



ST HELENS
BOROUGH COUNCIL

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

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

PLAN ORDER

PO3301 – PO3400

SEPTEMBER 2020

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PO3301

Representor Details

Web Reference Number	WF0112
Type of Submission	Web submission
Full Name	Mr Mark Daly
Organisation	Mr
Address	
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

01

02

01

01

03

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

03

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

01

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

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

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

04

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

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

06

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

04

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

06

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

04

The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents must rely on cars. 05

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever. The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to appreciate the current value that land has, in terms of crop production, employment and biodiversity. 07

I have been shocked by the cynical way in which the council has marked huge areas of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development. When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years. Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected. 03

By failing to use the most up to date information the plan is seriously flawed from the beginning. Ignoring the use of brownfields site, to benefit developers. Compounds this error. The brownfield sites have the capacity to for fill the needs of the plan and could do so well within the 15-year term of the plan. 01

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable. 08

Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely regarded as unsound.

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

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

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

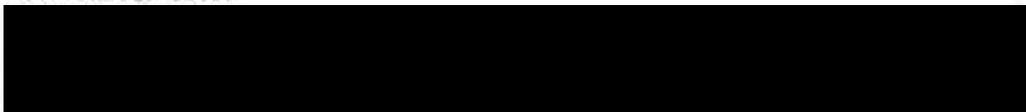
9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 8:53:31 AM
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PO3302



St.Helens Local Plan 2020-35 - Representation / Comment Form - 8HA Rainford
Swift, Susan M
to:
planningpolicy@sthelens.gov.uk
07/03/2019 13:07



1 Attachment



Mrs M MORGAN - Comments form for 8HA - St Helens Local Plan - March19.pdf

Dear sir / madam

please find enclosed by comments form in response to the development proposal for 8HA Rainford

Regards

Marian Morgan

Site 8HA

① - LPA02

② - LPA04

③ - LPA07

④ - LPA01



St. Helens
Council

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

Ref: LPSD

(For official use only)

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: MARIAN	First name:
Last Name: MORGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 101 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <input type="text" value="08/03/2019"/>
--	---

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

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

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

RETURN DETAILS

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.

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	LPA07	Paragraph / diagram / table	4.27	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	3.5.7 4.4 4.10	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

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

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

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

This Local Plan is not sound or justified as the proposed 8HA development is contrary to the statements within the Strategic Aims & Objectives of the Plan and Policy LPA07.

An extra 259 units would generate 500 cars and have a significant detrimental impact to the congestion and air quality in Rainford, and is contrary to the strategy objective of safeguarding and enhancing life in Rainford.

The Local Plan for 8HA consistently fails to meet its strategic aims & objectives and is not justified.

The B5205 is the main traffic route to & from Rainford High school and Cross Pit Lane primary school and since traffic calming measures were introduced on Church Road & Cross Pit Lane in 2015-16, residents from the Scarisbrook estate now use Higher Lane & Rookery Lane to exit the village.

Any future development would have a significant detrimental impact on the safety of children, pedestrians & cyclists trying to access the linear park for recreational purposes & increase the traffic congestion in this part of village.

The impact of an extra 500 cars from the development would be considerable, and Rookery Lane currently only has one pavement.

3

Rookery Drive, Derby Drive and Heyes Avenue housing estates already exit the village via Rookery Lane & this road would not be able to sustain more cars from another housing estate & the extra traffic congestion it would bring.

The traffic impact assessment carried out as part of the Sustainability Appraisal has failed to understand the flow of traffic into & out of Rainford.

This report has failed to appreciate that public transport services to & from Rainford are not frequent or reliable enough to hold down a full time job.

Residents of Rainford will always need a car as the majority of people do not work in St.Helens and require a car to travel further away to work.

The proposed development on 8HA will add approximately 500 cars to Rainford.

Any future development on 8HA would require a significant reduction to the number of proposed units and cater for a higher number of elderly residents, who may not have two cars.

Any new development should have its main access via Higher Lane, on the straight road past Dial Woods, for the safety of pedestrians & cyclists.

Due to the scale of the proposed 8HA the existing highway network would need significant traffic calming and improvements to Rookery Lane and Higher Lane, as current roads and pavements are substandard and in very poor condition.

Please continue on a separate sheet if necessary

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

The local plan needs to be reviewed as the statements made are incorrect relating to the Transport Impact Assessment by WSP, and has failed to understand the flow of traffic into & out of Rainford.

Please continue on a separate sheet if necessary

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

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

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

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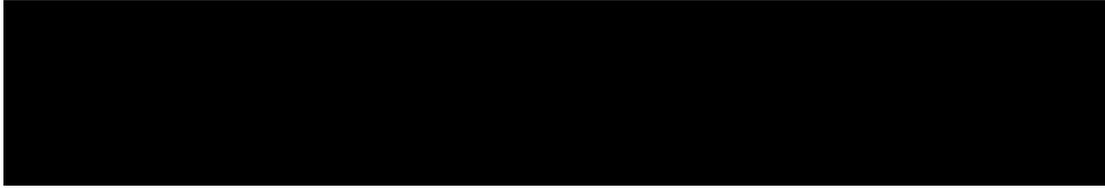
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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

PO3303



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.

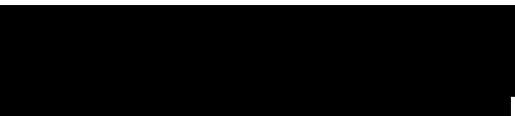
Please confirm receipt.

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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St. Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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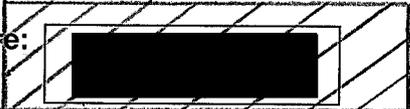
Part A – Personal Details

Part B – Your Representation(s).

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:

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)

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

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Telephone: 01744 676190

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

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;

Safeguarding too much land now, means that the principle for future development will be established now, and we are of the view that it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of future up-to-date knowledge. The need to avoid this excessive amount of safeguarded land is all the more relevant in view of the highly aspirational employment and housing figures used in the plan, as large areas of agricultural land will have development blight over them, and will fall victim to development under the next plan, even though on future needs assessments they may not be required..

23

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

CPRE recommends that development is focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport via other modes of transport..

24

CPRE Lancashire is critical that the expanded Liverpool Super Port only has capacity for 2% of freight on rail compared to 40% for its London counterpart. It is an unsustainable development that should not be supported. More freight needs to be rail based. Questions of Government need to be asked. Why is it that the north is such a poor relation when it comes to strategic rail transport infrastructure? How can the Northern Powerhouse ever be an effective market geography if rail investment is so limited. CPRE urges St Helens Council to lobby Government for much more support in this regard.

CPRE Lancashire queries whether there ought not to be recognition that the use of rural sites for what would be mostly executive housing, the far side of the Borough from the employment areas, would not meet the housing and travel needs of predominantly low-paid workers employed in warehousing and logistics

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)

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

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

PO3304

ELO117



Representations concerning the St Helens Borough Local Plan 2020-2035
 Greg Leyland
 to:
 planningpolicy
 12/03/2019 17:43
 Cc:

- ① GBR ④ LPA04 ⑦ LPA09 ⑩ LP009
 ② LPA06 ⑤ LPA05 ⑧ LPB01 ⑪ S.A. ⑬ Sus. TIA
 ③ LPA03 ⑥ LPA07 ⑨ LPC09 ⑫ TIA
- STIC 4HS
REDS.



1 Attachment



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

Dear Sir

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

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

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

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

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

Could you please acknowledge this email by return.

Yours faithfully

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

Extracted from: 'Greenbelt Review December 2018'

THE PURPOSES OF GREEN BELT

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

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

10

In this paragraph alone, the word 'likely' is used three times. If these assumptions are incorrect the requirement for an increased number of houses will also be incorrect. Basing requirements on assumptions whose impacts will potentially affect the status of green belt land is not a valid approach.

4.18.6, 4.18.7, 4.18.8 and 4.18.9 try to explain / justify the plan's calculated requirement of 486 new dwelling completions per annum. However, these are based on 'scenarios' which may or may not come to fruition. I believe that green belt status should only be reassessed when genuine requirements can be supported by factual evidence – it is too important to get wrong.

5

4.25 Policy LPA07: Transport and Travel

1. The Council's strategic priorities for the transport network are to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions. To achieve these priorities it will seek to:

a) **Secure the delivery of new or improved road, walking, cycling, and / or bus infrastructure where required;**

If EPGC is developed into a housing estate there is little scope to improve the road on Portico Lane in terms of capacity – it simply could not cope with the additional traffic generated by a large (500 – 900+ home) housing estate. I've already provided further comment in this area in an earlier comment.

With regards walking, very few people walk to the shops and even less to work. (This is borne out by the high levels of obesity in St Helens, which, incidentally, the plan does not seem to address.) Whilst I would encourage everyone to walk wherever possible, the plan doesn't make clear what 'improved walking' actually means or how it will be achieved in general but more specifically for the EPGC land. Similarly, the plan doesn't make clear what 'improved cycling' actually means or how it will be achieved. (I would note that there is an increasing trend for cyclists to ride on footpaths. This is dangerous and doesn't encourage anyone to walk for fear of being hit by a cyclist. Unfortunately neither the Council or the Police appear to take any interest in this.)

6

3. New development will only be permitted if it would:

a) **maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network;**

Should a housing development go ahead on the EPGC land, an additional c.1800 cars per day travelling in the Eccleston Park and Rainhill areas will cause severe harm to the highway network in terms of safety and efficiency. The Rainhill section of Warrington Road is particularly bad (over capacity) at most times of the day and St Helens Road in Eccleston Park is very busy during rush hours.

6

4.31 Policy LPA09: Green Infrastructure

Policy LPA09: Green Infrastructure

PO3305



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



1 Attachment



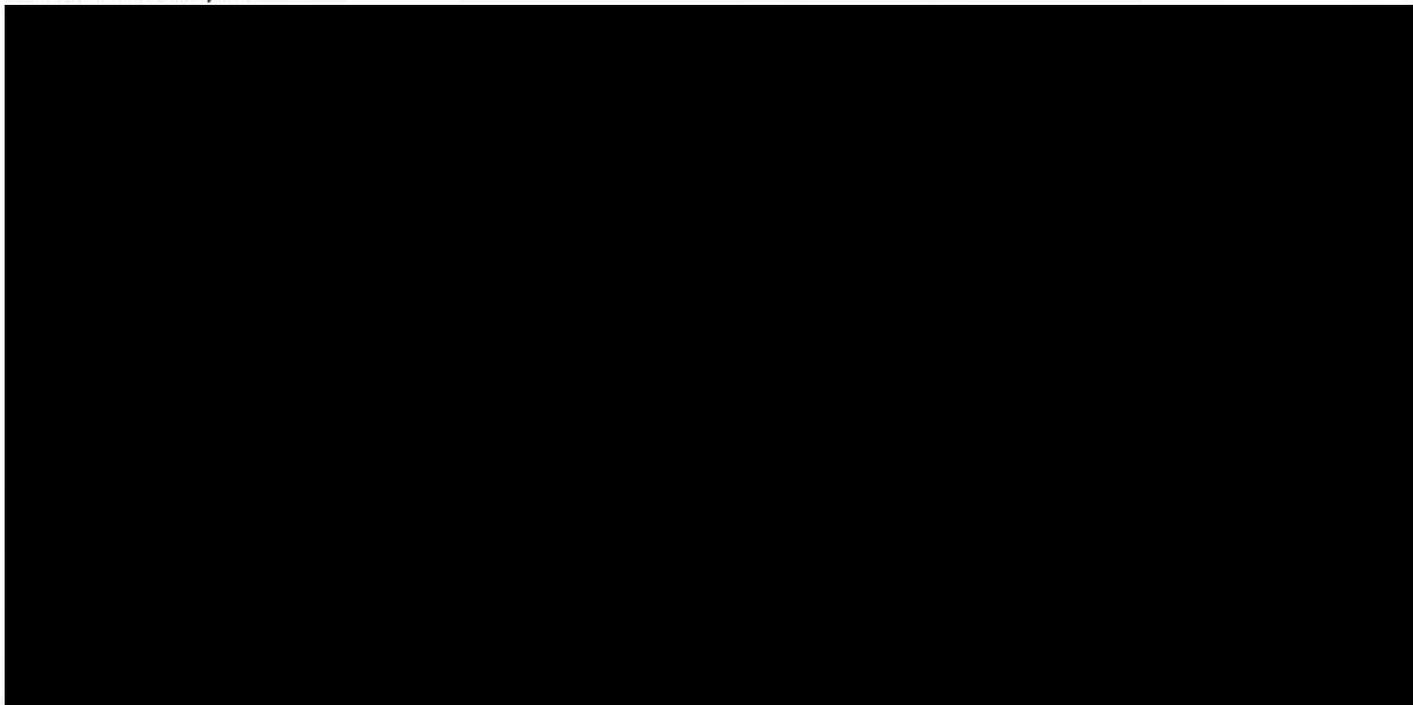
OBJECTION LETTER.docx

Dear Sirs

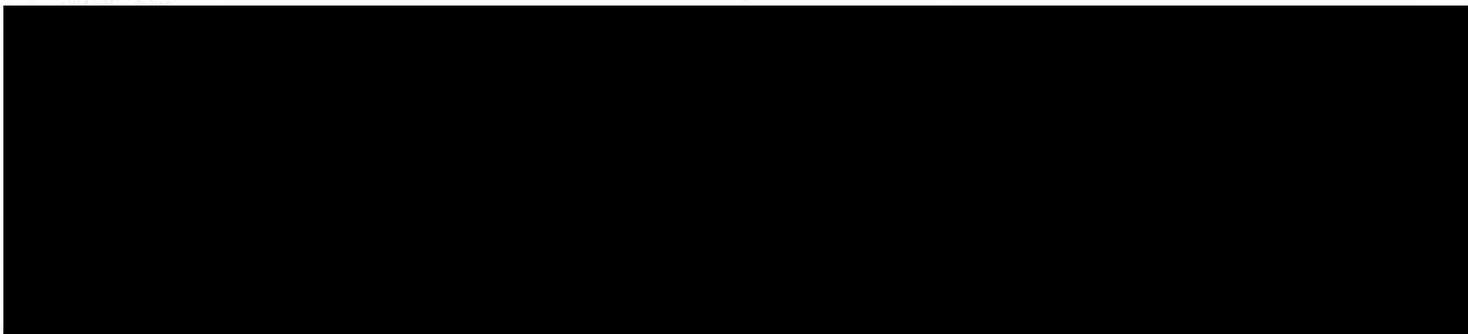
Please find attached my representation for the current Local Plan to development WA10 8HS 'Eccleston Vale'.

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

PO3306



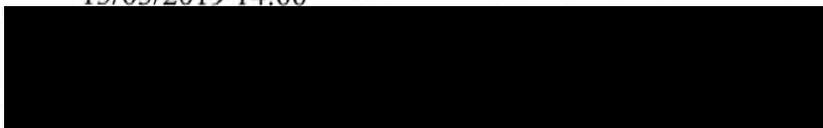
OBJECTION LETTER

Cathrine Benyon

to:

planningpolicy

13/03/2019 14:00



1 Attachment



OBJECTION LETTER.docx

Dear Sirs,

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

Regards,

Cath Benyon

Director

Aidapt Bathrooms Ltd

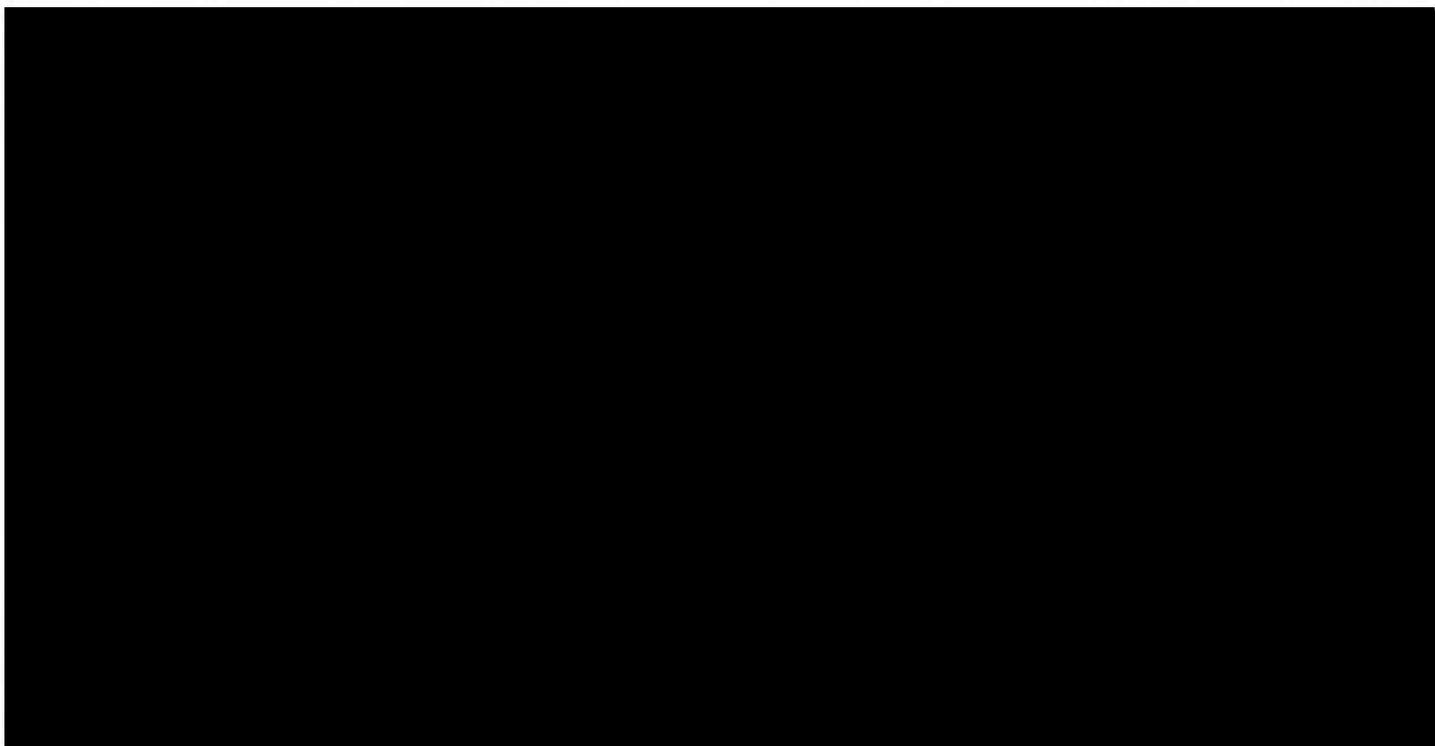
Lancots Lane

Sutton Oak

St Helens

Merseyside

WA9 3EX



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

Reference: St Helens Local Plan

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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

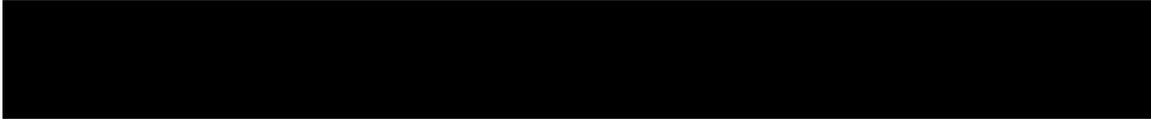
Yours faithfully

Catherine Hanwright

PO3307



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



1 Attachment



Green Belt Letter - Mr I Leyland.docx

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

Sent from [Mail](#) for Windows 10

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

13th March 2019

Reference: St Helens Local Plan

Dear Sirs,

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

Duties of an Elected Representative

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

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

Unrealistic Aspirations

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

Brown Field First

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

Future Development

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

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

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

Lack of Infrastructure

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

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

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

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

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

Yours Sincerely,

I Leyland

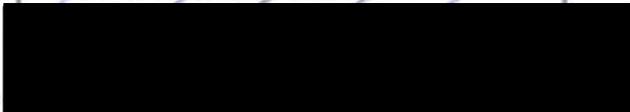
PO3308

ELO203

RE: Have your say on the St.Helens Borough Local Plan 2020-2035 Submission Draft



to:
planningpolicy
13/03/2019 15:11



① - LPA07
② - LPA04
③ - General

1 Attachment



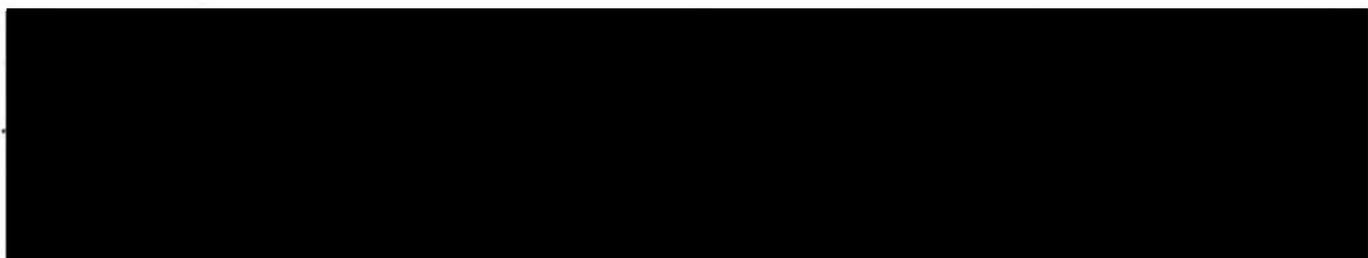
Local Plan PO Stage Comments March 2019.pdf

Dear Planning Policy

Please find my comments on the draft plan attached. Thank you.

Kind regards

Andrew Burrows MSc MCIHT MRTPI
11 Calday Grove, Pewfall, St Helens, WA11 9RS



Dear Sir or Madam,

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

I am writing to notify you that the St. Helens Borough Local Plan 2020-2035 Submission Draft ("the Local Plan") and supporting documents will be published under Regulation 19 of the above-mentioned Regulations on 17 January 2019. You have received this email because your contact details are held on our Register of Consultees database.

How can I view the Plan and submit representations?

Copies of the Plan, together with a Sustainability Appraisal, Habitats Regulation Assessment, Green Belt Review and other supporting documents (as well as Frequently Asked Questions and a Statement of the Representations Procedure) are available for inspection on the Council website at <https://www.sthelens.gov.uk/localplan> and (from 8.30 am until 5.15 pm on weekdays) at Ground Floor reception, St. Helens Town Hall, St Helens. Key documents are also available at all St.Helens Council libraries (see <https://www.sthelens.gov.uk/libraries> for details of locations and opening times).

You may submit comments (known as 'representations') on the Local Plan. Representations must be sent:

- by post to **Local Plan, St Helens Council, St Helens Town Hall, Victoria Square, St Helens, WA10 1HP**; or

- by email to planningpolicy@sthelens.gov.uk; or
- by using our on-line form at www.sthelens.gov.uk/localplan.

All representations must be received by 5.00 pm on Wednesday 13th March 2019. Please note that late representations cannot be accepted.

It is recommended that comments are made by completing the Council's Publication Stage Representation Form using the guidance notes. The forms and guidance notes are available to download from the Council's website at www.sthelens.gov.uk/localplan, and from the Ground Floor Reception, St. Helens Town Hall, St Helens from 8.30am – 5.15pm Monday to Friday and at all local St. Helens libraries. Alternatively, you can contact the Planning Policy Team on 01744 676190.

Next steps

Previously, the Council consulted on the Local Plan Preferred Options. It has taken representations received at that and earlier stages into account when producing the current 'Submission Draft' of the Plan. Following the current consultation, the Council intends to submit the current version of the Plan, together with any representations received during the consultation, to the Government. We expect to do this in summer 2019. A Government Planning Inspector will then examine the Plan and its supporting evidence. He or she will probably hold public hearings as part of this process. Following the examination, the Inspector will decide whether the Plan is 'sound' and can be adopted by the Council (with or without modifications). The Council expects to adopt the Plan in 2020.

Data protection

We process your 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.

If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, please let us know either by phone 01744 676190 or email planningpolicy@sthelens.gov.uk.

How can I find out more?

A series of drop in sessions have been arranged at various locations across the Borough at which you will be able to find out more. Please see the Council's website at www.sthelens.gov.uk/localplan for details of these events or use the contact details at the top of this letter for further details.

Yours sincerely,

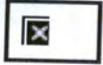
Jonathan Clarke

Development Plans Manager

(See attached file: Statement of Representation Procedure.pdf)

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delete the message and all copies from your computer. "



Virus-free. www.avast.com

REITERATING
LPPD SITE DEVELOPMENTS

HA
EA6
EA7

Dear Sir / Madam

Comments on 2020-2035 Submission Draft Local Plan

I object to allocations EA6, EA7 & HA3. My general and site-specific comments on the draft plan are provided below.

1. Inadequate Support for St Helens Central / St Helens Junction Rail Link

St Helens town centre has for many years needed a direct rail connection to Manchester. This plan will fail to deliver it yet again. The draft plan offers no clear strategy as to how this vital rail link will be delivered, how the plan will help fund it, or how the rail link will integrate with wider land use planning objectives.

①
FAILURE TO
DELIVER
RAIL CONNECTION
TO MANCHESTER

2. Inadequate Support for Carr Mill Rail Station

The draft plan offers only vague warm words regarding the proposed rail station development at Carr Mill. It contains no clear strategy detailing how the development of Carr Mill Station integrates with nearby land uses and proposed developments, or how the plan will help fund construction of the station or safeguard appropriate car parking levels to assist the station's business case. The plan will fail to deliver this new rail station yet again (as the previous local plan did).

①
FAILURE TO
DELIVER
STATION @
CARR MILL

3. Scale of Modern Warehousing Developments Out of Context Alongside Existing Residential Areas

It should be obvious from recent developments at EA2 Florida Farm that the scale of modern warehousing developments is far too large to be positioned beside existing residential areas. The plan does nothing to address this issue, particularly in relation to EA6 & EA7 developments proposed alongside the A58 Liverpool Road.

②
LANDSCAPING?
EA6, EA7

4. Extent of Land Release & Securing Infrastructure Improvements

The plan does not sufficiently prioritise brownfield land for development and is too heavily reliant on taking 'easy wins first' by promoting excessive levels of greenfield / green belt development. The plan also contains no clear transparent mechanism for securing contributions to local infrastructure improvements – despite the lower land development costs associated with greenfield land release. The potential financial benefits of adopting the Community Infrastructure Levy have not been clearly or independently assessed.

③
CIVIL

5. Partiality of the Council

The Council stands to make significant financial budgetary gains (in the form of increased council tax and business rates revenues) from the draft local plan. Yet the plan fails to acknowledge the scale of this financial gain and subsequently underplays the detrimental impacts of all proposed developments (excessive traffic levels, air pollution, CO2 emissions & impact on climate change).

④ - GEN
FINANCIAL
GAINS?

6. No Clear Strategy for Public Transport

Virtually all bus services have been withdrawn from the A58 Liverpool Road, and yet the draft plan proposes large scale land releases in this area (HA3, EA6 & EA7). The draft plan will permit development proposals without securing significant improvements to public transport, thus encouraging over-reliance on the private car. The plan contains no clear strategy for improving public transport, or for developing the A580 as a key public transport corridor (as planned within the Greater Manchester Spatial Framework), despite promoting extensive site releases alongside the A580.

①

7. Detrimental Impact on Climate Change Not Being Properly Assessed or Mitigated.

The plan does not present a clear strategy for how future developments will contribute towards minimising climate change. It underplays the impacts that the developments proposed (and increasing car use and lower public transport use) will have on CO2 emissions.

8. Detrimental Impact on Air Pollution Not Being Adequately Assessed or Mitigated

The plan does not present a clear strategy for how the air pollution created by future developments will be managed and mitigated. It underplays the impacts that the developments proposed (and increasing car use and lower public transport use) will have on air pollution levels, and the negative health impacts this will bring.

9. Exclusion of the Public from Decision Making on Local Transport Infrastructure

As with development at EA2 Florida Farm, the draft plan will allow the Council to approve developments whilst highway capacity issues (and any required improvements) are 'kicked down the road' for St Helens Highways Department to try and alleviate in future. Infrastructure works will then be undertaken without any consultation with the public (as with A58 Blackbrook Diversion and A580 / Haydock Lane improvement works). The draft plan should contain a clear policy to ensure the impacts of future highway improvement works are always fully assessed before planning applications are approved, and a clear mechanism to ensure consultation with the public always occurs in respect of the design of publicly funded highway improvement works.

10. A58 / A580 Junction Improvement

It is noted that details on this future junction improvement have been left empty within the Infrastructure Delivery Schedule. This suggests issues with highway infrastructure design are being deliberately 'kicked down the road', to be subsequently addressed by the Council's Highways Department. However, when the Highways Department undertakes the works, it will then avoid undertaking any consultation with residents in respect of the scheme design.

The following highway measures are needed in the vicinity of the improved A58 / A580 junction – to adequately mitigate the negative impacts of increased car and HGV traffic levels on the A58 Liverpool Road and A580 East Lancashire Road:

- Reduction in speed limit from 40mph to 30mph on A58 Liverpool Road (A580 to Millfield Lane) to improve highway safety;
- Keep Clear Markings on A58 Liverpool Road opposite Calday Grove, to address existing highway safety problem exiting Calday Grove;
- Reinstatement of pedestrian footway route across A580 (West side of junction) from A58 Liverpool Road (previously removed by the Council as part of A58 Blackbrook Diversion works - without public consultation - in 2008);
- Installation of controlled pedestrian crossing facilities on all arms of the A580 / A58 junction; and
- HGV ban on A58 Liverpool Road (between A580 and Millfield Lane) to improve highway safety and mitigate the significant increase in HGV numbers expected to use the A58 (which is too substandard in highway design terms for it to now be promoted as a main HGV route).

Yours faithfully,

Andrew Burrows MSc MCIHT MRTPI

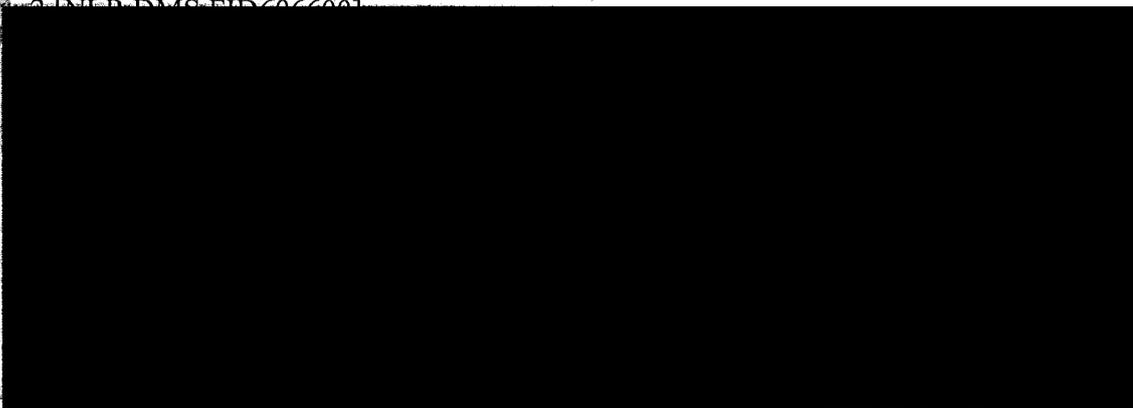
11 Calday Grove, Pewfall, St Helens, WA11 9RS

PO3309

ELO211



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



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

1 Attachment



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

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

- ⑰ GBR
- ⑱ EVA

Sir/Madam,

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

Kind regards,
Melissa

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

Melissa Wilson
Senior Planner

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



Sir/Madam,

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

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

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

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

Kind regards
Brian

Brian O'Connor
Associate Director

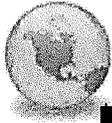
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

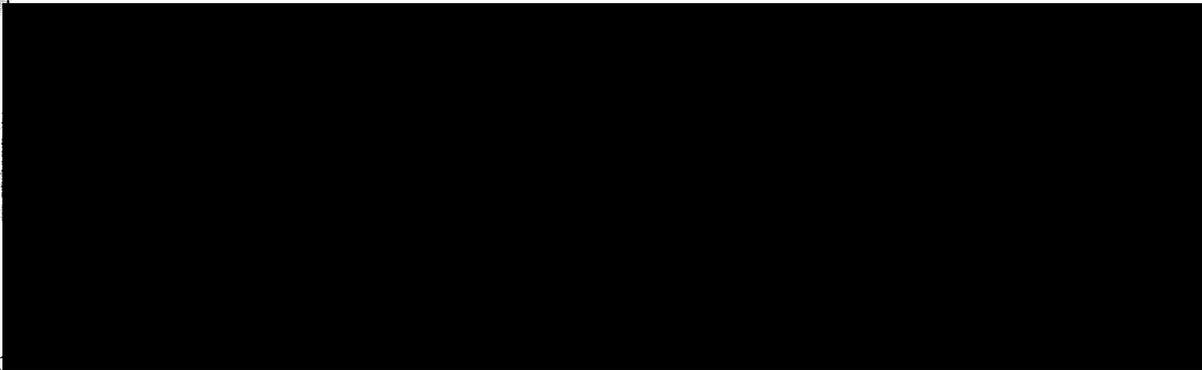
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Think of the environment. Please avoid printing this email unnecessarily.



