvenation. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

PO2492

ELOOS6



St Helens Local Plan 2020 - 2035, Submission Draft - Representations
 Dan Ingram
 to:
 planningpolicy@sthelens.gov.uk
 11/03/2019 13:18



1 Attachment



26800.A3.DI.DM - St Helens LP Submission Draft Reps - Travers Farm, Bold 190311 with Appendices.pdf

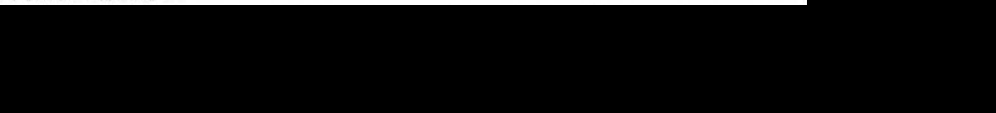
To whom it may concern,

Please find attached a copy of representations, including Vision Statement, prepared by Barton Willmore on behalf of our Client, Andrew Cotton and Family, in relation to the St Helens Local Plan Submission Draft for your consideration.

I would be grateful if you could confirm receipt of the attached in due course.

Kind regards.

Dan Ingram
 Senior Planner



Consider the Environment, Do you really need to print this email?

The information contained in this e-mail (and any attachments) is confidential and may be privileged. It may be read, copied and used only by the addressee, Barton Willmore accepts no liability for any subsequent alterations or additions incorporated by the addressee or a third party to the body text of this e-mail or any attachments. Barton Willmore accepts no responsibility for staff non-compliance with our IT Acceptable Use Policy.

- ① - GEN
- ② - Spatial Vision
- ③ - Objective 4
- ④ - key Diagram
- ⑤ - LPA01

- ⑥ - LPA02
- ⑦ - LPA03

- ⑧ - LPA04
- ⑨ - LPA04.1

- ⑩ - LPA05
- ⑪ - LPA05.1

- ⑫ - LPA06
- ⑬ - LPA08

- ⑭ - LPA09
- ⑮ - LPC01

- ⑯ - LPC02
- ⑰ - LPC07

- ⑱ - LPC09

- ⑲ - Appendix 5



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

EF0176

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|-----------------------|--|
| Title: MR | Title: MR |
| First Name: ANDREW | First name: DAN |
| Last Name: COTTON | Last Name: INGRAM |
| Organisation/company: | Organisation/company: BARTON WILLMORE |
| Address: C/O AGENT | Address: TOWER 12 BRIDGE STREET MANCHESTER |
| Postcode: | Postcode: M3 3BZ |
| Tel No: | |
| Mobile No: | |
| Email: | |

| | |
|-----------------------|----------------|
| Signature: [Redacted] | Date: 13/03/19 |
|-----------------------|----------------|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|---|--|-----------------------------|--|------------------------|--|--|--|--------------------------------|--|
| Policy | | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | WHOLE SUBMISSION DRAFT | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|------------------------------|-----------------------------|
| Legally Compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|--------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input type="checkbox"/> |
| Effective? | <input type="checkbox"/> |
| Consistent with National Policy? | <input type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

PLEASE REFER TO SUBMITTED REPRESENTATION DOCUMENT ACCOMPANYING THIS FORM.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

St Helens Borough Local Plan 2020 - 2035 Submission Draft

Representations on Behalf of Andrew Cotton and Family

March 2019

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

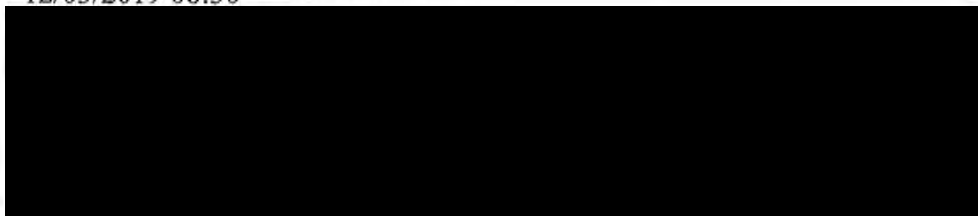
- 3.39 Building upon Policy LPA05, this Policy outlines which of the allocated sites will constitute Strategic Housing Sites. Our Client welcomes that their land interest is included within the list of Strategic Sites, under allocation 4HA (Land bounded by Reginald Road / Bold Road / Travers Entry / 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.

- 3.41 Furthermore, our Client is also concerned that, whilst being the largest allocated site within the Plan, and being labelled as a Garden Suburb, there is no site specific policy, or coverage within the entirety of the Plan, save from the Site Profile within Appendix 5 of the Plan (noting that the strategic rail freight interchange, of similar size and importance in the Borough does have a site specific policy (LPA10)). Our Client is concerned that this will lead to a level of uncertainty about what a development on this Site will be expected to deliver and considers that an allocation of this nature should be served by a site-specific policy. The level of detail afforded by the Site Profile within Appendix 5 of the new Local Plan is not considered to provide the level of detail one would expect of an allocation of circa 3,000 dwellings.
- 3.42 The lack of a site-specific policy for the Bold Forest Garden Suburb also raises questions about how serious the Council are about bringing the Site forward. One would expect a degree of excitement from the Council about the opportunity such a development poses, but one would also expect certainty of the Council's support of the Site, particularly considering the reliance the Council places upon this one allocation within the Plan. The lack of such a policy does not provide this.
- 3.43 As outlined within the review of Policy LPA05 above, our Client is also concerned about the anticipated rate of delivery outlined for allocation 4HA. The Plan indicates (Table 4.5) that the allocation will deliver a total of 2,988 dwellings in total, with only 480 to be delivered within the plan period, i.e. within the next 16 years. The remainder (2,508 dwellings) are anticipated to be provided beyond the plan period, after 2035. Our Client considers this to be an unrealistic and unambitious target and that the Site could deliver considerably more dwellings within the Plan Period. As detailed previously, the anticipated delivery rate of the allocation could also be amended to reduce the Council's reliance upon windfall sites and SHLAA sites without planning permission as is presently the case.
- 3.44 The Plan does not provide any justification as to why its key site, and largest allocation is expected to deliver so little housing throughout the Plan period and our Client considers that these figures should be re-visited to provide a more realistic and ambitious expectation for its Garden Suburb.

PO2493



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



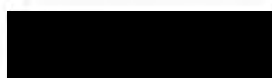
HARM3013 Representation Form on behalf of Harworth Estates Ltd (March 2019) LPD07.pdf

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).

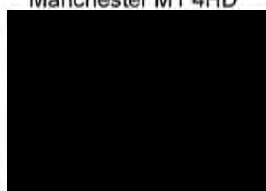
I would be grateful if you could please confirm receipt of this email and the representations enclosed.

Kind regards
Alice Fitton



Turley

1 New York Street
Manchester M1 4HD



- ① - LPD07
- ② - LPC13
- ③ - LPC02
- ④ - LPC01
- ⑤ - LPA05
- ⑥ - LPA02
- ⑦ - LPA05.1
- ⑧ - S-A
- ⑨ - LPA05 - Criterion 3

Linkedin

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St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: C/O Agent | Title: Miss |
| First Name: C/O Agent | First name: Alice |
| Last Name: C/O Agent | Last Name: Fitton |
| Organisation/company: Harworth Estates Ltd | Organisation/company: Turley |
| Address: C/O Agent | Address: 1 New York Street, Manchester |
| Postcode: | Postcode: M1 4HD |

Signature:

[Redacted Signature]

Date:

11/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.ssthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|---|-------|-----------------------------|--|--------------|--|--|--|--------------------------------|--|
| Policy | LPA05 | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|---|-----------------------------|
| Legally Compliant? | Yes <input checked="" type="checkbox"/> X | No <input type="checkbox"/> |
| Sound? | Yes <input checked="" type="checkbox"/> X | No <input type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input checked="" type="checkbox"/> X | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|--------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input type="checkbox"/> |
| Effective? | <input 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 supporting Representations Report

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting Representations Report

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 explain further the rationale behind the representations and be given the opportunity to respond to any changes the Council proposes to make and any further evidence that is presented.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

**St Helens Borough Council Local Plan -
Submission Draft**

Moss Nook Urban Village, Watery Lane, Moss
Nook

Representations on behalf of Harworth Estates Ltd

March 2019

Turley

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

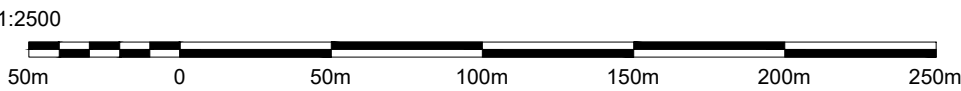
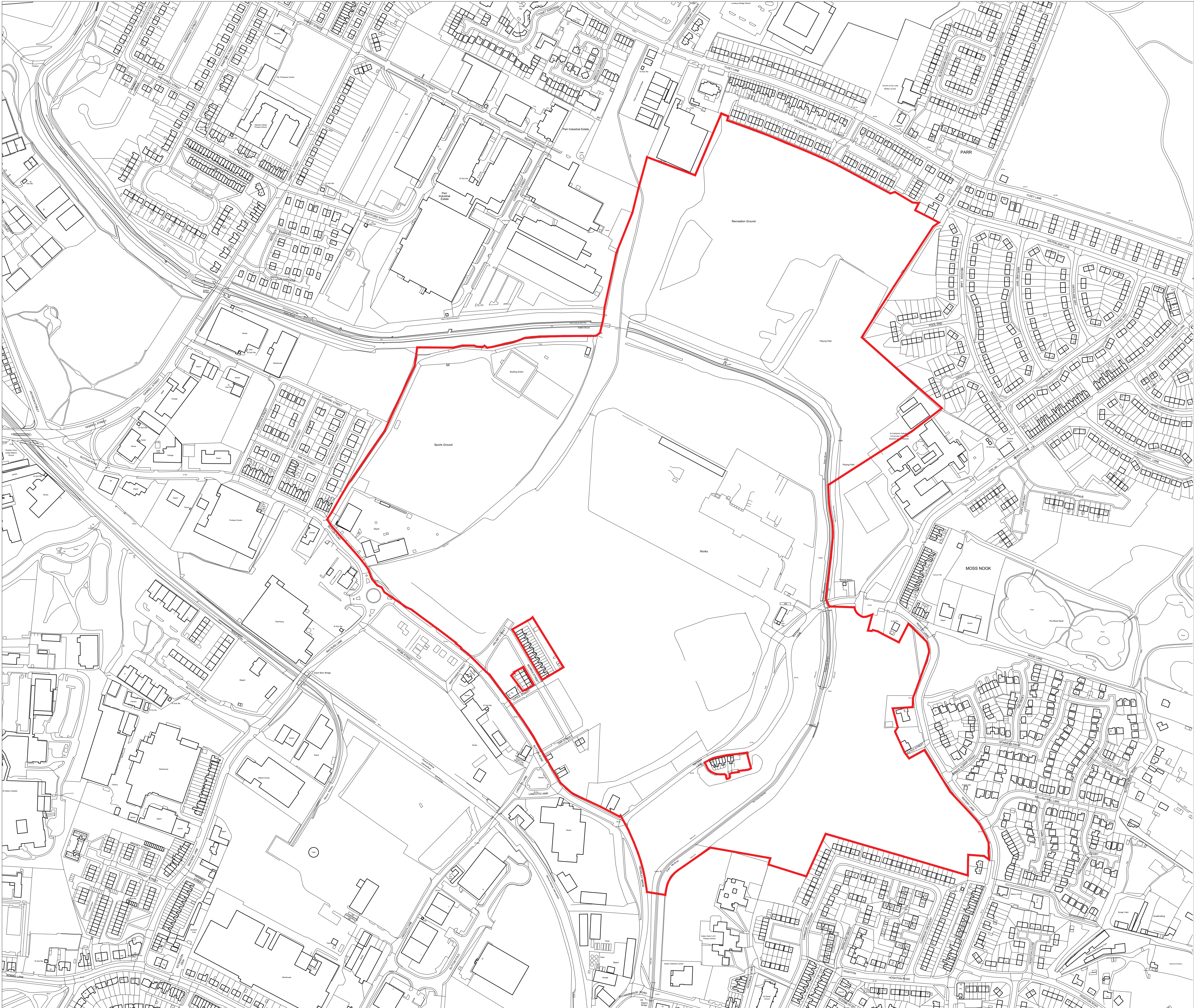
- 3.7 Harworth supports the allocation for residential development at Moss Nook Urban Village (Site Ref. 10HA) within emerging **Policy LPA05.1 'Strategic Housing Sites'**. The allocated site comprises 26.74 ha of land, bound by Sutton Brook to the north, Watery Lane to the east, Sutton Road to the south, 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**.

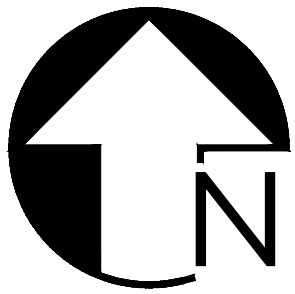
- 3.9 The approved Parameters Plan (Ref. HJB/PA511/226a) (**Appendix 3**) demonstrates how the land to the north of Sutton Brook will be utilised to accommodate areas of enhanced open space; and the land to the east of Watery Lane will accommodate an area of surface water attenuation as well as enhanced 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.
- 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'¹ 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

¹ Amber: Potentially negative effects which could be mitigated

Appendix 1: Site Location Plan



- The Copyright of this drawing belongs to MPSSL Planning & Design Ltd. and shall not be used or reproduced in any form without its express permission.
- Do not scale from this drawing - Work to figured dimensions only. All dimensions to be checked on site prior to the execution of any work.
- For the avoidance of doubt all dimensions are measured to wall structure and not the finishes unless otherwise stated.
- Where any discrepancy is found to exist within or between drawings and/or documents it should be reported to the architect immediately.
- MPSSL Planning & Design Ltd. shall not be liable for any use of drawings and documents for any purpose other than for which the same were prepared by or on behalf of MPSSL Planning & Design Ltd.



| Rev | Date | Revision | Initial |
|-----|------|----------|---------|
|-----|------|----------|---------|

+ Client

Harworth

+ Drawing Title

LOCATION PLAN

+ Project

Moss Nook
ST Helens

| Job No | Drp No | Drawn | Rev |
|-------------|------------|--------------|-----|
| 19019 | 00 | mpsl | |
| Scale | Date | Stage | |
| 1:2500 @ A1 | 08.03.2019 | For Approval | |

mpsl planning & design ltd
14 west point enterprise park,
clarence avenue, trafford park,
manchester. M17 1QS