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



1 Attachment



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

Sir / Madam

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

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

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

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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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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

Signature: [REDACTED]	Date: 13/03/2019
------------------------------	-------------------------

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
See supporting Representations and Appendices	

ELO211

St Helens Local Plan Soundness Representations

Taylor Wimpey UK Limited

13 March 2019



41874/03/SPM/MWI
17081285v8
17081285v8

9.0 **Policy LPA07: Transport and Travel**

(10)

Introduction

- 9.1 Policy LPA07 sets out the Council's strategic priorities for the transport network to facilitate economic growth, improve accessibility between homes, jobs and services and improve air quality and minimise carbon emissions.

Consideration of Policy

- 9.2 TW broadly supports the provision of Policy LPA07 which seeks to ensure adequate transport provision to meet the Council's strategic objectives. However, TW has concerns of the effectiveness and justification of Part 3 of the policy.

- 9.3 Part 3c requires new development to "provide appropriate provision for charging points for electric vehicles", TW has no objection to a requirement for all new properties to have access to vehicle charging infrastructure provided the full cost of this infrastructure is factored in to the viability evidence.

- 9.4 There is a significant cost to installing electric vehicle infrastructure in new developments and TW considers the reference in the Economic Viability report to having a "limited impact on overall viability" is unsound. Furthermore, it is considered unreasonable to require residential developments to provide electric vehicle charging infrastructure as the take up of electric cars in the UK is still very uncertain due to the expense purchasing the cars in the first instance. It may also be the case that alternative forms of powering private transport become more prominent as research into relevant technology progresses. Additional commentary is provided within Grasscroft's Assessment on viability (Appendix 4) but it is considered that the assumed cost of installing charging points is flawed and unrealistic particularly when associated and consequential infrastructure such as additional primary sub-stations are required as a result of the additional EUV charging points.

(10)

- 9.5 TW requests that the full and realistic cost of installing vehicle charging infrastructure is considered in the Viability Assessment.

Tests of Soundness

- 1 **It is not justified:** The evidence base does not factor in the true cost of providing this infrastructure on large scale strategic sites.
- 2 **It is not effective:** The policy as worded is vague and ineffective as it does not provide a clear justification as to the number of charging points required on developments to meet the policy requirement.

Recommended Change

- 9.6 To address the conflict above and ensure the Policy is sound, it is requested that the Council:
- 1 Ensure the evidence base (Viability Assessment) takes account of the full cost of installing this infrastructure on large scale strategic sites.

PO3310

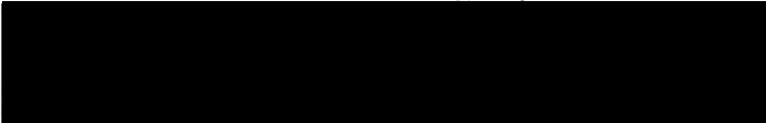
LPO040

EF0087
SITES - 8HS & 3HS



K Marr - St Helens LPSD representation form .
Ken Marr to: planningpolicy

13/05/2019 14:20



2 attachments



Chapel Lane Petition Signatures.pdf St Helens LPSD response - final - 13 May 2019.pdf

Dear Planning Policy Unit

Attached is my response to the Local Plan Submission Draft dated today.
It is also made on behalf of other residents on Chapel Lane Eccleston WA10
5DA & 5DB.

A copy of Petition Signature schedule giving permission for this is also
attached.

Please confirm receipt.

kind regards

Ken Marr

This email has been checked for viruses by AVG.
<https://www.avg.com>

- ① - DEC - para 1.7.2
- ② - LPA01
- ③ - LPA03
- ④ - GENERAL
- ⑤ - LPA05
- ⑥ - LPA06
- ⑦ - S.A
- ⑧ - GBR - GENERAL
- ⑨ - GBR - 8HS
- ⑩ - GBR - 3HS
- ⑪ - LPA04
- ⑫ - LPA07 - 8HS
- ⑬ - IDP
- ⑭ - LPA01



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: Kenneth	First name:
Last Name: Marr	Last Name:
Organisation/company:	Organisation/company:
Address: Beech Lea 7 Chapel Lane Eccleston St Helens Merseyside Postcode: WA10 5DA	Address: Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 13 th May 2019
-----------------------	---------------------------------

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

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

Yes (Via Email) No

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

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 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.**

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

PART B – YOUR REPRESENTATION
B4 TRANSPORT AND TRAFFIC (LPA07)

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
LPA07							
Other documents (please name document and relevant part/section)				IDP Infrastructure Delivery Plan			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/> Not sure
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

Traffic Assessments.

1. The LPSD is underpinned by the *Sustainable Transport Impact Assessment Report* that is informed by two further Impact assessment reports.
2. Clearly it is beyond our capacity to engage consultant appraisal of the evidence. However, it is also evident that a valid method of assessing the scale of the traffic impact of the LPSD proposals

can be obtained with an appraisal of vehicle ownership using 2011 Census, Local Plan housing numbers and Local Planning Authority parking standard provisions for new homes.

Residential Traffic

3. The SHLPPO 2016 proposed a housing target build 570 homes per annum. This results for translates to 8,550 homes over 15 years and 17, 100 homes over the 30 years.
4. The LPSD 2019 proposes a housing target of 486 homes per annum over the 15 year plan period plus 5, 000 extra beyond 2035 from safeguarded land and excess housing allocation land. A total of 7,290 homes over 15 years and 12,290 new homes proposed over roughly 25 years.

Off Road Vehicle Parking Standards for new homes

5. St Helens LPA parking standards for new build homes set out that 2 off street parking spaces are to be provided for Semi and Detached houses and 1.5 for Affordable Housing and Flats.
6. These local planning requirements are less onerous than the parking provisions laid down in the National Parking standards Annex A tables 7 & 8 found.
7. Current Car and Van ownership/availability rates are recorded by the ONS based on the 2011 Census included on the <https://info4.sthelens.gov.uk/> website . They are considered conservative as car ownership levels must have risen in the intervening period since 2011.
8. My estimates of increases in vehicle ownership resulting from the LPSD proposals are made on the basis that the proposed 30% affordable homes will be implemented. Hence an average figure of 1.85 parking spaces per new dwelling is used in our analysis. (i.e $70\% \times 2 + 30\% \times 1.5 = 1.85$).

Local & Regional Residential Traffic Growth.

9. The LPSD proposals is therefore forecast to add roughly 13,500 vehicles over 15 years and 22,750 beyond 2035.
10. There will be a significant increase in vehicle ownership across St Helens far greater that the increase in population. The 2011 census noted the vehicles per household was 1.11 – 84,445 vehicles for a housing stock of 74,736. It is estimated that 4, 452 homes will be completed in the period from 2011 to 2020 adding a further 8,236 vehicles at 1.85 vehicles per household to suit off street planning requirements. At the start of the plan in 2020 it is estimated that a total of 92,681 residential vehicles will be on St Helens roads.
11. From 2020-35, it is proposed that $15 \times 468 = 7290$ homes will be built adding a further 13,486 vehicles at 1.85 vph and increase of 15% for an estimated 9.3% in population. A further 5000 homes yielding are be built beyond 2035 equalling a homes total of 12,290 adding 22,736 vehicles at 1.85 vph or a 25% increase for a population increase of around 16.0%.
12. This level of increase will be repeated across the North West as all authorities have the same growth policy.

Commercial Traffic

13. The growth in commercial traffic across St Helens is driven by the Liverpool Superport and new logistics warehousing in the borough.
14. According to the *Mersey Ports Master Plan* there will be 3 million containers per year passing through the port by 2030. This will be four times the 750,000 containers it handled in 2014 and this growth will become increasingly apparent when the Rimrose Valley road scheme at Bootle is completed.
15. 57% of this container traffic is destined for Merseyside and the North West, and forecasts from the *Transport for the North (TfN)* consultation document (2018), estimate that there will be at

least 5,000 vehicles per day using the East Lancashire Rd (A580). These will include 20' and 40' containers.

16. These commercial vehicles will be servicing the new large logistics warehouses mushrooming along the A580 from Knowsley to Florida Farm, Haydock and to the M6 and Manchester. The developers of these sites advertise easy access to Liverpool and to the M6 and Manchester, effectively offering the A580 as an alternative motorway and putting more pressure on local roads and busy intersections.
17. In addition to the growth of HGV freight, these huge logistics warehouses will drive a significant increase in Light Goods Vehicles (LGVs) traffic such as internet shopping delivery vans (according to the Office of National Statistics (ONS), 77% of adults now shop on line).
18. Meanwhile, Amazon is about to open its massive warehouse at Florida Farm. This warehouse is understood to have an area of 361,000 sq ft, with 111 docking spaces and spaces for 211 HGVs. Increased internet shopping traffic will not just affect Haydock and J23 of the M6, but will impact all along the A580 to Liverpool and wider region.

Public Transport

19. Merseytravel makes no mention of improvements to local bus services and an older population relying on taxis for shopping and visits to doctors and chemists will add further traffic congestion.
20. The LPSD proposed allocated and safeguarded sites, 8HS in Eccleston in particular, tend to be situated on the rural fringe remote from transport hubs. This contrary to sustainable transport objectives of National Policy .] (12)

INFRASTRUCTURE AND FUNDING

Highways Infrastructure

21. The Highways Agency is responsible for motorways and motorway Junctions. Local Highway Authorities are responsible for local highway Infrastructure.
22. Development infrastructure is funded by developer contributions agreed with the Council at pre-planning and Planning Application stage under *Section 106 agreements* and *Community Infrastructure Levy (CIL)*. These funding agreements are for the provision of highways, utilities, schools, healthcare premises in order to satisfy a requirement for Sustainable Development.
23. In the case of highways, it is clear that the cumulative impact on what is essentially the legacy of a Victorian highway network of all individual developments will overwhelm the capacity of SHMBC to fund and complete the major improvements necessary to cope with a borough wide increase in household , commercial and light goods traffic in a timely manner to maintain sustainable development.
24. The public purse should not be called upon to make up any shortfalls in highways infrastructure funding.
25. Regional or Central Government have proved unreliable in funding local highway improvement. It has been shown that transport funding per head of population is 2.6 times higher in the south than the North⁸. The Department for Transport has spent billions on cross rail and have recently announced £26bn funding for a new Dartmouth tunnel in London, but can't find £2.6bn for a tunnel to save Rimrose Valley in Sefton. There can be no confidence therefore in assuming central government or regional funding will be available to meet the highways infrastructure demand outlined in the Local Plan Submission Draft or the Infrastructure Delivery Plan (IDP). (12)

Traffic Studies

26. Transport for the North (TftN) have been set up by the government to support the Northern Powerhouse to look at strategic transport issues. TftN has no funds nor has it any authority been

⁸<https://www.ippr.org/news-and-media/press-releases/new-transport-figures-reveal-north-to-receive-indefensible-2-555-less-per-person-than-london>

delegated to initiate projects. TfN aim in their Strategic Transport Plan (STP)⁹ that 850,00 new jobs will be provided in the Northern Powerhouse region over 30 years.

27. The *National Infrastructure Commission (NIC)* in their September *National Infrastructure Assessment*¹⁰ identified Manchester and Liverpool as the most congested Cities outside of London.
28. The CPRE study, the "End of the Road"¹¹ found that building new by-pass roads attracted more traffic and did not lead to shorter journey times. These new roads merely attract commercial and retail development at interchanges and alongside new link roads, killing investment and regeneration in local town centres, while damaging the countryside.
29. The Transport for New Homes (TfNH)¹² echo these concerns identifying that there is too much land given over to carparking in developments and that isolated edge of urban area developments are car dependent for access to community local services, healthcare, shopping and entertainment.

NPPF Transport guidelines and Summary

30. National Planning Policy Framework, NPPF Government guidelines state within the Promoting Sustainable Transport section 9 :- states

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

31. NPPF Para 109 clearly emphasises the point "severe". The Local Plan and Regional Proposals for transport will clearly lead to a 'severe' impact on St Helens highways network. The LPSD transport proposals are not sustainable nor sound. 12
32. Considering that St Helens MBC is a partner in the Liverpool City Region and fully aware of the impending effect of the GMSF proposals and the Northern Powerhouse initiative, it is questionable that a "duty to cooperate" has been satisfied so the legitimacy of the LPSD is debateable. 12

Specific Local Traffic Issues

B5201 Bleakhill Road/A570 Rainford Road Junction St Helens and A580 East Lancs Road/A570 Rainford Road (Windle Island) & the Rainford bypass

33. The junction is situated North of St Helens immediately adjacent the A580 East Lancs Road and A570 Rainford Road junction known as Windle Island. The junction has chronic long-standing intractable traffic issues.
34. The junction attracts traffic from Prescot and St Helens travelling north to Ormskirk and the M58. The junction is not controlled by traffic lights so queues form on Bleak Hill Road travelling north causing severe congestion generally during the day and particularly at peak periods. Traffic traveling south from the Rainford Road dual carriageway and bypass form long queues to the

⁹ <https://transportforthenorth.com/stp/>

¹⁰ <https://www.nic.org.uk/assessment/national-infrastructure-assessment/> September 2018

¹¹ <https://www.cpre.org.uk/resources/transport/roads/item/download/4851> Mar 2017

¹² <http://www.transportfornewhomes.org.uk/wp-content/uploads/2018/07/transport-for-new-homes-summary-web.pdf>

north as the road reduces to single carriageway on the south side in the short distance to the Bleakhill Road B5201 Junction.

35. A580/A570 junction improvements related to the Super port access and egress corridors are nearing completion and are aimed at relieving queuing and reducing queue idling but will not resolve the issues at the Bleakhill Road junction. These improvements to the A580/A570 junction are independent of the B5201 Bleakhill Road/A570 Rainford Road Junction which will remain unchanged.
36. An increase in local traffic Eccleston traffic as well the huge general increase in borough traffic, will greatly exacerbate the current situation. The East Lancs site, 8HS, will itself directly discharge some 1,850 residential vehicles onto this junction and the road network surrounding the site.
37. Unlike the 3HS Eccleston Park Golf Club site, The LPSD – IDP does not place housing development restrictions on 8HS East Lancs site until the traffic issues at this junction are resolved.

A580 East Lancashire Road – A570 Rainford bypass to J23/M6 – approx 10 miles

38. St Helens is geographically placed in the centre of the Northern Powerhouse Central Pennines Corridor. As such the A580 East Lancashire Road will see a massive increase in traffic resulting from of the new warehousing and TftN proposals.
39. The stretch of A580 between the M57 and M6 motorway is 10.4 miles long and provides a direct and busy route to the industrial estates at Stonebridge Park, Kirkby, Knowsley Village to the west and Haydock and Florida Farm to the east of Windle.
40. It has 17 junctions, roundabouts or traffic lights which impede the smooth flow of traffic in both directions and the addition of another one at the end of Catchdale Moss Lane (scene of recent fatal accidents) will not be beneficial. The more the traffic is forced to stop and idle, the more traffic pollution is generated.
41. The table below shows the extent of local traffic using A580, with car usage showing a continuing upward trend nearly 14% over the last 4 years for residential traffic.

Extract of a table of daily traffic statistics for the East Lancashire Road (A580)

	2014	2017	difference	% diff
Tot Cars	16008	18219	+ 2211	+ 13.82 %
Tot HGVs	2042	1570	- 472	- 23.1 %
Tot Vehicles (inc. Buses ,LGVs etc)	21916	24159	+ 2243	+ 10.23 %

Source: <https://roadtrafficstats.uk/traffic-statistics-st-helens-a580-eccleston-47329#data>

42. Building on 8HS is likely to produce a further 1850 cars which could increase the daily commuter traffic to at least 2019, an increase of 25% over 4 years. This is unsustainable and contrary to National Policy.
43. In addition, the West Lancashire Local Plan Preferred option 2018, designates 3 sites immediately to the north of Rainford, on which it is proposed to build 6000 houses. These sites are contiguous to the A570 (Rainford Bypass) and the B5240 (Lyelake Lane at Lathom), and although they straddle the M58 motorway, the preferred route to south east Liverpool and the burgeoning warehousing at Knowsley and Haydock it is clear much of the increased traffic would impact on the A570 and Windle Island.
44. The number of residential commuter vehicles estimated at 1.85 per household for new homes with a 30 % affordability ratio assuming LPA parking standards, could increase by over 11,000 in addition to the commercial vehicles leaving the industrial estates at north Skelmersdale again impacting on traffic to the north of St Helens.

A57 Warrington Road/B5413 Rainhill Road Junction at Skew Bridge west of Rainhill Village

45. This junction feeds directly east to J7/M62. The traffic at this junction is notorious and is a long-term intractable traffic issue to the South of St Helens. The skew bridge is Grade II listed and has a narrow dual carriageway that is subject to heavy congestion due to the acute angle junction with Rainhill Road immediately on its west side. Rainhill village and surrounding areas are also in a conservation area.
46. Congestion is general running west along the A570 Warrington road back beyond Whiston Hospital to Prescot. Congestion is understood to lead to Whiston Hospital regularly restricting admissions to emergencies only as a result of traffic congestion. A570 Congestion between the M62 J7 Rainhill Stoops and the M57 J2 to the west of Prescot is common.
47. A multi-storey carpark opposite Whiston Hospital is regularly full with queues extending onto the surrounding roads. It is believed many appointments are cancelled at the last minute when patients cannot find parking space. Access to Whiston A&E is impacted by traffic congestion.
48. The *Infrastructure Delivery Plan* offers no solutions to these severe traffic issues, and has included a restriction on housing development on the 3HS Eccleston Park Golf Club until traffic issues are investigated and resolved.

M6 J23/A580

49. The Highways Agency offered no objection to the Florida Farm planning application in 2017 where the traffic impact from the development on Junction J23 of the M6 was judged to be moderate.
50. The publication of the SHLPPO 2016 did invite comment from Wigan and the Highways England(HE) . The Local Plan traffic growth in St Helens, adjoining Authorities and the Super port will dramatically increase traffic at the junction.
51. Previous improvement works at the junction have had little effect in improving traffic flow at the junction. The SHLPSD Infrastructure delivery Plan does outline how St Helens in conjunction with the Highways authority will improve the junction for the traffic flow nor how it will be funded. ECRA believe the St Helens Plan needs to give more definition to how the junction will be improved to avoid a cumulative severe impact at this junction.
52. The SHLLPO proposals for Logistics warehousing the east and west of the Junction and the industrial development on the Parkside site in addition to an estimated 38% increase in residential traffic will place increased strain on the junction that is already subject to severe congestion and capacity issues despite recent alterations and improvements.
53. The situation is compounded in that the junction also serves Greater Manchester to east along the A580. It is estimated the current SH LPSD & GMCA GMSF will increase residential traffic by approximately 25 % excluding commercial and LGV traffic increases. This is greater than the new homes due to the current off street planning requirements that are far greater than those used for the 2011 census.
54. The motorway between J23 A580 and J26/Wigan is subject to heavy congestion and is presently being upgraded to smart motorway status. In addition, a motorway link road from the M6 J26 /M58 into the central Wigan and beyond extending eventually to form a bypass link to the M61.
55. This Junction, despite improvements has been found in HE's recent evaluation report to be yielding adverse benefits¹³ with traffic slightly improved flow at peak periods offset by reduced flow at other times.

M6 J21/A580 and M6-J26 /M58

56. This section of motorway is at present being upgraded to Smart motorway status in order to relieve congestion. It is not clear if the forecasting includes for the LPSD traffic growth over the Plan Period and beyond, in addition to similar growth in traffic in all neighbouring Regional and

¹³ <https://www.gov.uk/government/publications/national-pinch-point-programme-one-year-after-evaluation-meta-analysis> Apr 2019

Local authorities that also have ambitious employment growth scenarios related to logistics warehousing.

57. West Lancashire is planning large scale housing of up to 16,000 homes and logistics warehousing to the west of the junction and Wigan are planning for logistics warehousing to the east alongside a new link road between M6/J26 and the M61. All adding to the congestion currently on the road network in this area.

Parkside Link Road

58. This link road has been given planning permission and has funding from regional and central government. It is understood that the Highways Agency, Warrington and Wigan have objected to the LPPO & LPSD proposals for this link.

Air Quality, Noise and Tranquillity

59. Air Quality in the borough is an issue particularly alongside busy main routes. The trend to electric vehicles during the LPSD period is unlikely to significantly beneficial due to the overall increase in traffic volume. Idling will be an issue with due to the volume of traffic, queuing and congestion.
60. The website Air Quality England, has no data for this area. However, Local Councils must take into account local air quality as prescribed by the NPPF guidelines:

Para 170 – Conserving and enhancing the natural environment

“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, “

61. We must therefore protect and preserve our green spaces and provide a “green lung” for our families by protecting our Green Belt from development. Air quality local to proposed sites, should certainly have desk and field studies to inform the decision making process.
62. It is suspected that buffer zones to development alongside major routes , e.g A580 will require significant buffer zone depths to protect residential developments affecting the housing numbers and viability of developments
63. Traffic noise and lack of tranquillity due to the increase in traffic is also a major health concern.

Infrastructure Delivery Plan (IDP) – Highways

64. The LPSD Infrastructure Delivery Plan (IDP) is designed to consider the impact of the LPSD proposals on local Highways network and infrastructure and set out how these are to be managed and accommodated and more importantly how they are to be funded to meet demands the LPSD imposes on the existing road network.
65. The IDP unfortunately concentrates more on the current situation and does not outline in detail what impact the LPSD will have on the local road network nor how they propose manage that impact or fund it. Many of the issues marked TBA or TBC. The IDP falls well short of fulfilling its objective and needs a major review to furnish more detail on how the growth in traffic resulting from the LPSD is to be managed and funded.

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

- The Transport and Traffic proposals are not sound and contrary to NPPF section 9 as it promotes increased car dependency by favouring large scale rural fringe housing developments.
- Regional and neighbouring authority traffic growth from aspirational and accelerated growth scenarios require review as the growth cannot be accommodated under current Regional Local Plan proposals.
- The St Helens LPSD growth proposals will generate cumulated severe impacts contrary to NPPF para 108 & 109 and require review.
- There appears to be a lack of cross border discussions on Transport so may not satisfy under the Duty to Cooperate
- The Infrastructure Delivery Plan (IDP) fails to outline how the Traffic growth proposed in the LPSD will be implemented and funded. It falls well short of the detail needed for delivery and requires a major review.

Please continue on a separate sheet if necessary

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

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

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

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

I wish to attend the EiP, but not necessarily to speak.

Kirkwells submission was submitted on the 13th March 2019.

I would therefore like to nominate Michael Wellock of Kirkwells, to represent the groups and speak on our behalf.

I would like to attend to support him in that capacity.

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

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

PART B – YOUR REPRESENTATION

B5 INFRASTRUCTURE DELIVERY & FUNDING (LPA08)

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 LPA08		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Infrastructure Delivery Plan (IDP)			

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"/> Not sure
Sound?	Yes <input type="checkbox"/>	No <input checked="" 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"/>
Justified?	<input checked="" type="checkbox"/> X
Effective?	<input checked="" type="checkbox"/> X
Consistent with National Policy?	<input checked="" type="checkbox"/> X

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

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

Infrastructure Delivery Plan (IDP)

- The LPSD Infrastructure Delivery Plan (IDP) is designed to consider the impact of the LPSD proposals on local Highways network and infrastructure and set out how these are to be managed and accommodated and more importantly how they are to be funded to meet demands the plan imposes on the existing road network.
- Unfortunately, the report in general and does not set out how in sufficient detail how this will be achieved. The IDP unfortunately concentrates more on the current situation and does not outline in detail what impact the LPSD will have on the local road network nor how they propose manage that impact or fund it. There is a clear perception that the IDP pays lip service to important issues.

✓
13

3. Infrastructure is required to satisfy the 3 strands of sustainable development as outlined in NPPF section 2 and para 8. The provision of infrastructure to support development cannot be left as an afterthought and lag behind housing development.
4. There is a Housing Delivery Test (HDT) to monitor housing build out but no equivalent Infrastructure Delivery Test to ensure sound, properly funded infrastructure is provided in advance of house building to ensure compliance with Nation Policy.
5. The IDP falls well short of what is necessary to demonstrate infrastructure has been properly considered over the plan period and beyond.

Infrastructure Delivery Plan (IDP) – Highways

6. The IDP unfortunately concentrates more on the current highways situation and does not outline in detail what impact the LPSD will have on the local road network nor how they propose manage that impact or fund it. Many of the issues marked TBA or TBC.
7. The issues are addressed in more detail under the response to LPA07 Transport and Traffic above. It is clear that the LPSD proposals will lead to a massive increase in residential traffic that will overwhelm the local highway network and lead to cumulative severe impacts. The LPSD proposals do not explain how this is to be mitigated. The plan is not sound, justified, effective or consistent with National Policy.
8. The plan may also fail the Duty to Cooperate as it is evident that the regional situation is critical and has not been sufficiently addressed.

Infrastructure Delivery Plan (IDP) – Healthcare & Education.

9. The IDP fails to explain fully the impact of the LPSD on Healthcare, and Education. The current situation is touched on broadly, but the impact of the LPSD, and how this will be managed and funded is missing, not fully described or vague.

GP Services

10. On Healthcare, although consultation has been made on local CCG's on GP services there is no indication or reference to significant collaboration with St H & K Teaching Hospitals NHS Trust. The IDP gives an overview of the Whiston and St Helens services but does not go on to say how the LPSD proposals will impact on demand and how this demand will be accommodated and funded over the Plan period and beyond.
11. The IDP notes, that there is a registered NHS GP population of 196,627 and 64 practices. Para 4.29 notes that there are 52 GP's per 100,000 people or 1,923 people per GP, in St Helens CCG area and adds that a quarter of GP's are over 55 and due for retirement during the Local Plan period. The National average is 65 GP's per 100,000 people or 1,538 people per GP. A recent GP practice review indicated that GP practices varied between 1,200 and 3,300 patients averaging 1,750 nationally. Staffing within the health service is a growing problem and St Helens is known to have difficulty attracting staff.
12. This issue has been reinforced over the last few weeks, where GP's numbers have fallen to 60 per 100,000 from 65. There is concern that lack of UK training and over reliance on foreign doctors to meet the need in an uncertain economic background is placing the system at risk.
13. At a recent British Medical Council (BMA) Local Medical Committee (LMC) meeting in November 2018, GP leaders proposed to limit GP patients to 1,500 and 25 consultations per day. They also wanted to set an unsafe number of consultations of 35 per day or 2,100 patients per GP. At 1,923 patients per GP St Helens is approaching the unsafe limit, so increasing demand is something that cannot be dismissed within the Local Plan.
14. The 12,290 homes proposed in the LPSD over the Plan period and beyond will lead to a population increase of around 28,000 over the next 25 years. That translates to 16 more GP's to meet 14-19 extra GP's together with approximately 25 retirement replacement GP's all in a challenging recruitment market. Eccleston with a planned safeguarded housing need beyond

2035 of 1,983 homes (approx. 40 % increase on 2011 census of 4,800 homes) will increase the population of by about 4,500 requiring an extra 3 GP's and almost certainly another GP practice.

15. The IDP does not spell out these challenges are to be met or outline a strategy for provision and funding of GP services over the life of the Local Plan. It therefore fails to meet the NPPF para 8 b) for the social objective in Achieving Sustainable development.

Hospital provision.

16. The IDP para 4.35 outlines the what the Whiston & St Helens Hospitals provide services for 350,000 people across St Helens, Knowsley, Halton Liverpool and further afield. With the planned huge population growth across the areas served (Estimated to around 15%) and a higher proportion of elderly people, it is difficult to see how the Hospital Trust can justify with certainty that it sees no need to increase capacity and facilities. It is clear that the scale of population expansion will require hospital expansion and improvements to provide safe emergency and general medical care. The IDP does not reference any evidence documents to support the statement made in 4.38. This statement also appears in conflict with a response by [REDACTED] StH & K hospitals to RSOGB indicating that the services are continually under strain at present.

17. Such an important component of infrastructure provision to satisfy NPPF para 8 deserves more planning than the statement made in 4.38 of the IDP.

18. It is also known that attracting medical staff is challenging and the Royal College of Nursing estimated in May 2018 that there is a nursing shortfall of 40,000 nurses nationally and that currently more nurses are leaving than being replaced. This puts more pressure on Local services but the IDP fails to mention these challenges and how they may impact on the Hospital service and how they may be overcome. Brexit uncertainty is adding to the problem. Again, this issue made headline news in the last couple of weeks in respect of training and over reliance on foreign resources.

19. Moreover, it is known that patient appointments are disrupted and abandoned due to traffic congestion around Whiston Hospital as referred to above. There is no indication that St Helens highways or St H & K Trust has collaborated with Knowsley, Halton and the emergency service to ensure the Emergency services can access the Hospital as the population and traffic significantly increases across the region.

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 IDP proposals in support of the Transport and Traffic proposals are not sound, effective and contrary to NPPF section 9.
- The LPSD may not be legal as there are concerns over cross border issues on traffic and
- There appears to be a lack of cross border discussions on Healthcare matters that so may not satisfy the Duty to Cooperate
- The Infrastructure Delivery Plan (IDP) fails to outline in sufficient detail how the LPSD will be implemented and funded. It falls well short of the detail needed for delivery and requires a major review. As such it is not sound or effective nor consistent with National Policy.

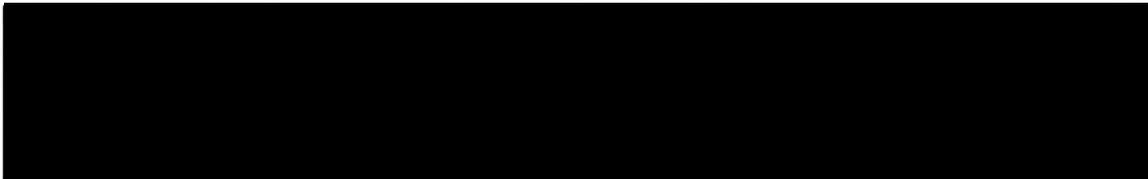
Please continue on a separate sheet if necessary

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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:	
I wish to attend the EIP, but not necessarily to speak.	
	
Kirkwells submission was submitted on the 13 th March 2019.	
I would therefore like to nominate Michael Wellock of Kirkwells, to represent the groups and speak on our behalf.	
I would like to attend to support him in that capacity.	