**Appendix 3: Approved Parameters Plan (Ref.
HJB/PA511/226a)**

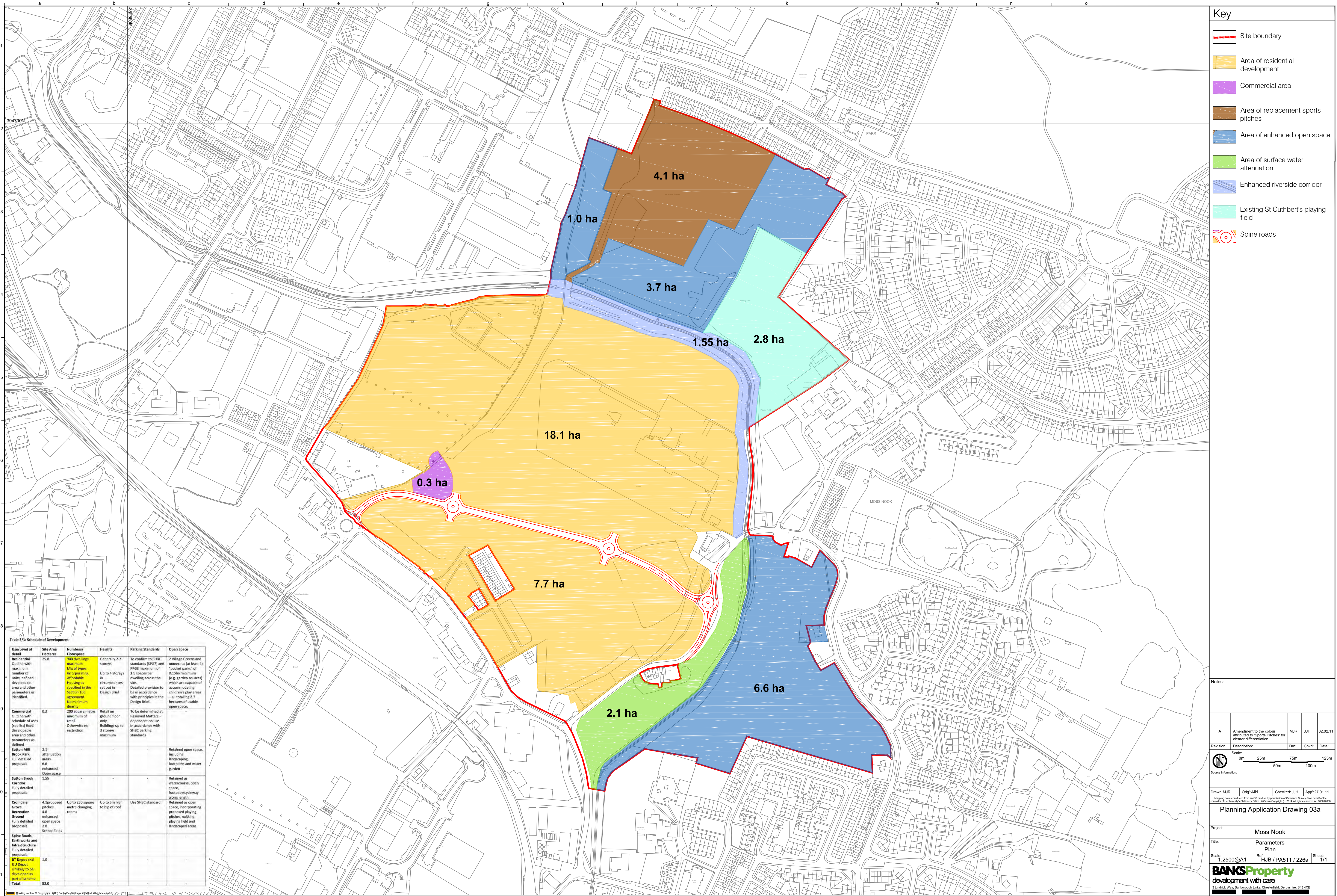


Table 3/1: Schedule of Development

| Use/Level of detail | Site Area Hectares | Numbers/Floorspace | Heights | Parking Standards | Open Space |
|--|--------------------|---|---|---|---|
| Residential Outline with maximum number of units, defined developable area and other parameters as identified. | 29.8 | 1000 dwellings maximum Mix of types incorporating Affordable Housing as specified in the Section 106 agreement No minimum density | Generally 2-3 storeys Up to 4 storeys in circumstances set out in Design Brief | To conform to SHBC standards (SPG7) and PP03 maximum of 3.5 spaces per dwelling across the site. Detailed provision to be in accordance with principles in the Design Brief. | 2 Village Greens and numerous (at least 4) "pocket parks" of 0.15ha minimum (e.g. garden squares) which are capable of accommodating children's play areas - all totalling 2.7 hectares of usable open space. |
| Commercial Outline with schedule of uses (use full field developable area and other parameters as defined). | 0.3 | 200 square metre maximum of retail Buildings up to 3 storeys maximum | Retail on ground floor only. Otherwise no restriction | To be determined at Reserved Matters - dependent on use - in accordance with SHBC parking standards | |
| Sutton Mill Brook Park Full detailed proposals | 2.1 | 2.1 attenuation areas 5.6 enhanced Open space | | | Retained open space, including landscaping, footpaths and water garden |
| Sutton Brook Corridor Fully detailed proposals | 1.55 | | | | Retained as watersource, open space, footpath/cycleway along length |
| Cromdale Grove Recreation Ground Fully detailed proposals | 4.1 | 4.1 proposed pitches 4.8 enhanced open space 2.8 School fields | Up to 250 square metre changing room Up to 5m high to hip of roof | Use SHBC standard | Retained as open space, incorporating proposed playing pitches, existing playing field and landscaped areas. |
| Spine Roads, Earthworks and Infra-Structure Fully detailed proposals | | | | | |
| BT Depot and VU Depot Unlikely to be developed as part of scheme | 1.0 | | | | |
| Total | 52.0 | | | | |

Notes:

| | | | | |
|-----------|---|-----|-------|----------|
| A | Amendment to the colour attributed to 'Sports Pitches' for clearer differentiation. | MJR | JJH | 02.02.11 |
| Revision: | Description: | Dm: | Chkd: | Date: |

Scale: 0m 25m 50m 75m 100m 125m

Source information:

Drawn: MJR | Orig: JJH | Checked: JJH | App: 27.01.11

Planning Application Drawing 03a

Project: Moss Nook

Title: Parameters Plan

Scale: 1:2500@A1 | Ref: HJB / PA511 / 226a | Sheet: 1/1

BANKSProperty
development with care

3 Lindrick Way, Barborough Links, Chesterfield, Derbyshire. S43 4XZ

PO2494

E0088

① - LPA05 - 4HA

② - LPA05 - 6HA



St Helens Borough Local Plan 2020 - 2035 : submission draft.
Kenny Jensen
to:
planningpolicy@sthelens.gov.uk
12/03/2019 12:28



After viewing the latest proposed plan i must say its very much improved plan. However there are a couple of sites within the plan that i feel certain considerations / amendments should be taken into account.

site 1 :- 4HA Bold Development on page 24 of the maps.

One particular part of the proposed development too the rear of the **French Fields** housing development (off Gorse lane Clockface)

and the rear of Crawford st Clockface lies a one specific field.

About three years ago the land owner of this particular field was approached by Clockface Miners Recreation Club with the view of purchasing this specific field for the expansion of the sports facilities in the Clockface area, however the deal fell through when the land owner at the last minute decided to double the price of the land meaning the club couldn't afford to purchase the this field. As this field has been included in the proposed plan for the bold housing development surely it would make more sense to remove this specific field from the proposed plan on the grounds of the future potential expansion of the recreational facilities for Not only the existing community in Clockface but also for the future residents of Bold development.

①

Site 2 :- 6HA former Pilkingtons Cowley Hill Site on page 10 of the maps.

Due to this sites close porximity too the East Lancashire road an size of the site it offers in my opinion great potential not only as a development site for housing but to finally achieve the realization to create a major arterial road that connects the East Lancs to the Town Centre plus the rest of the major network within St Helens. In my opinion this would help to elevate some of the trouble spots we have within the network ie **Windle Island** doesn't matter how much money you throw at it, it won't improve & **Blackbrook** area.

②

I hope you will take these proposed amendments into consideration .

Yours Sincerely Mr K Jensen

PO2495

E0088

① - LPA05 - 4HA

② - LPA05 - 6HA



St Helens Borough Local Plan 2020 - 2035 : submission draft.
 Kenny Jensen
 to:
 planningpolicy@sthelens.gov.uk
 12/03/2019 12:28



After viewing the latest proposed plan i must say its very much improved plan. However there are a couple of sites within the plan that i feel certain considerations / amendments should be taken into account.

site 1 :- 4HA Bold Development on page 24 of the maps.

One particular part of the proposed development too the rear of the **French Fields** housing development (off Gorse lane Clockface)

and the rear of Crawford st Clockface lies a one specific field.

About three years ago the land owner of this particular field was approached by Clockface Miners Recreation Club with the view of purchasing this specific field for the expansion of the sports facilities in the Clockface area, however the deal fell through when the land owner at the last minute decided to double the price of the land meaning the club couldn't afford to purchase the this field. As this field has been included in the proposed plan for the bold housing development surely it would make more sense to remove this specific field from the proposed plan on the grounds of the future potential expansion of the recreational facilities for Not only the existing community in Clockface but also for the future residents of Bold development.

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②

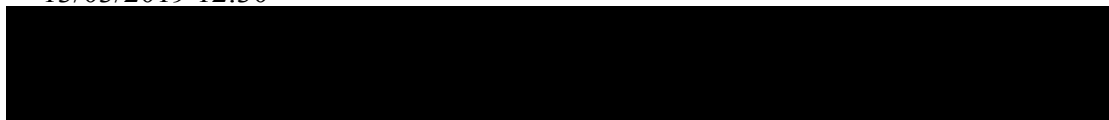
I hope you will take these proposed amendments into consideration .

Yours Sincerely Mr K Jensen

PO2496



St Helens Local Plan Submission Draft
 McBride, Sean
 to:
 'planningpolicy@sthelens.gov.uk'
 13/03/2019 12:30



5 Attachments



St Helens Local Plan Submission Draft Rep - March 2019.pdf



Vision Document - Land at Weathercock Hill Farm Rev A 13 03 19_compressed (2).pdf



Weathercock Hill Farm_Ecological Statement(1.1).pdf



Landscape Feasibility Statement - Land at Weathercock Hill Farm.pdf 2503.TN.pdf

Dear Sir/Madam

Further to the above consultation to the Council's Local Plan Submission Draft; please find attached a representation submitted on behalf of Persimmon Homes (North West) Ltd. I also attach supporting documentation concerning site 1HA South of Billinge Road, East of Garswood Road and West of Smock Lane, which is within the control of the Company.

I trust that the attached information is sufficient at this stage, and will be given full consideration. I would welcome the opportunity to engage further in the preparation of the St Helens Local Plan and would be happy to arrange a meeting with the Council to discuss the land at Garswood to ensure its confirmation as a viable development site.

I look forward to confirmation of receipt of this response in due course.

Kind regards
 Sean

Sean McBride
 Persimmon Homes (North West)



30-34 Crofts Bank Road, Urmston, Manchester, M41 0UH



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As part of our partnership with Team GB, we're **Building Futures**, giving away £1 million to the next generation of stars. [Find out more....](#)

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Our privacy policies for our customers, employees and job applicants are available at <https://www.persimmonhomes.com/corporate/corporate-responsibility/policies>

Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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**St. Helens Borough Local Plan
2020-2035 Submission Draft**

Representations submitted on behalf of Persimmon Homes North West

March 2019



the Site's location. There are no technical encumbrances which would prevent the site delivering this scale of homes.

6.24 The Parameters Masterplan appended to this representation demonstrates that the site can accommodate circa 265 new homes, having regard to the site's known physical and technical constraints; and the Council's open space requirements.

18

6.25 It is requested that the indicative site capacity is revised accordingly within table 4.5 to reflect this and to ensure that the Council is making the most efficient use of land.

6.26 Subject to the release of the land from the Green Belt upon adoption of the Local Plan, it is considered that the site can deliver homes early in the Plan period; the Company would welcome the opportunity to work with the Council to provide the necessary assurances to the Local Plan inspector.

Phasing

6.27 As set out at para 4.18.18; the Company supports the council not seeking to phase the release of allocated sites; acknowledging that lead-in times for larger sites will result in delivery occurring later in the Plan period.

19

Policy LPA05.1: Strategic Housing Sites

7.1 The Company supports the Council's approach to housing allocations, including a separate policy for those allocations considered to be strategic in scale (300 homes upwards).

7.2 It is considered appropriate that a range of sites are allocated in order to ensure a continuous and constant supply of homes throughout the Plan period. Sites' such as the Company's at Garswood (1HA) which are not identified as strategic in scale, present the opportunity to make a significant contribution to the Borough's housing supply early in the Plan period and are less likely to be encumbered by the requirement for significant additional supporting infrastructure, complicated land ownership patterns or disputes over land value equalisation.

20

7.3 Site 1HA is within a single private ownership and is controlled and being promoted by a FTSE-100 housebuilder with significant experience of delivering new homes in St Helens; its

development is not encumbered by any technical or legal constraints which would preclude delivery of homes commencing early in the Plan period.

Policy LPA06: Safeguarded Land

- 8.1 The Company supports policy LPA06 and the release of additional land from the Green Belt in order to meet needs beyond the Plan period; this being in accordance with the Framework which is clear that authorities should identify areas of safeguarded land in order to meet longer term development needs stretching beyond the plan period (para 139), also having regard to their intended permanence in the long term (para 136).

21

Policy LPA06 Extent of the Green Belt and Safeguarded Land

- 9.1 As referred in our response to Policy LPA02, the Company supports the release of sites from the Green Belt to meet housing and employment requirements. It is considered that the delivery of homes to meet objectively assessed need for housing and to support economic growth constitutes the 'exceptional circumstances' required in the Framework.

22

Policy LPA08 Infrastructure Delivery and Funding

- 10.1 The Company generally supports Policy LPA08 concerning developer contributions, subject to the appropriateness of contributions sought being assessed against the tests set out at para 58 of the Framework, and also that the extent of obligations sought does not threaten the viability of sites (Ref: 23b-002-20140306).

23

Policy LPC01: Housing Mix

- 11.1 The Company generally supports paragraph 1 of Policy LPC01, which seeks to provide a range of new market and affordable homes which includes a range of types, tenures and sizes in accordance with those needs set out within the SHMA; however would stress that the prospects of housing schemes coming forward should not be constrained by unrealistic and overly onerous housing mix obligations which have significant repercussions on viability.
- 11.2 Housing mix, type and size is often determined by the scale of development and market area and it would not be appropriate to assume a one size fits all approach. Paragraph 7.36 of the SHMA corresponds that although the types of homes needed in St Helens can be quantified using modelling and an understanding of the current market, 'it does not follow that such prescriptive figures should be included in the plan-making process'...the market is to some

24

PO2497

ELO210



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation - submitted
on behalf of BXB (Cowley Hill) Ltd
Gemma Williams

to:
planningpolicy@sthelens.gov.uk
13/03/2019 15:38

① - Appendix
② - LPA08
③ - LPC02
④ - LPA05.1

2 Attachments



lpsd-representation-form.doc 13 03 19.pdf c.pdf pt 12 03 19 sh GW.pdf

Please see attached a completed Representation Form and letter of explanation submitted on behalf of BXB (Cowley Hill) Ltd.

Kind regards

Gemma Williams
Administrator

Nexus Planning is pleased to have been shortlisted by the RTPI as a finalist for Planning Consultancy of the Year 2019



Nexus Planning
Eastgate, 2 Castle Street
Castlefield
Manchester M3 4LZ



St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: Mr | Title: Mr |
| First Name: Gary | First name: Peter |
| Last Name: Goodman | Last Name: Tooher |
| Organisation/company: BXB (Cowley Hill) Ltd | Organisation/company: Nexus Planning |
| Address: | Address: Eastgate, Castle Street, Manchester |
| Postcode: | Postcode: M3 4LZ |
| <div style="background-color: black; height: 40px;"></div> | |

Signature

Date:

13th March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes x (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 | |
| LPA05 | | Appendix 5, bullet points 2 (Green Infrastructure) and 5(B1 uses) | | | | | | | |
| Other documents (please name document and relevant part/section) | | | | | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|---|--|
| Legally Compliant? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|-------------------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input type="checkbox"/> |

| 6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible. |
|---|
| If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments |

BXB (Cowley Hill) Ltd strongly supports the allocation of Cowley Hill site for residential led development. BXB (Cowley Hill) Ltd supports the Council in progressing the Local Plan. The Local Plan preparation process and the requirements of the site however necessitate BXB (Cowley Hill) Ltd commenting on the draft Local Plan to the effect that two specific elements of

Appendix 5 as they relate to Cowley Hill are unsound. Please refer to the attached letter (Nexus Planning, 13.03.2019)

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the attached letter (Nexus Planning 13.03.19)

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:

The strategic importance of bringing forward the Cowley Hill site and BXB (Cowley Hill) Ltd's key role.

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.**



Paul Sanderson
Strategic Director of Place Services
St Helens Council
Local Plan
Town Hall, Victoria Square
St Helens, Merseyside
WA10 1HP

Manchester
Eastgate
2 Castle Street
Castlefield
Manchester M3 4LZ

nexusplanning.co.uk

E: planningpolicy@sthelens.gov.uk

13th March 2019

Dear Sir

The New St Helens Borough Council Local Plan 2020 – 2035
Submission Draft – ‘Regulation 19’ consultation
Representation submitted on behalf of BXB (Cowley Hill) Limited in relation to Cowley Hill, St Helens (6HA)

Thank you for the opportunity to comment on the submission draft of the New Local Plan. This representation is submitted on behalf of BXB (Cowley Hill) Ltd by Nexus Planning. ✓

A completed Representation Form is attached to this representation. ✓

BXB Ltd is a specialist land developer focussing on bringing forward brownfield, previously developed sites, for all types of development, including residential. ✓

BXB (Cowley Hill) Ltd has a land and promotion agreement with Pilkington plc in relation to the surplus land at Cowley Hill, Strategic Housing Site ref 6HA in the Draft Local Plan. BXB (Cowley Hill) Ltd intend to submit an application for residential-led development on the Cowley Hill site in 2019. Initial reclamation work on the site is due to commence in early 2020 as ‘permitted development’ demolition work. Subject to the appropriate approvals, this will be followed by further grounds works, site preparation, engineering works and reclamation and development later in 2020. ✓

of the town centre. For those who need to drive, the A580 East Lancs Road is accessible to the north of the site via Washway Lane / City Road, without the need to travel through existing residential areas.

Deliverable

The site is deliverable for residential led development. BXB (Cowley Hill) Ltd has undertaken an initial technical assessment of the site. Whilst inevitably there are a number of matters to be addressed as a consequence of the site's industrial history, BXB Ltd is confident that there are no constraints that would prevent residential development on the site. This technical work has been identified a net developable area of around 35 hectares.

BXB (Cowley Hill) Ltd has discussed the site with the Local Planning Authority and intend to submit a planning application for residential led development in 2019. This will be supported by a comprehensive masterplanning approach and a phasing strategy. The application will be prepared with the benefit of stakeholder and local community consultation. As noted earlier, and subject to the necessary approvals, BXB (Cowley Hill) Ltd expect development to start on the site in 2020, following phased site preparation, engineering and remediation.

Whilst the NPPF and extant development plan provide a very positive basis upon which an application on the site can be progressed in 2019 ahead of adoption of the new Local Plan, BXB Ltd are wholly supportive in principle of the proposed allocation of the site in the Submission Draft Local Plan. However, as noted above, the draft Local Plan is considered 'unsound' on a number of specific points.