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

PO3311



St. Helens Council

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

270

PF 0249

Ref: LPSD
01 MAR 2019
(For official use only)

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

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

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title:
First Name: <u>LEAH</u>	First name:
Last Name: <u>GLYNN-MANLEY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>34 Smock Lane</u> <u>Corswood 01</u>	Address:
Postcode: <u>WN4 0SN</u>	Postcode:
Tel No:	Tel No:
Mobile: 	Mobile No:
Email:	mail:

Signature:  Date: 28-2-19

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

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

Yes (via email)

No

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

RETURN DETAILS

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

post to:

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

or by hand delivery to:

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

or by email to:

planningpolicy@sthelens.gov.uk

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

FURTHER INFORMATION

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

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

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B - YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate? <i>IHA IHS</i>									
Policy <i>LPA 12</i> <i>LPA 11</i> <i>LPA 07</i> <i>LPA 08</i> <i>PC04</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

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

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

Legally Compliant?

Yes

No

Sound?

Yes

No

Complies with the Duty to Cooperate

Yes

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?

Justified?

Effective?

Consistent with National Policy?

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

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

Breat requires \$5 to be more self sufficient so loss of grade 2 fields - No schools to support high increase in pollution so increase in health problems no budget / risk to support increase St Helens population has declined and is continue to so no need to build these houses as OAN don't support this number - Traffic junction 23, is already under strain with this plus Franda farm it would be a major standstill. Mental health will decline due to the amount of greenbelt already taken in this area - Cost of sending child to Wigan is 5K so don't make cost efficient for St Helens

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.

→ Provision to be made for secondary & primary schools + floodism area.
 → Health service that exist - not baby clinic.
 → Transport - regular trainings taken at regular intervals.
 → ~~Work~~ suitable facilities in station required near shop was stopped due to high traffic in area.
 → ~~Head~~ is 500 plus ~~gangs~~ gangs to affect area if ~~an~~ one shop is stopped?
 → Better provision required from land. ^{Required to support this}

Please continue on a separate sheet if necessary.

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

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

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

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

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

Please keep a copy for future reference.

PO3312

271

Ref: LPSD

01 MAR 2019

(For official use only)



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

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr R Glyn-Monley</u>	Title:
First Name: <u>Reece</u>	First name:
Last Name: <u>Glyn-Monley</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>34 Smock Lane</u>	Address:
<u>Garswood</u>
Postcode: <u>WN4 0SN</u>	Postcode:
Tel No:	Tel No:
Mobile: 	Mobile No:
Email:	Email:

Signature:  Date: 28/2/19

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

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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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**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? 1+1A / 1+1S							
Policy LPA0 LPA1 LPA08	1 2 3	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

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

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

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

Please tick as appropriate

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

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

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

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

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

no schools or secondary schools being built.
 Junction 23. Extra 500 plus cars on a already
 dangerous junction to many houses being built
 around Garswood / Haydock for this
 junction to support major accidents happen
 regularly - 20min journey times. I have
 for train to support Disabled / Trans/Station
 inadequate. already taken alot of Green belt
 from area. It can do farm car construction which
 will affect Revolution + Traffic to high levels
 Asthma will increase
 No doctors to support increase as decline
 in area -> No mention of new schools

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.

Step Building in Haydock Barwood -
 it is over used now cannot support
 junction 23 - high levels - Health risk.
 Improve infrastructure of Barwood houses
 now - Flooding / GRADE 2 farmland needed -
 Build Secondary School as none
 to support / we use Wigan Council now
 costing £500k a year ^{per head} which can't
 justify use - or money council spend
 Please continue on a separate sheet if necessary

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

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

PO3313



St. Helens
Council

①-LPA02 ②-LPA05
③-LPA07 ④-LPC01

384

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

Ref: LPSD

11 MAR 2019

(For official use only)

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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: MARTIN	First name:
Last Name: SWIFT	Last Name:
Organisation/company:	Organisation/company:
Address: 103 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

8/3/2019

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

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

Yes (Via Email)

No

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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.

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	LPA02	Paragraph / diagram / table	4.4 4.6.10 3.2	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	3.5.7 4.10 4.4 4.3 3.3.30	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

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

Please tick as appropriate

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

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

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

This Local Plan is not Legally Compliant or sound as the proposal to remove 8HA is contrary to the statements within Policy LPA02.

The proposal for removal of Green Belt in Rainford on site 8HA fundamentally breaches NFFP policy, and fails to meet the conditions required for the selection of land for removal, and is needed for the preservation of open countryside in Rainford from encroachment.

Selecting 8HA is contradictory to the NFFP policy, as 8HA would be an inappropriate use of Green Belt as there are no exceptional circumstances in Rainford or St.Helens for its removal.

St.Helens is a borough with a falling population and house prices below the national average, and Rainford already has a large number of affordable family houses on the market for sale.

Green Belt land was created to prevent urban sprawl & over development & it has served its purpose well within the Rainford area.

This proposal in the Local Plan would undo all this good work over many years.

St.Helens Council own register shows that there is enough brownfield land within St.Helens for 5,818 houses, that would support the Council's housing supply for nearly 12 years.

St.Helens Council want to build 486 new houses per year in the borough, but latest figures from the Office for National Statistics shows St.Helens only needs 383 houses per year.

①

②

The Green Belt around Rainford should be maintained for Agricultural purposes and the rural economy in Rainford.

This would protect future farming employment to locally grow our own food, with Brownfield sites used as alternative locations of proposed developments as stated within policy LPA02.

Affordable housing is only likely in St.Helens where the housing density can be increased to provide affordable housing units per hectare & public transport is more readily available for low income families, as public transport is not frequent or reliable enough to hold down a full-time job.

Please continue on a separate sheet if necessary

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

Remove 8HA from the Local Plan as it currently breaches NFFP policy.

There is no very special circumstances to release this A1 Agricultural land from the Green Belt in Rainford, and would not hold up in a court of law if challenged on this point

Please continue on a separate sheet if necessary

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

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	LPA07	Paragraph / diagram / table	4.27	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	3.5.7 4.4 4.10	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

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

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

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

This Local Plan is not sound or justified as the proposed 8HA development is contrary to the statements within the Strategic Aims & Objectives of the Plan and Policy LPA07.

An extra 259 units would generate 500 cars and have a significant detrimental impact to the congestion and air quality in Rainford, and is contrary to the strategy objective of safeguarding and enhancing life in Rainford.

The Local Plan for 8HA consistently fails to meet its strategic aims & objectives and is not justified.

The B5205 is the main traffic route to & from Rainford High school and Cross Pit Lane primary school and since traffic calming measures were introduced on Church Road & Cross Pit Lane in 2015-16, residents from the Scarisbrook estate now use Higher Lane & Rookery Lane to exit the village.

Any future development would have a significant detrimental impact on the safety of children, pedestrians & cyclists trying to access the linear park for recreational purposes & increase the traffic congestion in this part of village.

The impact of an extra 500 cars from the development would be considerable, and Rookery Lane currently only has one pavement.

3

Rookery Drive, Derby Drive and Heyes Avenue housing estates already exit the village via Rookery Lane & this road would not be able to sustain more cars from another housing estate & the extra traffic congestion it would bring.

The traffic impact assessment carried out as part of the Sustainability Appraisal has failed to understand the flow of traffic into & out of Rainford.

This report has failed to appreciate that public transport services to & from Rainford are not frequent or reliable enough to hold down a full time job.

Residents of Rainford will always need a car as the majority of people do not work in St.Helens and require a car to travel further away to work.

The proposed development on 8HA will add approximately 500 cars to Rainford.

Any future development on 8HA would require a significant reduction to the number of proposed units and cater for a higher number of elderly residents, who may not have two cars.

Any new development should have its main access via Higher Lane, on the straight road past Dial Woods, for the safety of pedestrians & cyclists.

Due to the scale of the proposed 8HA the existing highway network would need significant traffic calming and improvements to Rookery Lane and Higher Lane, as current roads and pavements are substandard and in very poor condition.

Please continue on a separate sheet if necessary

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

The local plan needs to be reviewed as the statements made are incorrect relating to the Transport Impact Assessment by WSP, and has failed to understand the flow of traffic into & out of Rainford.

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

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PO3314

PA0354

① - LPA02 ② - LPA05
③ - LPA07 ④ - LPC01

385



St. Helens
Council

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

Ref: LPSD

11 MAR 2019

(For official use only)

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Title: MRS	Title:
First Name: SUSAN	First name:
Last Name: SWIFT	Last Name:
Organisation/company:	Organisation/company:
Address: 103 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date:

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

Please tick as appropriate

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①
②

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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An extra 259 units would generate 500 cars and have a significant detrimental impact to the congestion and air quality in Rainford, and is contrary to the strategy objective of safeguarding and enhancing life in Rainford.

The Local Plan for 8HA consistently fails to meet its strategic aims & objectives and is not justified.

The B5205 is the main traffic route to & from Rainford High school and Cross Pit Lane primary school and since traffic calming measures were introduced on Church Road & Cross Pit Lane in 2015-16, residents from the Scarisbrook estate now use Higher Lane & Rookery Lane to exit the village.

Any future development would have a significant detrimental impact on the safety of children, pedestrians & cyclists trying to access the linear park for recreational purposes & increase the traffic congestion in this part of village.

The impact of an extra 500 cars from the development would be considerable, and Rookery Lane currently only has one pavement.

Rookery Drive, Derby Drive and Heyes Avenue housing estates already exit the village via Rookery Lane & this road would not be able to sustain more cars from another housing estate & the extra traffic congestion it would bring.

The traffic impact assessment carried out as part of the Sustainability Appraisal has failed to understand the flow of traffic into & out of Rainford.

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

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

PO3315



St. Helens
Council

① - LPA02 ② - LPA05
③ - LPA07 ④ - LPC01

375

Ref: LPSD

11 MAR 2019

(For official use only)

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

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: MARIAN	First name:
Last Name: MORGAN	Last Name:
Organisation/company:	Organisation/company:
Address: 101 ROOKERY DRIVE, RAINFORD ST. HELENS	Address:
Postcode: WA11 8BA	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date: 08/03/2019

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.

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?										
Policy	LPA02	Paragraph / diagram / table	4.4 4.6.10 3.2	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	3.5.7 4.10 4.4 4.3 3.3.30	Habitats Regulation Assessment			
Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

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

This Local Plan is not Legally Compliant or sound as the proposal to remove 8HA is contrary to the statements within Policy LPA02.
The proposal for removal of Green Belt in Rainford on site 8HA fundamentally breaches NFFP policy, and fails to meet the conditions required for the selection of land for removal, and is needed for the preservation of open countryside in Rainford from encroachment.

Selecting 8HA is contradictory to the NFFP policy, as 8HA would be an inappropriate use of Green Belt as there are no exceptional circumstances in Rainford or St.Helens for its removal.

St.Helens is a borough with a falling population and house prices below the national average, and Rainford already has a large number of affordable family houses on the market for sale. Green Belt land was created to prevent urban sprawl & over development & it has served its purpose well within the Rainford area.
This proposal in the Local Plan would undo all this good work over many years.

St.Helens Council own register shows that there is enough brownfield land within St.Helens for 5,818 houses, that would support the Council's housing supply for nearly 12 years.
St.Helens Council want to build 486 new houses per year in the borough, but latest figures from the Office for National Statistics shows St.Helens only needs 383 houses per year.

1

2

The Green Belt around Rainford should be maintained for Agricultural purposes and the rural economy in Rainford.

This would protect future farming employment to locally grow our own food, with Brownfield sites used as alternative locations of proposed developments as stated within policy LPA02.

Affordable housing is only likely in St.Helens where the housing density can be increased to provide affordable housing units per hectare & public transport is more readily available for low income families, as public transport is not frequent or reliable enough to hold down a full-time job.

Please continue on a separate sheet if necessary

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

Remove 8HA from the Local Plan as it currently breaches NFFP policy.

There is no very special circumstances to release this A1 Agricultural land from the Green Belt in Rainford, and would not hold up in a court of law if challenged on this point

Please continue on a separate sheet if necessary

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

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

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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3. To which part of the Local Plan does this representation relate?										
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Other documents (please name document and relevant part/section)										

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

Please tick as appropriate

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

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

This Local Plan is not sound or justified as the proposed 8HA development is contrary to the statements within the Strategic Aims & Objectives of the Plan and Policy LPA07.

An extra 259 units would generate 500 cars and have a significant detrimental impact to the congestion and air quality in Rainford, and is contrary to the strategy objective of safeguarding and enhancing life in Rainford.

The Local Plan for 8HA consistently fails to meet its strategic aims & objectives and is not justified.

The B5205 is the main traffic route to & from Rainford High school and Cross Pit Lane primary school and since traffic calming measures were introduced on Church Road & Cross Pit Lane in 2015-16, residents from the Scarisbrook estate now use Higher Lane & Rookery Lane to exit the village.

Any future development would have a significant detrimental impact on the safety of children, pedestrians & cyclists trying to access the linear park for recreational purposes & increase the traffic congestion in this part of village.

The impact of an extra 500 cars from the development would be considerable, and Rookery Lane currently only has one pavement.

3

Rookery Drive, Derby Drive and Heyes Avenue housing estates already exit the village via Rookery Lane & this road would not be able to sustain more cars from another housing estate & the extra traffic congestion it would bring.

The traffic impact assessment carried out as part of the Sustainability Appraisal has failed to understand the flow of traffic into & out of Rainford.

This report has failed to appreciate that public transport services to & from Rainford are not frequent or reliable enough to hold down a full time job.

Residents of Rainford will always need a car as the majority of people do not work in St.Helens and require a car to travel further away to work.

The proposed development on 8HA will add approximately 500 cars to Rainford.

Any future development on 8HA would require a significant reduction to the number of proposed units and cater for a higher number of elderly residents, who may not have two cars.

Any new development should have its main access via Higher Lane, on the straight road past Dial Woods, for the safety of pedestrians & cyclists.

Due to the scale of the proposed 8HA the existing highway network would need significant traffic calming and improvements to Rookery Lane and Higher Lane, as current roads and pavements are substandard and in very poor condition.

Please continue on a separate sheet if necessary

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

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

PO3316

①-LPA02 ②-LPA05 PFO361
③-LPA07 ④-LPC01 (396)



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

Ref: LPSD
11 MAR 2019
(For official use only)

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

This form has two parts;

Part A - Personal Details **Part B - Your Representation(s)**

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>ROSALINE</u>	First name: _____
Last Name: <u>SWIFT</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>40 HEYES AVENUE</u>	Address: _____
<u>RAINFORD</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA11 8AR</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: _____ Date: 8 March 2019

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

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

Yes (via email) No

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

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

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**Local Plan
St.Helens Council
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St Helens
WA10 1HP**

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

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

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

Please tick as appropriate

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

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

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Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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The Local Plan for 8HA consistently fails to meet its strategic aims & objectives and is not justified.

The B5205 is the main traffic route to & from Rainford High school and Cross Pit Lane primary school and since traffic calming measures were introduced on Church Road & Cross Pit Lane in 2015-16, residents from the Scarisbrook estate now use Higher Lane & Rookery Lane to exit the village.

Any future development would have a significant detrimental impact on the safety of children, pedestrians & cyclists trying to access the linear park for recreational purposes & increase the traffic congestion in this part of village.

The impact of an extra 500 cars from the development would be considerable, and Rookery Lane currently only has one pavement.

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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PO3317



St. Helens Council

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

405

Ref: LPSD
12 MAR 2019
(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

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

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: <u>N/A</u>
First Name: <u>DEREK</u>	First name: _____
Last Name: <u>WOODS</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>THE FIRS</u>	Address: _____
<u>3 HOWARDS LANE, ECCLESTON,</u>	_____
<u>ST. HELENS, MERSEYSIDE</u>	_____
Postcode: <u>WA10 5HJ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 11 March 2019

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

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

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**Local Plan
St.Helens Council
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Victoria Square
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**Now please complete PART B of this form,
setting out your representation/comment.**

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

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>Not consistent with National Policy. Anticipated growth not based on latest figures for 2016, which states lower growth therefore less houses needed. Fails to utilize existing surplus Brownfield Sites in the Borough.</p> <p>The land SHS South of A580 Windle Island is Grade 1 Agricultural land and urgently need for the food supply of the county.</p> <p>Traffic would increase by 3000 cars onto Houghtons Lane / Bleak Hill Rd resulting in grid lock at peak times. Existing Schools, Doctors, Postnets Shopping facilities unable to cope. Loss of public space, footpaths.</p>

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

The land 8HS to be removed from the proposed plan and Brownfield sites used instead
 The recalculation of the number of homes required using latest figures
 Further study of the impact of the additional 3000 cars plus on the existing infrastructure and the increase in population on the existing schools, Doctors, Dentists.

Please continue on a separate sheet if necessary

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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Please keep a copy for future reference.

PO3318



St. Helens
Council

683

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

Ref: LPSD

13 MAR 2019

(For official use only)

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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: Sharon	First name:
Last Name: Railton	Last Name:
Organisation/company:	Organisation/company:
Address: 29 Rookery Lane Rainford, St Helens Merseyside	Address:
Postcode: WA11 8EF	Postcode:
Tel No:	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <input type="text" value="12.03.2019"/>
-----------------------	---

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

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

Yes (Via Email)

No

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

RETURN DETAILS

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

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

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

Please tick as appropriate

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

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

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

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

underpinned by relevant and up-to-date evidence.

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

The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land. 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 available for development.

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 numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding 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 reach 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 guestimate figures bear no resemblance to this fact.

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 means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

Policy LPA05.1: Strategic Housing Sites

I am opposed to needless release of Green Belt land for housing.

Policy LPA06: Safeguarded Land

I am 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.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this 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. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate.

Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

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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PO3319



St. Helens
Council

684
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Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: Jemma	First name:
Last Name: Jones.	Last Name:
Organisation/company:	Organisation/company:
Address: 6, ORWELL CLOSE STANDISH LOWER CROFT, WIGAN.	Address:
Postcode: WN6 8JH	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 

Date: 13-03-19.

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
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Please tick as appropriate

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Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please keep a copy for future reference.**

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9

PO3320

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

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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
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Please tick as appropriate

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Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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PO3321



St. Helens
Council

686

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13 MAR 2019

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Title: <i>MRS</i>	Title:
First Name <i>MARGARET</i>	First name:
Last Name: <i>AINSCOUGH.</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>13, ECCLES ROAD. KITT GREEN, WIGAN</i>	Address:
Postcode: <i>WNS 04R.</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <i>12/3/19.</i>
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Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

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PO3322



St. Helens
Council

687

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: GARY	First name:
Last Name: AINSCOUGH.	Last Name:
Organisation/company:	Organisation/company:
Address: 13, ECCLES ROAD, KITT GREEN, WIGAN	Address:
Postcode: WNS 0HR.	Postcode:
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: 13/3/19.
-----------------------	----------------

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Yes (Via Email) No

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RETURN DETAILS

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

Please tick as appropriate

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Positively Prepared?	<input type="checkbox"/>
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PO3324



St. Helens
Council

689
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Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

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Title: <i>MRS</i>	Title:
First Name: <i>HAZEL</i>	First name:
Last Name: <i>ROBY</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>50 CLAREMONT ROAD, BILLINGE</i>	Address:
Postcode: <i>WN5 7LT</i>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <i>10/03/19</i>
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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

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PO3325

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PO3326



St. Helens
Council

bal

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Ref: LPSD

13 MAR 2019

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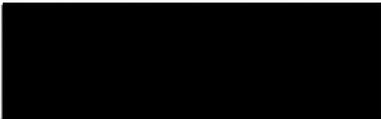
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Organisation/company:	Organisation/company:
Address: <i>WHITEGATES BILLINGOE</i>	Address:
Postcode: <i>WN5 7MA</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:  Date: *11/03/19*

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Please keep a copy for future reference.**

PO3327



St. Helens
Council

692

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

Ref: LPSD

13 MAR 2019

(For official use only)

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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: <i>Ms</i>	Title:
First Name: <i>RACHEL</i>	First name:
Last Name: <i>FREARSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>14 FOXGLOVE LANE, BROUGHTON,</i>	Address:
Postcode: <i>LE9 6YU</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 

Date: *04/03/19*

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

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

Yes (Via Email)

No

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

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

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

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

Please tick as appropriate

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

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

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

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

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: LINDSEY	First name:
Last Name: CAREY.	Last Name:
Organisation/company:	Organisation/company:
Address: 2 SHELBUENE DRIVE MINDLET VICAR	Address:
Postcode: WN2 3NE	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: 3/3/19.
--	----------------------

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Yes (Via Email) No

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St.Helens
Merseyside
WA10 1HP**

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NEXT STEPS

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DATA PROTECTION

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

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

Please tick as appropriate

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

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Positively Prepared?	<input type="checkbox"/>
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PO3329

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PO3330



St. Helens
Council

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Title: <i>MS</i>	Title:
First Name: <i>KIRSTY</i>	First name:
Last Name: <i>WILKINSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>7 LANGLEY GROVE, DURHAM</i>	Address:
Postcode: <i>DL14 6UJ</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:	Date:
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St. Helens
Council

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

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Title: <i>MISS</i>	Title:
First Name: <i>WENDY</i>	First name:
Last Name: <i>SINGLETON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>3 FAIRWAYS DRIVE, WALMET ISLAND</i>	Address:
Postcode: <i>LA14 3HT</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:  Date: *07/03/19*

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

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

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

Please tick as appropriate

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

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

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

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

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- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
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Policy LPA06: Safeguarded Land

I am 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.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this 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. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

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8

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PO3332



St. Helens
Council

699

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

Ref: LPSD

13 MAR 2019

(For official use only)

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PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>ROBERT</i>	First name:
Last Name: <i>ATHERTON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>2 HOWFORD MILL COTTAGE SELKIRK</i>	Address:
Postcode: <i>TD7 5JH</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <i>21/02/19</i>
--	-----------------------

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

Yes (Via Email)

No

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RETURN DETAILS

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Victoria Square
St.Helens
Merseyside
WA10 1HP**

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

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

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

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

Please tick as appropriate

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

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

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

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8

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PO3333



St. Helens
Council

701
St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name SODIE	First name:
Last Name: TUUSTALL	Last Name:
Organisation/company:	Organisation/company:
Address: 23, PARKFIELD ST WIGAN	Address:
Postcode: WN6 7ED.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature



Date:

01/03/19

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Yes (Via Email)

No

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

Please tick as appropriate

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>	
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Justified?	<input checked="" type="checkbox"/>
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PO3335

704



St. Helens Council

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

Ref: LPSD
13 MAR 2019
(For official use only)

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name HEATHER	First name:
Last Name: MARCM	Last Name:
Organisation/company:	Organisation/company:
Address: 1 LEAFIELD CLOSE, BIRTLEY, DURHAM	Address:
Postcode: DH3 1RX.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:  Date: 01/03/19

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<input type="checkbox"/>	<input checked="" type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/>	<input type="checkbox"/>
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PO3336



St. Helens
Council

705

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13 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>SHANE</u>	First name:
Last Name: <u>CAREY.</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 SHELburne Drive HINDLEY, UIGAN.</u>	Address:
Postcode: <u>WN2 3NE</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <u>4/3/19.</u>
--	----------------------

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PO3337



St. Helens
Council

706

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>HOWARD</u>	First name:
Last Name: <u>RAILTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>50 CLAREMONT ROAD, BILLINGE</u>	Address:
Postcode: <u>WN5 7LT</u>	Postcode:
[REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <u>10/03/19</u>
-----------------------	-----------------------

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Would you like to be kept updated of future stages of the St 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)

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FURTHER INFORMATION

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Telephone: 01744 676190

NEXT STEPS

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

PART B – YOUR REPRESENTATION

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

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

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
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8

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PO3338



St. Helens
Council

707

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

Ref: LPSD

13 MAR 2019

(For official use only)

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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: STUART	First name:
Last Name: ALDRIDGE	Last Name:
Organisation/company:	Organisation/company:
Address: 6376 ASTANG ROAD, PRESTON	Address:
Postcode: PR3 5DQ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: 08/03/19
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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

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St.Helens
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Telephone: 01744 676190

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

PART B – YOUR REPRESENTATION

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

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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PO3339

708



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft) 1
Representation (i.e. Comment) Form**

Ref: LPSD

3 MAR 2019
(For official use only)

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

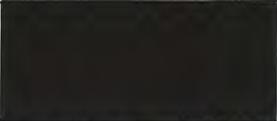
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This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>STUART</i>	First name:
Last Name: <i>FIRTH</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>82 ALT CROSS CROXTETH</i>	Address:
Postcode: <i>L11 4UP</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:  Date: *02/03/19*

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

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

Yes (Via Email) No

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

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

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

Please tick as appropriate

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

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

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PO3340



St. Helens
Council

723

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

Ref: LPSD

13 MAR 2019

(For official use only)

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>GARY</u>	First name:
Last Name: <u>RALTON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>26 COLERIDGE AV. DONTONS GREEN,</u>	Address:
Postcode: <u>WA10 6RN</u>	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date: 09/03/19

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

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

Please tick as appropriate

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

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
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
Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.
The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):
a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

Policy LPA06: Safeguarded Land

I am 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.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this 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. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

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Policy LPA07: Transport and Travel

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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

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.**

8

9

PO3341



St. Helens Council

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

Ref: LPSD

13 MAR 2019

(For official use only)

724

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 LEWIS	First name:
Last Name: RAILTON	Last Name:
Organisation/company:	Organisation/company:
Address: 26 COLERIDGE AV. DONTONS GREEN	Address:
Postcode: WA10 6RN	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 02/03/19

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

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

Yes (Via Email) No

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)

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FURTHER INFORMATION

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

NEXT STEPS

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DATA PROTECTION

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

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Policy LPA06: Safeguarded Land

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Please keep a copy for future reference.**

PO3342

725



St. Helens Council

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

Ref: LPSD

13 MAR 2019

(For official use only)

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name IAN	First name:
Last Name: ROBY	Last Name:
Organisation/company:	Organisation/company:
Address: 50 CLAREMONT ROAD, BILLINGE,	Address:
Postcode: WNS 7LT	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 09/03/19

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

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Merseyside
WA10 1HP**

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

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

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3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
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4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <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.

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

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

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Please keep a copy for future reference.**

PO3343



St. Helens
Council

729

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

Ref: LPSD
13 MAR 2019
(For official use only)

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>JOHN</u>	First name:
Last Name: <u>LYON</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>5 TRURO CLOSE, ST. HELENS</u>	Address:
Postcode: <u>WA11 9EL</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 06/03/19

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

Would you like to be kept updated of future stages of the St 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
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Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

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

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8

9

PO3344



St. Helens
Council

730

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

Ref: LPSD

13 MAR 2019

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Part B – Your Representation(s).

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>EMMA</i>	First name:
Last Name: <i>ROBY</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>50 CLAREMONT ROAD, BILLINGE</i>	Address:
Postcode: <i>WN5 7LT</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [REDACTED]	Date: <i>10/03/19</i>
---	-----------------------

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

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

Yes (Via Email)

No

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

PART B – YOUR REPRESENTATION

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

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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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>	
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Policy LPA06: Safeguarded Land

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8
9

PO3346



St. Helens
Council

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

Ref: LPSD

13 MAR 2019

(For official use only)

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Part B – Your Representation(s).

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>JOHN</i>	First name:
Last Name: <i>GASKELL</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>2A ROCKOLY LANE</i>	Address:
Postcode: <i>WAL1 8ER</i>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: <i>11/02/19</i>
-----------------------	-----------------------

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Yes (Via Email) No

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RETURN DETAILS

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St.Helens Council
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Victoria Square
St.Helens
Merseyside
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Other documents (please name document and relevant part/section)							

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

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
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Policy LPA06: Safeguarded Land

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PO3347



St. Helens
Council

734

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Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name CRAIG	First name:
Last Name: AINSCOUGH.	Last Name:
Organisation/company:	Organisation/company:
Address: 23, PAGEFIELD ST WIGAN	Address:
Postcode: WN6 7ED.	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date: 01/3/19.

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Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
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Please tick as appropriate

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PO3348

736



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

Ref: LPSD
13 MAR 2019
(For official use only)

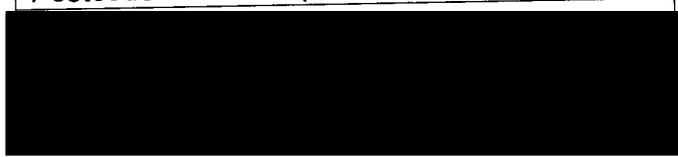
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Part B – Your Representation(s).

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>BILLY</i>	First name:
Last Name: <i>RICHARDSON</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>9A VILLAGÉ TERR NEWTOWN,</i>	Address:
Postcode: <i>CA9 3PL</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: *06/03/19*

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Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓	
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Please tick as appropriate

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Justified?	<input checked="" type="checkbox"/>
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8

9

PO3349

PF1347



St. Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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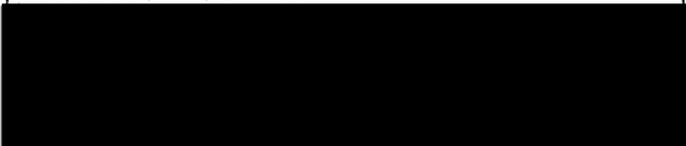
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Part B – Your Representation(s).

1428
13 MAY 2019 6:02 AM E 1

PART A – YOUR DETAILS

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

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

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Foreword and additions for the May 2019 representation:

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

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

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

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

For the May 2019 representation it should be noted that:

1. The National Planning Policy Framework (February 2019) Paragraph 177 states:

"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."

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

"Likely to generate negative effects" for

SA1. To protect and enhance biodiversity
SA2. To protect and improve land quality in St Helens
 - 1.2. HA4 is known to support, or has recently supported, local populations of several UK Priority Species (NERC Act, 2006). These include; Brown Hare (*Lepus euro*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Grey Partridge (*Perdix perdix*), Yellowhammer (*Emberiza citronella*), Tree Sparrow (*Passer montanus*) and Corn Bunting (*Emberiza calandra*); of which five are also Local BAP species (Merseyside Biodiversity Group). All but two of the bird species were present between late March and early May 2019 in significant numbers – and showing breeding behaviour. Effective mitigation for these species in particular is not a viable option off site and any large scale development in this area of the (current) Green Belt would have significant negative impacts on the local populations.
These species are a material consideration for planning.
 - 1.3. Other Priority Species such as Common Toad (*Bufo bufo*) and Great Crested Newt (*Triturus cristatus*), which is also a Local BAP species, are present using the area as hibernation and commuting habitats. Under the BCT good practice guidelines 3rd edition (Collins, 2016), the area of HA4 is a high value area for commuting and foraging bats species including; Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Noctule (*Nyctalus noctula*) and Brown Long-eared (*Plecotus auritus*), which require a mosaic of open habitats, hedgerows and woodland. At least three of the four bat species were present on site in late March to early May 2019.
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However:

- 3.2. There are no recommendations as to how this could be achieved.
-
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- 3.7. Land parcel HA4 is INSIDE the Bold Forest Park Green Infrastructure (GI) and an integral part of it, therefore:
- Removing HA4 from Green Belt increases risk to its GI;
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- 07
08
-
- 3.8. In May 2019, the United Nations' Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) released its Global Assessment Summary for Policymakers report. It highlights (among many other relevant items) the importance of maintaining soil integrity to combat climate change - and that a significant part of that is retaining permanent grassland to hold carbon dioxide deposits rather than releasing them into the atmosphere. It would appear that the Council's proposals for HA4 (at least) do not comply with any recommendations therein. 09
-
- 3.9. The issues raised above are significant issues for existing properties in the area, the character of the land parcel, any new build proposals and the impact of climate change.
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- 4.1. Traffic on the existing narrow, poor quality, local access roads is already at high volume and speed.
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5. The Bold Forest Park AAP (adopted July 2017) states that:

PO3350

PF1348



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

14209
13 MAY 2019

PART A – YOUR DETAILS

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

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

Signature: [REDACTED]	Date: 13/5/19
-----------------------	---------------

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

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

Yes (Via Email)

No

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

RETURN DETAILS

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

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

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

Foreword and additions for the May 2019 representation:

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

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

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

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PO3351

PF1350

BOLD & CLOCK FACE VILLAGE ACTION GROUP PART B REPRESENTATION

① - LPA01

② - LPA02

③ - Gen. J. Belt Review

④ - LPA04

⑤ - LPA05

⑥ - LPA05.1

⑦ - IDA

⑧ - LPA07

⑨ - LPA09

⑩ - LPC05

⑪ - LPC06

⑫ - LPC07

⑬ - LPC08

⑭ - LPC09

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

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

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

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

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

Bold and Clock Face Village Action Group.