Draft Policy LPA05.1: identifies 'Strategic Housing Sites' and refers to:

'6HA: Land at Cowley Street, Cowley Hill, Town Centre'

The policy notes that any planning application for development within a Strategic Housing Site must be supported by a comprehensive masterplan.

Detailed development proposals within a Strategic Housing Site are required to comply with Policy LPA08. Policy LPA08 deals with Infrastructure Delivery and Funding and developer contributions secured by legal agreement or a tariff based system such as the Community Infrastructure Levy. The policy notes that development contributions will be considered in the context of the economic viability of new development. Consideration will be given to economic viability evidence to determine the ability of the development scheme to support the required level of contributions.

A similar approach is taken to the provision of Affordable Housing in Policy LPC02, which acknowledges that provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need and where appropriate, the economic viability of the development. The policy notes that affordable housing requirements can be relaxed where it is fully justified by an independent site-specific viability appraisal and where a reduced affordable housing provision is outweighed by the other benefits of the development.

BXB (Cowley Hill) Ltd welcome this clear and pragmatic approach. As noted earlier, BXB Ltd are confident that the Cowley Hill site can come forward for residential development. However, bringing the site forward will require significant investment in site remediation and infrastructure, amongst other things. The inevitable, additional costs of viably developing a large scale, brownfield site will need to be reflected in the extent of developer contributions and affordable housing provision, based on a robust viability appraisal. The significant additional investment in infrastructure and other works in bringing forward brownfield sites such as Cowley Hill

620210

should be explicitly reflected in LPA08 and LPC02. Similarly LPC02 should be reflected to take into account the benefit of delivering a range of tenures, including affordable housing, as part of providing new homes and choice, in an innovative way.

Appendix 5

The masterplans for each Strategic Housing Site are to address the indicative requirements set out in Appendix 5.

Appendix 5 to the Draft Plan identifies the Cowley Hill site as having a 'notional' capacity of 816 units.

The site extends to approximately 50 hectares and initial capacity testing undertaken by BXB (Cowley Hill) Ltd confirms that the site has a net developable area of 35 hectares and a capacity of around 1,000 – 1,200 new homes, subject to detailed masterplanning and housing mix.

Reflecting Policy LPA05.1, Appendix 5 identifies a series of 'indicative requirements' that are to be 'addressed'. These as drafted, are as follows:

- *Appropriate highway access should be provided from City Road and College Street (with any necessary off-site improvements).*
- *A Green corridor, incorporating the LWS47*, should be provided from the north around the eastern boundary of the site linking the green spaces and habitats along Rainford Brook and the wider greenway network.*
- *Measures to 'slow the flow' and enhance biodiversity within the culvert running along the eastern boundary of the site will be required in line with Policy LPC12 'flood Risk and Water Management'.*
- *The development should include appropriate measures to attenuate noise from the adjacent employment use(s).*
- *The development area allows for the inclusion of 4ha of B1 employment uses (if this is not implemented this will make more land available for housing).*
- *Any development should address any contamination issues and/or other geotechnical issues affecting the site.*
- *Related to the above, site levels should be carefully considered in relation to the site layout and surrounding area.*
- *The design and layout of the development should provide for a range of house types in character areas.*
- *Appropriate provision of open space must be included in accordance with Policy LPC05 and LPD03.*

*Local Wildlife Site 47

BXB (Cowley Hill) Ltd support the master planning approach to Strategic Sites including Cowley Hill and, in large part, the requirements proposed for the site. The inherent flexibility in how the 'indicative requirements' are addressed through a masterplanning process which, in the case of Cowley Hill, will inevitably have to balance a range of design, ground conditions, infrastructure, environmental and viability issues is welcomed.

However for the sake of clarity, and given the scale of the site, the need to address its' industrial legacy, as well as its future relationship with remaining industrial uses, access and other considerations, it is considered that the albeit indicative requirements set out in Appendix 5, should be amended. There indicative requirements

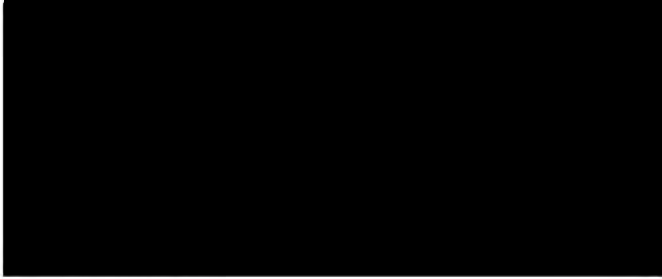
KL0213

may be more suitable. Again, the approach to open space will be considered as part of the masterplanning strategy supporting a planning application. However, it is noted at this stage that the proximity of the site to the historic and characterful Victoria Park offers a particular opportunity, through enhanced linkages and other improvements, to provide new residents access to a high quality, substantial public open space. This will be reflected in the masterplan approach and should be reflected in the application of relevant open space policies.

4

I trust these comments are helpful and can be reflected as appropriate in the proposed modifications. Please let me know if my client can assist further in supporting the authority in the preparation of the Local Plan.

Yours faithfully

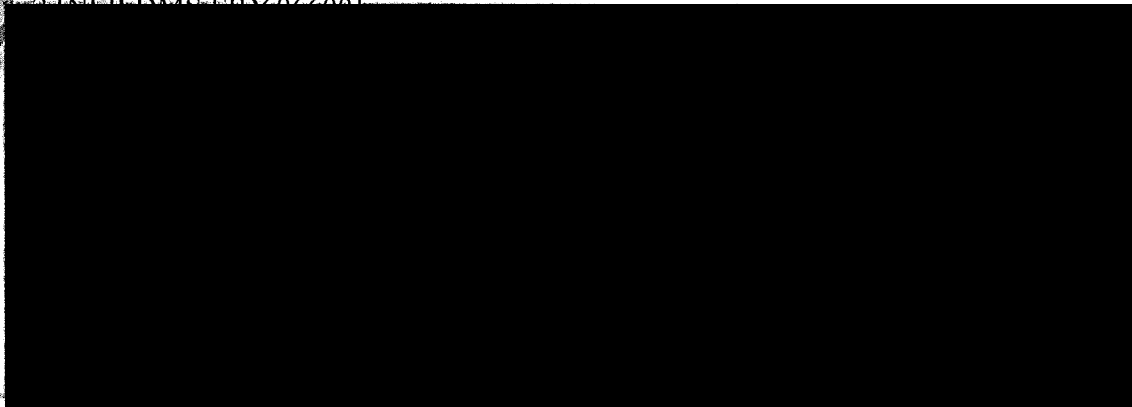


Peter Tooher
Director

PO2498

ELO211

RE: Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 1 of 2



① LPA01
② LPA02
③ LPA03
④ LPA04
⑤ LPA05
⑥ LPA05
⑦ LPA05
⑧ LPA05.1
⑨ LPA06

1 Attachment



41575_09 lpsd-representation-form Taylor Wimpey St Helens 13.03.2019.pdf

⑩ LPA07

⑪ LPA08

⑫ LPA09

⑬ LPA11

⑭ GBR

⑮ EVA

Sir/Madam,

Further to my colleague Brian's email below and the link sent across, I attach a copy of the signed Representation Form.

Kind regards,
Melissa

Melissa Wilson
Senior Planner

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

⑭ LPC01/2

⑮ LPC02

⑯ LPC13

⑰ LPD01

⑱ LPC01/3

⑲ LPC05

⑳ LPD01

㉑ LPD02

㉒ LPC01/5

㉓ LPC10

㉔ LPD01

㉕ LPD03

㉖ LPC01/6

㉗ LPC12

㉘ LPD01

㉙ LPD07

㉚ SHMA

Sir/Madam,

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. A completed Representation Form will follow on a separate email due to restrictions on email size.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseYorPfo>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards
Brian

Brian O'Connor
Associate Director

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

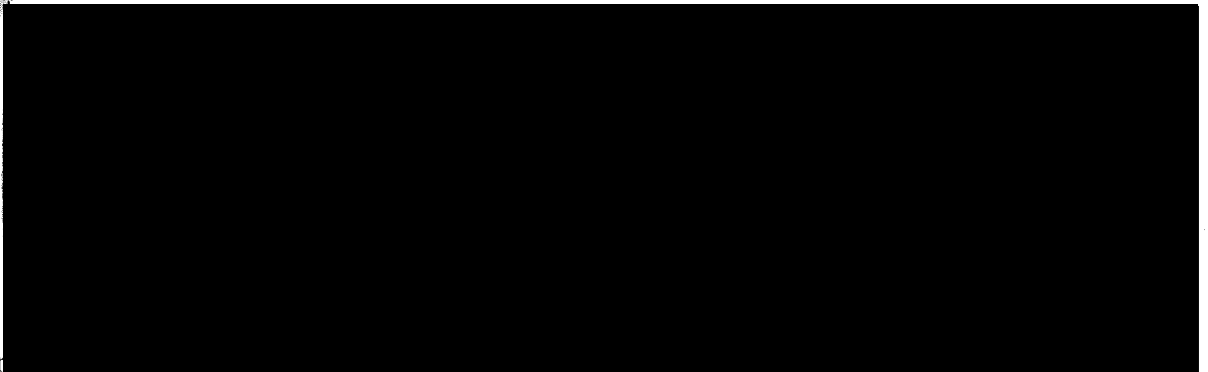
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Representations to St Helens Local Plan 2020-2035 (Submission Draft) - Email 2 of 2
[NLP-DMS.FID606600]
Brian O'Connor



1 Attachment



SPLIT 41874_03 St Helens Local Plan Consultation - Soundess Reps 13.03.19_Part_1.pdf

Sir / Madam

On behalf of our client, Taylor Wimpey UK Limited, please find attached representations to the current consultation on the Submission Draft of the emerging St Helens Local Plan [SDLP]. Due to the size of the representation we have had to split it into two separate emails and I will send the second email shortly.

I also attach a separate link to the representations and associated appendices.

<https://we.tl/t-yDseY9rPfO>

I would be grateful if you could confirm receipt of these representations via return email. If you have any questions in relation to these representations or would like to discuss any of Taylor Wimpey's land assets in St Helens, please let me know.

Kind regards
Brian

Brian O'Connor
Associate Director

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

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Nathaniel Lichfield & Partners Limited is registered in England, no. 2778116. Our registered office is at 14 Regent's Wharf, All Saints Street, London N1 9RL.



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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|---|--|
| Title: Ms | Title: Mr |
| First Name: Kate | First name: Brian |
| Last Name: McClean | Last Name: O'Connor |
| Organisation/company: Taylor Wimpey UK Limited | Organisation/company: Lichfields |
| Address: Ground Floor, Washington House Birchwood | Address: Ship Canal House 98 King Street Manchester |
| Postcode: WA3 6GR | Postcode: M2 4WU |
| Tel No: | Tel No: [REDACTED] |
| Mobile No: | Mobile No: [REDACTED] |
| Email: | Email: [REDACTED] |

| | |
|------------------------------|-------------------------|
| Signature: [REDACTED] | Date: 13/03/2019 |
|------------------------------|-------------------------|

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|---|--|-----------------------------|--|---|--|--|--|--------------------------------|--|
| Policy | | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | | Habitats Regulation Assessment | |
| See cover letter | | See cover letter | | See cover letter | | | | | |
| Other documents (please name document and relevant part/section) | | | | See supporting Representations and Appendices | | | | | |

| 4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i> | | |
|---|---|--|
| Legally Compliant? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Complies with the Duty to Cooperate | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|-------------------------------------|
| Positively Prepared? | <input checked="" type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input checked="" type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See supporting Representations and Appendices

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See supporting Representations and Appendices

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | | | |
|--|--|--|---|
| | | | Yes, I wish to participate at the oral examination |
|--|--|--|---|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To ensure that the modifications to the policies are incorporated and we have an opportunity to present to the Inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

EL0211

St Helens Local Plan Soundness Representations

Taylor Wimpey UK Limited

13 March 2019

LICHFIELDS

41874/03/SPM/MWI
17081285v8
17081285v8

7.0 **Policy LPA5.1: Strategic Housing Sites**

⑧

Introduction

- 7.1 Policy LPA05.1 sets out the strategic residential sites allocated to meet the borough's housing requirement.

Consideration of Policy

- 7.2 As noted in TW's response to Policy LPA05; TW strongly supports the allocation of sites 4HA and 5HA in St Helens. Taylor Wimpey notes that neither the Vista Road (Allocation 2HS) or the Common Road, Newton-le-Willows sites are identified as part of Policy LPA5.1. However, Taylor Wimpey considers that these sites should be included as housing allocations within this Policy. The development of all four sites provide an opportunity to comprehensively boost housing and investment by a known housebuilder committed to early delivery.
- 7.3 With reference to the comments made in LPA05 TW has concerns over the alignment of economic and housing growth aspirations. In this regard, TW believes the Council has failed to identify sufficient land to meet the housing requirement and deliver economic growth aspirations promoted in LPA04.
- 7.4 TW welcomes the Council's acknowledgement that the Gorsey and Gartons Lane sites are suitable, achievable and deliverable sites in allocating them for residential development. As identified in the preceding paragraphs, the delivery of housing is important in order for the borough to meet its economic growth aspirations.
- 7.5 Site 4HA has the capacity to delivery 2,988 units, with the TW parcel delivering up to 290 dwellings. TW notes that the Plan allows for 480 dwellings to be brought forward up to 2035. TW in the attached masterplan (Appendix 3) highlight that the Gorsey Lane site can make a significant contribution to this requirement within the plan period and would welcome clarity over where it is intended that these units are delivered. Taylor Wimpey consider that their element of the overall allocation should be brought forward in the first instance as it is adjacent to the existing settlement boundary and will be deliverable immediately after the adoption of the plan.
- 7.6 Allocation 5HA has the capacity to deliver 569 dwellings. The appended masterplan (Appendix 3) and previously submitted Delivery Statement demonstrates that the Site is deliverable and available for development and Taylor Wimpey is committed to its early delivery upon adoption of the plan. As set out earlier, Taylor Wimpey requests a minor amendment to the allocation boundary is made to include the area of land containing the farm buildings fronting Gartons Lane.
- 7.7 It is therefore requested that the Council continues to support the sites and their allocation in the Local Plan on account of their suitability, deliverability and sustainability, and on the premise that it would make a significant contribution to meeting the OAN requirement. Indeed, the sites would assist the delivery of a sustainable form of development and would provide economic, social and environmental gains in accordance with the Framework.
- 7.8 Notwithstanding the above, TW has concerns over the comments made in Part 2 of the Policy. It is not clear, for those allocations which are made up of multiple site ownerships, where the infrastructure would be required to be delivered and timescales. TW considers that without this clarity, this could result in piecemeal development.
- 7.9 TW would comment that in respect of Part 3, it is important that where development proposals only cover part of a strategic housing site, any financial contributions are proportionate to the

⑧

scheme and fully evidenced. It is currently not clear how this would be split, or what would be required as part of each individual site. The wording of the policy should be amended to recognise that each site should 'contribute' to defined elements; and ensure that the Policy does not prevent large housing sites coming forward where a masterplan is not agreed for a wider strategic allocation.

- 7.10 Any funding requested, as detailed in Appendix 5 of the SDLP will need to comply with the tests set out in the CIL Regulations [§122&123] and the Framework [§34] and be justified as part of any viability work. The current Viability Assessment makes a very small allowance for S.106/S.278 contributions and it is considered on the larger strategic sites that the allowance is insufficient to account for public transport, highway improvements, education contributions, community facilities etc. It is imperative that all likely costs associated with the delivery of strategic sites are fully considered.

Alternative Housing Sites

- 7.11 Taylor Wimpey is disappointed that their Vista Lane site was removed as a potential residential allocation and instead included as safeguarded land. Taylor Wimpey are of the opinion that given the sustainability credentials of Newton-le-Willows and given its high standing in the settlement hierarchy, a higher proportion of housing should be directed towards the area. Taylor Wimpey's Vista Lane site is deliverable immediately and there are no insurmountable constraints which would preclude its delivery. A detailed masterplanning exercise has already been undertaken and the Council have been party to this exercise. As such, Taylor Wimpey consider that the site should be included as an allocation rather than safeguarded land in the emerging Local Plan.
- 7.12 Similarly, Taylor Wimpey were disappointed that their Common Road site was removed as a safeguarded site and is proposed to be retained within the Green Belt. Taylor Wimpey consider that their Common Road site forms a logical Phase 2 extension to their 'Whittle Chase' development currently under construction.
- 7.13 The proposed Phase 2 extension has been specifically designed in a manner to deliver a high quality landscaped edge to the Green Belt which will minimise the impact on the openness of the Green Belt. The proposed development site is bounded to the west by a high-pressure pipeline and this acts as a very strong long term defensible boundary which cannot be built upon. Given Taylor Wimpey's knowledge of the Newton-le-Willows housing market, they consider that both sites are deliverable and request that the Council includes both sites as allocations to meet their housing need over the plan period.
- 7.14 Taylor Wimpey are a responsible housebuilder and offer apprenticeship opportunities for local youths when delivering developments and support other community organisations. Numerous examples of this have already been done in St Helens and Taylor are committed to this going forward.