12 MAY 2019



St.Helens
Council

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Representation (i.e. Comment) Form**

Ref: LPSD

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Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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

Signature: [Redacted]	Date: <input type="text" value="13.05.19"/>
------------------------------	--

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

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

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

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

PART B – YOUR REPRESENTATION

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

3. To which part of the Local Plan does this representation relate?									
Policy	X	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Green Belt Review 2018					

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

Please tick as appropriate

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

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

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

Please see attached representation made on behalf of Bold and Clock Face Village Action Group with regards to Policy LPA07: Transport and Travel.

Please continue on a separate sheet if necessary

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

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

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:

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

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

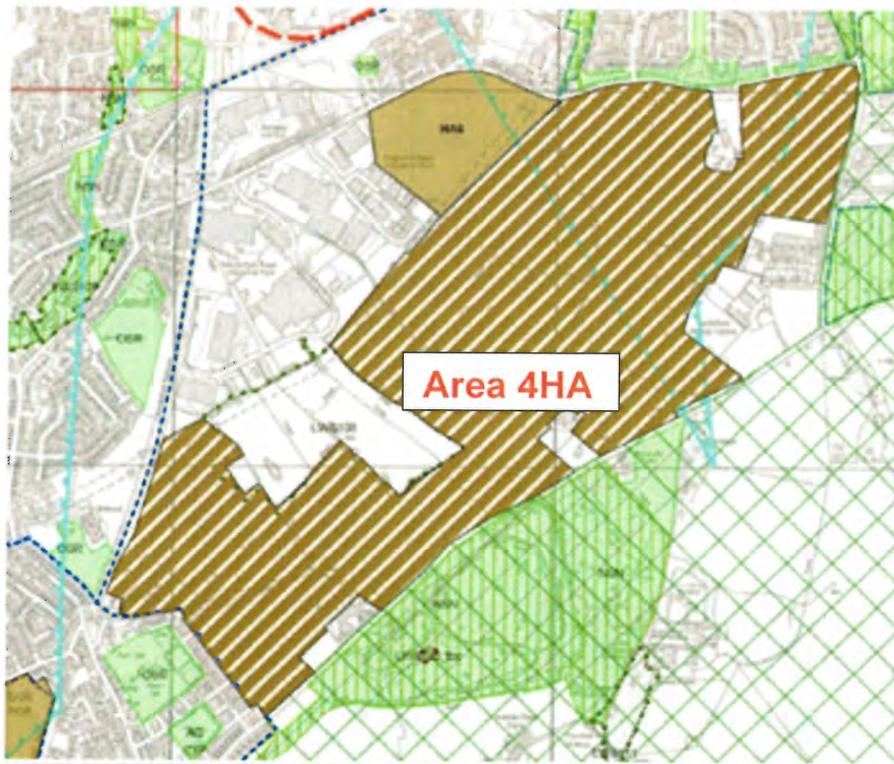
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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

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

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

Policy LPA07: Transport and Travel



The area shown above 4HA is an area of 132.86 hectares with a proposed allocation of 2988 homes.

- The area 5HA is a proposed development of 520 homes.

The surrounding area has already seen a number of housing developments in close proximity with planning permission for more.

- Area 3HA Reginald Road 337 houses.
- Juniper Grove 129 houses.
- Chester Lane 250 houses.

Within a 2 mile radius there is a potential for 4224 houses.

UK statistics show that the North West region has 1.18 cars per household, so within a two mile radius there is a potential for 4984 extra vehicles on the road.

The **National Planning Policy Framework (NPPF)** makes it clear that we should be building in places that engender healthy lifestyles and that we should encourage active travel. We are supposed to be building for a low carbon future. We are supposed to build around sustainable transport.

Area 4HA takes us in exactly the wrong direction.

St Helens Transport Assessment report says the following,

- Many of the sight allocations are to be removed from the greenbelt in particular those larger strategic sites, are located on the periphery of St Helens and the urban areas and so many have fewer existing sustainable transport options.
- In order to conform to the NPPF it is essential that the local plan has a robust evidenced based supporting policies and requirements that ensure that each site can maximise existing, and where required provide sustainable options.
- The NPPF Chapter 9 point C states that opportunities to promote walking, cycling and public transport use are identified and pursued.

It should also be noted that area 4HA is not mentioned in the following document,

St Helens Council Sustainable Transport Impact Assessment Plan Project No 70038483 dated January 2019.

The area has seen a significant increase in the amount of traffic on the roads over recent years due to the number of new homes that have been built not only in St Helens but the neighbouring boroughs also. The area is saddled with a Victorian road network which in some cases will be difficult to improve effectively. There are already significant concerns around the volume of traffic and speed on Gorsey Lane that will run south of the 4HA development. The

road is used as a rat run for people heading to junction 8 of the M62 in Burtonwood, attempts to slow traffic has had limited results. It is also compounded with being the main access point to Bold Industrial Estate and therefore used by a significant number of HGVs and on occasion abnormal loads. These require police escort and limit the scope of traffic calming measures available. An alternative route that is sometimes used is Bold Road, Reginald Road and Mill Lane. Bold Road runs along the north boundary of 4HA, eventually running into Mill Lane and past a primary school. Clock Face Road has also become heavily congested and is raising concerns on health and safety. There are bottle necks on the road, mainly at points lined by terraced houses, which as a result will be difficult to resolve.

In Area 4HA referring specifically to the two main arterial routes Gorsey Lane and Neills Road, they have a severe lack of footpaths and cycling lanes making it a danger to other road users. Neills Road at its junction with Gorsey Lane has no footpaths for a distance of over 100 meters. Gorsey Lane has suffered numerous road traffic collisions which have resulted in fatalities.

Images of the aforementioned are shown below:



Gorsey Lane looking Down Neills Road (NO FOOTPATHS)



Gorse Lane heading west from the junction of Neills Road

*The photographs quite clearly demonstrate NO CYCLE LANE and they have little or no accessibility for,
Prams pedestrians and wheelchairs*

The St Helens Council Sustainable Traffic Impact Assessment Report (St. Helens Local Plan) has highlighted that St Helens currently experiences congestion, queues and delays during weekday peak periods. The impact of traffic growth (14%-16%) from committed developments and SHLAA sites, combined with ongoing general background traffic growth is forecast to worsen the level of operation at many of the key junction during peak periods. The additional traffic growth in the region of 14% to 16% associate with traffic from the local plan sites is also forecast to **worsen** the level of operation at some locations. It is recommended that further consideration be given to the forecast operation of the following junctions.

- St Helens Town Centre Sherdley Roundabout (MacDonald's)
- Liverpool via M62 junction 7
- Manchester via junction 8

All these junctions will service 4HA, thus increasing congestion and emissions, which as we know is a major source of carbon dioxide emissions, which in turn is a major cause of climate change. Lea Green station has 190 parking spaces which already is totally inadequate as a number of rail users have been issued with parking tickets for not parking in bays, as all the bays are full.

The NPPF Chapter 9, Paragraph 103

Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help reduce congestion and emissions, and improve air quality and public health. The National Planning Policy Framework sets out many other obligations in relation to traffic; pollution and noise. These effects will be far worse under the new proposals.

Accessibility

The distances to the local centre would be 2 kilometres from 4HA, with the nearest Primary School some 1.6 kilometres and the Post Office 1 kilometre. Those distances are likely to be a disincentive to walking although they may be cycled. However, more significantly part of the route to those facilities would involve walking or cycling along a road with a speed limit of 40 mph and is relatively close to the Motorway Junction 8 of the M62. The route does not have any natural surveillance form other dwellings for some of its distance and would be an unattractive environment for pedestrians and cyclists.

This runs counter to the thrust of the Framework in terms of promoting sustainable transport choices and conflicts with CS Policy and CP 2 which seeks to locate development on sites where, amongst other things, facilities can be accessed by walking or cycling, there is good access to public transport and there are safe pedestrian routes to schools.

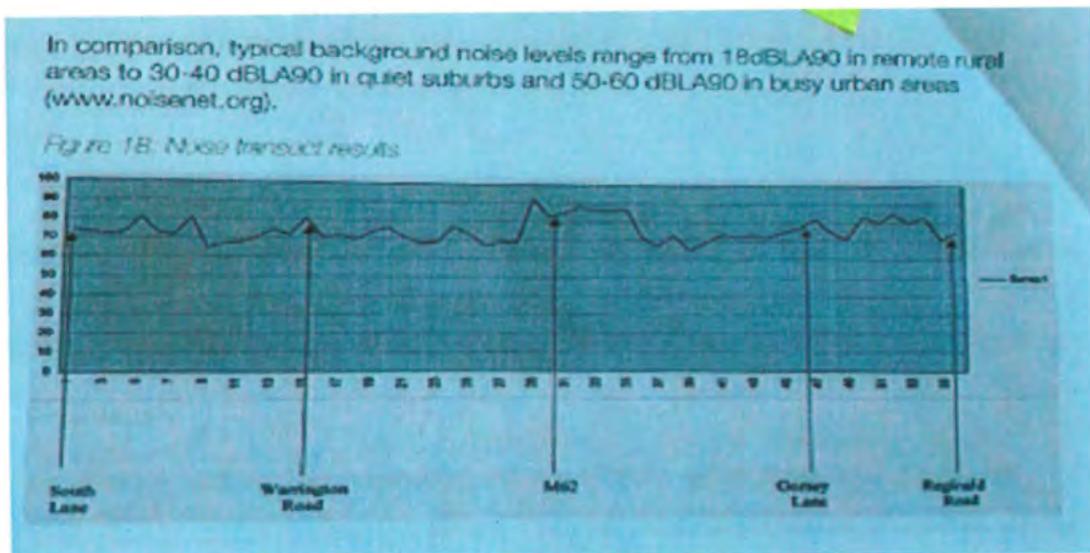
8



Hall Street with its junction with Crawford Street

In March 2019 [redacted] Senior Strategic Land and Planning Manager for Taylor Wimpey informed local residents that Hall Street off Crawford Street would be the main access route into 4HA. As you can see from the photographs the access route is insufficient, dangerous and **not appropriate for emergency vehicles**. The houses were built in the 1920s and have very little, and in many cases no off road parking.

Noise Pollution



The Bold Forest Park Action Plan (adopted July 2017) states;

“The high background noise level is a major environmental detractor for both residents around the area and potential visits to the Forest Park.” **AAP 3.2.11** Noise pollution from road traffic is a constant background feature of the area. Amelioration of this through higher levels of woodland planting is high priority. As you can see from the chart and comments from the Bold Forest Park Action Plan in 2017, noise is a major concern this will significantly get worse under the proposed plan.

⑧

PO3352

Representor Details

Web Reference Number	WF0019
Type of Submission	Web submission
Full Name	mr scott swiffen
Organisation	
Address	meadow view golbourne road hermitage green winwick wa28sn
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

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

The plan is showing buildings on green belt land with inadequate transport links and using roads that are already over congested.

There are already excessive wagons/vehicles driving along park side road and golbourne road and this will add to an already over congested route. The construction and increased traffic noise will not be acceptable to residents and parkside has a lot of animals and nature on there so this green belt should not be built on.

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

The plan should be scrapped and the former collier should be a nature reserve and accessible for people to explore nature.

not covered with concrete, tarmac and shed type buildings

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

PO3353

- ① LPA01
- ④ LPA04
- ⑦ LPA05.1
- ② LPA02
- ⑤ LPA04.1
- ⑧ LPA06
- ③ LPA03
- ⑥ LPA05
- ⑨ LPA07

Representor Details

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

⑩ PARA
1.7.2 DHC

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

Yes (via e-mail)

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

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

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

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

5. If you consider the Local Plan is unsound, it because it is not:
Justified, Effective, Consistent with national policy

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

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

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

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

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

The economic analysis is flawed and based on over-optimistic assumptions

②

Policy LPA06: Safeguarded Land

I am 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.

Safeguarded land can be a useful tool, however 85.88 hectares for employment (equal to 39.9%), and 114.19 hectares of such land for housing (equal to 28.6% of housing numbers), is totally excessive.

If too much land is allocated all at once, then developers will target that which is most profitable and this 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. Planning policy should encourage sustainable development, and not development in rural places, which is comparatively least sustainable.

Safeguarding too much land now, means that the principle for future development will be established now, it is more prudent to decide development principles on a much smaller amount of land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.

Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate. Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

8

9

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

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

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

Response Date	3/13/2019 4:27:25 PM
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PO3354

① LPA01

④ LPA04

⑦ LPA05.1

⑩ LPA07

② LPA02

⑤ LPA04.1

⑧ S.A.

⑪ PAR 1.7.2

③ LPA03

⑥ LPA05

⑨ LPA06

DEC.

Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

Justified, Effective, Consistent with national policy

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

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

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

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

②

land at the current time. Locations for development in the future may not accord with decisions taken now, and should be deferred to a later date with the benefit of up to date knowledge.
Policy LPA07: Transport and Travel

This policy should insist on all new development, especially for employment and housing to be reliant on public transport and it should discourage motor based development. St Helens road network is already heavily used and investment in public transport has been woefully inadequate. Development should be focused around integrated transport hubs and that developer contributions are forthcoming for public transport improvements, and for sustainable travel modes such as walking and cycling.

Given 26.7% of residents of St Helens do not have access to private car transport it is imperative that places are better connected through modes other than private car transport.

Site 8HA is close to two accident blackspots in Rainford at either end of Mill Lane and traffic from this site will inevitably pass through one or other of these junctions on the way to/from St Helens. The site 8HA promotes biodiversity and sustains wildlife. Building will destroy habitat and reduce biodiversity. Mitigation is not properly addressed in the Plan.

9

10

6

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

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

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

Response Date	3/13/2019 1:53:32 PM
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PO3355

①-LPA02 ②-LPA04 ③-LPA07 ④-LPA06
 ⑤-LPA08 ⑥-LPC12 ⑦-LPD07

Representor Details

Web Reference Number	WF0183
Type of Submission	Web submission
Full Name	Mrs Clare McDermott
Organisation	N/A
Address	8 Mallard Gardens St Helens WA9 5BL
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	7HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	x
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

The population has been declining and without knowing the impact of Brexit is it unclear why there is a requirement for additional housing on this land. 01

St Helens Council suggests availability for 84 units.

Declining business including industry has declined since the middle of the 1980s and the area proposed relies on employment outside of the area to be able to afford the houses. 02

This obviously has an impact on the traffic throughout the area and the current infrastructure is insufficient to cope with that and the additional pollution.

There have been houses built on the old Sutton site, further down the road nearer to Sutton on Elton Head Road plus the new Waterside development with additional housing suggested there. Elton Head Road is heavily used at present including a through route for the ambulance service which means the traffic noise is already high and the number of cars, vans, buses and wagons also contribute to the pollution. 03

The area of Rainhill only has one A road which services this area in addition to the by pass so it is heavily used and Elton Head Road is used as a cut through.

Add another 160 cars plus would add to congestion, pollution and noise levels.

This will also impact pedestrian safety to have increased traffic and again pollution levels.

I have breathing problems and over the past few years I have reviewed the pollution levels and surrounding areas and between 2013 and 2015 there were on average 51.9 deaths per 100,000 from

respiratory diseases in the under 75s compared to 44.3 for the North West and 33.1 for the rest of England with Thatto Heath rated as the second highest effected in the Borough.

Therefore this area of Elton Head Road would be affected by the increase not only of cars but the additional pollution linked to homes and gardens.

03

The area designated in 7HS is a natural green band of land which acts as a buffer between the industrial buildings built on the link way and the new housing estate further down Elton Head Road. There are foxes and rabbits, bats, squirrels and the occasional heron who inhabit the area and there are numerous wild birds in the area.

If this area were to disappear and removed from the green belt area and place into safe guarding and then subsequently development it would be one large housing estate from Rainhill through to St Helens forming a huge urban development and lack of green space.

04

If areas of natural land are removed from the green belt areas then this would cause significant harm to the purpose of having the green belt.

Additional housing would add to the problems of school places and availability of seeing the doctor in the local surgeries. It could also impact hospital and A&E facilities, doctors and dentists. If the new houses were occupied and they could not gain access to local facilities then they would have to travel and again this adds to the amount of cars on the road.

05

If you add approximately 160 cars (some families will have more than 2 cars) and the number of journeys per day then we would find it hard to exit our close which is hard at the moment between the hours of 7 and 9 and then 3 and 5 and 6 and 8 due to the rush hour and school times.

03

There is also flooding every year on the road and the three closes opposite the proposed site were built on 3 ponds and this is obvious in times of bad weather.

At moment at least the water is near the farm land and does not always spread across the road.

If there was significant building then the utilities and facilities would need to be thoroughly excavated and proper drainage and management implemented.

06

The area has confirmed flood zones and a high water table to lose the space available to help with the drainage could put our houses at risk of flooding.

We also have shortages every now and then and broadband can drop in and out and if you add further volumes then this could impact these services again if volumes increased.

07

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

The council should not consider removing this land from green belt or open spaces to place in safe guarding.

I have been advised that this could be reviewed every five years so although it states it is safeguarded until 2035 I am registering my representation for my future safety and wellbeing.

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

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

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

Response Date	3/12/2019 3:02:20 PM
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PO3356

Representor Details

Web Reference Number	WF0203
Type of Submission	Web submission
Full Name	Mrs Rose Hatton
Organisation	
Address	16 Heywood Gardens WA10 4JU
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

- No exceptional circumstances have been demonstrated to deviate from the Standard Method calculation
- The employment land requirements are based on aspirational growth rather than need
- The Plan then goes on to base housing needs on the flawed methodology used to calculate employment growth
- It's disappointing that despite many and numerous organisation disagreeing with the use of 2014 figures to calculate housing need, the Government has so far insisted on using them instead of more up to date figure from the ONS 2016
- Given the uncertainty of the figures, some allowance should be made to use a lower figure whilst that is being resolved and potentially allow a 10 year plan to be released instead of 15 years
- There is no evidence that all options have been explored to recycle some of the 3170 ha of the lowest priority contaminated land that exists in St Helens.
- Just a small percentage of that would be needed to avoid any Green Belt land being required
- Given no evidence that all options are explored, the Green Belt Review should not have been carried out
- The effort and expense of the GBR would have been better served remediating contaminated sites
- The LP mentions that much of the borough is Agricultural Land and as such this appears to have been discounted from decision making

01

02

03

- The contribution of AL should not be under-stated, providing jobs (farming and distribution) and food security to the greater North West region; particularly in this period of uncertainty during Brexit 03

- The growth projections and figures used are pre-Brexit and no account appears to have been made as to the impact this could have; even with a deal, the Governments own figures still point to negative growth 01

- The borough already has significant and long term network issues, with congestion and pinch points on the increase

- The IDP discusses these problems and the planned fixes in place for these issues but does not address future problems; only that development won't be approved until they are

- The Plan does not promote sustainability with many sites promoting car dependency and isolation from public transport 04

- This will increase air and noise pollution along with associated health issues, which surely cannot be in-line with NPPF

- The borough already struggles to provide GP appointments in a timely manner and additional GP's are already required for today's needs, especially in light of an aging population and current GP's reaching retirement age. 05

- The IDP does not actually put a plan in place for how this will be resolved

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

The plan has completely ignored the important role agricultural land has for jobs and food security. None of the best ALC should be used for development. The figures used are way out of date and over the top. No exceptional circumstances are shown for not using the standard method or for changing GB boundaries

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

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

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

Response Date	3/11/2019 9:14:20 PM
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PO3357

Representor Details

Web Reference Number	WF0221
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey WA5 3RH
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy LPA04.1, Strategic Employment Sites
Paragraph / diagram / table	Section 4.13
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Bold Forest Park Area Action Plan, Adopted July 2017

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

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

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

Justified

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

From consulting the National Planning Policy Framework (NPPF, last updated 19th February 2019, especially paragraphs 133 -147) I read that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also explicitly states that once established Green Belt boundaries should only be altered in 'exceptional circumstances' and that these "Very special circumstances" will not exist unless any potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." The Draft Local Plan (St Helens Borough Local Plan 2020-2035: Proposed Submission Draft, December 2018) includes a proposal to allow the extension of the Omega industrial site west into the eastern side of Bold Forest Park (in the report, designated as Area 1EA, comprising 31 hectares), which is currently part of the St Helens Green Belt. I consider that the proposed change is unsound because of a lack of justification for the required 'exceptional circumstances' needed to allow conversion of Green Belt land – in this case farmland - to industrial use. This change to a secure, well-established, Borough, County, and mature tree-lined Green Belt boundary is being proposed to meet projected future employment requirements for Warrington, adjacent to St Helens. Warrington currently has a net 14,000 commuters coming into the borough each day so is not generally short of employment opportunities for its population, and is presently using up the vast potential of the Omega South employment area land with both warehouses and housing, suggesting that their

priority is not to create significant additional employment within the Borough. In the future, this proposed change could make a small contribution to Warrington's employment numbers, but it is insignificant compared with all the many and various opportunities proposed within Warrington itself, with an available land area consisting of hundreds of hectares in total. In addition, Warrington is having to compete with other areas in the north west of England such as Haydock, Heywood, Middlewich and Knowsley for warehouse business. It is, therefore, unclear how an argument of 'exceptional circumstances' might be made for this proposed change from farmland to warehousing at this location. 01

The proposed area 1EA is within Bold Forest Park. Removal of this land from Green Belt goes against the stated aims of the Bold Forest Park Area Action Plan that was signed by St Helens Council in 2017 after significant work to look at all aspects of environmental value and protection and enhancement of the area. (In the AAP Technical Report, the land 1EA is shown as Medium/High sensitivity [Section 2.3.7] – the highest category given, and also as 'Conserve/Enhance' in Figure 9. The designated nature conservation site of Booth's Wood would be right on the edge of the proposed area 1EA, removing the protecting buffer such that the industrial site would run right up against the TPO'd trees and the boundary of the original mediaeval deer park.) 02

Since the numbers quoted in the Draft Local Plan apparently demonstrate that this area of farmland is not needed to meet St Helens employment requirements, it would appear that the anticipated benefit that could arise from this proposed industrial extension would be in the form of a relatively small amount of additional Council revenue (70% of which would go to St Helens, 30% to Warrington). Set against this is the damage done to the agricultural land of Bold Forest Park and the rest of the Park countryside by having the intended warehouses on its eastern side. In addition, even more traffic and air pollution will be generated in the west Warrington area from the increased diesel lorry traffic. Local Warrington residents will be affected by the increased pollution, noise and congestion. 03

In the documentation for this proposal to remove area 1EA from the Green Belt, there is a general statement, as made for other areas under consideration, that there are people living within 1km of the area who are in the bottom 20% of the economic scale. If this statement is considered to have any particular significance, it should perhaps be noted that the population on and around this southeast side of the Bold Forest Park countryside area is of very low density apart from the extensive Warrington-based Lingley Green and Whittle Hall areas of Great Sankey, which comprise mostly of new modern three- and four- and five- bedroom detached houses. If, the report is suggesting as a justification that there may be a potential employment opportunity for any nearby population in St Helens, it should be noted that, in practice, the M62 cuts these populations off such that they are at least 8km away by road and about 1.5 hours away by existing public transport from this area (using information from Google maps in March 2019). 04

In the event that such a development is allowed to proceed, the documentation does not contain any information e.g. under 'Requirements' that might help mitigate the environmental damage done to Bold Forest Park. This seems to have been considered for certain other sensitive areas, but was this considered here? Many of the trees and woods in the Bold Forest Park area probably date from the first half of the 18th century when the new Bold Hall was built, when they lined the original driveway – and many are now protected by TPOs. There is a variety of wildlife and under the St Helens AAP there is the intention to increase tree cover by 10% in this area. However, the generally open aspect of the farmland means that once the current strong treelined boundary is breached, the whole area across to the St Helens conurbation from the Warrington boundary would be visible to the development. The development at Omega South is currently well screened from the St Helens Green Belt area by mature trees along the County and Borough boundary. 05

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 06

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 07

pollution, noise and air pollution. The effect would be a reversal of the intent so recently shown by St Helens Council in the recent AAP of 2017. 07

With respect to pollution from diesel lorries and other additional traffic generated in the Great Sankey area: One of the current occupants of a warehouse on Omega South – Amazon – operates three times as many lorries to and from their warehouse as was expected by the developers of Omega for the area of the development. If this were repeated for any of the warehouses proposed for the Bold Forest Park extension, it would add even more than expected amounts of pollution, noise and congestion to the roads and surrounding area. 08

I have three young grandchildren growing up in the Whittle Hall – one of whom has spent time in hospital with asthma-related breathing difficulties on more than one occasion. For this additional reason, I oppose an extension of the Omega South development across the border into St Helens and would ask if a case of 'exceptional circumstances' has been made? 09

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

In line with the above comments, to make the report sound, it is proposed the Draft Local Report would have the references to the development of the area designated 1EA removed, such that this area remains part of the current Green Belt. (Minor changes may be required to various supporting documentation where this proposal has been mentioned.)

If, following the review, the argument for proceeding with removal of the area 1EA from Green Belt for the stated purpose is considered justified, in the light of the above and any other arguments presented, then a statement of intent in the documentation to minimise the environment impact on the Bold Forest Park area, and facilitate enhancements where possible, would seem appropriate.

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 4:27:16 PM
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PO3358

Representor Details

Web Reference Number	WF0222
Type of Submission	Web submission
Full Name	Mrs Gill Holmes
Organisation	
Address	13 Villiers Crescent Eccleston St. Helens WA10 5HP
Agent Details	

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

Yes (via e-mail)

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

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

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

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

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

Positively prepared, Justified, Effective

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

1: St Helens council have stated a principle of brownfield site first and greenfield only in extreme circumstances, however they have not demonstrated diligence in identifying suitable brownfield sites for housing or monies to support decontamination of these sites. Other councils have demonstrated a commitment to regeneration of town centres through housing development - a strategy that is desperately needed in St Helens. There has been little demonstration of imagination in solving this issue and the decision to build on greenfield sites is an easy option which leads to further dereliction and decay of the town centre. Eccleston's inclusion is the green belt which is to be safe guarded for development, this is grade 1 or 2 agricultural land, a very necessary resource at this time, therefore the plan is not justified ore sustainable. 01

2: Employment growth. The figures supplied are based on unreasonable assumptions and will lead to an oversupply of housing. the main source of employment will be warehousing which will not provide the high earning jobs suggested, also it is anticipated that warehousing industry will increasingly make use of robot technology which will reduce the predicted employment figures. These factors will affected the numbers and type of housing development and is not reflected in the plan making it unjustifiable and unsustainable. The employment figures quoted should be replaced by ONS (2018) which uses more current data. 02

3: Infrastructure: the Infrastructure Delivery Plan is weak to the point of non-existence. The areas to be developed already have the problems of oversubscribed schools and major transport problems. The 8HS is beside the A580 a major route between Manchester and Liverpool, already undergoing major work to improve traffic flow. Further disgorgement of thousands more cars onto this road will make this expensive upgrading pointless. Bleakhill Road is already a bottle-neck morning and night without further cars from a new development adding to the problem. There is also the issue of road safety there is the school on this road and access to this will become more difficult together with the danger of air pollution from idling cars - a very pertinent problem currently. It is proposed that Houghton's Lane development will exit directly onto the A580 in an area that is an know black spot - 3 people lost there lives at this point just before Christmas. For Windle and Eccleston 8HS acts as a lone greenspace and a buffer for the road pollution from the A580. It is the only accessible area of greenbelt criss-crossed by footpaths which are regularly used by residents. The Plan is not effective or justified. 03

4: Duty to cooperate: there is little evidence of discussion with other authorities or services e.g NHS. Neighbouring authorities have major development plans for both employment and housing and there is little evidence of discussion between authorities as to how realistic these plans are. It appears that it is a race to develop land and the first to build will win, such a policy will cause over prediction of employment and housing need which could be disastrous for the region. There appears to have been little negotiation with the NHS and the services that can be provided. The area already has a recruitment problem both for GPs and hospital staff, Brexit will make this worse and there has been little discussion as to how this development will affect services already stretched and whether it is possible for the NHS to respond to the extra demand. Therefore the plan is not sustainable. 04

The Plan does not comply with NPPF (2018) and it does not consider the more accurate and true housing and employment information in ONS (2018) figures therefore due to all the factors listed (and more) this could lead to an unsustainable oversupply of housing in the North West together with the loss of valuable agricultural land. 05

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

Suggestion:

The ONS (2018) needs to be adopted, more accurate and realistic housing need statistics should be developed/sourced;

funding to decontaminate brownfield sites should be sourced;

redevelopment of town centre sites to enhance regeneration of this area is a priority;

remove all Green Belt areas from the plan; protect agricultural land.

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

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

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

Response Date	3/11/2019 2:19:27 PM
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PO3359

Representor Details

Web Reference Number	WF0232
Type of Submission	Web submission
Full Name	Mr K Seward
Organisation	
Address	
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA07
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:

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.

Development of Eccleston Park Golf Club will increase traffic jams at the junction by the historic screw bridge in Rainhill and will impede the safe and efficient flow of traffic on Rainhill Road – a windy B-road which was never designed for the significant number of extra journeys that will be generated by building on the site.

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

Eccleston Park Golf Club should be removed from safeguarding and returned to green belt status. This modification will make the Local Plan sound by maintaining the safe and efficient flow of traffic on the surrounding highway network.

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

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

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

Response Date	3/10/2019 8:30:36 PM
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PO3360

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. 01

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. 02

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. 03

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

Examples of brownfield sites that could be developed for housing and aren't put forward in the Local Plan are:

- 1 Land off Parr Street in St Helens Town Centre, to the rear of St Helens Central Station. This site was formerly the Council owned abattoir which was demolished many years ago and has been derelict ever since. In close proximity to the station and the Town Centre this site would appear to be ripe for development and would clear up an unsightly mess. OK
- 2 Land off Bellerophon Way, Haydock, to the rear of the Tesco Haydock. This land is currently being marketed as housing land but again it isn't allocated in the Local Plan.

These are just two examples and there are many other areas of brownfield sites throughout the Borough that could be developed but the Council would appear to favour release of Greenbelt rather than insisting that developers remediate brownfield sites to clean up the many eyesore areas. The Council states that it has a 'brownfield first' policy but this seems to be mere lip service and is not put into practice or made manifestly clear from the Local Plan.

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

This site, Florida Farm South, is some 23 hectares or approximately 57 acres. On the opposite side of the A580 East Lancashire Road the Council granted planning permission for warehouse development at Florida Farm North, some 36.37 hectares of Greenbelt Land..

Its proposals are that a further 28 hectares to the north of that site should also be allocated for warehousing, giving a total of almost 65 hectares or 160 acres to be covered in concrete, tar macadam and huge sheds.

Those sites, together with Florida Farm South will amount to approximately 217 acres of Greenbelt for development, a huge proportion of the Greenbelt in this vicinity.

..
Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. Building housing developments on the fringes of the Borough encourages the use of motor cars because of the lack of facilities.

The access to the site is inadequate, a left in/left out from the East Lancashire Road isn't safe because of the proximity to the newly re-configured junction of Haydock Lane and the A580 which lies to the East of the proposed junction.

This junction was constructed with money received from the Liverpool City Region rather than being provided by the developer in what is said to be a £150 million development. This is now a 4-way junction with Toucan crossing facilities meaning that traffic in the morning and evening peak periods is queuing for longer and the drivers are then moving away from the signals and rapidly accelerating. These vehicles will be confronted by vehicles leaving the proposed housing development. 05

The proposal for a roundabout junction at Liverpool Road & Vicarage Road would put additional traffic on an already overstretched highways system. There would be problems of rat-running through the proposed development.

A development of this size at this location is likely to generate over 2000 additional vehicle movements per day. Anyone leaving the development to travel in the direction of Manchester can only do so by leaving at this junction and then accessing the A580 via the A58/A580 junction or by travelling through Haydock via the A599 and accessing the A580 via the Haydock Lane junction referred to above.

The Council has proposals to upgrade the A58/A580 junction but it isn't known whether the works have anticipated the additional traffic that will be generated by the proposal. Other than the construction of the roundabout referred to at the junction of Liverpool Road and Vicarage Road there don't appear to be any additional highways infrastructure proposals. This roundabout is merely to provide access to the development, it doesn't mitigate the problems that will be created by the development.

Air pollution is already a major problem in St Helens with the statistics for deaths from pulmonary disease being higher than average. The recent BBC website article about polluted areas of the UK, list Merseyside and Manchester as two of the worst polluted areas. The A580 links these two areas and already carries a heavy burden of traffic. 05

The developers of the site at Florida Farm North stated in their planning application that the development would generate an estimated 6,700 additional vehicle movements per day through the A580/Haydock Lane junction. The additional air pollution caused by these vehicles was described as negligible in the report to the Planning Committee. There must come a time, however, when all the negligible amounts add up to substantial. 06

There are existing flooding problems at this site any remedies to prevent this would place even greater amounts of water into Clipsley Brook which floods at the junction of West End Road and Stanley Bank Way (A58). The problem isn't made any easier because the Council for the Florida Farm North development has relaxed its requirements for flood prevention from a one in 100 year storm plus 40% for climate change to one in a 100 year plus 10% for climate change, without giving any adequate reasons why. The Employment Land proposals at LPA04 Sites 5EA and 6EA will do nothing to ease the burden on the amount of water in Clipsley Brook. 05

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

The Council doesn't appear to have provided a statement of common ground with neighbouring authorities. 07

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

The site at LPA05 - 2HA should be deleted from the list of land to be deleted from the Greenbelt.

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

Yes, I wish to participate at the oral examination

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

I wish to speak on behalf of residents in the vicinity of this proposed development who have already had their lives blighted by the granting of planning permission for the warehouse development at Florida Farm North.

Response Date	3/10/2019 6:08:16 PM
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PO3361

Representor Details

Web Reference Number	WF0250
Type of Submission	Web submission
Full Name	Mr Richard Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

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

No

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

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

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

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contanimated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.

- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05

- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09

- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10

- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

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

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

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

Response Date	3/10/2019 5:51:50 PM
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PO3362

Representor Details

Web Reference Number	WF0112
Type of Submission	Web submission
Full Name	Mr Mark Daly
Organisation	Mr
Address	[REDACTED]
Agent Details	[REDACTED]

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

01

02

01

01

03

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

03

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

01

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

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

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

04

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

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

06

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

04

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

06

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

04

The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents must rely on cars. 05

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever. The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to appreciate the current value that land has, in terms of crop production, employment and biodiversity. 07

I have been shocked by the cynical way in which the council has marked huge areas of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development. When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years. Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected. 03

By failing to use the most up to date information the plan is seriously flawed from the beginning. Ignoring the use of brownfields site, to benefit developers. Compounds this error. The brownfield sites have the capacity to for fill the needs of the plan and could do so well within the 15-year term of the plan. 01

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable. 08

Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely regarded as unsound.

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

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

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

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

Response Date	3/13/2019 8:53:31 AM
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PO3363



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.

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

Signature and Date fields. Signature is redacted, Date is 13/03/2019.

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

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) Yes [X] (Via Email) No []

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

RETURN DETAILS

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

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

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

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

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

FURTHER INFORMATION

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

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

NEXT STEPS

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

DATA PROTECTION

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

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

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

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

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

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

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

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

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

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.

- 4.38. Murphy Group acknowledge that the ground conditions are not known at this stage as no ground investigation work has commenced. This would be commissioned prior to the planning application stage. However, the site is in arable use and ground conditions are expected to be similar to the land to the south that has been allocated for new residential development.
- 4.39. Policy LPA06.2 highlights that planning permission for development of the safeguarded sites will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing and employment of safeguarded sites in the plan period will be refused. We request further clarity on when a full review of the will be triggered. 29
- 4.40. We object to this on the basis that if housing allocations are not coming forward in the timescales referred to in the local plan (at Table.45 'Sites allocated for new housing development' (either before 31.05.35 and after 31.05.35)), or development is stalled, safeguarded housing sites should be brought forward for development within the plan period. Waiting for the plan to be reviewed could be a lengthy delay during which the housing crisis is exacerbated further. It is therefore not appropriate to include a policy in the local plan which authorises the point-blank refusal of planning application on safeguarded housing land within the plan period. Such applications should be assessed at that time (which would inevitably be later in the plan period), on a case by case basis, and considering the wider context and planning balance (ie housing delivery/under delivery, five year housing land supply or lack of).
- 4.41. We support that safeguarded land should be developed before other Green Belt and greenfield sites. 30

Policy LPA07: Transport and Travel

- 4.42. We support that Policy LPA07.1.b. seeks to ensure new development is sufficiently accessible by road transport, walking, cycling and public transport. 31
- 4.43. Garswood offers a range of local services, facilities and public transport connections and is well positioned to accommodate growth. The St Helens Core Strategy confirms that improvements have been made to Garswood train station, offering journeys to both Wigan and Liverpool, whilst the town has good road linkages to areas across Merseyside.
- 4.44. Within Garswood and in context of the Leyland Green Farm site, there are a number of key amenities located within an appropriate walking distance of the site which would serve some of the day-to-day needs of future residents, including primary schools, healthcare facilities and local shops. The site is served by numerous bus routes however, which provide high frequency services to Ashton-in-Makerfield, therefore providing the potential for sustainable travel when undertaking general day-to-day activities.
- 4.45. The identification of a proposed housing allocation of land south of Billinge Road, East of Garswood Road and West of Smock Lane (site ref. 1HA), with an indicative capacity of 216 dwellings, demonstrates the settlement is a suitable and sustainable location, in transport terms, to accommodate development.
- 4.46. In the St Helens Emerging Local Plan Evidence Base Transport Impact Assessment, housing allocations are ranked in terms of their accessibility to local facilities. Whilst it does not refer directly to the Leyland Green Site, it assesses the land directly adjacent to the south of our site (ie land south of Billinge Road, east of Garswood Road and west of Smock Lane, Garswood (site ref. HA2)). It is assessed as 'excellent' in terms of accessibility to the railway station by cycle, major food stores, primary schools and healthcare facilities. The Leyland Green Farm site (which adjoins the housing allocation to the north) shares similar accessibility ratings to the housing allocation and is therefore well connected to local services and facilities.
- 4.47. Policy LPA07(9) states that further details of the policy will be set out in a future review of the 32

Council's Ensuring and Choice of Travel Supplementary Planning Document. However, in the absence of an updated SPD, it is unclear how the Council will approach matters relating to vehicle and cycle parking standard, electric vehicle charging point provision and to the requirements concerning transport assessments, transport statements and travel. Further clarification should be for developments which come forward in the interim.

32

- 4.48. The policy needs to confirm that the most up to date SPD and / or travel studies will be used during the plan period, to ensure that the most relevant and up to date information is used.

Policy LPA08: Infrastructure Delivery and Funding

- 4.49. We welcome the additional clarity and flexibility introduced within the policy, but we maintain that the council must ensure that they do not impose requirements that could render schemes unviable. We support that the council will consider site specific economic viability evidence to determine the ability of a scheme to provide the required level of contributions.
- 4.50. It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis. Additionally, it is not clear how any such infrastructure requirements might be assisted by the introduction of CIL.
- 4.51. Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

33

Policy LPC01: Housing Mix

- 4.52. We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that at least 20% of the new dwellings must be designed to be "accessible and adaptable" as set out in Part M4(2) and 5% of new dwellings must be designed to the "wheelchair user" dwellings standard set out in Part M4(3). The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy in the Local Plan. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

34

- 4.53. We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date evidence and housing need.

- 4.54. Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

35

Policy LPC02: Affordable Housing

- 4.55. We welcome efforts to improve affordability. However, the level of affordable housing a site can deliver should be supported by robust and up to date evidence.

36

- 4.56. We support the amendment of LPC02(3) to include provision of Starter Homes.

37

Policy LPC10: Trees and Woodland

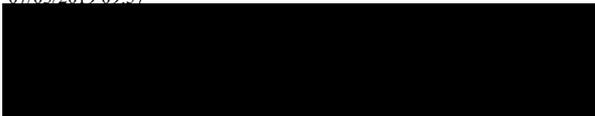
- 4.57. We support the amendment to the policy which has resulted in the removal of the reference to the ratio approach to tree replacement where development proposal will result in the loss of existing trees.

38

PO3364



St Helens Local Plan Submission Draft Network Rail comments
TownPlanning LNW
to:
planningpolicy@sthelens.gov.uk
07/03/2019 09:57



1 Attachment



St Helens Local Plan Submission Draft Network Rail ltr 07032019.pdf

FAO Planning Policy Team

Please find attached Network Rail's comments on the Local Plan Submission Draft.

From

Diane Clarke
Town Planning Technician LNW
Network Rail



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To:
FAO
Planning Policy Team
St Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP

From: Town Planning Team LNW
Network Rail
1st Floor
Square One
4 Travis Street
Manchester
M1 2NY

Date: 7th March 2019

① - LPA10
② - LPA07
③ - LPA08

St Helens Local Plan – Draft Submission

Thank you for consulting Network Rail on the St Helens Plan. We have the following comments to make.

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).

(1)

"Policy LPA10: Parkside East

e) achieve direct rail access to and from the Liverpool / Manchester ('Chat Moss') and the West Coast Main Lines (unless agreed otherwise by the Council);"

Feasibility work would be required to determine the potential of such a development, and to understand the availability of space to run freight in this already heavily congested area of the network.

(2)

The council states in their Transport and Travel Policy (LPA07) section (f) that they are looking to 'Protect former railway lines and corridors from development that could hinder their future re-use for sustainable modes of transport'.

Network Rail has submitted a pre-application notification with the Council for residential or residential led development at Parr Street in St Helens. It is located directly to the east of St Helens Central Railway Station (plans attached to covering email – sale area in blue). Network Rail has met with the council and there have been several meetings on the proposals.

Network Rail undertook a full industry consultation on the disposal of the site; it was determined that there were no firm plans from stakeholders to use any of the development site for future railway/transport proposals.

Following consultation, the Council felt that the development could be used for car parking however, Network Rail highlighted that parking could be located on the western side of the track closer to the station entrance and existing car park.

The Council also felt that some of the site could be used for a new rail link through the site including a new platform. However, there was no supporting evidence, no funding, no scheme or a firm-ed-up timeline to deliver this. The council's aspiration was based on planning policy dating back to the early 1990's. In light of this, the Office of Road and Rail (ORR) agreed with Network Rail's approach and provided formal consent to dispose. Therefore, we would request that you reflect this the local plan.

(3)

The Local Plan identifies a total of 7706 dwellings supply over the plan period.

Consideration should be given in Transport Assessments (TA) to the potential for increased footfall at Railway Stations

PO3365

ELO112



HBF response to St Helens Local Plan Submission

Joanne Harding

to:

planningpolicy@sthelens.gov.uk

12/03/2019 17:26

Hide Details



① - STRATEGICAL AIMS & OBJECTIVES

② - LPA05

③ - LPA05 - PARA. 3

④ - LPA05 - PARA 4

2 Attachments



19-03-13 St Helens Local Plan Submission.docx HBF lpsd-representation-form-signed.pdf

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI

Local Plans Manager - North

HOME BUILDERS FEDERATION



⑤ - LPA07 - PART 3C

⑥ - LPA07 - PART 9

⑦ - LPC01 - PART 1

⑧ - LPC01 - PART 2

⑨ - LPC01 - PART 3

⑩ - LPC01 - PART 4

⑪ - LPC02

⑫ - LPC10

⑬ - LPC13

⑭ - LPD07

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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House 27 Broadwall London	Address:
Postcode: SE1 9PL	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: 13/03/2019
-----------------------	------------------

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

Would you like to be kept updated of future stages of the St 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.	

PART B – YOUR REPRESENTATION

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

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

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

Please tick as appropriate

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

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

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

Please see separately attached letter.

Please continue on a separate sheet if necessary

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

Please see separately attached letter.

Please continue on a separate sheet if necessary

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

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

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

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

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

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

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

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



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

SENT BY EMAIL
planningpolicy@sthelens.gov.uk
13/12/2018

Dear Sir / Madam,

ST HELENS LOCAL PLAN SUBMISSION DRAFT

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members. ✓

Vision and Objectives

The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:

The HBF support the part of the vision which states that 'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as set out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply.] (1)

The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on matters in relation to housing delivery and would be keen to work proactively with the Council on this issue.

The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

Policy LPA07: Transport and Travel

The HBF does not consider that Policy LPA07 is sound, as it is not justified or effective for the following reasons:

Part 3c of this policy states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst the HBF do not oppose the provision of electric charging points, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others.

The HBF also have concerns that part 9 states that further details of the operation of this policy including standards for vehicle charging provision will be set out in a Supplementary Planning Document (SPD). It is not considered appropriate to set out in SPD elements of policy, namely the number of charging points that would be 'appropriate provision', that will have a direct role in the determination of a planning application. The HBF consider that these elements should be set out in policy and open for debate at the Examination in Public, without these details it is impossible to consider the impact of these policies on viability or whether they are justified and effective. The HBF would encourage the Council to work with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

The HBF considers that the policy should be modified as follows in order to make the document sound:

- Further consideration is given to what the Council consider to be 'appropriate provision' supported by evidence.
- That additional standards for electric charging point provision are not included within an SPD that will not be tested at examination.

Policy LPC01: Housing Mix

The HBF does not consider that Policy LPC01 is sound, justified, effective or consistent with national policy for the following reasons:

PO3366

ELO258



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

SITE GBP-092-A

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



4 Attachments

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

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

- ⑪ LPA05 - PARA 3 ⑫ LPC02
- ⑬ APPENDIX 4 ⑭ LPA05 - PARA 4 ⑮ LPC04
- ⑯ LPA07 - PARA 3, 4 ⑰ LPA07, PARA 9
- ⑱ LPC10 - PARA 6 ⑲ LPA07, PARA 9
- ⑳ LPC10 - PARA 6 ㉑ LPA06
- ㉒ LPC13 - PARA 4
- ㉓ LPA06 ㉔ LPD07
- ㉕ LPC01 ㉖ LPD02
- ㉗ LPD03

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



1 Attachment



Appendix 1- Delivery Statement.pdf

Email 2

Graham Lamb
Associate Planner

Pegasus Group

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



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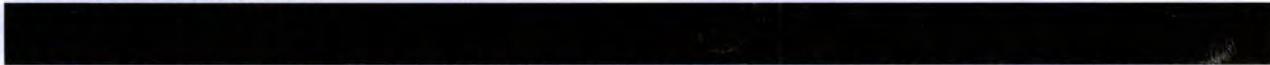
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From: Graham Lamb

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/iHEt88g.jpg>

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 <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

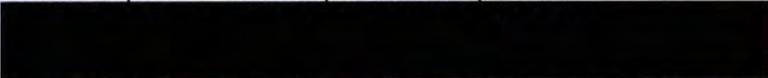
Email 3

Graham Lamb
Associate Planner

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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



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



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

Dear Sir/Madam,

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

Submissions will come in 2 emails due to file size.

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

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group
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KW/GL/P17-0098/L004

13 March 2019

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

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

Dear Sir/Madam,

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

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

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

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

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

The need to allocate additional sites

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

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

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Registered Office: Pegasus house, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

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

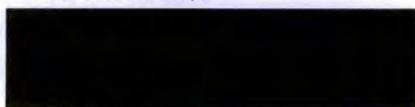
1

2

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

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

Yours sincerely,



Graham Lamb
Associate Planner



Encs.





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

**REPRESENTATION BY
REDROW HOMES NORTH WEST**

Date: 13th March 2019

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

Pegasus Group

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9. OTHER RELEVANT POLICIES (CHAPTERS 4, 5, 7 & 8)

9.1 This section addresses the remaining policies in the Plan that are considered relevant to Redrow.

Policy LPA07 - Transport and Travel

9.2 Redrow are generally supportive of this policy and welcome the fact that our previous comments to the Preferred Options have been taken account of (regarding consistency of wording with NPPF paragraph 32/ now 109); however, we still have concerns with some elements of the policy as drafted.

9.3 Firstly, part 3(c) states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst Redrow do not oppose the provision of electric charging points, we would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements as they arise in different locations, rather than imposing a blanket requirement on all developments, as this could require a massive over provision of capacity (additional substations etc) which is never properly utilised.

9.4 Part 9 goes on to note that details of the operation of this policy including standards for vehicle charging provision will be set out in a future review of the Council's Ensuring a Choice of Travel Supplementary Planning Document (SPD). In our view, any such standards should be included in the policy rather than an SPD, so that they can be properly interrogated and justified in Local Plan Examination, as they will have a direct role in the determination of a planning applications and may also impact viability, where the energy requirements necessitate the provision of additional energy infrastructure within a development.

9.5 The Viability Assessment bears these concerns out (paragraphs 2.49 - 2.50), as it confirms that it has included a cost for £220 per dwelling for charging points, yet it goes on to note that:

"no allowance is made for any infrastructure costs that may in the future be needed if the chargers are used on a large scale".

9.6 We would also urge the Council to consult with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

Policy LPC10 - Trees and Woodland

9.7 In our view the requirement for trees to be replaced at a ratio of at least 2 to 1 is unjustified, as there is nothing in the evidence base supporting such elevated levels of planting, whilst such a requirement could prove particularly onerous on strategic sites where large scale tree clearance is required to facilitate development, both financially and in purely practical terms (if it is not possible to accommodate double the number of trees on the site).

PO3367

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

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

- ⑦ - LPA02 - PARA 3
- ⑧ - LPA02 - PARA 4
- ⑨ - LPA03
- ⑩ - LPA04

Dear Sir/Madam,

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

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

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

- ⑪ - LPA05 - PARA 3
- ⑫ - LPA05 - PARA 4
- ⑬ - APPENDIX 4
- ⑭ - TABLE 4.6
- ⑮ - LPA05.1
- ⑯ - LPA06
- ⑰ - LPC01

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.

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

Many thanks and kind regards,

Rebecca Dennis
Principal Planner

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

- ⑲ - LPC13 - PARA 4
- ⑳ - LPD07
- ㉑ - LPD02
- ㉒ - LPD03

- ⑱ - LPC02
- ⑲ - LPC04
- ㉑ - LPA07 - PARA 3d
- ㉒ - LPA07 - PARA 9
- ㉓ - LPC10

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

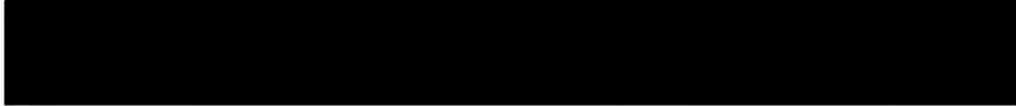
Email 2 of 4

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:06



3 Attachments



Appendix 2 Part 2-Delivery Statement-Redrow.pdf Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-
Email 3 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07



7 Attachments



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



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



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



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



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



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

Email 3 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-
Email 4 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07



1 Attachment



Appendix 10-Spatial Distribution of Sites-Redrow.pdf

Email 4 of 4 of Redrow representations.

Rebecca Dennis
Principal Planner

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St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

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

PART A – YOUR DETAILS

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

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



Signature:	Date: <input type="text" value="13/05/19"/>
------------	---

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

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

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	LPA07	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 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 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.

REQUEST FURTHER FLEXIBILITY IN WORDING IN RELATION TO CHARGING POINT FOR ELECTRIC VEHICLES, TO TAKE INTO ACCOUNT VIABILITY CONSIDERATIONS.

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.



**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

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9. OTHER RELEVANT POLICIES (CHAPTERS 4, 5, 7 & 8)

9.1 This section addresses the remaining policies in the Plan that are considered relevant to Redrow.

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9.2 Redrow are generally supportive of this policy and welcome the fact that our previous comments to the Preferred Options have been taken account of (regarding consistency of wording with NPPF paragraph 32/ now 109); however, we still have concerns with some elements of the policy as drafted.

9.3 Firstly, part 3(c) states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst Redrow do not oppose the provision of electric charging points, we would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements as they arise in different locations, rather than imposing a blanket requirement on all developments, as this could require a massive over provision of capacity (additional substations etc) which is never properly utilised.

9.4 Part 9 goes on to note that details of the operation of this policy including standards for vehicle charging provision will be set out in a future review of the Council's Ensuring a Choice of Travel Supplementary Planning Document (SPD). In our view, any such standards should be included in the policy rather than an SPD, so that they can be properly interrogated and justified in Local Plan Examination, as they will have a direct role in the determination of a planning applications and may also impact viability, where the energy requirements necessitate the provision of additional energy infrastructure within a development.

9.5 The Viability Assessment bears these concerns out (paragraphs 2.49 - 2.50), as it confirms that it has included a cost for £220 per dwelling for charging points, yet it goes on to note that:

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9.6 We would also urge the Council to consult with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

Policy LPC10 - Trees and Woodland

9.7 In our view the requirement for trees to be replaced at a ratio of at least 2 to 1 is unjustified, as there is nothing in the evidence base supporting such elevated levels of planting, whilst such a requirement could prove particularly onerous on strategic sites where large scale tree clearance is required to facilitate development, both financially and in purely practical terms (if it is not possible to accommodate double the number of trees on the site).

PO3368

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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

⑧ LPA02- PARA 4

⑨ LPA03



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑩ LPA04

Dear Sir/Madam,

⑪ LPA05 - PARA 3

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

⑫ LPA05 - PARA 4

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

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

⑬ APPENDIX 4

⑭ LPA05 - TABLE 4.6

⑮ LPA05.1

⑯ LPA06

⑰ LPC01

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

⑱ LPC02

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

⑲ LPC04

⑳ LPC03 - PARA 4

Many thanks and kind regards,

㉑ LPA07-PARA 3c) ㉒ LPD07

㉓ LPA07-PARA 9 ㉔ LPD02

Rebecca Dennis

Principal Planner

Pegasus Group

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

㉕ LPC10

㉖ LPD03



Representations to Local Plan Submission Draft Consultation-Wallace-Email 2 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:13



4 Attachments



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



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

Email 2 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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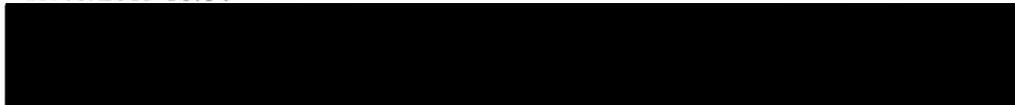
Representations to Local Plan Submission Draft Consultation-Wallace-Email 3 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:14



1 Attachment



Appendix 2 Part 5-LVIA-Wallace.pdf

Email 3 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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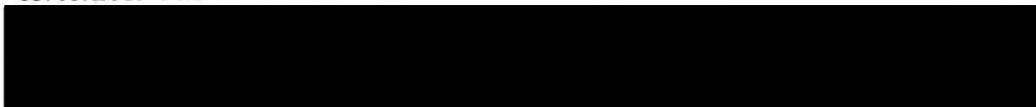
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<https://i.imgur.com/05aES4f.jpg>



Representations to Local Plan Submission Draft Consultation-Wallace-Email 4 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:14



2 Attachments



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

Email 4 of 8 of Wallace representations.

Rebecca Dennis
Principal Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW



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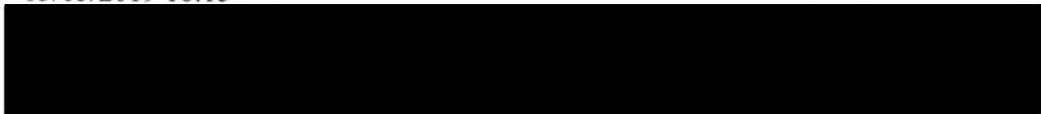
Representations to Local Plan Submission Draft Consultation-Wallace-Email 5 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:15



1 Attachment



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

Email 5 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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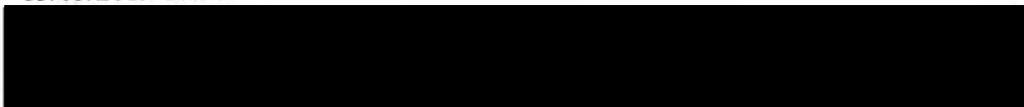
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<https://i.imgur.com/iHET88g.jpg>

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



Representations to Local Plan Submission Draft Consultation-Wallace-Email 6 of 8
Rebecca Dennis
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planningpolicy@sthelens.gov.uk
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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
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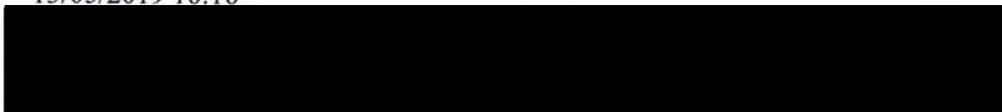
Representations to Local Plan Submission Draft Consultation-Wallace-Email 7 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

13/05/2019 16:16



7 Attachments



Appendix 4-Detailed Site Pro Formas-Wallace.pdf



Appendix 5-Council's Stage 3 Green Belt Assessment-Wallace.pdf



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



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



Appendix 8c-Summary Supply Trajectory-Wallace.pdf



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



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

Email 7 of 8 of Wallace representations.

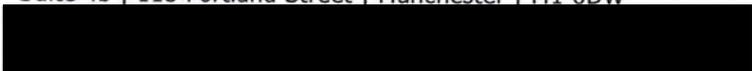
Rebecca Dennis

Principal Planner

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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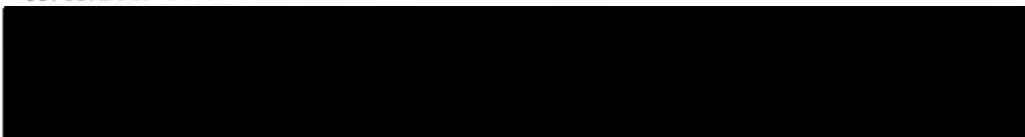
<https://i.imgur.com/05aES4f.jpg>

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

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



Representations to Local Plan Submission Draft Consultation-Wallace-Email 8 of 8
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:16



1 Attachment



Appendix 9-Spatial Distribution of Sites-Wallace.pdf

Email 8 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW



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

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



St. Helens
Council

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

Ref: LPSD

(For official use only)

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

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

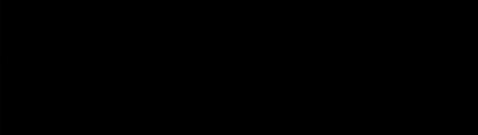
This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

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

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



Signature: 	Date: <input type="text" value="13/05/2019"/>
--	---

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

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

Yes (Via Email) No

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

RETURN DETAILS

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

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

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

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

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

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	LPA07	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 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 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.

REQUEST FURTHER FLEXIBILITY IN WORDING IN RELATION TO CHARGING POINT FOR ELECTRIC VEHICLES, TO TAKE INTO ACCOUNT VIABILITY CONSIDERATIONS.

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

PLEASE 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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9. OTHER RELEVANT POLICIES (CHAPTERS 4, 5, 7 & 8)

9.1 This section addresses the remaining policies in the Plan that are considered relevant to Wallace’s proposals.

Policy LPA07 - Transport and Travel

9.2 Wallace are generally supportive of this policy, however we still have concerns with some elements of the wording.

9.3 Firstly, part 3(c) states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst Wallace do not oppose the provision of electric charging points, we would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements as they arise in different locations, rather than imposing a blanket requirement on all developments, as this could result in an over provision of capacity (additional substations etc) which is never properly utilised.

20

9.4 Part 9 goes on to note that details of the operation of this policy including standards for vehicle charging provision will be set out in a future review of the Council’s Ensuring a Choice of Travel Supplementary Planning Document (SPD). In our view, any such standards should be included in the policy rather than an SPD, so that they can be properly interrogated and justified in Local Plan Examination, as they will have a direct role in the determination of a planning applications and may also impact viability, where the energy requirements necessitate the provision of additional energy infrastructure within a development.

21

9.5 The Viability Assessment acknowledges these concerns (at paragraphs 2.49 - 2.50), as it confirms that it has included a cost for £220 per dwelling for charging points, yet it goes on to note that:

“no allowance is made for any infrastructure costs that may in the future be needed if the chargers are used on a large scale”.

9.6 We would also urge the Council to consult with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

21

Policy LPC10 - Trees and Woodland

9.7 In our view the requirement for trees to be replaced at a ratio of at least 2 to 1 is unjustified, as there is nothing in the evidence base supporting such elevated levels of planting, whilst such a requirement could prove particularly onerous on strategic sites where large scale tree clearance is required to facilitate development, both financially and in purely practical terms (if it is not possible to accommodate double the number of trees on the site).

22

PO3369

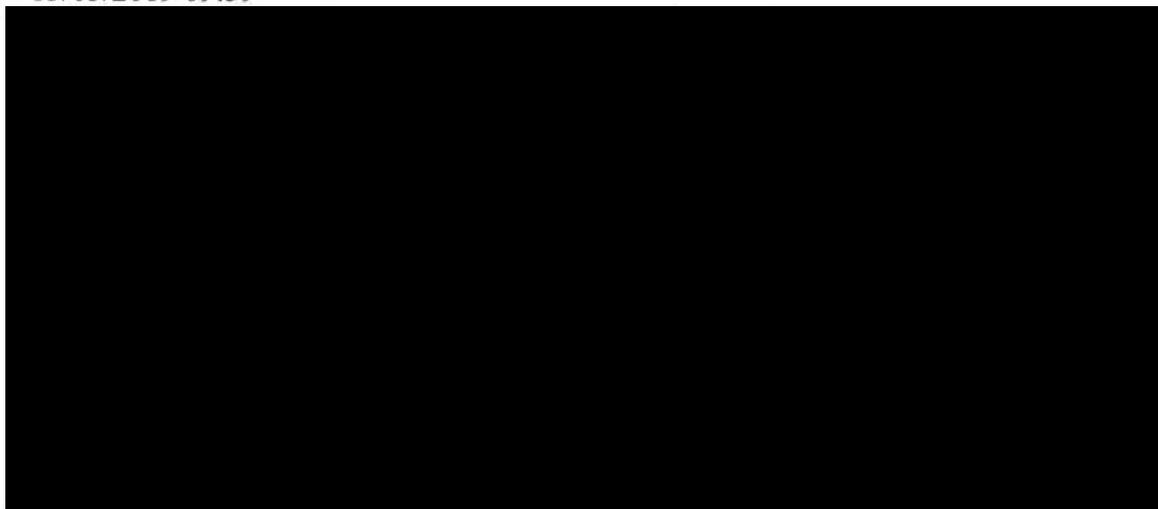
①-LPA02 ②-Para 17.2 DTC

③-LPA07 ④-LPA05



RAG Submission

[Redacted]
to:
planningpolicy
13/03/2019 09:59



1 Attachment



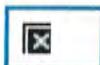
RAG Submission Final.docx

Dear Sirs,

Please find attached the representation from Rainford Action Group re the St Helens Plan 2020-2035 proposed Submission Draft

Kind Regards,

Ian McFegan



Virus-free. www.avast.com

Rainford Action Group (RAG) Representation; St. Helens Local Plan 2020-2035 Proposed Submission Draft

March 2018

1. Purpose
2. Introduction
3. Overall Plan
4. Comments on site 8HA (Land South of Higher Lane and East of Rookery Lane, Rainford)
5. Appendix 1

Key	
Abbreviation	Full Title
SHLP	St. Helens Local Plan 2020 -2035 Proposed Submission Draft
SHBC	St Helens Borough Council ("The Council")
RAG	Rainford Action Group



1. Purpose

- 1.1 This submission is made on behalf of Rainford Action Group (RAG) in consultation with the concerns raised by the local residents and complements the SHGBA submission by Kirkwells.