Tests of Soundness

- 7.15 TW strongly supports Allocation 4HA and 5HA for residential development on the basis that:
- 1 **It is justified:** There are exceptional circumstances to justify the removal of land from the Green Belt; both sites have the capacity to make a significant contribution towards meeting the housing OAN requirement for the borough. They are appropriate sites in the context of the alternatives.

Recommended Change

- 7.16 To would comment that further clarity in respect of how strategic sites in multiple ownership address Part 2 of the Policy is provided in the explanatory text; as well as identify additional housing land to delivery economic growth aspirations. ✓
- 7.17 Taylor Wimpey requests that their site at Vista Road and Common Road, Newton-le-Willows are included in Policy LPA5.1 as allocations.

PO2499

GBR-078

EL0227



Representations to Submission Draft St Helens Local Plan on behalf of Muller Property

Group

Helen Binns

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:14

① - LPA05

② - GREEN BELT REVIEW

③ - LPA05.1

④ - LPA06

⑤ LPA05 TABLE 4.5

5 Attachments



Site Location Plan.pdf



Representations form - Part A and B.pdf



13-03-2019 Site Assessment Document.pdf



13-03-2019 St Helens Council - Representations to Submission Draft St Helens Local Plan.pdf



CLO1902_Clockface Comparative Study_Final Report_LR.pdf

Dear Sir / Madam

Please find attached representation to the Submission Draft St Helens Local Plan on behalf of our client Muller Properties Group.

Our submission comprises the following:

- Covering letter;
- Representations form – parts A and B combined;
- Site location plan;
- Site Assessment Document; and
- Comparative Sites Study

I would be grateful of confirmation of receipt of this emails.

Kind regards

Helen

Helen Binns

Principal Consultant

Walsingham Planning

Brandon House, King Street, Knutsford, WA16 6DX



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WALSINGHAM PLANNING

SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

| 1. Your Details | 2. Your Agent's Details (if applicable) (we will correspond via your agent) |
|--|--|
| Title: | Title: Mr |
| First Name: | First name: Mark |
| Last Name: | Last Name: Krassowski |
| Organisation/company: Muller Property Group | Organisation/company: Walsingham Planning |
| Address: C/O Agent | Address: Brandon House, King Street Knustford |
| Postcode: | Postcode: WA16 6DX |

Signature:

Date:

13/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: **planningpolicy@sthelens.gov.uk**

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

| 3. To which part of the Local Plan does this representation relate? | | | | | | | |
|---|-------------|-----------------------------------|--|-------------------------|--|--|--------------------------------------|
| Policy | LPA 05-1 | Paragraph / diagram / table | | Policies Map | | Sustainability Appraisal/ Strategic Environmental Assessment | Habitats Regulation Assessment |
| Other documents (please name document and relevant part/section) | | | | Strategic Housing Sites | | | |

| 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 checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please tick as appropriate

| 5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i> | |
|---|-------------------------------------|
| Positively Prepared? | <input type="checkbox"/> |
| Justified? | <input checked="" type="checkbox"/> |
| Effective? | <input checked="" type="checkbox"/> |
| Consistent with National Policy? | <input checked="" type="checkbox"/> |

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

See attached covering letter from Mark Krassowski Walsingham Planning and Supporting documents.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached covering letter from Mark Krassowski Walsingham Planning.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

| | |
|---|--|
| <input type="checkbox"/> No, I do not wish to participate at the oral examination | <input checked="" type="checkbox"/> Yes, I wish to participate at the oral examination |
|---|--|

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

In order to present a comprehensive case and contribute to discussions on other sites.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

**Our Ref: MK/KN0024/19**13th March 2019Brandon House, King Street, Knutsford,
Cheshire WA16 6DXLocal Plan Team
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HPWeb: www.walsinghamplanning.co.uk

Dear Sir/ Madam

Submission Draft – St Helens Borough Local Plan 2020 -2035

Following detailed consideration of the Submission Draft Local Plan, together with relevant supporting documents, we are instructed by Muller Property Group to make representations on their behalf to the draft Plan. Our client considers the draft Plan and in particular, Policy LPA05, LPA05.1 and LPA06 to be unsound and specifically, not justified, not effective and inconsistent with government guidance contained in the NPPF. ✓

In order to make the Plan sound we consider that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be deleted from the Green Belt and allocated for housing under Policy LPA05 Table 4.5 and Policy LPA05.1. Please find appended to this letter a site location plan identifying the extent of the site to be allocated. In the event that the Council consider that there are more suitable sites to allocate for housing to meet housing need over the Plan period, we are of the view that the site should be designated as safeguarded land under Policy LPA06 Table 4.8. Our reasons for this are set out below. ✓

Housing Requirement

Policy LPA05 sets out a housing requirement of 9,234 dwellings for St Helens for the Plan period 2016 -2035. With a residual requirement of 7,245 dwellings, taking account of expected housing completions to April 2020. Table 4.6 which accompanies Policy LPA05 indicates that the Council anticipate the residual housing requirement being met by 5,550 dwellings from sites identified in the SHLAA (of which four sites are proposed to be allocated for housing with a total capacity of 2,029 dwellings) and 2,056 dwellings from six sites removed from the Green Belt and allocated for housing. ✓

The Plan thus proposes that circa 73% of the housing requirement for the Plan period will come from SHLAA sites, of which only 27% are allocated sites, with another 27% of the housing requirement being met by sites removed from the Green Belt and allocated for housing. This means that the Council are reliant upon 46% of their total housing requirement for the Plan period coming from unallocated SHLAA sites. ✓



Our client intends to carry out survey/ assessment work in order to provide more detailed information in respect of the site's development potential which we would be happy to share with the Council. This is likely to include an Ecological Assessment, a Noise Assessment (to robustly identify a developable area), detailed access design with capacity assessment and safety audit, desk-based Ground Investigation, Sub-scan Survey to identify services, Utilities Assessment, Tree Survey, Air Quality Assessment and Landscape and Visual Assessment. Our client also intends to prepare an indicative site layout plan for the site. ✓

More Appropriate Housing Site

Whilst we consider that the Council needs to allocate more land for housing in order to ensure that the Local Plan housing requirement can be met and in particular, that the Plan should allocate smaller sites which will deliver new housing within the first part of the Plan period. In the event that the Council do not allocate additional sites, we consider that a reassessment must be carried out of the sites that are proposed for removal from the Green Belt and allocation for housing or future safeguarding and compared with land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078). 1

It is our view, together with PGLA who have undertaken a Comparative Site Study, that the aforementioned site makes less contribution to the three purposes of including land in the Green Belt than do a number of other parcels of land that are identified for removal from the Green Belt. Indeed, if reference is made to the Site Assessment Proformas for Sites 1HA (GBP_025), 4HA (GBP_074) and 8HA (GBP_019), it is clear that parcels of land within these large sites are considered to make a medium contribution to a number of the purposes of including land in the Green Belt, whereas land south of Clock Face / north of the M62 makes a low contribution to all three purposes. ✓ 1 3 5

It cannot be right, and the Plan cannot in our view be considered to be sound, in circumstances where land which has a more important role to play in terms of the purposes of including land in the Green Belt is proposed for removal, as compared to land which is of less importance. The Plan and in particular, Policy LPA05 and LPA05.1 are thus in our view not justified, not effective and are inconsistent with government guidance contained in the NPPF. We accordingly, consider that these allocations should be omitted either in their entirety or in part, and that land south of Clock Face / north of the M62, Clock face is allocated for housing in their place. 1 3 5

Attention is drawn in particular to allocation 4HA which is located directly to the northeast of the subject site. Large parts of this site (GBP_074A and 074B which comprises circa 70% of the site) have been found to make a medium contribution to one of the three assessed purposes of including land in the Green Belt. Furthermore, this land forms a substantial part of the Bold Forest Park, which is subject to its own Area Action Plan (Bold Forest Area Action Plan) adopted in 2017. The document sets out the following Vision for the area: ✓

"By 2030 Bold Forest Park will be at the heart of a thriving diverse economy, providing a hub for family leisure and adventure sports. The natural environmental and cultural environment will be rich and diverse. A network of open spaces and routes accessible to all connects the Forest Park to the wider countryside and links to our local communities". ✓

Whilst it is acknowledged that the document notes that some land within the AAP area may be required to meet the Borough's housing and employment needs, it is in our view entirely perverse to remove land which has been allocated for leisure, recreation and tourism uses, particularly land that 3



lies within the Green Belt, when there are alternative available, suitable and viable sites within close proximity that could meet the need for housing land over the Plan period. Such a situation is even more perverse when considering there is an alternative site within 570 metres that is less important in terms of the purposes of including land within the Green Belt, is available for development now and is in a more accessible and sustainable location with better access to local shops, facilities and services. ✓