2. Introduction

- 2.1 RAG was formed in Dec 2016, initially to help Rainford residents to understand what was being proposed by St. Helens Council in the SHLPP, and to help them through the somewhat complicated submission process.
- 2.2 Many residents were deeply concerned by the scale of development in Rainford proposed by that document. A committee was formed to represent the views of the community and encourage participation in the process.
- 2.3 Public meetings were held with over 400 attendees, and a Facebook Group was set up which currently has 1,500 members, as well as a Twitter account with over 1,000 followers.
- 2.4 RAG welcomes the reduction in the number of sites and housing numbers proposed for Rainford in the St.Helens Local Plan 2020-2035 Proposed Submission Draft.
- 2.5 RAG is not against development *per se*, and accepts the need for new housing in the right amount and location and where there is a proven need.
- 2.6 We would also like to see the early adoption of a local Plan. However, we do not believe that this Proposed Submission Draft passes the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF) and there are number of issues we feel need to be addressed which are set out below.

3. Overall Plan

In summary our issues with the overall plan are;

-
- 3.1 There are no exceptional circumstances to justify not using the standard method to calculate housing need
 - 3.2 The economic analysis is flawed and based on over-optimistic assumptions
 - 3.3 The level of land needed for housing and employment is therefore not as high as set out in the Plan 01
 - 3.4 There are therefore no exceptional circumstances to change Green belt boundaries
 - 3.5 Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land and remedial work to bring back into use land currently classified as contaminated

3.6 The Council have failed to co-operate with other councils and have not published any statement(s) of common ground. 02

3.7 Traffic & congestion are already a serious issue for Rainford residents, with the village situated at the 'wrong' side of the A580 East Lancs Road for access to St Helens. Windle Island has been a severe pinch point for many years and the current works to improve the junction will only give 13% headroom over current levels. This will be swallowed up by additional freight traffic from warehouse and housing developments in the Plan and already approved at Florida Farm, plus increased Superport traffic. This will serve to limit economic growth. 03

[Note: Points 3.1 to 3.6 are covered in detail in the Kirkwell's submission on behalf of St Helens Green Belt Association, and by Dr Athey's submission.]

4. Comments on Site 8HA

(Land South of Higher Lane and East of Rookery Lane, Rainford)

-
- 4.1 Only 4 sites score 4 negatives* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. SHBC's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1. It is therefore logical that this should be the first site Green Belt site released from development if the housing need is reduced. We are arguing (3.1 above) that the Council should use the Standard method of 468 rather than the uplifted 486, which over 19 years equates to 342 fewer houses. This comfortably exceeds the 259 houses planned for site 8HA 04

PO3370

PF1299



St. Helens Council

①-LPA04 ③-LPA02 ⑤-LPC05
②-LPC12 ④-LPA07 ⑥-LPA03

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

Ref: LPSD

(For official use only)

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

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

13 MAY 2019
1380

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: David	First name:
Last Name: Almond	Last Name:
Organisation/company:	Organisation/company:
Address: 33 Millbrook Lane Eccleston, St. Helens, Merseyside	Address:
Postcode: WA10 4QX	Postcode:
[Redacted]	el No:
[Redacted]	obile No:
[Redacted]	mail:

Signature: [Redacted] Date: 11th May 2019

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

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

Yes (Via Email) No

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

RETURN DETAILS

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

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

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

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

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

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

Please tick as appropriate

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

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

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

Because Greenbelt meant protected. The council is lifting Greenbelt when it suits them. St Helens hasn't provided lots of jobs that need housing. The site would be an area that floods. There is lots of brown field sites that need cleaning up and using first. Someone will have to clean the land up eventually. There is already too much traffic on the roads without additional pressure. The land is needed for food growing near to residential areas especially if food transport becomes more expensive. More of the natural environment is being lost.

Please continue on a separate sheet if necessary

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

Build on brownfield first. Encourage good companies to the area such as aerospace jobs, light engineering. wind turbine factories. Then if they come and need employees, the council would be able to justify the need for housing in the area.

Please continue on a separate sheet if necessary

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.

PO3371

Representor Details

Web Reference Number	WF0112
Type of Submission	Web submission
Full Name	Mr Mark Daly
Organisation	Mr
Address	[REDACTED]
Agent Details	

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

No

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

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

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

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

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

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

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

01

02

01

01

03

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

03

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

01

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

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

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

04

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

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

06

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

04

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

06

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

04

The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents must rely on cars. 06

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever. The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to appreciate the current value that land has, in terms of crop production, employment and biodiversity. 07

I have been shocked by the cynical way in which the council has marked huge areas of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development. When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years. Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected. 03

By failing to use the most up to date information the plan is seriously flawed from the beginning. Ignoring the use of brownfields site, to benefit developers. Compounds this error. The brownfield sites have the capacity to for fill the needs of the plan and could do so well within the 15-year term of the plan. 01

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable. 08

Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely regarded as unsound.

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

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

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

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

Response Date	3/13/2019 8:53:31 AM
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PO3372

Representor Details

Web Reference Number	WF0128
Type of Submission	Web submission
Full Name	mrs julie ireland
Organisation	
Address	105 longton lane rainhill l35 8nu
Agent Details	

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

Yes (via e-mail)

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

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	X
Habitats Regulation Assessment	
Other documents	

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

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

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

Positively prepared, Justified, Effective, Consistent with national policy

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

1. St Helens has a reducing population where is the additional population coming from to justify additional housing.
2. St Helens own brownfield register suggests land availability for 5808 houses 01
3. The councils plan means another 57 hectors land over the Brownfield land to build 1437 houses not the 288 hectors in table 4.5
4. 3HS has a declining industrial base, meaning its population rely s for their employment outside St Helen's boundary. 02
5. The road infrastructure around 3HS isn't capable to cope with existing levels of traffic, increases in traffic will divert more cars into the small roads of the existing estates. namely Longton lane, Two Butt lane, Holt Lane, Mill Lane, View rd, Stoney lane, Blundells lane. 03
6. Warrington Rd and Rainhill Rd junction at Skewed Bridge is at capacity with the councils own figures, similarly the junction at Portico lane and Prescot Rd at capacity. 03
7. Increased traffic increases risk to pedestrians and increases air pollution.
8. The release of greenbelt will cause significant harm to the reason having green belt 01
9. 3HS infrastructure can't sustain increases with dentist, doctor, school places
10. 3HS is a designated flood zone, to loose the land draining leaves existing properties at risk.
11. Sport England objected stage 1 plan, this objection hasn't been answered. 04
12. 3HS incudes more than 13 flora and fauna species protected

13. There is no statement of common ground with neighboring authorities

05

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

The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)
The council should not consider removing this land from green belt to place in safeguarded

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

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

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

Response Date	3/12/2019 9:43:01 PM
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PO3373

Representor Details

Web Reference Number	WF0175
Type of Submission	Web submission
Full Name	mr steven ireland
Organisation	
Address	105 longton lane rainhill l35 8nu
Agent Details	

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

Yes (via e-mail)

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

Policy	lpa6
Paragraph / diagram / table	3hs
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	yes
Habitats Regulation Assessment	
Other documents	

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

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

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

Justified

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

1. There's a declining population. There's no evidence presented supporting the need for additional housing, without any details where the additional home occupiers will come from. 01
2. Brown field will supply land for 5808, houses. there's no argument to justify removing greenbelt.
3. Declining industries in St Helens involves a lot of the existing population traveling outside the borough boundaries for employment. 02
4. Anyone moving into St Helens looking to purchase a property will need a salaried employment. inevitability that puts additional cars in the area 3HS where roads are cant cope with current level of traffic.
5. The 2 major roads supporting Rainhill, is A57 Warrington Rd and Rainhill Rd. These Roads are congested already. Any more traffic will put pressure on residential roads , which have seen increases significantly, to name but a few: Mill lane, Holt lane, Longton lane. 03
6. Any improvement works for Warrington rd, will need to overcome the Skewed Bridge. There's little scope to improve there.
7. Any traffic rises will lead to additional air pollution, increasing risks to health and pedestrian accidents.
8. 3HS area has got the infrastructure to support increase housing, Doctors, Dentists, school places these services will be accessed elsewhere, committing people to travel. 04

9. Any development in 3HS increase risk to existing properties, by not allowing the flood plain draining the land via the brook.
10. St Helens council hasn't provided Sport England a decision on their previous objection which should be rejected or upheld.
11. 3HS supports 13 species of protected flora and fauna
-

OK

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

The council should withdraw this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)

The council should not remove this land from green belt to place it as safeguarded

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

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

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

Response Date	3/12/2019 5:18:52 PM
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PO3374

Representor Details

Web Reference Number	WF0347
Type of Submission	Web submission
Full Name	Mr Alan Garner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA104EY
Agent Details	

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

Yes (via e-mail)

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

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

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

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. 08
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

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

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

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

Response Date	3/5/2019 6:18:13 PM
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PO3375

①-LPA01 ②-LPA02 ③-LPA04 ④-LPA02

⑤-Green Belt Review 2018 ⑥-LPA04 ⑦-Para 1.7.2 DTC

⑧-LPA05 ⑨-LPA08 ⑩-LPA07 ⑪-LPA08

Representor Details

Web Reference Number	WF0394
Type of Submission	Web submission
Full Name	Mr Michael McLoughlin
Organisation	
Address	3b Sadlers Lane Rainford St. Helens WA11 7HT
Agent Details	Mr Michael McLoughlin

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

Yes (via e-mail)

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

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

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

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

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

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

this version does not satisfy:

- the requirement for Sustainable development 01
 - the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
 - sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
 - effective land use by concentrating on Green Space development over town centre development with higher densities. 04
 - food security by ignoring Agricultural Land Quality. 05
- In addition, the following fundamental elements of the Plan remain questionable -
- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
 - Adequate regional and cross border collaboration has not been undertaken. 07
 - The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
 - The latest estimate produced by the ONS (2016) predicts that 383 houses

per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

08

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

05

• The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

09

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

10

• The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

11

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

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

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

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

Response Date	3/2/2019 1:35:59 PM
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PO3376

Representor Details

Web Reference Number	WF0445
Type of Submission	Web submission
Full Name	Mr Paul McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

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

Yes (via e-mail)

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

Policy	Yes
Paragraph / diagram / table	
Policies Map	Areas 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

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

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.
- Adequate regional and cross border collaboration has not been undertaken.

01
02
03
04
05

06
07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. 08
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) 09
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

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

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

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

Response Date	2/24/2019 3:12:06 PM
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PO3377

Representor Details

Web Reference Number	WF0446
Type of Submission	Web submission
Full Name	Mrs Helen McKeon
Organisation	
Address	59 Springfield Lane Eccleston St Helens Merseyside WA105HB
Agent Details	

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

Yes (via e-mail)

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

Policy	Yes
Paragraph / diagram / table	
Policies Map	Area s 8HS and 3HS
Sustainability Appraisal / Strategic Environmental Assessment	yes
Habitats Regulation Assessment	yes
Other documents	

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

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

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

Justified, Effective, Consistent with national policy

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

The plan does not comply with NPPF 2018

I believe that this version the plan does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

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

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
 - The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
 - The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
 - The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
 - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
-
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
 - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
 - The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
 - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

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

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

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

Response Date	2/24/2019 3:06:37 PM
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PO3378

Representor Details

Web Reference Number	WF0449
Type of Submission	Web submission
Full Name	Mrs Carmel Farmer
Organisation	
Address	46 Ecclesfield Rd, Eccleston, St Helens, Merseyside WA105NB
Agent Details	

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

Yes (via e-mail)

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

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

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

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

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

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.

Positively prepared.

Although within the plan it states that there is cross border communication and collaboration, this has not been shared or how bordering boroughs plans have informed St Helens plan or visa versa. 01

Justified

The Housing Needs assessment has not used standard methodology and has been informed by out of date statistics (ONS 2016 predicts 383 houses, Local plan has been prepared using previous figure (2014)of 486 houses per year). 02

This leads to an over estimation of houses required.

St Helens is a working class town, with many brownfield sites which are under-utilised. Brownfield register does not take into account contaminated sites, which should be further explored before taking any action on green belt sites.

The land identified as 8HS has attracted a large developer and their need for this prime land appears to have influenced the decision making of the council. In that, within the council Green Belt Review, within the comment section the rational used to protect other green belt site have not been applied to 8HS despite the same findings. In fact the findings are used to justify releasing 8HS from green belt status. 03

With the many brownfield sites across the borough it is highly likely that other site are made available to the council within the time period of this plan. Thus negating the need to release this green belt land.

The plan makes no reference to the current funding and plans of Torus Housing Association who have recently won substantial funding through Homes England. They have published their intent to build 800 new homes across St Helens. Furthermore, from their website they state they are aspiring to build 1800 affordable homes over the next four years within St Helens. 04

Effective

How local infrastructure will support the plan has not been explored or defined.

The large development would not be sustainable and no further information has been made available how transport, access to health care and education would be met. 05

This area would promote car dependence in an area which reports frequent road traffic accidents and which has a high volume of traffic. Current public transport is infrequent, any increase will impact further on road congestion. There is no rail links within this area of St Helens.

As a result, it as to be expected that there will be an increase both air, noise and environmental pollution, which will impact on people's health and well being. 06

The land is high quality agricultural land, which offers economic growth in the form of produce and the plan does not take into account the impact of losses in employment and farming industry. 07

8HS offers significant protection and food for wildlife. 03

Consistent with National policy

It does not comply with NPPF 2018 specifically point 11 and 13 (failure to demonstrate "exceptional circumstance")

Green belt is precious to us. St Helens is a historic working class town which bares the scars that many industries have left behind. These areas are crying out to be developed, as open spaces, housing and recreational activities. However, this plan chooses to ignore this heritage and need, choosing to demote green belt land to safeguarded land to enable greedy developers the opportunity to destroy part of our town.

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

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

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

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

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

Response Date	2/23/2019 6:36:43 PM
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PO3379

Representor Details

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

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

Yes (via e-mail)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Plan is not effective.

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

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

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

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

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

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

Response Date	2/23/2019 9:59:21 AM
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PO3380

EL0167



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

Draft

Johnson, Adam

to:

planningpolicy@sthelens.gov.uk

13/03/2019 11:29



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

1 Attachment



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

Good morning

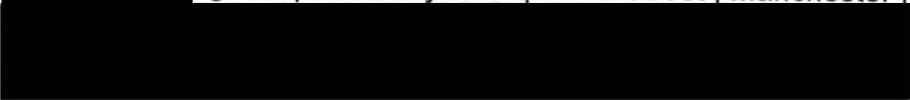
Please find attached Highways England's response to the St Helens Borough Local Plan 2020-2035 Submission Draft.

Kind regards

Adam

Adam Johnson, Assistant Asset Manager (Liverpool City Region)

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



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

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.

Our ref:
Your ref:

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

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

[REDACTED]
13 March 2019

Dear Sir / Madam

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

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

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

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

Major Road Network

We would expect to see reference to the emerging Major Road Network within the Local Plan Submission Draft, and the possible inclusion of the A58, A570 and A580 highway links. The Local Plan should set out how a Major Road Network is likely to impact the Borough and the approach it will take with regards to its management with Highways England and the wider Liverpool City Region. ①

Strategic Employment Sites

The policy criteria of creating masterplans, development phasing, site access arrangements and encouraging sustainable travel for Strategic Employment Sites is supported by Highways England. This approach should ensure that the delivery of employment land-use is managed appropriately. To that end, site-specific analysis should be undertaken for each of the proposed allocated development sites within the Local Plan ②

Sustainability

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

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

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

Transport and Travel Plans

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

Plans is not included as part of the policy. It is recommended that the requirement for Travel Plans for each development site is set out in the policy due to their inherent ability to mitigate the traffic impacts of development on both the local and strategic road network.

The policy further sets out assessment criteria, from both a wider transport as well as a highway perspective, for permitting new development if it would:

'Maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals are not permitted where vehicle movements would cause severe harm to the highway network.'

The criteria also set out that new development be permitted if located and designed to enable an appropriate level of access to and from both existing and proposed public transport services. Inclusion of the assessment criteria is noted as this complements the role of Highways England to, as stated in paragraph 133 of Planning for the Future, by:

'maintaining the safe and efficient movement of goods and people on the SRN.'

Where development is projected to cause severe harm to the highway network, as set out in the National Planning Policy Framework, the Council must have and / or develop suitable testing mechanisms. However, no assessment criteria for analysing this impact is currently set out in the policy document.

Paragraph six of the policy states:

'Direct access from new development on to the Strategic Road Network will only be permitted where agreed by Highways England'

The Local Plan should make it evidently clear to developers that any alterations to the SRN are taken as a last resort and, if required, should be clearly demonstrated through the following initial two stages:

- Avoidance - Minimising the level of physical mitigation required through utilising measures such as Travel Plans, travel demand measures, development phasing and sustainable travel.
- Off-Line improvements - Promoters of developments must first assess the potential for alterations to be made to the local road network in the first instance.

It is only after all other avenues have been explored and discounted would we consider permitting direct access to the SRN.

Spatial Strategy Shift

Highways England is aware that there is a general shift in the spatial strategy for the Borough to accommodate more B8 (Storage and Distribution) use class development sites. This is likely due to existing connectivity and accessibility to the SRN. It is also likely

PO3381

Representor Details

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

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

No

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

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

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

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

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

Positively prepared, Justified, Effective

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

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

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

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan

should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise. 02

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 03

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land. 04

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/11/2019 7:45:47 PM
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PO3382

Representor Details

Web Reference Number	WF0221
Type of Submission	Web submission
Full Name	Mr Colin Morgan
Organisation	Mr
Address	17 Bembridge Close Great Sankey WA5 3RH
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA04.1, Strategic Employment Sites
Paragraph / diagram / table	Section 4.13
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Bold Forest Park Area Action Plan, Adopted July 2017

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

From consulting the National Planning Policy Framework (NPPF, last updated 19th February 2019, especially paragraphs 133 -147) I read that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also explicitly states that once established Green Belt boundaries should only be altered in 'exceptional circumstances' and that these "Very special circumstances" will not exist unless any potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." The Draft Local Plan (St Helens Borough Local Plan 2020-2035: Proposed Submission Draft, December 2018) includes a proposal to allow the extension of the Omega industrial site west into the eastern side of Bold Forest Park (in the report, designated as Area 1EA, comprising 31 hectares), which is currently part of the St Helens Green Belt. I consider that the proposed change is unsound because of a lack of justification for the required 'exceptional circumstances' needed to allow conversion of Green Belt land – in this case farmland - to industrial use. This change to a secure, well-established, Borough, County, and mature tree-lined Green Belt boundary is being proposed to meet projected future employment requirements for Warrington, adjacent to St Helens. Warrington currently has a net 14,000 commuters coming into the borough each day so is not generally short of employment opportunities for its population, and is presently using up the vast potential of the Omega South employment area land with both warehouses and housing, suggesting that their

priority is not to create significant additional employment within the Borough. In the future, this proposed change could make a small contribution to Warrington's employment numbers, but it is insignificant compared with all the many and various opportunities proposed within Warrington itself, with an available land area consisting of hundreds of hectares in total. In addition, Warrington is having to compete with other areas in the north west of England such as Haydock, Heywood, Middlewich and Knowsley for warehouse business. It is, therefore, unclear how an argument of 'exceptional circumstances' might be made for this proposed change from farmland to warehousing at this location. 01

The proposed area 1EA is within Bold Forest Park. Removal of this land from Green Belt goes against the stated aims of the Bold Forest Park Area Action Plan that was signed by St Helens Council in 2017 after significant work to look at all aspects of environmental value and protection and enhancement of the area. (In the AAP Technical Report, the land 1EA is shown as Medium/High sensitivity [Section 2.3.7] – the highest category given, and also as 'Conserve/Enhance' in Figure 9. The designated nature conservation site of Booth's Wood would be right on the edge of the proposed area 1EA, removing the protecting buffer such that the industrial site would run right up against the TPO'd trees and the boundary of the original mediaeval deer park.) 02

Since the numbers quoted in the Draft Local Plan apparently demonstrate that this area of farmland is not needed to meet St Helens employment requirements, it would appear that the anticipated benefit that could arise from this proposed industrial extension would be in the form of a relatively small amount of additional Council revenue (70% of which would go to St Helens, 30% to Warrington). Set against this is the damage done to the agricultural land of Bold Forest Park and the rest of the Park countryside by having the intended warehouses on its eastern side. In addition, even more traffic and air pollution will be generated in the west Warrington area from the increased diesel lorry traffic. Local Warrington residents will be affected by the increased pollution, noise and congestion. 03

In the documentation for this proposal to remove area 1EA from the Green Belt, there is a general statement, as made for other areas under consideration, that there are people living within 1km of the area who are in the bottom 20% of the economic scale. If this statement is considered to have any particular significance, it should perhaps be noted that the population on and around this southeast side of the Bold Forest Park countryside area is of very low density apart from the extensive Warrington-based Lingley Green and Whittle Hall areas of Great Sankey, which comprise mostly of new modern three- and four- and five- bedroom detached houses. If, the report is suggesting as a justification that there may be a potential employment opportunity for any nearby population in St Helens, it should be noted that, in practice, the M62 cuts these populations off such that they are at least 8km away by road and about 1.5 hours away by existing public transport from this area (using information from Google maps in March 2019). 04

In the event that such a development is allowed to proceed, the documentation does not contain any information e.g. under 'Requirements' that might help mitigate the environmental damage done to Bold Forest Park. This seems to have been considered for certain other sensitive areas, but was this considered here? Many of the trees and woods in the Bold Forest Park area probably date from the first half of the 18th century when the new Bold Hall was built, when they lined the original driveway – and many are now protected by TPOs. There is a variety of wildlife and under the St Helens AAP there is the intention to increase tree cover by 10% in this area. However, the generally open aspect of the farmland means that once the current strong treelined boundary is breached, the whole area across to the St Helens conurbation from the Warrington boundary would be visible to the development. The development at Omega South is currently well screened from the St Helens Green Belt area by mature trees along the County and Borough boundary. 05

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 06

The area that will be affected is green, forested, contains many varieties of birds (I have counted over forty different species) and other wildlife, including breeding hares. The effect of a modern development is devastating to the natural environment with its loss of habitat, the resultant light 07

pollution, noise and air pollution. The effect would be a reversal of the intent so recently shown by St Helens Council in the recent AAP of 2017. 07

With respect to pollution from diesel lorries and other additional traffic generated in the Great Sankey area: One of the current occupants of a warehouse on Omega South – Amazon – operates three times as many lorries to and from their warehouse as was expected by the developers of Omega for the area of the development. If this were repeated for any of the warehouses proposed for the Bold Forest Park extension, it would add even more than expected amounts of pollution, noise and congestion to the roads and surrounding area. 08

I have three young grandchildren growing up in the Whittle Hall – one of whom has spent time in hospital with asthma-related breathing difficulties on more than one occasion. For this additional reason, I oppose an extension of the Omega South development across the border into St Helens and would ask if a case of 'exceptional circumstances' has been made? 09

7. Please set out modification(s) you consider are necessary

In line with the above comments, to make the report sound, it is proposed the Draft Local Report would have the references to the development of the area designated 1EA removed, such that this area remains part of the current Green Belt. (Minor changes may be required to various supporting documentation where this proposal has been mentioned.)

If, following the review, the argument for proceeding with removal of the area 1EA from Green Belt for the stated purpose is considered justified, in the light of the above and any other arguments presented, then a statement of intent in the documentation to minimise the environment impact on the Bold Forest Park area, and facilitate enhancements where possible, would seem appropriate.

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 4:27:16 PM
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PO3383

Representor Details

Web Reference Number	WF0248
Type of Submission	Web submission
Full Name	Mrs Catherine Houlihan
Organisation	
Address	68 Ecclesfield Rd Ecclesfield St Helens WA10 5NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

- the requirement for Sustainable development. 01

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02

- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03

- effective land use by concentrating on Green Space development over town centre development with higher densities. 04

- food security by ignoring Agricultural Land Quality. 05

7. Please set out modification(s) you consider are necessary

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06

- Adequate regional and cross border collaboration has not been undertaken. 07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. 08

- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.

- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05

- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and Borough wide road improvements are to made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). 09

- The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. 10

- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. 11

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 6:03:27 PM
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PO3384

Representor Details

Web Reference Number	WF0249
Type of Submission	Web submission
Full Name	Mr Brendan Houlihan
Organisation	
Address	68 Ecclesfield Rd Eccleston St Helens WA10 5NB
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	8HS
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan does not comply with NPPF 2018 and this version of the Local Plan does not satisfy:

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- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02

- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03

- effective land use by concentrating on Green Space development over town centre development with higher densities. 04

- food security by ignoring Agricultural Land Quality. 05

7. Please set out modification(s) you consider are necessary

The following fundamental elements of the Plan remain questionable:

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06

- Adequate regional and cross border collaboration has not been undertaken. 07

- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08

- The latest estimate produced by the ONS (2016) predicts that 383 hous per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, it it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing unstuitable sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.

- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. 05

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 5:58:24 PM
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PO3385

Representor Details

Web Reference Number	WF0313
Type of Submission	Web submission
Full Name	Mrs Ann-Marie Barrow
Organisation	
Address	11 Lynton Way Windle St. Helens WA10 6EQ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan. 06
- Adequate regional and cross border collaboration has not been undertaken. 07
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. 08
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council

are using an older forecast (2014) of 486.

- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
 - The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.
 - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.
-
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.
 - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)
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 - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

08

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7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

3/7/2019 12:03:49 PM

PO3386

Representor Details

Web Reference Number	WF0346
Type of Submission	Web submission
Full Name	Mrs Elizabeth Graner
Organisation	
Address	45 Alpine Close Eccleston St Helens Merseyside WA10 4EY
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	Yes
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I consider that the Local Plan is neither justified, effective or consistent with National policy. (National Planning Policy Framework (NPPF)2018).

I also believe that this version does not satisfy:

- the requirement for Sustainable development 01
- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs. 02
- sustainable housing, targets proposed are based on aspirational employment growth predictions. 03
- effective land use by concentrating on Green Space development over town centre development with higher densities. 04
- food security by ignoring Agricultural Land Quality. 05

7. Please set out modification(s) you consider are necessary

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- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. 08
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/5/2019 6:20:22 PM
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PO3387

E10065



Wigan Council response to the St Helens Borough Local Plan 2020-2035

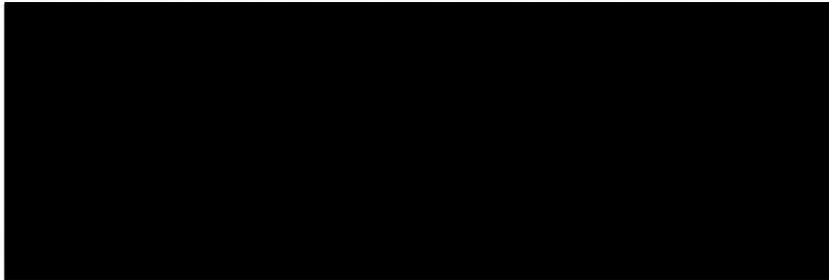
see attachment

N.Clarke

to:

planningpolicy

11/03/2019 18:34



- ① - LPA04
- ② - LPA04.1
- ③ - LPA06 (res)
- ④ - LPA06 (HWA+H)
- ⑤ - LPA07
- ⑥ - LPA10

1 Attachment



Letter and reps on St Helens LP 11 Mar 19.pdf

Please note that Wigan's Council's representations on the St Helens Local Plan have been approved by the Council's Portfolio Holder for Planning and Environment but that the required 5 working days until that decision can be enacted have not passed and will not have passed until after your deadline of 13 March. They are therefore submitted on that basis and we will advise accordingly of the status once that time has passed.

Dear [redacted]

Thank you for the opportunity to comment on the Submission Draft version of your St Helens Borough Local Plan 2020-2035.

Overall, Wigan Council is supportive of the plan and is keen to continue working with you on key cross boundary issues of interest, including access to training and employment, accessibility by bus services, cycling and walking, and highway and other infrastructure improvements.

In this context, there are a small number of opportunities to improve the plan, most of which have been discussed at officer level recently, and parts that we specifically support. The related representations concerning them are attached and set out below, and cover parts of the following policies:

Policy LPA04: A Strong and Stable Economy

Policy LPA04.1: Strategic Employment Sites

Policy LPA06: Safeguarded Land

Policy LPA07: Transport and Travel

Policy LPA10: Parkside East

We firmly believe and that these matters can be overcome by short alterations to the wording of the policies.

All of these matters are, of course, pertinent to the duty to cooperate and the new requirement to prepare a statement of common ground. We will be happy to work further with you on this and discuss any matters arising to agree proposed amendments for submission alongside the plan, if possible. More generally, we wish you all the very best with progressing your local plan through to adoption.

Yours sincerely

Marie Bintley

E10065



[REDACTED]
Strategic Director – Place Services
St Helens Council
Town Hall
Corporation Street
St Helens WA10 1HP

Our reference: PB/NC/MB/KF
Your reference:
Please ask for: Marie Bintley
Extension:
Direct line: [REDACTED]
Date: 11 March 2019

[REDACTED]
St Helens Borough Local Plan 2020-2035

Thank you for the opportunity to comment on the Submission Draft version of your St Helens Borough Local Plan 2020-2035.

Overall, Wigan Council is supportive of the plan and is keen to continue working with you on key cross boundary issues of interest, including access to training and employment, accessibility by bus services, cycling and walking, and highway and other infrastructure improvements.

In this context, there are a small number of opportunities to improve the plan, most of which have been discussed at officer level recently, and parts that we specifically support. I attach the related representations concerning them, which cover parts of the following policies:

Policy LPA04: A Strong and Stable Economy

Policy LPA04.1: Strategic Employment Sites

Policy LPA06: Safeguarded Land

Policy LPA07: Transport and Travel

Policy LPA10: Parkside East

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All of these matters are, of course, pertinent to the duty to cooperate and the new requirement to prepare a statement of common ground. We will be happy to work further with you on this and discuss any matters arising to agree proposed amendments for submission alongside the plan, if possible. More generally, we wish you all the very best with progressing your local plan through to adoption.

Yours sincerely

[REDACTED]
Marie Bintley
Assistant Director Growth and Housing

Please reply to: Marie Bintley

Wigan Council, Places Directorate: Economy and Environment, PO Box 100, Wigan, WN1 3DS

[REDACTED]

Wigan Council is supportive of this policy position in preference to the allocation for employment development proposed in the previous version of the plan. However, there are four issues of concern that we wish to raise:

1. The proposed area of safeguarded land and consequent deletion from the Green Belt reflects land ownership issues and would appropriately be rounded off on the eastern boundary and northern boundary, with the land removed from the site and restored to the Green Belt. This would result in the development intruding less into undeveloped land create a more logical revised Green Belt boundary than that currently proposed. To the north of the site, it would also allow the Green Belt boundary to be retained in its current form, extending to the rear of Haydock Park Gardens.
2. It should be clear within the policy that the improved highways infrastructure needed should be in place before any development on the site is operational.
3. If the A49 needs to be diverted in order to secure the strategic improvement needed to Junction 23, accessibility between Ashton-in-Makerfield and Newton-le-Willows should be maintained and improved, particularly for bus services, cycling and walking, for which there is a strong case for enhancement of provision for all three particularly the opportunity to strengthen links with the railway station.
4. Furthermore, if the A49 does need to be diverted, the approach to Wigan Borough from the south, and Ashton-in-Makerfield in particular, needs appropriate consideration befitting such a gateway route, with particular emphasis on the environmental quality of that route.

Policy LPA06: Safeguarded Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood (ref 1HS)

One of the eight areas safeguarded for future housing development is Land South of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood. It is relatively close to the boundary with Wigan Borough and has capacity for around 291 homes.

The policy is clear that planning permission for the development of the safeguarded sites for housing development will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing development on safeguarded sites in the Plan period will be refused.

Together with land adjacent that is allocated for 216 homes, Wigan Council has concerns about the level of traffic that could be generated from these two areas combined using junctions in Bryn, Ashton town centre and Windy Arbour within Wigan Borough. Mitigation measures would be sought and, therefore, Wigan Council is supportive of this policy position.

Policy LPA07: Transport and Travel (Accessibility)

Clause 1 of this policy states that "The Council's strategic priorities for the transport network are to facilitate economic growth, enable good levels of accessibility between homes, jobs and services, improve air quality and minimise carbon emissions. To achieve these priorities it will seek to: b) Ensure that new development is sufficiently accessible by road transport, walking, cycling and public transport."

Clause 3 of this policy states that "New development will only be permitted if it would:

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res

4
HS, 11

5

- d) Enable good levels of accessibility by walking and cycling between homes, jobs and services
- e) Provide for safe and convenient pedestrian, cycle and vehicular access and movement to, from and within the development"

Where strategic new development is close to the boundary with Wigan Borough, it is essential that cross-boundary connections with Wigan by bus, cycling and walking are a serious part of these considerations. The policy should acknowledge this relationship specifically together with the need to work with Wigan Council, Transport for Greater Manchester and Highways England to improve cross-boundary accessibility by public transport, cycling and walking, including to railway stations.

Issues for bus travel are compounded by the fact that bus ticketing arrangements are different within Greater Manchester and Merseyside and walking and cycling links are restricted by the motorway and heavy traffic on roads to and from motorway junctions.

Policy LPA07: Transport and Travel (M6 Junction 23)

Wigan Council supports clause c) of Policy LPA07 "Secure improvements to existing motorway capacity and infrastructure with particular priority being given to the M6 Junction 23" and Wigan Council officers will continue to work with St Helens to determine what improvements need to be secured, to the benefit for both boroughs.

Policy LPA07: Transport and Travel (Carr Mill)

Wigan Council supports clause e) i) of Policy LPA07 "Secure a new station at Carr Mill". Although this will be a further stop for the hourly stopping service, adding 3-4 minutes per journey to Liverpool and St Helens from Bryn, it would improve accessibility into Wigan and Manchester from north St Helens, as well as into St Helens town centre and Liverpool.

05

Policy LPA07: Transport and Travel (Skelmersdale Rail Link)

Wigan Council supports clause e) iii) of Policy LPA07 "Secure delivery of the proposed Skelmersdale Rail Link" on the Wigan-Kirby railway line, which would extend the Merseyrail line though Rainford Junction in St Helens to a new terminus at Skelmersdale as well as diverting the Wigan Kirby line to Skelmersdale. As such it would result in improved accessibility between Wigan and Skelmersdale too and is a feature of the West Lancashire Local Plan, to which we have also offered our support.

Policy LPA07: Transport and Travel (Freight)

Clause 5 of this policy states "Development that would generate significant movement of freight must be located where there is a safe, convenient and environmentally acceptable access route to a suitable part of the Key Route Network. The part of the Network that is marked as 'Key Route Network – non freight' on the Policies Map shall not be regarded as suitable in this context. Access into a new development (of any land use) directly from the Key Route Network will only be allowed if this would not unduly restrict the capacity of the road or cause harm to highway safety, and where no more suitable alternative exists or would be provided by the development."

This clause is supported although it is noted that the A579 Winwick Road is not marked on the St Helens Policies Map as "non-freight" as it is not in St Helens, although clearly part of it at least is going to be heavily reliant on part of Winwick Lane at least. As you are aware, Winwick Lane is in Warrington at the point where the highway access into Parkside is proposed, and it is in Wigan Borough north of the railway line. Freight traffic to/from

Parkside must be directed to M6 Junction 22 and not permitted to go northwards on the A579 Winwick Lane. This issue forms part of our objection to Policy LPA10: Parkside East.

Policy LPA10: Parkside East

Parkside East abuts the borough boundary south of the Chat Moss railway line. Wigan Council has objected previously to a planning application for this land on the grounds of traffic impacts, and has made representations on St Helens' previous local plan to ensure that the policy safeguards residents' interests in Wigan Borough.

Clause 3 of the policy states that "Proposals for development within (the) site... will be required to:

b) Create safe and convenient access from Junction 22 of the M6 for Heavy Goods Vehicles and other vehicles

c) Mitigate any adverse impacts on the surrounding strategic and local road network.

Freight traffic to/from Parkside must be directed to M6 Junction 22 and not permitted to go northwards on the A579 Winwick Lane.

This issue is pertinent to a planning application consultation at the present time, for a new road from the A49 in Newton-le-Willows through Parkside West, connecting to the A573 Golborne Road / Parkside Road under the motorway and then across Parkside East to the A579 Winwick Lane. The justification for this is to provide access to/from Parkside via M6 Junction 22, but it could also load traffic on to the East Lancashire Road at Lane Head. Wigan Council has a holding objection to this planning application on traffic and air quality grounds based upon the information currently available.

Clause 3 of the policy states that "Proposals for development within (the) site... will be required to: f) be designed to minimise impacts on residential amenity. There is no specific reference to air quality or noise, with the potential for rail movements and loading / unloading operations to give rise to disturbance to local residents, particularly at night if 24 hour operations are anticipated, including at Town of Lowton and Lane Head within Wigan Borough. The policy would benefit from the addition of wording similar to that applying to Parkside West in Appendix 5 to the plan, which states "Suitable measures must be included to control the impact of increased traffic movement or uses within the site on residential amenity, noise and/or air quality in the surrounding area."

The potential for advanced strategic landscape planting to take place should also be explored and written into the draft policy, in order to form a substantial visual screen to improve visual amenity once the development comes forward in what a largely flat landscape.

Clause 2 of the policy states that "The site is also considered suitable in principle for other forms of B2 and B8 employment use provided that they would: a) bring significant inward investment, local employment and training benefits for the local community." In line with our representation on clause 10 of Policy LPA04, as "local" clearly includes residents in places like Golborne, Lowton, Leigh and Ashton-in-Makerfield within Wigan Borough, measures should be taken to ensure that such opportunities are available for residents in Wigan Borough as well as St Helens, and this should be recognised in the policy. We would also be happy to agree the means for how this can be achieved in practice and provide you with the relevant contacts to ensure it is implemented through the development management process.

PO3388

EL0167



Highways England Response to the St Helens Borough Local Plan 2020-2035 Submission

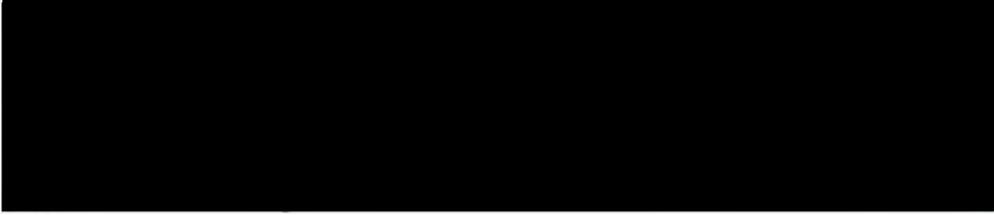
Draft

Johnson, Adam

to:

planningpolicy@sthelens.gov.uk

13/03/2019 11:29



- ① - PARA 4.27-8
- ② - LPA04-1
- ③ - LPA05
- ④ - LPA03
- ⑤ - LPA07-Criter
- ⑥ - TIA
- ⑦ - IDP
- ⑧ - APPENDIX 5
- ⑨ - LPA07-Criter
- ⑩ - Green ⑥

1 Attachment



St Helens Borough Local Plan 2020-2035 Submission Draft - Highways England Response - 13 March 2019.pdf

Good morning

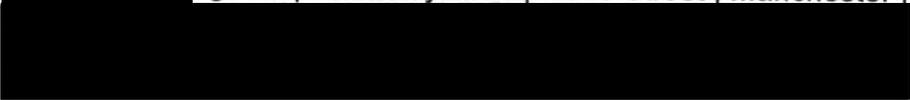
Please find attached Highways England's response to the St Helens Borough Local Plan 2020-2035 Submission Draft.

Kind regards

Adam

Adam Johnson, Assistant Asset Manager (Liverpool City Region)

Highways England | Piccadilly Gate | Store Street | Manchester | M1 2WD



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Highways England Company Limited | [Redacted] | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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Our ref:
Your ref:

Local Plan
St Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP

Adam Johnson
Highways England
Piccadilly Gate
Store Street
Manchester
M1 2WD

[REDACTED]
13 March 2019

Dear Sir / Madam

ST HELENS BOROUGH LOCAL PLAN 2020-2035 (SUBMISSION DRAFT)

Thank you for consulting Highways England regarding the submission draft of your Local Plan. We very much welcome the opportunity to review your plans and provide advice that I trust will be helpful to you as the plans proceed.

Highways England is responsible for the Strategic Road Network (SRN) in England. Within St Helens this includes parts of the M62 and M6 motorways and, to the north and west, the M58 and M57 motorways. The comments I make here relate to the potential impacts of your plans on that network.

On the whole, we are supportive of the methodology used and the outcomes shown within the Plan. Significant work has clearly been undertaken regarding both the Local Plan itself and the supporting transport evidence base. That notwithstanding, there are gaps in the information that has been published as part of the consultation process, and as such there are a number of points and recommendations we wish to make resulting from our review. These areas are listed below.

Major Road Network

We would expect to see reference to the emerging Major Road Network within the Local Plan Submission Draft, and the possible inclusion of the A58, A570 and A580 highway links. The Local Plan should set out how a Major Road Network is likely to impact the Borough and the approach it will take with regards to its management with Highways England and the wider Liverpool City Region. ①

Strategic Employment Sites

The policy criteria of creating masterplans, development phasing, site access arrangements and encouraging sustainable travel for Strategic Employment Sites is supported by Highways England. This approach should ensure that the delivery of employment land-use is managed appropriately. To that end, site-specific analysis should be undertaken for each of the proposed allocated development sites within the Local Plan ②

Sustainability

Policies that promote sustainable methods of transport are welcomed by Highways England in that they offer both environmental benefits and help in the reduction of congestion on the SRN. We would therefore recommend that the Local Plan sets out specific detail in Policy LPA03 regarding how the local authority will guide development to be focussed in sustainable and accessible locations. The following observations have also been made regarding sustainability:

- A number of sites within the Plan have limited sustainable access to St Helens railway stations, being further than the recommended walking distance. Accessibility increases significantly if cycling is included, however significant infrastructure improvements and behaviour changes will be required to make this viable.
- Three-quarters of employment allocations, and just under a third of housing allocations, were identified as having Average or worse accessibility by bus. (4)
- Whilst it is noted that a number of sites are rated as being within a Good or Excellent distance from cycle routes, the rating does not take into account the ease of the access to the route, or quality of the route and its connectivity to key origins and destinations.
- With regards to the Core Accessibility Indicators, it was found that the housing allocations were, in the main, well located in terms of major food stores, healthcare facilities, local centres and primary schools, while secondary schools are more dispersed which decreases accessibility by foot. The assessment recommends potential improvements to pedestrian facilities to encourage more travel by foot to local facilities.

The assessment of the issues in terms of current sustainable transport accessibility to the proposed Local Plan site allocations is comprehensive. However, overall it is considered that the measures proposed are light-touch, placing a strong emphasis on future documents such as the LCR LCWIP, Transport Assessments / Statements and Travel Plans to establish appropriate measures on a more localised site-by-site basis rather than offering more strategic measures that impact across the Borough. With this in mind, it is difficult to assess to what extent the investment into non-car modes throughout the Borough in the Local Plan period will impact the SRN. That notwithstanding, we support the implementation of the LCR LCWIP as a means of providing a policy framework which encourages walking and cycling. (8)

Transport and Travel Plans

To assist in the promotion of sustainable methods of transport, it is usually recommended that development sites adopt a Travel Plan in order to limit the number of car journeys in favour of public transport or non-motorised forms of travel. Policy LPA07 states that developments which generates significant amounts of traffic should be supported by a Transport Assessment or Transport Statement, however the implementation of Travel (5)

Plans is not included as part of the policy. It is recommended that the requirement for Travel Plans for each development site is set out in the policy due to their inherent ability to mitigate the traffic impacts of development on both the local and strategic road network.

The policy further sets out assessment criteria, from both a wider transport as well as a highway perspective, for permitting new development if it would:

'Maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals are not permitted where vehicle movements would cause severe harm to the highway network.'

The criteria also set out that new development be permitted if located and designed to enable an appropriate level of access to and from both existing and proposed public transport services. Inclusion of the assessment criteria is noted as this complements the role of Highways England to, as stated in paragraph 133 of Planning for the Future, by:

'maintaining the safe and efficient movement of goods and people on the SRN.'

Where development is projected to cause severe harm to the highway network, as set out in the National Planning Policy Framework, the Council must have and / or develop suitable testing mechanisms. However, no assessment criteria for analysing this impact is currently set out in the policy document.

Paragraph six of the policy states:

'Direct access from new development on to the Strategic Road Network will only be permitted where agreed by Highways England'

The Local Plan should make it evidently clear to developers that any alterations to the SRN are taken as a last resort and, if required, should be clearly demonstrated through the following initial two stages:

- Avoidance - Minimising the level of physical mitigation required through utilising measures such as Travel Plans, travel demand measures, development phasing and sustainable travel.
- Off-Line improvements - Promoters of developments must first assess the potential for alterations to be made to the local road network in the first instance.

It is only after all other avenues have been explored and discounted would we consider permitting direct access to the SRN.

Spatial Strategy Shift

Highways England is aware that there is a general shift in the spatial strategy for the Borough to accommodate more B8 (Storage and Distribution) use class development sites. This is likely due to existing connectivity and accessibility to the SRN. It is also likely

PO3389



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



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Hannah
Last Name:	Last Name: Payne
Organisation/company: Barratt Homes	Organisation/company: Indigo Planning Ltd
Address:	Address: St James' Tower, 7 Charlotte Street, Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	

Signature: 	Date: <input type="text" value="13/03/2019"/>
--	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input type="checkbox"/> (Via Email)	No <input type="checkbox"/>
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see 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)

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 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.

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01

02

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expanded and / or enhanced infrastructure that is required to serve the development of the whole site". 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 whole addresses infrastructure requirements adequately.

18

LPA05.1(3) requires development proposals which only cover part of a Strategic Housing 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.

19

Appendix 5

We support the identification of site access via Vicarage Road and the A580 and have undertaken extensive discussions with Officers at St Helens Council to agree access for the site.

20

It is proposed that the primary access to the site will be taken from Vicarage Road via a new priority controlled junction along with a right turning ghost island provided. A secondary access is proposed from the A580 East Lancashire Road, this access will only cater for left in and left out movements.

Barratt are aware that the site will require a pedestrian and cycleway connection from the sites eastern boundary to the site entrance to the north on the A580. However, the specifics of this access point should be addressed during the planning application process and not included within planning policy.

We support the amendment to the site requirements relating to Clipsley Brook. An FRA will be submitted with the planning application and flooding matters will be dealt with at planning application stage.

Financial contributions will be assessed during the planning application process and will be subject to the relevant S106 policies and will be reasonable and justified. It is therefore not necessary to identify within policy contributions which are 'likely' to be required. Reference to highways and education contributions should therefore be removed.

21

Policy LPA07: Transport and Travel

Policy LPA07(9) states that further details of the policy will be set out in a future review of the Council's Ensuring and Choice of Travel Supplementary Planning Document. However, in the absence of an updated SPD, it is unclear how the Council will approach matters relating to vehicle and cycle parking standard, electric vehicle charging point provision and to the requirements concerning transport assessments, transport statements and travel. Further clarification should be for developments which come forward in the interim.

22

The policy needs to confirm that the most up to date SPD and / or travel studies will be used during the plan period. This is to ensure that the most relevant and up to date information is used.

PO3390

ELO112



HBF response to St Helens Local Plan Submission

Joanne Harding

to:

planningpolicy@sthelens.gov.uk

12/03/2019 17:26

Hide Details



① - STRATEGICAL AIMS & OBJECTIVES

② - LPA05

③ - LPA05 - PARA. 3

④ - LPA05 - PARA 4

2 Attachments



19-03-13 St Helens Local Plan Submission.docx HBF Ipsd-representation-form-signed.pdf

⑤ - LPA07 - PART 3C

⑥ - LPA07 - PART 9

⑦ - LPC01 - PART 1

⑧ - LPC01 - PART 2

⑨ - LPC01 - PART 3

⑩ - LPC01 - PART 4

⑪ - LPC02

⑫ - LPC10

⑬ - LPC13

⑭ - LPD07

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the St Helens Local Plan Submission Draft consultation.

I would be grateful if you can confirm receipt of this response.

If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI

Local Plans Manager - North

HOME BUILDERS FEDERATION



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Representation (i.e. Comment) Form**

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Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Joanne	First name:
Last Name: Harding	Last Name:
Organisation/company: HBF	Organisation/company:
Address: HBF House 27 Broadwall London	Address:
Postcode: SE1 9PL	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED]	Date: 13/03/2019
-----------------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St 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.	

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Please see separately attached letter.			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Please see separately attached letter.		

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/> Please see separately attached letter.
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see separately attached letter.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see separately attached letter.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	-------------------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**



Local Plan
St Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP

SENT BY EMAIL
planningpolicy@sthelens.gov.uk
13/12/2018

Dear Sir / Madam,

ST HELENS LOCAL PLAN SUBMISSION DRAFT

Thank you for consulting with the Home Builders Federation on the St Helens Local Plan 2020-2035 Submission Draft consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF have provided comments at previous stages within the production of this Plan. However, a number of concerns remain, therefore, please find below our comments on a selection of policies within the document, that are felt to be of relevance to our members. ✓

Vision and Objectives

The HBF does not consider that the Objectives are sound, as it is not positively prepared for the following reasons:

The HBF support the part of the vision which states that 'Good quality new market and affordable housing will have been provided, broadening the housing stock, meeting local needs, providing safe and sustainable communities, and making the Borough a residential destination of choice'. The HBF also generally support Objective 4 which looks to enable the delivery of sustainable communities by identifying land for a sufficient number and range of new dwellings. However, as set out in our previous responses 'sufficient' suggests only just meeting needs. It is suggested that the objective be amended to reflect the NPPF requirement for plans to be 'positively prepared' and 'boost significantly' housing supply.] (1)

The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on matters in relation to housing delivery and would be keen to work proactively with the Council on this issue.

The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

✓
2

Policy LPA07: Transport and Travel

The HBF does not consider that Policy LPA07 is sound, as it is not justified or effective for the following reasons:

Part 3c of this policy states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst the HBF do not oppose the provision of electric charging points, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others.

5

The HBF also have concerns that part 9 states that further details of the operation of this policy including standards for vehicle charging provision will be set out in a Supplementary Planning Document (SPD). It is not considered appropriate to set out in SPD elements of policy, namely the number of charging points that would be 'appropriate provision', that will have a direct role in the determination of a planning application. The HBF consider that these elements should be set out in policy and open for debate at the Examination in Public, without these details it is impossible to consider the impact of these policies on viability or whether they are justified and effective. The HBF would encourage the Council to work with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

6

The HBF considers that the policy should be modified as follows in order to make the document sound:

- Further consideration is given to what the Council consider to be 'appropriate provision' supported by evidence.
- That additional standards for electric charging point provision are not included within an SPD that will not be tested at examination.

✓

Policy LPC01: Housing Mix

The HBF does not consider that Policy LPC01 is sound, justified, effective or consistent with national policy for the following reasons:

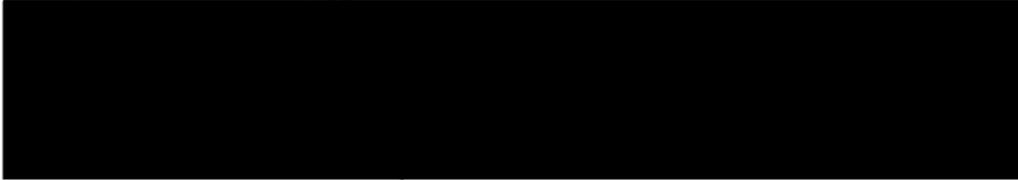
PO3391



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.

Table with 2 columns: 1. Your Details, 2. Your Agent's Details (if applicable). Rows include Title, Name, Organisation, Address, Postcode, and Contact Information.

Signature and Date fields. Signature is redacted, Date is 13/03/2019.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan) Yes [X] (Via Email) No []

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table	<input checked="" type="checkbox"/>	Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				2017 Strategic Housing Land Availability Assessment					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to supporting representation report submitted alongside this form.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/> No , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	<input type="checkbox"/> Yes , I wish to participate at the oral examination
---	-------------------------------------	---

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.

- 4.38. Murphy Group acknowledge that the ground conditions are not known at this stage as no ground investigation work has commenced. This would be commissioned prior to the planning application stage. However, the site is in arable use and ground conditions are expected to be similar to the land to the south that has been allocated for new residential development.
- 4.39. Policy LPA06.2 highlights that planning permission for development of the safeguarded sites will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing and employment of safeguarded sites in the plan period will be refused. We request further clarity on when a full review of the will be triggered. 29
- 4.40. We object to this on the basis that if housing allocations are not coming forward in the timescales referred to in the local plan (at Table.45 'Sites allocated for new housing development' (either before 31.05.35 and after 31.05.35)), or development is stalled, safeguarded housing sites should be brought forward for development within the plan period. Waiting for the plan to be reviewed could be a lengthy delay during which the housing crisis is exacerbated further. It is therefore not appropriate to include a policy in the local plan which authorises the point-blank refusal of planning application on safeguarded housing land within the plan period. Such applications should be assessed at that time (which would inevitably be later in the plan period), on a case by case basis, and considering the wider context and planning balance (ie housing delivery/under delivery, five year housing land supply or lack of).
- 4.41. We support that safeguarded land should be developed before other Green Belt and greenfield sites. 30

Policy LPA07: Transport and Travel

- 4.42. We support that Policy LPA07.1.b. seeks to ensure new development is sufficiently accessible by road transport, walking, cycling and public transport. 31
- 4.43. Garswood offers a range of local services, facilities and public transport connections and is well positioned to accommodate growth. The St Helens Core Strategy confirms that improvements have been made to Garswood train station, offering journeys to both Wigan and Liverpool, whilst the town has good road linkages to areas across Merseyside.
- 4.44. Within Garswood and in context of the Leyland Green Farm site, there are a number of key amenities located within an appropriate walking distance of the site which would serve some of the day-to-day needs of future residents, including primary schools, healthcare facilities and local shops. The site is served by numerous bus routes however, which provide high frequency services to Ashton-in-Makerfield, therefore providing the potential for sustainable travel when undertaking general day-to-day activities.
- 4.45. The identification of a proposed housing allocation of land south of Billinge Road, East of Garswood Road and West of Smock Lane (site ref. 1HA), with an indicative capacity of 216 dwellings, demonstrates the settlement is a suitable and sustainable location, in transport terms, to accommodate development.
- 4.46. In the St Helens Emerging Local Plan Evidence Base Transport Impact Assessment, housing allocations are ranked in terms of their accessibility to local facilities. Whilst it does not refer directly to the Leyland Green Site, it assesses the land directly adjacent to the south of our site (ie land south of Billinge Road, east of Garswood Road and west of Smock Lane, Garswood (site ref. HA2)). It is assessed as 'excellent' in terms of accessibility to the railway station by cycle, major food stores, primary schools and healthcare facilities. The Leyland Green Farm site (which adjoins the housing allocation to the north) shares similar accessibility ratings to the housing allocation and is therefore well connected to local services and facilities.
- 4.47. Policy LPA07(9) states that further details of the policy will be set out in a future review of the 32

Council's Ensuring and Choice of Travel Supplementary Planning Document. However, in the absence of an updated SPD, it is unclear how the Council will approach matters relating to vehicle and cycle parking standard, electric vehicle charging point provision and to the requirements concerning transport assessments, transport statements and travel. Further clarification should be for developments which come forward in the interim.

32

- 4.48. The policy needs to confirm that the most up to date SPD and / or travel studies will be used during the plan period, to ensure that the most relevant and up to date information is used.

Policy LPA08: Infrastructure Delivery and Funding

- 4.49. We welcome the additional clarity and flexibility introduced within the policy, but we maintain that the council must ensure that they do not impose requirements that could render schemes unviable. We support that the council will consider site specific economic viability evidence to determine the ability of a scheme to provide the required level of contributions.
- 4.50. It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis. Additionally, it is not clear how any such infrastructure requirements might be assisted by the introduction of CIL.
- 4.51. Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

33

Policy LPC01: Housing Mix

- 4.52. We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that at least 20% of the new dwellings must be designed to be "accessible and adaptable" as set out in Part M4(2) and 5% of new dwellings must be designed to the "wheelchair user" dwellings standard set out in Part M4(3). The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy in the Local Plan. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

34

- 4.53. We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date evidence and housing need.

- 4.54. Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

35

Policy LPC02: Affordable Housing

- 4.55. We welcome efforts to improve affordability. However, the level of affordable housing a site can deliver should be supported by robust and up to date evidence.

36

- 4.56. We support the amendment of LPC02(3) to include provision of Starter Homes.

37

Policy LPC10: Trees and Woodland

- 4.57. We support the amendment to the policy which has resulted in the removal of the reference to the ratio approach to tree replacement where development proposal will result in the loss of existing trees.

38

PO3392

ELO258



Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens
Graham Lamb

SITE GBP-092-A

to:
planningpolicy@sthelens.gov.uk
13/03/2019 17:01



4 Attachments

- L004- Land at St Helens Road - Repts to Submission Local Plan.pdf Appendix 3- Agricultural Land Report.pdf
 - Appendix 4- Comprehensive Repts to Submission Local Plan.pdf
 - Appendix 4a- Interim Housing Needs Assessment.pdf
- ① LPA05 ⑥ S.O.5.1
 ② LPA02 ⑦ LPA02 - PARA 3
 ③ GBP ⑧ LPA02 - PARA 4
 ④ S.A. ⑨ LPA03
 ⑤ S.O.4.1 ⑩ LPA04

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW

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- ⑪ LPA05 - PARA 3 ⑮ LPC02
- ⑫ LPA05 - PARA 4 ⑯ LPC04
- ⑬ APPENDIX 4 ⑰ LPA07 - PARA 3, C
- ⑭ TABLE 4.6 ⑱ LPA07, PARA 9
- ⑰ LPA05.1 ⑳ LPC10 - PARA 6
- ⑳ LPA06 ㉑ LPC13 - PARA 4
- ㉒ LPC01 ㉒ LPD07
- ㉓ LPD02 ㉓ LPD02
- ㉔ LPD03

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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)
Graham Lamb
to:
planningpolicy@sthelens.gov.uk
13/03/2019 17:03



1 Attachment



Appendix 1- Delivery Statement.pdf

Email 2

Graham Lamb
Associate Planner

Pegasus Group

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Please consider the environment before printing this email message.

From: Graham Lamb

Sent: 13 March 2019 17:01



Subject: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens

Dear Sir/Madam,

I have been instructed on behalf of our client, I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors, to submit the attached representations to your Local Plan Submission Draft Consultation, in respect of Land North of St Helens Road, Eccleston Park, St Helens.

Submissions will come in 2 emails due to file size.

I look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Thanks and kind regards,

Graham Lamb
Associate Planner

Pegasus Group

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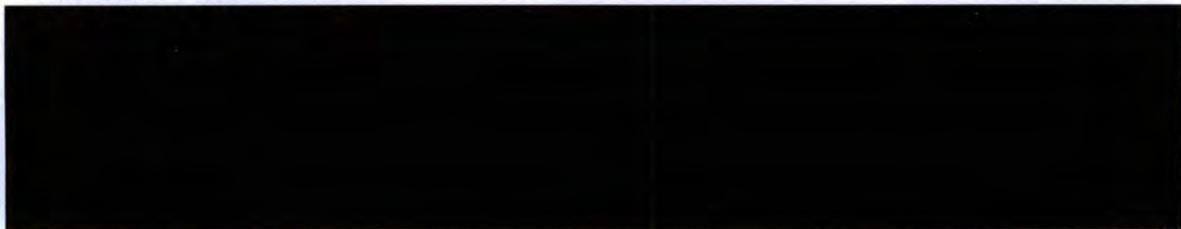
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RE: Representations to Local Plan Submission Draft Consultation- I Birchall & D Birchall c/o P Wilson & Company LLP Chartered Surveyors - Land North of St Helens Road, Eccleston Park, St Helens (EMAIL 2)
Graham Lamb
to:
planningpolicy@sthelens.gov.uk
13/03/2019 17:04



1 Attachment



Appendix 2- Accessibility Stmt (I Birchall).pdf

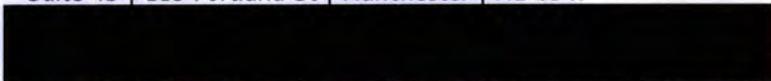
Email 3

Graham Lamb
Associate Planner

Pegasus Group

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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

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KW/GL/P17-0098/L004

13 March 2019

Planning Policy Team
Development Plans Section
St Helens Council
Place Services
Town Hall Annexe
Victoria Square
St Helens
Merseyside
WA10 1HP

Sent via email to: planningpolicy@sthelens.gov.uk

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.

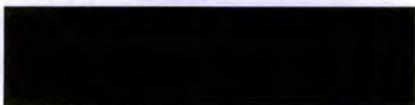
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2

To conclude, we politely suggest that the Council need to allocate more sites in order for the plan to be found sound. As demonstrated in the appended documents, the St Helens Road, Eccleston site is available and suitable for development and should therefore be considered for housing allocation.

I trust the enclosed is clear, however should you have any queries on these representations please do not hesitate to contact me on the details provided below.

Yours sincerely,



Graham Lamb
Associate Planner



Encs.





**ST HELENS BOROUGH LOCAL PLAN 2020-2035:
SUBMISSION DRAFT**

**REPRESENTATION BY
REDROW HOMES NORTH WEST**

Date: 13th March 2019

Pegasus Reference: GL/KW/P17-0098/R005v4

Pegasus Group

Suite 4b | 113 Portland Street | Manchester | M1 6DW

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9. OTHER RELEVANT POLICIES (CHAPTERS 4, 5, 7 & 8)

9.1 This section addresses the remaining policies in the Plan that are considered relevant to Redrow.

Policy LPA07 - Transport and Travel

9.2 Redrow are generally supportive of this policy and welcome the fact that our previous comments to the Preferred Options have been taken account of (regarding consistency of wording with NPPF paragraph 32/ now 109); however, we still have concerns with some elements of the policy as drafted.

9.3 Firstly, part 3(c) states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst Redrow do not oppose the provision of electric charging points, we would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements as they arise in different locations, rather than imposing a blanket requirement on all developments, as this could require a massive over provision of capacity (additional substations etc) which is never properly utilised.