To conclude, we consider Policy LPA05, including Table 4.5 and LPA05.1 to be unsound. Specifically, we consider that sites 1HA (GBP_025), 4HA (GBP_074) and 8HA (GBP_019) should be deleted or at the minimum their boundaries amended such that only land which makes a low contribution to all three purposes of including land in the Green Belt is allocated for housing. Furthermore, we consider that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be allocated for housing (150 dwellings) in Policy LPA05 Table 4.5 and LPA05.1. Contrary to the conclusions of the Green Belt Review, the site is not constrained such that it would substantially limit the development capacity of the site. Indeed, we are confident it could deliver circa 150 dwellings. ✓

Furthermore, it is material to any assessment of alternative sites that our client's site is available for immediate development and as such, could deliver new housing within a relatively short period of time and certainly within five years. It is also worth reiterating at this point that the NPPF is clear in its guidance to LPA's and that they should identify both a sufficient supply and a mix of different types and sizes of sites. To rule out our client's site on the basis of the number of units it might deliver in the absence of any technical assessments to support and evidence this conclusion renders the Council's approach flawed, ineffective and unjustified and therefore the housing policies wholly unsound. ✓

Safeguarded Land Allocation

Policy LPA06 identifies a number of sites that the Plan proposes be removed from the Green Belt and safeguarded for future housing or employment development. In the Preferred Options Local Plan (December 2016), it was proposed that our client's land be removed from the Green Belt and safeguarded for future housing development. ✓

It is our view that the site should be allocated for housing development over the Plan period. The reasons for this are set out above. However, in the event that the Council determine that sufficient land has been allocated for housing and that Policy LPA05 and LPA05.1 of the draft Plan are sound, we believe that land to the south of Clock Face/ north of the M62, Clock Face (Site GBP_078) should be reallocated as safeguarded housing land. It is however considered that the entire site to the boundary with M62 should be allocated as detailed on the attached site location plan. (4) ✓

It is our view, together with PGLA who have undertaken a Comparative Site Study, that our client's land makes less contribution to the three purposes of including land in the Green Belt than many of the proposed safeguarded housing land sites. As with the proposed housing allocations, if reference is made to the Site Assessment Proformas for Sites 1HS (GBP_025), 2HS (GBP_53), 5HS (GBP_025) and 7HS (GBP_085), it is very clear that these sites make a much greater (medium and high) contribution to the purposes of including land in the Green Belt than our client's site. The remaining sites make an equal (low) contribution to the purposes of including land in the Green Belt and thus perform no better or worse in Green Belt terms than our client's site. (4) ✓

It cannot be right in our view, and indeed such an approach is clearly flawed and unsound, that sites that make a greater and more important contribution to the purposes of including land in the Green Belt are proposed for removal and allocation as safeguarded housing land in advance of land which

PO2500

E-LO229



St Helens Local Plan Submission Draft - strategic representations on behalf of

Wainhomes NW

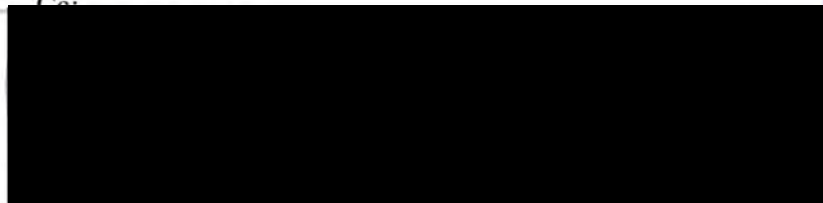
Nick Scott

to:

planningpolicy@sthelens.gov.uk

13/03/2019 16:16

Cc:



1 Attachment



Representations - St Helens LP Reg 19 - Wainhomes combined.pdf

Dear Sir / Madam,

Please find attached, strategic written representations made on behalf of Wainhomes North West Ltd to the Submission Draft (Regulation 19) St Helens Local Plan.

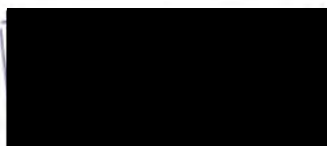
We trust these comments will be considered during the independent examination. As we do wish to participate at the oral examination, we look forward to hearing from you with further details on this in due course.

If you have any further questions regarding the attached site specific representations, please contact this office at your earliest convenience.

Kind regards,

Nick Scott

Assistant Consultant



① - GENERAL

② - LPA05

③ - LPC02

④ - LPA05.1

ns.gov.uk>

⑤ - LPA06

⑥ - LPC01 - CRITERIA 1

⑦ - LPC01 - CRITERIA 2

⑧ - LPC01 - CRITERIA 3

⑨ - LPC13

⑩ - LPA05 - TABLE 4.6

Emery Planning is proud to support the Keaton Emery Memorial Foundation. To find out more about the charity or to make a donation, please visit www.keatonemeryfoundation.com

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planning

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Emery Planning

Emery Planning
2-4 South Park Court
Hobson Street
Macclesfield
SK11 8BS

Registered
office as above



Representations to the Submission Draft

St Helens Local Plan – Regulation 19

for Wainhomes (North West) Ltd

Emery Planning project number: 17-005



6. Policy LPA05.1: Strategic Housing Sites

Site 2HA: Florida Farm (South of A580), Slag Lane, Brackbrook

- 6.1 The Council's viability assessment demonstrates that the site is not viable with the full provision of affordable housing (see Table 6.19 of the Council's Viability Assessment). This is before other policy requirements / S106 contributions (including education). This is a significant issue given that the Council is unlikely to be able to meet its identified needs for affordable housing, as we have identified in our response to Policy LPA05.
- 6.2 In our view other sites which are viable and capable of meeting affordable housing and other necessary contributions should be allocated in preference to this site.

Site 4HA: Bold Forest Garden Suburb

- 6.3 We object to the allocation of this site.
- 6.4 Firstly, the site comprises approximately 133ha. We cannot see the justification for the release of such a large quantum of land from the Green Belt which on the Council's own figures will deliver only 480 dwellings during the plan period (only 16% of the total capacity). The same quantum of development could be achieved from a number of smaller allocations with substantially less Green Belt release. As such the exceptional circumstances necessary for the release of the land from the Green Belt cannot be demonstrated.
- 6.5 Secondly, we would question the deliverability of the site and whether it is viable. The site falls within multiple ownerships. Numerous parcels will be undevelopable, or more difficult to develop than others, indicating that negotiations between the landowners are likely to be extremely difficult and protracted. We also would question its viability. The Council's viability assessment does not appear to factor in all of the strategic infrastructure required (for example the new primary school, local retail centre and potentially health facilities referred to elsewhere within the evidence base).

Site 5HA: Gartons Lane, Bold

- 6.6 The site is not viable with the full provision of affordable housing once other policy requirements / S106 contributions (including education) are factored in (see Table 6.19 of the Council's Viability Assessment).

- 6.7 As per our representations to Site 2HA, other sites which are viable and capable of meeting affordable housing and other necessary contributions should be allocated in preference to this site.

Proposed additional allocations

- 6.8 We have very significant concerns in relation to the proposed plan period, housing requirement and housing land supply. In particular we consider that the anticipated supply from SHLAA sites during the plan period has been significantly over-estimated. We also consider that insufficient allocations have been identified to meet the housing requirement. In our view a much higher flexibility allowance is required, to provide a reasonable prospect of the housing requirement being met.
- 6.9 Therefore to boost significantly the supply of housing land, we consider that additional allocations are required. This would provide a reasonable prospect of the requirement being met. We do not consider that the plan should be submitted for examination until these fundamental issues of soundness have been resolved.
- 6.10 Wainhomes is promoting three sites for residential development:
- Land south-east of Lords Fold, Rainford (ref: HA14)
 - Land off Winwick Road, Newton-le Willows (ref: HS17)
 - Land off Camp Road & Strong Road, Garswood (ref: HS01)
- 6.11 Representations specifically in relation to the above sites are submitted under separate cover.
- 6.12 The land south-east of Lords Fold, Rainford was previously proposed as an allocation for residential development in the Preferred Options consultation. The land off Winwick Road, Newton-le Willows and the land off Camp Road & Strong Road, Garswood were proposed as safeguarded land. However in the Submission Draft, only the land off Winwick Road, Newton-le Willows is proposed as safeguarded land. The other two sites would be retained as Green Belt.
- 6.13 We consider that the above sites represent logical allocations, which are capable of delivering sustainable development to meet the identified shortfall in housing land. Their sustainable credentials are reflected in the previous Preferred Options Draft, which proposed the sites for release from the Green Belt. We therefore propose that they are allocated for residential

development, in order to meet the shortfall in housing land supply and flexibility that we have identified.