9.4 Part 9 goes on to note that details of the operation of this policy including standards for vehicle charging provision will be set out in a future review of the Council's Ensuring a Choice of Travel Supplementary Planning Document (SPD). In our view, any such standards should be included in the policy rather than an SPD, so that they can be properly interrogated and justified in Local Plan Examination, as they will have a direct role in the determination of a planning applications and may also impact viability, where the energy requirements necessitate the provision of additional energy infrastructure within a development.

9.5 The Viability Assessment bears these concerns out (paragraphs 2.49 - 2.50), as it confirms that it has included a cost for £220 per dwelling for charging points, yet it goes on to note that:

"no allowance is made for any infrastructure costs that may in the future be needed if the chargers are used on a large scale".

9.6 We would also urge the Council to consult with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

Policy LPC10 - Trees and Woodland

9.7 In our view the requirement for trees to be replaced at a ratio of at least 2 to 1 is unjustified, as there is nothing in the evidence base supporting such elevated levels of planting, whilst such a requirement could prove particularly onerous on strategic sites where large scale tree clearance is required to facilitate development, both financially and in purely practical terms (if it is not possible to accommodate double the number of trees on the site).

PO3393

Representations to Local Plan Submission Draft Consultation- Redrow Homes North West
Email 1 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:05

- ① - LPA05
- ② - LPA02
- ③ - GBR
- ④ - S.A.



- ⑤ - S.O. 4.1
- ⑥ - S.O. 5.1
- ⑦ - LPA02 - PARA 3
- ⑧ - LPA02 - PARA 4
- ⑨ - LPA03
- ⑩ - LPA04

4 Attachments

- Appendix 1-Site Location Plan-Redrow.pdf
- Appendix 2 Part 1-Delivery Statement-Redrow.pdf
- Representation Form-Redrow-May 19.pdf R005v6 - Repts to Submission Local Plan-Redrow.pdf

Dear Sir/Madam,

We are instructed on behalf of our client, Redrow Homes North West, to submit the attached form and representation (R005) to the Local Plan Submission Draft Consultation. Redrow have land interests in relation to the Burrows Lane, Ecclestone site, which is discussed in detail in the attached representation.

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Site Location Plan (attached to this email)
- Appendix 2 - Delivery Statement (Part 1 attached to this email)
- Appendix 3 - Accessibility Statement
- Appendix 4 - Phase 1 Ecology Survey
- Appendix 5 - Agricultural Land Assessment
- Appendix 6 - Detailed Site Pro Formas
- Appendix 7 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 8 - Council's Housing Trajectory
- Appendix 9 - Pegasus Housing Trajectory
- Appendix 10 - Spatial Distribution of Sites

- ⑪ - LPA05 - PARA 3
- ⑫ - LPA05 - PARA 4
- ⑬ - APPENDIX 4
- ⑭ - TABLE 4.6
- ⑮ - LPA05.1
- ⑯ - LPA06

We will follow up this submission by sending a CD in the post which contains the entirety of Redrow's submission to the Local Plan consultation.

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

Many thanks and kind regards,

Rebecca Dennis
Principal Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS
Suite 4b | 113 Portland Street | Manchester | M1 6DW

- ⑰ - LPC01
- ⑱ - LPC02
- ⑲ - LPC04
- ⑳ - LPA07 - PARA 3d
- ㉑ - LPA07 - PARA 9
- ㉒ - LPC10

- ⑳ - LPA07 - PARA 3d
- ㉑ - LPA07 - PARA 9
- ㉒ - LPC10

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Representations to Local Plan Submission Draft Consultation- Redrow Homes North West-
Email 2 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:06



3 Attachments



Appendix 2 Part 2-Delivery Statement-Redrow.pdf Appendix 3-Accessibility Statement-Redrow.pdf



Appendix 4-Phase 1 Ecological Survey-Redrow.pdf

Email 2 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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Email 3 of 4
Rebecca Dennis
to:
planningpolicy@sthelens.gov.uk
13/05/2019 16:07



7 Attachments



Appendix 5-Agricultural Land Classification-Redrow.pdf Appendix 6-Detailed Site Pro Forma-Redrow.pdf



Appendix 8-Council's Housing Trajectory-Redrow.pdf



Appendix 9a-Pegasus Trajectory Best Case Scenario-Redrow.pdf



Appendix 9b-Pegasus Trajectory Worst Case Scenario 9b-Redrow.pdf



Appendix 9c-Summary Supply Trajectory-Redrow.pdf



Appendix 7-Review of Employment-Led Local Plan Housing Requirement-Redrow.pdf

Email 3 of 4 of Redrow representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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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 Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Graham
Last Name:	Last Name: Lamb
Organisation/company: Redrow Homes North West	Organisation/company: Pegasus Group
Address:	Address: Suite 4b, 113 Portland Street, Manchester,
Postcode:	Postcode: M1 6DW



Signature:	Date: <input type="text" value="13/05/19"/>
------------	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <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 Monday 13th May 2019** by:

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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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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	LPA07	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 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 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.

REQUEST FURTHER FLEXIBILITY IN WORDING IN RELATION TO CHARGING POINT FOR ELECTRIC VEHICLES, TO TAKE INTO ACCOUNT VIABILITY CONSIDERATIONS.

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.



**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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9. OTHER RELEVANT POLICIES (CHAPTERS 4, 5, 7 & 8)

9.1 This section addresses the remaining policies in the Plan that are considered relevant to Redrow.

Policy LPA07 - Transport and Travel

9.2 Redrow are generally supportive of this policy and welcome the fact that our previous comments to the Preferred Options have been taken account of (regarding consistency of wording with NPPF paragraph 32/ now 109); however, we still have concerns with some elements of the policy as drafted.

9.3 Firstly, part 3(c) states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst Redrow do not oppose the provision of electric charging points, we would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements as they arise in different locations, rather than imposing a blanket requirement on all developments, as this could require a massive over provision of capacity (additional substations etc) which is never properly utilised.

9.4 Part 9 goes on to note that details of the operation of this policy including standards for vehicle charging provision will be set out in a future review of the Council's Ensuring a Choice of Travel Supplementary Planning Document (SPD). In our view, any such standards should be included in the policy rather than an SPD, so that they can be properly interrogated and justified in Local Plan Examination, as they will have a direct role in the determination of a planning applications and may also impact viability, where the energy requirements necessitate the provision of additional energy infrastructure within a development.

9.5 The Viability Assessment bears these concerns out (paragraphs 2.49 - 2.50), as it confirms that it has included a cost for £220 per dwelling for charging points, yet it goes on to note that:

"no allowance is made for any infrastructure costs that may in the future be needed if the chargers are used on a large scale".

9.6 We would also urge the Council to consult with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

Policy LPC10 - Trees and Woodland

9.7 In our view the requirement for trees to be replaced at a ratio of at least 2 to 1 is unjustified, as there is nothing in the evidence base supporting such elevated levels of planting, whilst such a requirement could prove particularly onerous on strategic sites where large scale tree clearance is required to facilitate development, both financially and in purely practical terms (if it is not possible to accommodate double the number of trees on the site).

PO3394

Sinc: Former LPA0 HS23 ELO290

ELO290B.1.pdf



Representations to Local Plan Submission Draft Consultation-Wallace-Email 1 of 8

Rebecca Dennis

to:

planningpolicy@sthelens.gov.uk

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① LPA05

② LPA02

③ GBR

④ SA

⑤ S.O.4.1

⑥ S.O.5.1

⑦ LPA02-PARA 3

3 Attachments



Representation Form-Wallace-May 19.pdf R001v7- Reps to Submission Local Plan-Wallace.pdf

⑧ LPA02- PARA 4

⑨ LPA03



Appendix 1-Illustrative Masterplan-Wallace.pdf

⑩ LPA04

Dear Sir/Madam,

⑪ LPA05 - PARA 3

We are instructed on behalf of our client, Wallace Land Investments, to submit the attached form and representation (R001) to the Local Plan Submission Draft Consultation. Wallace have land interests in relation to the Mill Lane, Rainhill site, which is discussed in detail in the attached representation.

⑫ LPA05 - PARA 4

The representation includes the following appendices which, owing to file size, will be emailed separately:

- Appendix 1 - Illustrative Masterplan (attached to this email)
- Appendix 2 - Previously Submitted Documents and Technical Information
- Appendix 3 - Additional Technical Documents (May 2019)
- Appendix 4 - Detailed Site Pro Formas
- Appendix 5 - Council's Stage 3 Green Belt Assessment of Mill Lane Site
- Appendix 6 - Review of Employment-Led Local Plan Housing Requirement
- Appendix 7 - Council's Housing Trajectory
- Appendix 8 - Pegasus Housing Trajectory
- Appendix 9 - Spatial Distribution of Sites

⑬ APPENDIX 4

⑭ LPA05 - TABLE 4.6

⑮ LPA05.1

⑯ LPA06

⑰ LPC01

We will follow up this submission by sending a CD in the post which contains the entirety of Wallace's submission to the Local Plan consultation.

⑱ LPC02

We look forward to receiving receipt of these representations in due course and please can it be ensured that these are formally considered as part of this consultation.

⑲ LPC04

⑳ LPC03 - PARA 4

Many thanks and kind regards,

㉑ LPA07-PARA 3c) ㉒ LPD07

Rebecca Dennis

Principal Planner

㉓ LPA07-PARA 9 ㉔ LPD02

Pegasus Group

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㉕ LPC10

㉖ LPD03



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4 Attachments



Appendix 2 Part 3-Highways-Wallace.pdf Appendix 2 Part 4-Agri Land-Wallace.pdf



Appendix 2 Part 1-Promo Doc-Wallace.pdf Appendix 2 Part 2-Promo Doc additional-Wallace.pdf

Email 2 of 8 of Wallace representations.

Rebecca Dennis

Principal Planner

Pegasus Group

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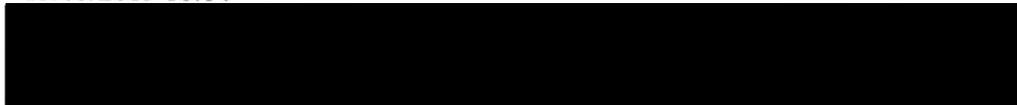
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Appendix 2 Part 5-LVIA-Wallace.pdf

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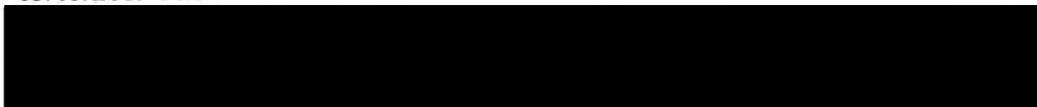
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2 Attachments



Appendix 2 Part 6-Ecology-Wallace.pdf Appendix 2 Part 7-Heritage-Wallace.pdf

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Rebecca Dennis

Principal Planner

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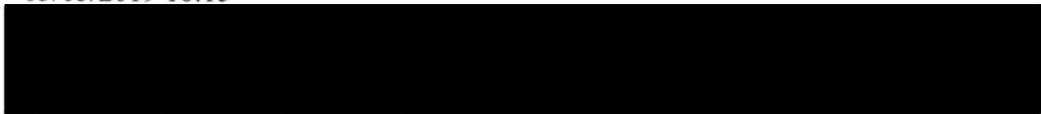
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Appendix 3 Part 1-Landscape and Visual Note May 19-Wallace.pdf

Email 5 of 8 of Wallace representations.

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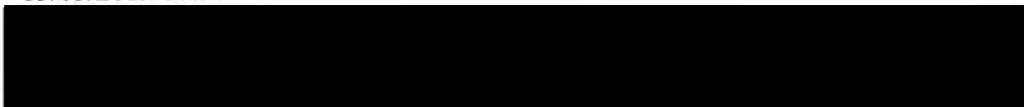
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Appendix 3 Part 2-Noise Assessment May 19-Wallace.pdf

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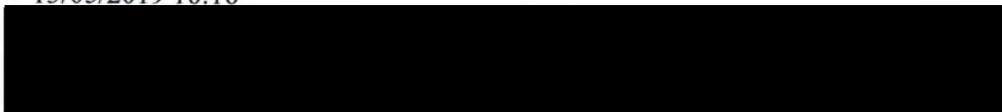
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7 Attachments



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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



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Email 7 of 8 of Wallace representations.

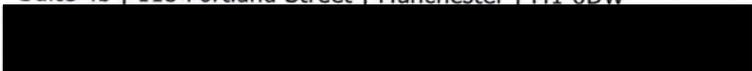
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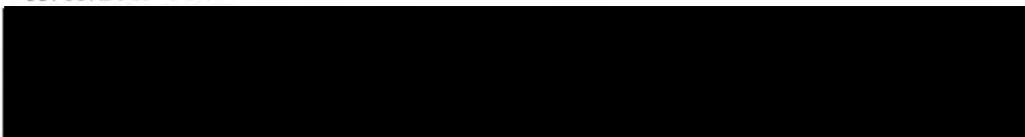
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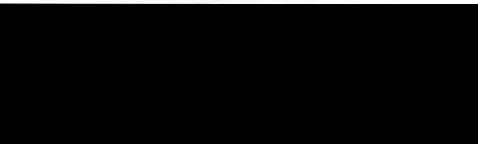
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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Mr
First Name:	First name: Sebastian
Last Name:	Last Name: Tibenham
Organisation/company: Wallace Land Investments (c/o Agent)	Organisation/company: Pegasus Group
Address:	Address: Suite 4b, 113 Portland Street, Manchester
Postcode:	Postcode: M1 6DW



Signature: 	Date: <input type="text" value="13/05/2019"/>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

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or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Email: planningpolicy@sthelens.gov.uk
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	LPA07	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 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 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.

REQUEST FURTHER FLEXIBILITY IN WORDING IN RELATION TO CHARGING POINT FOR ELECTRIC VEHICLES, TO TAKE INTO ACCOUNT VIABILITY CONSIDERATIONS.

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



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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Live: 45457800 v 3

9. OTHER RELEVANT POLICIES (CHAPTERS 4, 5, 7 & 8)

9.1 This section addresses the remaining policies in the Plan that are considered relevant to Wallace’s proposals.

Policy LPA07 - Transport and Travel

9.2 Wallace are generally supportive of this policy, however we still have concerns with some elements of the wording.

9.3 Firstly, part 3(c) states that new development will only be permitted if it would provide appropriate provision of charging points for electric vehicles. Whilst Wallace do not oppose the provision of electric charging points, we would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements as they arise in different locations, rather than imposing a blanket requirement on all developments, as this could result in an over provision of capacity (additional substations etc) which is never properly utilised.

20

9.4 Part 9 goes on to note that details of the operation of this policy including standards for vehicle charging provision will be set out in a future review of the Council’s Ensuring a Choice of Travel Supplementary Planning Document (SPD). In our view, any such standards should be included in the policy rather than an SPD, so that they can be properly interrogated and justified in Local Plan Examination, as they will have a direct role in the determination of a planning applications and may also impact viability, where the energy requirements necessitate the provision of additional energy infrastructure within a development.

21

9.5 The Viability Assessment acknowledges these concerns (at paragraphs 2.49 - 2.50), as it confirms that it has included a cost for £220 per dwelling for charging points, yet it goes on to note that:

"no allowance is made for any infrastructure costs that may in the future be needed if the chargers are used on a large scale".

9.6 We would also urge the Council to consult with developers to ensure that any provision is realistic and viable, and that the wording allows for appropriate flexibility where circumstances require.

21

Policy LPC10 - Trees and Woodland

9.7 In our view the requirement for trees to be replaced at a ratio of at least 2 to 1 is unjustified, as there is nothing in the evidence base supporting such elevated levels of planting, whilst such a requirement could prove particularly onerous on strategic sites where large scale tree clearance is required to facilitate development, both financially and in purely practical terms (if it is not possible to accommodate double the number of trees on the site).

22

PO3395

Representor Details

Web Reference Number	WF0306
Type of Submission	Web submission
Full Name	Mr Peter Richards
Organisation	West Lancashire Borough Council
Address	52 Derby Street Ormskirk L39 2DF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	Yes
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

West Lancashire Borough Council has no objections to the content of the St. Helens Borough Local Plan 2020-2035 Submission Draft document, and is content that the Plan has been prepared in compliance with all legal requirements and is "sound". In particular, West Lancashire Borough Council can confirm that St Helens Council have engaged on strategic, cross boundary matters in accordance with the requirements of the Duty to Co-operate both as part of the Liverpool City Region (including West Lancashire) working groups and evidence studies, and directly with West Lancashire Borough Council in relation to specific cross-boundary matters which affect St Helens and West Lancashire. ①

In particular, this Council supports the St Helens Local Plan's proposals to allocate a significant area of land for employment purposes (policy LPA04.1) on the M6 Corridor, including for large-scale Logistics space, which will, alongside proposals in West Lancashire's own Local Plan Review for the M58 Corridor, help to meet the wider demand for such large-scale Logistics space arising in the Liverpool City Region (including West Lancashire) as identified by the LCR SHELMA study. ③

This Council also welcomes the Local Plan's support for the Skelmersdale Rail Link proposals (policy LPA07 and on the Key Diagram), which, if delivery can be secured, will be of great benefit to West

↓
②

Lancashire in general (in particular the town of Skelmersdale), as well as Rainford in St Helens borough and Kirkby in Knowsley borough.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 5:18:34 PM
---------------	---------------------

PO3396

① -LPA05 ② -LPA07

Representor Details

Web Reference Number	WF0159
Type of Submission	Web submission
Full Name	MR LAMBERT MARTLAND
Organisation	
Address	[REDACTED]
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The plan is not consistent with national policy as no exceptional circumstances are demonstrated for so much green belt to be used.

Not surprisingly the positive comments detailed in the report of consultation all come from developers and land owners, looking to profit from the decimation of valuable green space.

Nor does it comply with sustainable development requirements.

It does not satisfy the criteria for sustainable transport as it promotes edge of town, isolated land parcels for housing.

These will require increased car dependency, even for short journeys, as they are also isolated from transport hubs.

The targets being aspired to are wildly optimistic and based on old data.

Warrington Council have delayed their local plan until the calculation method arguments can be solved.

[REDACTED] is seeking an urgent meeting with the housing minister in order to finalise the plans for the Manchester region.

It cannot be justified or a positively prepared plan given all this in-house arguing and disagreement over the right base data to use.

With all this continued debate over the right numbers to use, why can there not be option to use the lower number in the first instance and commit to reviewing the plan earlier than 15 years; say 10.

①

②

①

That would be a more sensible approach to take than simply removing hectares of land from green belt because some of it 'might' be needed.
It would allow a shallower growth trajectory in the short term, whilst all the infrastructure needs are properly assessed and reviewed.
The Haydock area is being marketed as logistics because it is on the doorstep of the motorway network but that junction of motorway does not work today – it is continually congested.
In 10 years' time, the plans for a station at Carr Mill might have happened.
The Parkside East freight rail interchange might be in place, taking the burden from the roads and a better laid local plan can be put forward.
The congestion/ pinch points span the length and breadth of the St Helens area; Windle Island is being reworked now, Lea Green also. M62 junction at Rainhill has issue as well as the M6 junction at Haydock.
On top of that, there are numerous congestion points at smaller junctions throughout the town.
This level of growth will simply cripple the road network and make it completely unusable.

①

②

7. Please set out modification(s) you consider are necessary

Less employment, less housing, more infrastructure using the most up to date information possible.
Why base future plans on out of date information.
No green belt land to be used, it is of great importance and that should be respected

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 7:49:11 PM
---------------	----------------------

PO3397

- ① - LPA05 ② - LPA04 ③ - Green Belt Review
 ④ - LPA07 ⑤ - Para 172 DTC

Representor Details

Web Reference Number	WF0162
Type of Submission	Web submission
Full Name	Mrs Vicky Riley
Organisation	Mr
Address	35 Kiln Lane WA10 6AD
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

As I understand the whole of the North West are creating these local plans but there doesn't seem to be much mentioned about discussions with other authorities. I think it is known as Duty to Cooperate and Statement of Common ground, but they appear to be absent.

With all regional authorities following a similar growth trajectory, they must surely be competing for the jobs and new residents.

This surely cannot be deemed sustainable.

Current government policy is not to be encouraging international immigration, in fact the opposite.

That must mean that the migration for these jobs and houses must be UK internal.

If one borough gains though, another must lose. So they cannot all grow by these ludicrous and aspirational figures that are being suggested.

The St Helens growth figures are far in excess of any previous actual growth and looking extremely optimistic to say the least.

The employment growth seems to be completely centred and focused on logistics and warehousing.

That growth though appears to be reliant on land being released.

I think someone at the council must have recently watched "Field of Dreams" and adopted an 'if you build it, they will come' attitude.

This must lead to a situation of questioning the entire strategic decision process that this local plan is built upon.

⑤

①

②

The construction industry themselves have questioned whether they even have the ability and capacity to deliver such astronomical growth predictions.

The standard method calculation shows 468 houses per annum and the plan does not demonstrate any exceptional need to deviate from this and shift to 486. A minimal increase of 18pa is not exceptional.

The table in the plan (4.6) details all the housing numbers.

I can't follow the trail of the figures and some appear to be wrong and there must be a transparency question raised in regard to this table.

It is almost a self-fulfilling problem given that of the 1695 capacity that is required to be found on green belt, 794 of them are for non-delivery (15% of SHLAA).

Instead of performing the huge green belt review, it would have been better to figure out how to ensure delivery of everything in the SHLAA and then find a relatively small amount of contaminated land to make up the balance of approx. 700 dwellings.

Using the smaller figure of 468 (342 fewer houses) plus ensuring delivery of those 794 means only a shortage of 559 dwellings.

Such a low number surely cannot lead to exceptional circumstances for a once in a lifetime green belt review.

There must also be a transparency question raised in regard to the green belt review process.

The parcels of land apparently undergo a developability assessment with the result being good, medium or limited, but the process and findings to arrive at the results are missing from the documents and therefore cannot be scrutinised in this consultation process.

A massive concern of mine would be the delivery of infrastructure needed for growth of this scale.

All around Windle and Eccleston there are massive congestion issues.

It is the same at Haydock and around the M6.

St Helens Council will quite simply be incapable of delivering the requirements to manage this scale of growth.

They cannot maintain the roads today, never mind with thousands more cars on them.

More congestion will be inevitable leading to more noise and air pollution leading to greater health issues.

7. Please set out modification(s) you consider are necessary

Reduce the growth projection.

Do not use green belt.

Utilise more brownfield land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 7:39:21 PM
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PO3398

EL0167



Highways England Response to the St Helens Borough Local Plan 2020-2035 Submission

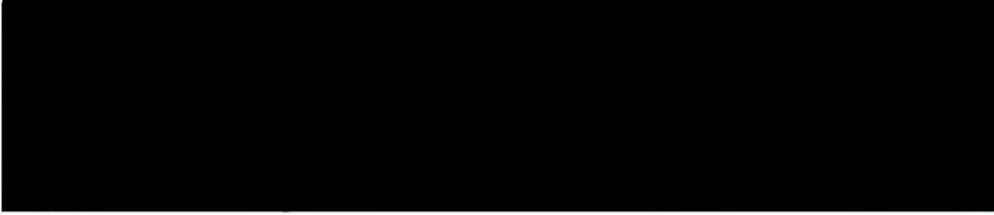
Draft

Johnson, Adam

to:

planningpolicy@sthelens.gov.uk

13/03/2019 11:29



- ① - PARA 4.27-8
- ② - LPA04-1
- ③ - LPA05
- ④ - LPA03
- ⑤ - LPA07-Criter
- ⑥ - TIA
- ⑦ - IDP
- ⑧ - APPENDIX 5
- ⑨ - LPA07-Criter
- ⑩ - Green ⑥

1 Attachment



St Helens Borough Local Plan 2020-2035 Submission Draft - Highways England Response - 13 March 2019.pdf

Good morning

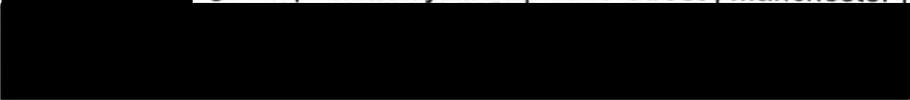
Please find attached Highways England's response to the St Helens Borough Local Plan 2020-2035 Submission Draft.

Kind regards

Adam

Adam Johnson, Assistant Asset Manager (Liverpool City Region)

Highways England | Piccadilly Gate | Store Street | Manchester | M1 2WD



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Highways England Company Limited | [Redacted] | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |

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Consider the environment. Please don't print this e-mail unless you really need to.

Our ref:
Your ref:

Local Plan
St Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP

Adam Johnson
Highways England
Piccadilly Gate
Store Street
Manchester
M1 2WD

[REDACTED]
13 March 2019

Dear Sir / Madam

ST HELENS BOROUGH LOCAL PLAN 2020-2035 (SUBMISSION DRAFT)

Thank you for consulting Highways England regarding the submission draft of your Local Plan. We very much welcome the opportunity to review your plans and provide advice that I trust will be helpful to you as the plans proceed.

Highways England is responsible for the Strategic Road Network (SRN) in England. Within St Helens this includes parts of the M62 and M6 motorways and, to the north and west, the M58 and M57 motorways. The comments I make here relate to the potential impacts of your plans on that network.

On the whole, we are supportive of the methodology used and the outcomes shown within the Plan. Significant work has clearly been undertaken regarding both the Local Plan itself and the supporting transport evidence base. That notwithstanding, there are gaps in the information that has been published as part of the consultation process, and as such there are a number of points and recommendations we wish to make resulting from our review. These areas are listed below.

Major Road Network

We would expect to see reference to the emerging Major Road Network within the Local Plan Submission Draft, and the possible inclusion of the A58, A570 and A580 highway links. The Local Plan should set out how a Major Road Network is likely to impact the Borough and the approach it will take with regards to its management with Highways England and the wider Liverpool City Region. ①

Strategic Employment Sites

The policy criteria of creating masterplans, development phasing, site access arrangements and encouraging sustainable travel for Strategic Employment Sites is supported by Highways England. This approach should ensure that the delivery of employment land-use is managed appropriately. To that end, site-specific analysis should be undertaken for each of the proposed allocated development sites within the Local Plan ②

PO3399



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.

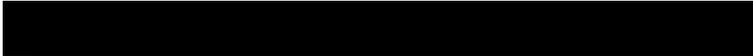
Note that we would like to be informed of future progress on the Local Plan and request the opportunity to attend Examination in Public.

We would be grateful if you could confirm receipt by way of a return email.

Kind regards,

Hannah

Hannah Payne | Senior Planner



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



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St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Hannah
Last Name:	Last Name: Payne
Organisation/company: Barratt Homes	Organisation/company: Indigo Planning Ltd
Address:	Address: St James' Tower, 7 Charlotte Street, Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	

Signature: 	Date: <input type="text" value="13/03/2019"/>
--	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see enclosed representation.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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)

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 see enclosed representation.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

indigo.

St James' Tower,
7 Charlotte Street,
Manchester, M1 4DZ

Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP



By email
planningpolicy@sthelens.gov.uk
let.001.NF..21450010

13 March 2019

Dear Sirs

ST HELENS LOCAL PLAN: SUBMISSION DRAFT (2019)

We write on behalf of Barratt Homes in response to your call for representations on the St Helens Local Plan Submission Draft (2019). This letter provides additional detail alongside the submitted Representations Form, in addition to the detailed information and representations submitted to the previous consultations.

Context

Barratt Homes take a keen interest in the development of the Borough's planning policy and are committed to work with the Council throughout the plan-making process to achieve the delivery of new housing, in line with the National Planning Policy Framework (NPPF).

Barratt Homes controls a 37ha site on the north-western edge of Haydock. The site is a natural residential infill opportunity and is surrounded by development on all sides. Details of Barratt's vision for the site (known as 'Florida Farm South') were submitted to the Council's Call for Sites in September 2014, with further representations submitted in response to the Local Plan Scoping Consultation in March 2016 and Preferred Options Consultation in December 2016.

We support the Submission Draft Local Plan (2019) and are pleased that St Helens Council continue to put forward Site ref: 2HA Land at Florida Farm (south of A580), Slag Lane, Blackbrook site as a draft housing allocation.

It is against this context that comments on each of the Local Plan policies have been made where relevant.

Policy LPA02: Spatial Strategy

We support the proposed distribution of development and the overall spatial strategy for St Helens. The identification of the Key Settlements, particularly Blackbrook and Haydock, will lead to sustainable development across the borough. The spatial distribution effectively addresses the existing housing and employment issues within the borough.

London • Manchester • Leeds • Birmingham • Dublin

Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E1 1JX
Registered number 2078663 VAT number 849246134



01

02

indigo.

Policy LPA08: Infrastructure Delivery and Funding

We welcome the additional clarity and flexibility introduced within the policy but the Council must ensure that they do not impose requirements that could render schemes unviable.

23

It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis and, additionally, how any such infrastructure requirements might otherwise be assisted by the introduction of CIL.

24

Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

Policy LPC01: Housing Mix

We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, at least 20% of the new dwellings must be designed to be "*accessible and adaptable*" and 5% of the market housing should be bungalows is unjustified and contrary to national policy. The policy also refers to 'optional standards' but that a) AND b) will be applied. This reference should therefore be removed.

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The Government's building regulations cover the level of accessibility required in all developments and as such, it is not necessary to specify this particular requirement in policy. We therefore object to the inclusion of point 2) and request that this be deleted from the policy.

We object to the requirement that on greenfield sites of 25 or more units, 5% of the market housing should be bungalows on the basis that the mix and tenure of units should be determined on a site by site basis, in accordance with the most up to date market evidence.

26

Whilst clearly the housing mix requirements of the Borough need to be addressed as new development comes forward, the policy should be flexible enough to enable a bespoke approach to be applied to any given site at any given time, where this will help enable development to be secured.

LPC01(4) sets out exceptions to providing the above on viability grounds however, there are also site specific conditions and limitations which would render the requirements undeliverable in some instances. The policy should there be reworded to provide flexibility.

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It must be noted that when discussing housing mix on a site at application stage, the Local Planning Authority must refer to the most up to date SHMA.

Policy LPC02: Affordable Housing

Barratt are one of the United Kingdom's main providers of affordable homes and

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PO3400



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



RTPI Planning Consultancy of the Year 2017

St James' Tower, 7 Charlotte Street, Manchester, M1 4DZ



This e-mail (including any attachments) is intended only for the recipient(s) named above. It may contain confidential or privileged information and should not be read, copied or otherwise used by any other person. If you are not a named recipient, please contact the sender and delete the e-mail from the system.



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title: Miss
First Name:	First name: Hannah
Last Name:	Last Name: Payne
Organisation/company: Barratt Homes	Organisation/company: Indigo Planning Ltd
Address:	Address: St James' Tower, 7 Charlotte Street, Manchester
Postcode:	Postcode: M1 4DZ
Tel No:	
Mobile No:	
Email:	

Signature: 	Date: <input type="text" value="13/03/2019"/>
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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.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see 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)

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 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.

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Registered office: Indigo Planning Ltd, Arkwright House 10, 35 Queen Street, London E1 1JX
Registered number 2078663 VAT number 849246134



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Policy LPA08: Infrastructure Delivery and Funding

We welcome the additional clarity and flexibility introduced within the policy but the Council must ensure that they do not impose requirements that could render schemes unviable.

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It is not clear the precise basis on which contributions towards new or improved infrastructure will be required on a site by site basis and, additionally, how any such infrastructure requirements might otherwise be assisted by the introduction of CIL.

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Further clarity is needed on how the policy clearly satisfies the tests of the Framework and Community Infrastructure Levy Regulations in terms of ensuring the necessity and appropriateness of any contributions / provisions sought.

Policy LPC01: Housing Mix

We object to LPC01(2). The requirement that on greenfield sites of 25 or more units, at least 20% of the new dwellings must be designed to be "*accessible and adaptable*" and 5% of the market housing should be bungalows is unjustified and contrary to national policy. The policy also refers to 'optional standards' but that a) AND b) will be applied. This reference should therefore be removed.

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